



Prospectus

BNY Mellon Investment Funds

This Prospectus is dated, and is valid as at 28 March 2017
and replaces any previously issued version.

Copies of this Prospectus have been sent to the FCA and the Depositary.

(An investment company with variable capital incorporated with limited liability and registered in England and Wales under
registered number IC27) (A UCITS scheme)



BNY MELLON

BNY Mellon Fund Managers Limited is the Authorised Corporate Director (ACD) of the Company. The ACD is responsible for managing and administering the Company's affairs in compliance with FCA Regulations and the OEIC Regulations. The ACD will delegate investment management to one or more of its affiliated specialist investment boutiques.

Important: If you are in any doubt about the contents of this prospectus you should consult a professional adviser.

This document constitutes the Prospectus for BNY Mellon Investment Funds which has been prepared in accordance with the rules contained in the FCA's Collective Investment Schemes Sourcebook (COLL) forming part of the FCA Regulations.

BNY Mellon Investment Funds is an investment company with variable capital, and is a UCITS scheme for the purpose of Chapter 5 of the COLL Sourcebook.

This Prospectus should be read in its entirety before making any application for Shares. If you are in any doubt about the contents of this Prospectus you should consult your professional adviser. Shares are offered on the basis of the information contained in and the documents referred to in this Prospectus.

No person has been authorised to issue any advertisement or to give any information, or to make any representations in connection with the offering, placing, subscription or sale of Shares other than those contained in this Prospectus and, if issued, given or made, the advertisement, information or representations must not be relied upon as having been authorised by the Company.

This Prospectus does not constitute, and may not be used for the purposes of, an offer or solicitation to anyone in any jurisdiction in which the offer or solicitation is not authorised, or to any person to whom it is unlawful to make the offer or solicitation. The distribution of this Prospectus and the offering of Shares in certain jurisdictions may be restricted and accordingly, persons into whose possession this Prospectus comes are required to inform themselves about and to observe those restrictions.

Prospective investors should inform themselves as to

- (a) the legal requirements within their own countries of residence or domicile for the purchase or holding of Shares;
- (b) any foreign exchange restrictions which may affect them; and
- (c) the income and other tax consequences which may apply in their own countries of residence or domicile relevant to the purchase, holding or disposal of Shares. Shares in the Company are not listed on any investment exchange.

The Prospectus is based on information, law and practice at the date of this Prospectus. The Company is not bound by any out of date prospectus when it has issued a new prospectus and potential investors should check that they have the most recently published prospectus. Neither the delivery of this Prospectus nor the offer, placement, allotment or issue of any of the Shares shall under any circumstances create any implication or constitute a representation that the information given in this Prospectus is correct as of any time subsequent to the date hereof.

Investors should note that not all of the protections provided under their relevant regulatory regime may apply and there may be no right to compensation under the regulatory regime, if the scheme exists.

United States and restrictions on U.S. Persons

The Shares have not been and will not be registered in the United States under the Securities Act of 1933, as amended (the "Securities Act"), or any U.S. state securities laws, and neither the Sub-Funds nor the Company has been or will be registered in the United States under the Investment Company Act of 1940, as amended (the "1940 Act"), and shareholders will not be entitled to the benefits of registration. Accordingly, except as provided below, no Shares may be offered or sold, directly or indirectly, in the United States, any state thereof or its territories or possessions or to any U.S. Person. The ACD may authorise the offer and sale of Shares in the United States or to a limited number or category of U.S. Persons provided that, if so authorised, Shares will be offered and sold only to those persons and in such a manner as will not require registration of the Company, any Sub-Fund, or the Shares under the securities laws of the United States or any state thereof. The Shares have not been approved or disapproved by the United States Securities and Exchange Commission, any state securities commission or other regulatory authority in the United States, nor has any such authority passed upon or endorsed the merits of this offering or the accuracy or adequacy of this Prospectus as may be amended or supplemented from time to time. Any representation to the contrary is a criminal offence. Certain

restrictions also apply to subsequent transfers of Shares in the United States or to U.S. Persons (please see the compulsory redemption provisions under section "Restrictions and Compulsory Transfer and Redemption" on page 25). Should a Shareholder become a U.S. Person they may be subject to adverse tax consequences including without limitation U.S. withholding taxes and tax reporting.

Applicants will be required to certify that they are not a U.S. Person precluded from purchasing, acquiring or holding Shares.

The price of Shares in the Company and the income from them may go down as well as up and an investor may not get back the amount invested.

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DEFINITIONS

■ “ACD”

BNY Mellon Fund Managers Limited, or such other entity as is appointed to act as the authorised corporate director of the Company;

■ “Administrator”

The Bank of New York Mellon (International) Limited, or such other entity as is appointed to act as administrator to the Company;

■ “Approved Bank”

in relation to a bank account opened by the Company:

- (a) if the account is opened at a branch in the UK:
 - (i) the Bank of England;
 - or
 - (ii) the central bank of a member state of the OECD;
 - or
 - (iii) a bank;
 - or
 - (iv) a building society;
 - or
 - (v) a bank which is supervised by the central bank or other banking regulator of a member state of the OECD;
 - or
- (b) if the account is opened elsewhere:
 - (i) a bank in (a);
 - or
 - (ii) a credit institution established in an EEA State other than the UK and duly authorised by the relevant home state regulator;
 - or
 - (iii) a bank which is regulated in the Isle of Man or the Channel Islands;
 - or
- (c) a bank supervised by the South African Reserve Bank;

■ “B Shares”

; B Shares (Accumulation) and B Shares (Income);

■ “Class” or “Classes”

in relation to Shares, means (according to the context) all of the Shares of a particular Sub-Fund or a particular class or classes of Share of a particular Sub-Fund;

■ “COLL Sourcebook” or “COLL”

the Collective Investment Schemes Sourcebook issued by the FCA, as amended or replaced from time to time;

■ “Company”

BNY Mellon Investment Funds;

■ “Dealing Day”

9:00 a.m. until 5:00 p.m. (UK time) on each weekday excluding UK public holidays;

■ “Depositary”

National Westminster Bank Plc, or such other entity as is appointed to act as depositary of the Company;

■ “EPM” or “efficient portfolio management”

the use of techniques and instruments which relate to transferable securities and approved money market instruments and which fulfil the following criteria:

- (a) they are economically appropriate in that they are realised in a cost effective way;
- (b) they are entered into for one or more of the following aims:
 - (i) reduction of risk;
 - (ii) reduction of cost
 - (iii) generation of additional capital or income for the relevant Sub-Fund with a risk level which is consistent with the risk profile of the relevant Sub-Fund and the diversification rules laid down in COLL;

■ “Eligible Institution”

one of certain eligible institutions (being a BCD credit institution authorised by its home state regulator or a MiFID investment firm authorised by its home state regulator, as defined in the glossary of definitions to the FCA Handbook);

■ “Exempt Shares”

Exempt Shares 1 (Accumulation), Exempt Shares 2 (Accumulation), Exempt Shares 3 (Accumulation), Exempt Shares 1 (Income), Exempt Shares 2 (Income), Exempt Shares 3 (Income); Exempt Shares 4 (Income) and Exempt Shares 4 (Accumulation);

■ “Exempt L Shares 1”

Exempt L Shares 1 (Income) and Exempt L Shares 1 (Accumulation);

■ “FATCA”

the US Foreign Account Tax Compliance provisions enacted by the US Hiring Incentives to Restore Employment Act of 18 March 2010 (as amended, consolidated or supplemented from time to time);

■ “F Shares”

F Shares (Accumulation), F Shares (Income) ;

■ “FCA”

the Financial Conduct Authority of 25 The North Colonnade, Canary Wharf, London E14 5HS or any other regulatory body which may assume its regulatory responsibilities from time to time;

■ **“FCA Regulations”**

the rules contained in the COLL Sourcebook published by the FCA as part of their handbook of rules and guidance or any such rulebook(s) as may replace it from time to time. To the extent possible, this definition will exclude any part of such sourcebook(s) that concern guidance or evidential requirements;

■ **“Insight”**

Insight Investment Management (Global) Limited;

■ **“Institutional Shares W”**

Institutional Shares W (Accumulation) and Institutional Shares W (Income);

■ **“Instrument”**

the instrument of incorporation of the Company as amended from time to time;

■ **“Investment Manager” or “Investment Managers”**

Insight, Newton, The Boston Company, and/or Walter Scott as the context requires;

■ **“Net Asset Value” or “NAV”**

the value of the Scheme Property of the Company (or of any Sub-Fund as the context requires) less the liabilities of the Company (or of the Sub-Fund concerned) as calculated in accordance with the Company's Instrument;

■ **“Newton”**

Newton Investment Management Limited;

■ **“OECD”**

Organisation for Economic Co-operation and Development;

■ **“OEIC Regulations”**

the Open-Ended Investment Companies Regulations 2001 (as amended or re-enacted from time to time);

■ **“P Shares”**

P Shares (Accumulation) and P Shares (Income);

■ **“S Shares”**

S Shares (Accumulation) and S Shares ((Income);

■ **“Scheme Property”**

the property of the Company to be given to the Depositary for safekeeping, as required by the FCA Regulations;

■ **“SDRT”**

stamp duty reserve tax;

■ **“securities financing transactions” or “SFTs”**

as defined in article 3 of the Securities Financing Transactions Regulation, i.e. any or all of the following:

- (a) a repurchase contract;
- (b) securities or commodities lending and securities or commodities borrowing;

- (c) a buy-sell back transaction or sell-buy back transaction;
- (d) a margin lending transaction.

■ **“Securities Financing Transactions Regulation” or “SFTR”**

Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012;

■ **“Shares”**

shares of no par value in the capital of the Company which may be designated as different Classes of shares in one or more Sub-Fund;

■ **“Shareholder”**

a holder of registered Shares in the Company;

■ **“Sub-Fund” or “Sub-Funds”**

a sub-fund of the Company (being part of the Scheme Property of the Company which is pooled separately) and to which specific assets and liabilities of the Company may be allocated and which is invested in accordance with the investment objective applicable to that sub-fund;

■ **“The Boston Company”**

The Boston Company Asset Management LLC;

■ **“total return swap” or “TRS”**

A derivative contract in which one counterparty transfers the total economic performance, including income from interest and fees, gains and losses from price movements, and credit losses, of a reference obligation to another counterparty;

■ **“U Shares”**

U Shares (Accumulation) and U Shares (Income);

■ **“United States”**

the United States of America (including the states thereof and the District of Columbia), its territories, its possessions and other areas subject to its jurisdiction;

■ **“U.S. Person”**

means a person who is in either of the following two categories:

- (a) a person included in the definition of “U.S. person” under Rule 902 of Regulation S under the Securities Act, or
- (b) a person excluded from the definition of a “Non-United States person” as used in Commodity Futures Trading Commission (“CFTC”) Rule 4.7. For the avoidance of doubt, a person is excluded from this definition of U.S. Person only if he or it is outside both the definition of “U.S. person” in Rule 902 and the definition of “Non-United States person” under CFTC Rule 4.7.

“U.S Person “ under Rule 902 generally includes the following:

- (a) any natural person resident in the United States (including U.S. residents temporarily residing abroad);
- (b) any partnership or corporation organised or incorporated under the laws of the United States;

- (c) any estate of which any executor or administrator is a U.S. person;
 - (d) any trust of which any trustee is a U.S. person;
 - (e) any agency or branch of a non-U.S. entity located in the United States;
 - (f) any non-discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary for the benefit or account of a U.S. person;
 - (g) any discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary organised, incorporated or (if an individual) resident in the United States;
- and
- (h) any partnership or corporation if:
 - (i) organised or incorporated under the laws of any non-U.S. jurisdiction;
 - and
 - (ii) formed by a U.S. person principally for the purpose of investing in securities not registered under the Securities Act, unless it is organised or incorporated, and owned, by accredited investors (as defined in Rule 501(a) of Regulation D under the Securities Act) who are not natural persons, estates or trusts.

Notwithstanding the preceding paragraph, "U.S. person" under Rule 902 does not include:

- (a) any discretionary account or similar account (other than an estate or trust) held for the benefit or account of a non-U.S. person by a dealer or other professional fiduciary organised, incorporated, or (if an individual) resident in the United States;
 - (b) any estate of which any professional fiduciary acting as executor or administrator is a U.S. person, if
 - (i) an executor or administrator of the estate who is not a U.S. person has sole or shared investment discretion with respect to the assets of the estate,
 - and
 - (ii) the estate is governed by non-United States law;
 - (c) any trust of which any professional fiduciary acting as trustee is a U.S. person, if a trustee who is not a U.S. person has sole or shared investment discretion with respect to the trust assets, and no beneficiary of the trust (and no settler if the trust is revocable) is a U.S. person;
 - (d) an employee benefit plan established and administered in accordance with the law of a country other than the United States and customary practices and documentation of such country;
 - (e) any agency or branch of a U.S. person located outside the United States if
 - (i) the agency or branch operates for valid business reasons,
 - and
 - (ii) the agency or branch is engaged in the business of insurance or banking and is subject to substantive insurance or banking regulation, respectively, in the jurisdiction where located;
- and
- (f) certain international organisations as specified in Rule 902(k)(2)(vi) of Regulation S under the Securities Act.

CFTC Rule 4.7 currently provides in the relevant part that the following persons are considered "Non-United States persons":

- (i) a natural person who is not a resident of the United States;
 - (ii) a partnership, corporation or other entity, other than an entity organised principally for passive investment, organised under the laws of a non-U.S. jurisdiction and which has its principal place of business in a non-U.S. jurisdiction;
 - (iii) an estate or trust, the income of which is not subject to United States income tax regardless of source;
 - (iv) an entity organised principally for passive investment such as a pool, investment company or other similar entity, provided that units of participation in the entity held by persons who do not qualify as Non-United States persons or otherwise as qualified eligible persons (as defined in CFTC Rule 4.7(a)(2) or (3)) represent in the aggregate less than ten percent of the beneficial interest in the entity, and that such entity was not formed principally for the purpose of facilitating investment by persons who do not qualify as Non-United States persons in a pool with respect to which the operator is exempt from certain requirements of Part 4 of the CFTC's regulations by virtue of its participants being non-United States persons;
- or
- (v) a pension plan for the employees, officers or principals of an entity organised and with its principal place of business outside the United States;

■ "VAT"

value added tax;

■ "Walter Scott"

Walter Scott & Partners Limited; and

■ "X Shares"

X Shares 1 (Accumulation), X Shares (Accumulation), X Shares 1 (Income), and X Shares (Income).

In this Prospectus, all references to "Sterling", "GBP" and "£" are to the currency of the United Kingdom, all references to "Euro", "EUR" and "€" are to the common currency of member states in the European Union, and all references to "USD" and "\$" are to the currency of the United States.

General

BNY Mellon Investment Funds is an open-ended investment company with variable capital, incorporated in England and Wales under registered number IC 27 and authorised by the FCA with effect from 13 April 1999.

The Company qualifies as an undertaking for collective investment in transferable securities (a “UCITS”) and may obtain recognition under the EC Council Directive 2009/65/EC for marketing in certain member states of the European Economic Area.

The head office of the Company is at BNY Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA which is also the address of the place in the UK for service on the Company of notices or other documents required or authorised to be served on it.

The base currency of the Company is Sterling.

The maximum share capital of the Company is currently £100,000,000,000 and the minimum is £100. Shares in the Company have no par value and therefore the share capital of the Company at all times equals the Company’s current Net Asset Value.

Shareholders in the Company are not liable for the debts of the Company.

The Company has been established as an “umbrella company” (as defined in the FCA Regulations) and therefore different Sub-Funds may be formed by the ACD, subject to approval from the Depositary and the FCA. On the establishment of a new Sub-Fund or Share Class an updated Prospectus will be prepared setting out the relevant information concerning the new Sub-Fund or Share Class.

Company Structure

As an umbrella company, the Sub-Funds of the Company are segregated portfolios of assets and, accordingly, the assets of each Sub-Fund belong exclusively to that Sub-Fund and shall not be used to discharge directly or indirectly the liabilities of, or claims against, any other person or body, including the Company, or any other Sub-Fund, and shall not be available for any such purpose. Any liability incurred on behalf of or attributable to any Sub-Fund shall be discharged solely out of the assets of that Sub-Fund.

At present, the Sub-Funds available for investment are:

1. BNY Mellon Long-Term Global Equity Fund
2. Insight Corporate Bond Fund (formerly Newton Corporate Bond Fund)
3. Insight Equity Income Fund
4. Insight Equity Income Booster Fund
5. Insight Global Absolute Return Fund
6. Insight Global Multi-Strategy Fund
7. Insight Inflation-Linked Corporate Bond Fund
8. Newton 50/50 Global Equity Fund
9. Newton Asian Income Fund
10. Newton Continental European Fund
11. Newton Emerging Income Fund

12. Newton Global Balanced Fund
13. Newton Global Dynamic Bond Fund
14. Newton Global Dynamic Bond Income Fund
15. Newton Global Emerging Markets Fund
16. Newton Global Equity Fund
17. Newton Global High Yield Bond Fund
18. Newton Global Income Fund (formerly Newton Global Higher Income Fund)
19. Newton Global Opportunities Fund
20. Newton Index Linked Gilt Fund
21. Newton International Bond Fund
22. Newton Long Corporate Bond Fund
23. Newton Long Gilt Fund
24. Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund)
25. Newton Multi-Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund)
26. Newton Multi-Asset Growth Fund (formerly Newton Managed Fund)
27. Newton Multi-Asset Income Fund
28. Newton Oriental Fund
29. Newton Real Return Fund
30. Newton UK Equity Fund (formerly Newton Income Fund)
31. Newton UK Income Fund (formerly Newton Higher Income Fund)
32. Newton UK Opportunities Fund
- and
33. The Boston Company US Opportunities Fund

Details of each Sub-Fund, including their investment objectives and policies are set out in Appendix I.

Each Sub-Fund has a specific portfolio of assets and investments to which the Sub-Fund’s assets and/or liabilities are attributable and each investor should view each Sub-Fund as a separate investment entity.

While the provisions of the OEIC Regulations provide for segregated liability between Sub-Funds, the concept of segregated liability is relatively new. Accordingly, where claims are brought by local creditors in foreign courts or under foreign law contracts, it is not yet known how those foreign courts will react to regulations 11A and 11B of the OEIC Regulations.

Each Sub-Fund will be charged with the liabilities, expenses, costs and charges of the Company attributable to that Sub-Fund and within the Sub-Funds charges will be allocated between Share Classes in accordance with the terms of issue of those Share Classes.

Any assets, liabilities, expenses, costs or charges not attributable to a particular Sub-Fund may be allocated by the ACD in a manner which is fair to Shareholders as a whole but they will normally be allocated to all Sub-Funds pro rata to the value of the net assets of the relevant funds.

Classes of Share(s) within the Sub-Funds

Each Share issued by the Company is linked to one of its Sub-Funds. Several Classes of Share may be created or issued in respect of each Sub-Fund.

Details of the Classes of Share(s) which may be available are set out below:

Class	Currency	Income Accrual	Investor Eligibility
Sterling Income Shares	GBP	Income	Available to retail and institutional investors
Sterling Income A Shares	GBP	Income	
Sterling Accumulation Shares	GBP	Accumulation	
Institutional Shares W (Accumulation)	GBP	Accumulation	Available to: a) to institutional investors who meet the minimum initial investment level and the minimum holdings as set out in Appendix I; and b) entities designated by the ACD as providing platform services, and which have platform arrangements (or an equivalent) with the ACD or its associates, and which are investing on behalf of underlying investors rather than on their own behalf. There are no specific minimum initial investment or holding requirements, however platforms will be subject to minimum account maintenance or other qualifications established from time to time by the ACD.
Institutional Shares W (Income)	GBP	Income	
Institutional Shares (Accumulation)	GBP	Accumulation	Available primarily to institutional investors
Institutional Shares (Income)	GBP	Income	
Institutional Shares (Accumulation) Euro	EUR	Accumulation	
Institutional Shares (Income) Euro	EUR	Income	
Institutional Shares (Accumulation) USD	USD	Accumulation	
Institutional Shares (Income) USD	USD	Income	
Exempt Shares 1 (Accumulation)	GBP	Accumulation	Only available to institutional investors who are wholly exempt from UK taxation other than by reason of non-residence
Exempt Shares 2 (Accumulation)	GBP	Accumulation	
Exempt Shares 3 (Accumulation)	GBP	Accumulation	
Exempt Shares 4 (Accumulation)	GBP	Accumulation	
Exempt Shares 1 (Income)	GBP	Income	
Exempt Shares 2 (Income)	GBP	Income	
Exempt Shares 3 (Income)	GBP	Income	
Exempt Shares 4 (Income)	GBP	Income	
Exempt L Shares 1 (Income)	GBP	Income	Available only to the London LGPS CIV Ltd or such nominee as it may appoint.
Exempt L Shares 1 (Accumulation)	GBP	Accumulation	
Euro Accumulation Shares	EUR	Accumulation	Available to retail and institutional investors
Euro Income Shares	EUR	Income	
F Shares (Accumulation)	GBP	Accumulation	Available only to investors who are clients of the ACD or their associates and may be subject to minimum account maintenance or other qualifications established from time to time by the ACD or their associates
F Shares (Income)	GBP	Income	
P Shares (Accumulation)	GBP	Income	Available only to investors who are clients of (or who otherwise have an investment management agreement) with Newton or its associates.
P Shares (Income)	GBP	Accumulation	
S Shares (Accumulation)	GBP	Accumulation	Available only to investors who are clients of or who otherwise have an investment management agreement with the ACD, Insight or their associates and may be subject to minimum account maintenance or other qualifications established from time to time by the ACD, Insight or their associates.
S Shares (Income)	GBP	Income	
B Shares (Accumulation)	GBP	Accumulation	Available to: a) retail investors in the United Kingdom who have received professional advice in relation to their investment; and b) investors who have an account with InvestorZone, a non advised website which provides registered shareholders online access to manage their accounts.
B Shares (Income)	GBP	Income	
U Shares (Accumulation)	GBP	Accumulation	Available only to institutional investors who are acting for themselves or in a fiduciary, custodial or other similar capacity
U Shares (Income)	GBP	Income	

Class	Currency	Income Accrual	Investor Eligibility
USD Accumulation Shares	USD	Accumulation	Available to retail and institutional investors
USD Income Shares	USD	Income	
X Shares 1 (Accumulation)	GBP	Accumulation	Available only to institutional investors who are clients of or who otherwise have an investment management arrangement with the ACD or its associates
X Shares 1 (Income)	GBP	Income	
X shares (Income)	GBP	Income	
X Shares (Accumulation)	GBP	Accumulation	

The Classes of Share(s) in issue or available for issue for each Sub-Fund together with the details for each Sub-Fund are set out in Appendix I. However, the Instrument allows for the creation of additional Classes of Shares in respect of Sub-Funds. Investment in each Class of Share(s) is restricted to meeting certain requirements as set out above and in Appendix I (including, without limitation, minimum investment and holding requirements) ("Share Class Restrictions"). The ACD has the right to waive the Share Class Restrictions for any Class of Share in one or more Sub-Funds at any time.

Holders of accumulation Shares are not entitled to be paid the income attributable to the Shares, but that income is automatically transferred to (and retained as part of) the capital assets of the relevant Sub-Fund on the relevant interim and/or annual accounting dates and is reflected in the price of an accumulation Share.

Holders of income Shares are entitled to be paid the income attributed to the Shares on or before the relevant interim and annual allocation dates. Income will be paid directly to the bank or building society account of the holders of income Shares or by such other method as determined by the ACD. If a holder of income Shares does not provide bank or building society details, income will be automatically reinvested to purchase further Shares.

Where a Sub-Fund has different Classes, each Class may attract different charges and expenses and so monies may be deducted from Classes in unequal proportions. In these circumstances the proportionate interests of the Classes within a Sub-Fund will be adjusted accordingly.

When available, Shareholders are entitled (subject to the Share Class Restrictions and certain other requirements) to convert all or part of their Shares in a Class of a Sub-Fund for Shares in another Class within the same Sub-Fund or switch them for Shares of the same or another Class within a different Sub-Fund. Details of this conversion and switching facility are set out on pages 20 - 21.

Typical investor profile

Share(s) in the Company are available to retail and institutional investors, subject to Share Class Restrictions.

Investment and borrowing powers

The assets of each Sub-Fund will be invested with the aim of achieving the investment objective and in accordance with the policy of that Sub-Fund. They must also be invested so as to comply with this Prospectus, the Instrument and with the investment and borrowing powers and restrictions set out in the COLL Sourcebook as they apply to a UCITS scheme. A summary of the investment and borrowing powers and restrictions applicable to the Sub-Funds is set out in Appendix II.

The ACD is subject to the provisions of the Securities Financing Transactions Regulation. The SFTR sets out certain disclosure requirements regarding the use of securities financing transactions and total return swaps, as described in Appendix II under the section headed "Investment and Financial Techniques".

Cluster Munitions

The UN Convention on Cluster Munitions (the "Convention") prohibits all use, stockpiling, production and transfer of cluster munitions and anti-personnel mines.

The ACD, in recognition of the Convention, has decided not to invest, for all the BNY Mellon Investment Fund Sub-Funds (unless otherwise stated within the specific Sub-Fund supplement in Appendix I), in corporates involved in cluster munitions and anti-personnel mines. To this end, the ACD uses an external research provider to highlight those corporates involved in cluster munitions and anti-personnel mines. Where a corporate is reported by our external research provider to undertake such activities, the ACD's policy is not to invest in the securities issued by that corporate.

MANAGEMENT AND ADMINISTRATION

The ACD

About the ACD

The authorised corporate director of the Company is BNY Mellon Fund Managers Limited which is a private company limited by shares incorporated in England and Wales on 11 March 1986.

The ACD is authorised and regulated by the FCA.

Registered Office and Head Office:	BNY Mellon Centre, 160 Queen Victoria Street, London, EC4V 4LA
Share Capital:	An issued share capital of £1,625,000 represented by 1,625,000 ordinary share of 100 pence fully paid.
Ultimate Holding Company:	The Bank of New York Mellon Corporation, a corporation registered in the state of Delaware, USA.

Role and Delegation

The ACD is responsible for managing and administering the Company's affairs in compliance with the FCA Regulations and the OEIC Regulations. Subject to the FCA Regulations, the ACD has delegated investment management to one or more Investment Managers. The ACD has also delegated fund administration to the Administrator. The Investment Managers and the Administrator are affiliates of the ACD.

Directors of the ACD

The directors of the ACD are:

Greg Brisk, David Turnbull, Jonathan Lubran and Hilary Lopez.

None of the directors have any significant business activities which are not connected with the business of the ACD or its affiliates.

Terms of Appointment

The ACD was appointed pursuant to an agreement between the ACD and the Company dated 16 June 1999 (the "ACD Agreement"). The ACD Agreement provides that the appointment of the ACD may be terminated in a number of ways including by either party giving the other not less than 12 months' written notice to expire on an accounting date or interim accounting date of the Company. Termination cannot take effect until the FCA has approved the change of director.

The ACD Agreement provides indemnities to the ACD by reason of any act or thing done by the ACD as a result of any negligent or wrongful direction or requirement of the Company given or made under the ACD Agreement.

The ACD is under no obligation to account to the Depositary or the Shareholders for any profit it makes on the issue or re-issue of Shares or cancellation of Shares which it has redeemed.

The fees to which the ACD is entitled are set out on pages 34 - 35.

Remuneration Policy of the ACD

The ACD has designed and implemented a remuneration policy (the "Remuneration Policy") which is in accordance with the requirements of SYSC 19 E of the FCA Regulations (the UCITS Remuneration Code). The Remuneration Policy is designed to ensure that the ACD's remuneration practices applicable to staff caught by the relevant rules: are consistent with and promote sound and effective risk management; do not promote risk taking and are consistent with the risk profile of the ACD or the

Company or the provisions of its Instrument or Prospectus; do not impair the ACD's compliance with its duty to act in the best interests of the Company; and includes fixed and variable components of remuneration, including salaries and discretionary pension benefits. The Remuneration Policy is consistent with the business strategy, objectives, values and interests of each of the ACD, the Company, and the Shareholders and includes measures to avoid conflicts of interest.

In line with the provisions of Directive 2009/65/EC (as amended from time to time) and the relevant guidelines issued by the European Securities and Markets Authority ("ESMA"), each of which may be amended from time to time, the ACD applies its Remuneration Policy in a manner which is proportionate to its size, its internal organisation and the nature, scope and complexity of its activities.

Where the ACD delegates certain portfolio management and risk management functions in respect of the Company, the ACD requires that:

- the entities to which portfolio management activities have been delegated are subject to regulatory requirements on remuneration that are equally as effective as those applicable to the ACD; or
- appropriate contractual arrangements are put in place to ensure that there is no circumvention of the remuneration rules set out in the relevant ESMA guidelines or the FCA Regulations.

Up-to-date details of the remuneration policy of the ACD including, but not limited to, a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits including the composition of the remuneration committee, where such a committee exists, will be available at www.bnymellonim.co.uk and a paper copy will be made available free of charge upon request.

The Depositary

About the Depositary

The depositary of the Company is National Westminster Bank Plc which is a public limited company incorporated in England and Wales on 18 March 1968. The Depositary is authorised by the Prudential Regulation Authority and regulated by the FCA and the Prudential Regulation Authority.

Registered Office and Head Office:	135 Bishopsgate, London EC2M 3UR, England
Ultimate Holding Company:	The Royal Bank of Scotland Group plc, incorporated in Scotland
Principal business activity:	Banking

Terms of Appointment

The Depositary was appointed pursuant to an agreement dated 7 February 2003, between the Company, the ACD and The Royal Bank of Scotland plc novated in favour of the Depositary with effect from 17 October 2011 and subsequently amended and restated by the depositary agreement between the Company and the Depositary dated 18 March 2016 (the "**Depositary Agreement**").

Under the terms of the Depositary Agreement, the Depositary, the Company and the ACD are subject to a duty not to disclose confidential information.

As a general rule, under the Depositary Agreement the Company will indemnify the Depositary for losses incurred by the Depositary in the proper performance of its obligations and duties under the Depositary Agreement or as a result of its reliance on properly given instructions except in respect of:

- (a) its failure to exercise all due care and diligence in the discharge of its functions in respect of the UCITS,
- (b) its fraud, negligence or wilful default or its intentional or negligent failure to fulfil its obligations under the Depositary Agreement or applicable law and regulation,
- or
- (c) any liability to the extent that it has actually been recovered by the Depositary.

Nothing in the Depositary Agreement shall act to prevent the Depositary from rendering similar services to others.

The fees to which the Depositary is entitled are set out on pages 35 - 36.

Termination

The Depositary Agreement may be terminated on at least six months' written notice by the Depositary or the Company or immediately in certain circumstances set out in the Depositary Agreement. Termination cannot take effect, nor may the Depositary retire voluntarily, until a successor depositary has been appointed.

Duties of the Depositary

The responsibilities of the Depositary include:

- (a) cash monitoring and verifying each Sub-Fund's cash flows;
- (b) safekeeping of the assets of the Sub-Funds;
- (c) ensuring that dealing in Shares and valuation of Shares is carried out in accordance with the Instrument and applicable national law including the FCA Regulations;
- (d) ensuring that in transactions involving the Sub-Funds, any consideration is remitted within the usual time limits;
- (e) ensuring that the Sub-Funds' income is applied in accordance with the Instrument and applicable national law, including the FCA Regulations; and

carrying out instructions from the ACD or the Company unless they conflict with the Instrument and applicable national law, including the FCA Regulations.

The powers, duties, rights and obligations of the Depositary, the Company and the ACD under the Depositary Agreement shall, to the extent of any conflict, be overridden by the FCA Rules and any other applicable laws and regulations.

Liability of the Depositary

The Depositary is liable to the Company and its Shareholders for the loss of a financial instrument held in custody by the Depositary or a third party to whom custody has been delegated. In such case the Depositary is under an obligation to return a financial instrument of identical type or corresponding amount without undue delay. The Depositary will not be liable if it can prove that loss has arisen as a result of an external event beyond its reasonable control (or that of any sub-custodian or other third party), the consequences of which would have been unavoidable despite all reasonable efforts to the contrary. This exclusion is only applicable where the loss of such financial instrument is not the result of any act or omission of the Depositary, its delegates or sub-delegates; the Depositary could not have reasonably prevented the occurrence of the event which led to the loss despite adopting all precautions incumbent on a diligent depositary as reflected in common industry practice; and despite undertaking rigorous and comprehensive due diligence.

As a general rule, the Depositary shall also be liable for any losses suffered as a result of the Depositary's material breach of the Depositary Agreement, negligence, fraud, wilful misconduct or its negligent or intentional failure (or that of any of its delegates) to properly fulfil its obligations under the UCITS Regulations Depositary Agreement or applicable law or regulation.

Delegation

Under the Depositary Agreement, the Depositary has the power to (and authorise its delegates to sub-delegate) all or any part of its duties as depositary in relation to safekeeping of the Company's assets, upon prior notice to the ACD. The Depositary's liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping.

The Depositary has delegated its safe-keeping duties in respect of financial instruments in custody to The Bank of New York Mellon SA/NV. The list of sub-delegates appointed by The Bank of New York Mellon SA/NV is set out in Appendix VII to this Prospectus. The use of particular sub-delegates will depend on the markets in which the Company invests. Investors should note that the list of sub-delegates is updated only at each Prospectus review. An updated list of sub-delegates is maintained by the ACD at www.bnymellonim.co.uk

Conflicts

The Depositary may act as the depositary of other open-ended investment companies and as trustee or custodian of other collective investment schemes.

The Depositary and/or its delegates and sub-delegates may in the course of its or their business be involved in other financial and professional activities which may on occasion have potential conflicts of interest with the UCITS or a particular Sub-fund and/or other funds managed by the ACD or other funds for which the Depositary acts as the depositary, trustee or custodian. The Depositary will, however, have regard in such event to its obligations under the Depositary Agreement and the Regulations and, in particular, will use reasonable endeavours to ensure that the performance of its duties will not be impaired by any such involvement it may have and that any conflicts which may arise will be resolved fairly and in the best interests of Shareholders collectively so far as practicable, having regard to its obligations to other clients. The Depositary maintains a conflict of interest policy to address such conflicts.

Nevertheless, as the Depositary operates independently from the Company, Shareholders, the ACD and its associated suppliers and the Custodian, the Depositary does not anticipate any conflicts of interest arising between it and any of the aforementioned parties.

Where a conflict or potential conflict of interest arises, the Depositary will have regard to its obligations to the Company, applicable law and regulation, and its conflicts of interest policy.

Up-to-date information regarding the Depositary, its duties and any conflicts of interest that may arise and the Depositary's delegation arrangements will be made available to Shareholders on request.

The Investment Managers

Insight

The ACD has appointed Insight Investment Management (Global) Limited to provide investment management services to the ACD for the following Sub-Funds:

1. Insight Corporate Bond Fund (formerly Newton Corporate Bond Fund),
2. Insight Equity Income Fund,
3. Insight Equity Income Booster Fund,

4. Insight Global Absolute Return Fund,
5. Insight Global Multi-Strategy Fund and
6. Insight Inflation-Linked Corporate Bond Fund.

Insight is authorised and regulated by the FCA. Its registered office is at BNY Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA. The principal activity of Insight is acting as an investment manager. Insight is in the same group of companies as the ACD.

Insight has been appointed by an investment management agreement between the Company, the ACD and Insight with effect from and including 9 February 2013.

Under the investment management agreement with Insight the ACD provides indemnities to Insight (except in the case of any matter arising as a result of Insight's negligence, wilful default or fraud). The ACD may be entitled under the indemnities in the ACD Agreement to recover from the Company amounts paid by the ACD under the indemnities in the investment management agreement with Insight.

■ Newton

The ACD has appointed Newton Investment Management Limited to provide investment management services for the following Sub-Funds:

1. Newton 50/50 Global Equity Fund,
2. Newton Asian Income Fund
3. Newton Continental European Fund,
4. Newton Emerging Income Fund,
5. Newton Global Dynamic Bond Fund,
6. Newton Global Dynamic Bond Income Fund,
7. Newton Global Emerging Markets Fund,
8. Newton Global Balanced Fund,
9. Newton Global Equity Fund,
10. Newton Global High Yield Bond Fund,
11. Newton Global Income Fund (formerly Newton Global Higher Income Fund),
12. Newton Global Opportunities Fund,
13. Newton Index Linked Gilt Fund,
14. Newton International Bond Fund,
15. Newton Long Corporate Bond Fund,
16. Newton Long Gilt Fund,
17. Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund),
18. Newton Multi-Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund),
19. Newton Multi-Asset Growth Fund (formerly Newton Managed Fund),
20. Newton Multi-Asset Income Fund,
21. Newton Oriental Fund,
22. Newton Real Return Fund,
23. Newton UK Equity Fund (formerly the Newton Income Fund),
24. Newton UK Income Fund (formerly Newton Higher Income Fund)
and
25. Newton UK Opportunities Fund.

Newton is authorised and regulated by the FCA. Its registered office is at BNY Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA. The principal activity of Newton is acting as an investment manager. Newton is in the same group of companies as the ACD.

Newton was appointed by an investment management agreement between the Company, the ACD and Newton dated 16 June 1999, as amended from time to time.

Under the investment management agreement with Newton, Newton is not liable for any investment decision made in good faith within the agreed policy, but Newton agrees to indemnify the Company and the ACD in respect of any loss incurred as a result of the negligence, default or fraud of Newton.

■ The Boston Company

The ACD has appointed The Boston Company Asset Management, LLC to provide investment management services for The Boston Company US Opportunities Fund.

The Boston Company is registered in the United States as an "investment adviser" under the Investment Advisers Act of 1940, as amended. Its registered office is at BNY Mellon Center, One Boston Place, Boston, MA 02108-4408, USA. The principal activity of The Boston Company is acting as an investment manager. The Boston Company is in the same group of companies as the ACD.

The Boston Company was appointed by an investment management agreement between the Company, the ACD and The Boston Company dated 30 January 2012.

Under the investment management agreement with The Boston Company the ACD provides indemnities to The Boston Company (except in the case of any matter arising as a result of The Boston Company's negligence, wilful default or fraud). The ACD may be entitled under the indemnities in the ACD Agreement to recover from the Company amounts paid by the ACD under the indemnities in the investment management agreement with The Boston Company.

■ Walter Scott

The ACD has appointed Walter Scott & Partners Limited to provide investment management services for BNY Mellon Long-Term Global Equity Fund.

Walter Scott is authorised and regulated by the FCA. Its registered office is at One Charlotte Square, Edinburgh EH2 4DZ. The principal activity of Walter Scott is acting as an investment manager. Walter Scott is in the same group of companies as the ACD.

Walter Scott was appointed by an investment management agreement between the Company, the ACD and Walter Scott dated 24 August 2007, as amended from time to time.

Under the investment management agreement with Walter Scott, Walter Scott shall not be liable for the consequence of any investment decision made in good faith within the agreed policy, but Walter Scott agrees to indemnify the Company and the ACD in respect of any loss incurred as a result of the negligence, default or fraud of Walter Scott.

The Administrator

The ACD has delegated the maintenance of the register of Shareholders to the Administrator. The administrator is The Bank of New York Mellon (International) Limited. The Administrator was appointed to act as administrator pursuant to an administration agreement dated 1 June 2002, as amended.

The register of Shareholders may be inspected at BNY Mellon Centre, 160 Queen Victoria Street, London, EC4V 4LA during normal business hours by any shareholder or any shareholder's duly authorised agent.

The Auditors

The Auditors of the Company are Ernst & Young LLP, whose registered office is at 1 More London Place, London SE1 2AF.

BUYING, SELLING, CONVERTING AND SWITCHING SHARES

The dealing office of the ACD is open from 9.00 a.m. until 5.00 p.m. (UK time) on each weekday excluding UK public holidays (a "Dealing Day") to receive requests for the issue, redemption and switching of Shares, by telephone, facsimile instruction or in writing. Requests for the conversion of Shares may also be received by facsimile or in writing on a Dealing Day. In addition, the ACD may from time to time make arrangements to allow Shares to be bought or sold on-line or through other communication media.

Buying Shares

■ Initial Offer Period

A Sub-Fund may or may not have an initial offer period. Where there is an initial offer period, the initial offer period will commence on the date, will run for the number of days and end on the date, specified in Appendix I. During this period the initial offer price of Shares in the relevant Sub-Fund will be fixed at the initial price (exclusive of any initial charge).

Any subscriptions received after the close of the initial offer period cut off point specified in Appendix I, will be processed on the next Dealing Day and Shares will be issued at the relevant Net Asset Value per Share as determined on the Dealing Day on which they are issued.

Shareholders will only become exposed to market movements once investment has occurred. No subscription monies will be invested during the initial offer period. No interest will accrue on the subscription monies during the initial offer period. The ACD will commence investment decisions following the end of the initial offer period. The initial offer period may be extended at the ACD's discretion.

■ Procedure

All Shares (other than Exempt Shares, Exempt L Shares 1 and X Shares) can be bought either by sending a completed application form to the ACD at BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF or by telephoning the ACD on 08085 440 000 or +44 (0)203 528 4012. The completed application form may also be faxed to the ACD at 0844 892 2716 with the original to be sent to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF.

Exempt Shares, Exempt L Shares 1 and X Shares can be bought by sending a completed application form to the ACD at BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF. The completed application form may also be faxed to the ACD at 0844 892 2716 or +44 (0)131 305 3289 with the original to be sent to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF.

Application forms for all Shares may be obtained from the ACD.

The ACD has the right to reject, on reasonable grounds relating to the circumstances of the applicant, any application for Shares in whole or part, and in this event the ACD will return any money sent, or the balance of the monies, at the risk of the applicant.

Any subscription monies remaining after a whole number of Shares has been issued will not be returned to the applicant. Instead, smaller denomination Shares will be issued in such circumstances. A smaller denomination Share is equivalent to one one-thousandth (0.001) of a larger denomination Share.

The following additional requirements apply to investors seeking to buy Exempt Shares and Exempt L Shares 1.

Investors who satisfy the relevant Share Class Restrictions may apply for Exempt Shares and Exempt L Shares 1 by sending a completed application form to the ACD together with a copy of their exemption certificate or other evidence satisfactory to the ACD of their tax exempt status. Subsequent investments may be made without submitting an application form. Exempt Shareholders are also required to notify the ACD immediately should their tax exempt status be amended or revoked.

■ Documentation

A contract note giving details of the Shares purchased and the price used will be issued by the end of the business day following the later of receipt of the application to purchase Shares or the valuation point by reference to which the purchase price is determined, together with, where appropriate, a notice of the applicant's right to cancel.

Settlement is the relevant Dealing Day plus three business days for all Share Classes in all Sub-Funds. If settlement is due on a non business day in the country of the currency of the relevant class, settlement must be paid on the following business day in the country of the currency of the relevant class.

Share certificates will not be issued in respect of Shares. Ownership of Shares will be evidenced by an entry on the register of Shareholders. Statements in respect of periodic distributions on Shares will show the number of Shares held by the recipient. Individual statements of a shareholder's (or, when Shares are jointly held, the first named holder's) Shares will also be issued at any time on request by the registered holder.

The Company has power to issue bearer shares, but there are no present plans to do so.

■ Minimum Subscriptions and Holdings

The minimum initial and subsequent subscription amounts for each Class of Shares of each Sub-Fund is set out in Appendix I. The ACD may at its discretion accept subscriptions lower than the minimum amount.

If a holding is below the minimum holding, the ACD has the discretion to require redemption of the entire holding.

Unless specifically permitted by the ACD either generally or in respect of specific applications, Shares may not be held by or for the account of any U.S. Person.

■ Limited issue

The issue of Shares in a Sub-Fund or Class may be limited at times in the circumstances described below.

The ACD may in accordance with the COLL Sourcebook, limit the issue of Shares in any Sub-Fund or Class to a prescribed NAV or number of Shares ("Limit") if the assets attributable to the Sub-Fund or Class are at a level, above which it is not in the best interests of Shareholders to accept further subscriptions - for instance where the ACD considers that further subscriptions, if accepted, may not be efficiently invested; that a further increase in the size of the Sub-Fund may constrain the ability of the Investment Manager to meet the investment objective of the Sub-Fund; or that the further issue of Shares might cause material prejudice to existing Shareholders. The ACD may continue to permit the issue of Shares to subscriptions from existing regular savers and other Shareholders, provided the ACD is satisfied on

reasonable grounds that the proceeds of such subscriptions can be invested without compromising the investment objective of the Sub-Fund or materially prejudicing existing Shareholders.

Limiting the issue of Shares in any Sub-Fund or Class will not affect the rights of Shareholders in the Sub-Fund or Class in accordance with this Prospectus to redeem, convert or switch their Shares. The ACD may subsequently re-open any Sub-Fund or Class to further subscriptions from existing and/or new Shareholders, provided the ACD is satisfied on reasonable grounds that the proceeds of such subscriptions can be invested without compromising the investment objective of the Sub-Fund or materially prejudicing existing Shareholders. The process of limiting the issue of Shares and potentially re-opening a Sub-Fund or Class to further subscriptions may be repeated thereafter as the ACD may determine from time to time.

Prior to limiting the issue of Shares in any Sub-Fund or Class, the ACD will update the Prospectus with the details thereof, including the relevant Limit and circumstances and conditions in which Shares may subsequently be issued. Shareholders in the relevant Sub-Fund or Class will be notified of any such limitation in the issue of Shares. Shareholders may also ascertain the limited issue status of any Sub-Fund or Class to existing and/or new Shareholders by contacting the Client Service Centre on 0800 614 330 or +44 203 528 4002. Details of the limited issue status and any subsequent re-opening in any Sub-Fund or Class will be also be made available by the ACD on its website at www.bnymellonim.co.uk/limitedissue

As at the date of this Prospectus, the issue of Shares is not limited in any Sub-Fund or Class.

Selling Shares

■ Right to Redeem

Every Shareholder has the right to require that the Company redeem his Shares on any Dealing Day unless the value of Shares which a Shareholder wishes to redeem will mean that the Shareholder will hold Shares with a value less than the required minimum holding for the Class of Shares concerned (as set out in Appendix I), in which case the Shareholder may be required to redeem his entire holding.

■ Procedure

Requests to redeem all Shares (other than Exempt Shares, Exempt L Shares 1 and X Shares) may be made to the ACD by telephone on freephone 08085 440 000 followed up with a written instruction or a signed form of renunciation to the ACD. Redemption instructions for Exempt Shares, Exempt L Shares 1 and X Shares must be faxed, and for all other Shares may be faxed, to the ACD at 0844 892 2716 or +44 (0) 131 305 3289 with the original copy to be sent to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF.

■ Documents the Seller will Receive

A contract note giving details of the number and price of Shares redeemed will be sent to the redeeming Shareholder (the first named, in the case of joint Shareholders) together (if sufficient written instructions have not already been given) with a form of renunciation for completion and execution by the shareholder (and, in the case of a joint holding, by all the joint holders) not later than the end of the business day following the later of the request to redeem Shares or the valuation point by reference to which the redemption price is determined. For Euro and USD denominated Shares, redemption monies will be settled by telegraphic transfers. Cheques or, where specifically requested, telegraphic transfers (however the ACD reserves the right to settle

by cheque) in satisfaction of the redemption monies will be issued and/or despatched by post (as applicable) within three business days of the later of:

- receipt by the ACD of the form of renunciation (or other sufficient written instructions) duly signed by all the relevant shareholders and completed as to the appropriate number of Shares, together with any other appropriate evidence of title; and
- the valuation point following receipt by the ACD of the request to redeem.

If settlement is due on a non business day in the country of the currency of the relevant class, settlement will be paid on the following business day in the country of the currency of the relevant class.

■ Minimum Holding

Part of a shareholder's holding may be sold, but the ACD reserves the right to refuse a redemption request or require the entire holding to be sold if the value of the Shares remaining falls below the minimum holding for the appropriate Share Class, as detailed in Appendix I.

Conversion

Subject to the qualifications below and the relevant Share Class Restrictions, where more than one Class is in issue in a Sub-Fund, the ACD may at its absolute discretion permit a Shareholder to convert all or some Shares held from one Class in a Sub-Fund for Shares in another Class in the same Sub-Fund.

Such conversions will generally be executed within three Dealing Days of receipt of a valid instruction. Requests to convert between Classes are undertaken by reference to the respective prices of each Class.

Where the ACD determines at its absolute discretion that Class conversions are materially prejudicial to the Shareholders of a Class, instructions to convert between Classes will only be executed on the Dealing Day following the relevant Sub-Fund's income allocation date. In such circumstances, instructions to convert between Classes must be received by the ACD no sooner than ten business days before the Sub-Fund's relevant income allocation date.

Requests to convert between Classes must be submitted in writing to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF. Requests may also be faxed to 0844 892 2716 or +44 (0) 131 3053289. Shareholders may be required to complete a conversion request form (which, in the case of joint shareholders must be signed by all the joint holders). Conversion request forms may be obtained from the Administrator.

Where conversion requests involve multiple individual shareholder accounts the ACD may at its discretion impose a requirement to process the request on a pre-agreed date and template. The ACD may agree to accept submission of such bulk requests by means other than in writing including electronically.

The ACD may at its discretion impose a conversion fee on the conversion of Shares. Further details about the fee are set out on page 22.

If the conversion would result in the shareholder holding a number of new Shares of a value which is less than the minimum holding in the Share Class concerned, the ACD may, if it thinks fit, convert the whole of the applicant's holding of old Shares to new Shares or refuse to effect any conversion of the old Shares.

No conversion will be made during any period when the right of the Shareholders to request a redemption of Shares is suspended.

Conversions will generally not be treated as a disposal for capital gains tax perspective.

A Shareholder who converts Shares will not be given a right by law to withdraw from or cancel the transaction.

Governing Law

All deals in Shares are governed by English law.

Switching

Subject to the qualifications below, a Shareholder in a Sub-Fund may at any time switch where permissible some or all of his Shares of one Class or Sub-Fund ("Old Shares") for Shares of another Class in another Sub-Fund ("New Shares"), subject to meeting the Share Class Restrictions for the New Shares.

The number of New Shares issued will be determined by reference to the respective prices of New Shares and Old Shares at the valuation point applicable at the time the Old Shares are repurchased and the New Shares are issued.

Requests to switch all Shares (other than Exempt Shares, Exempt L Shares 1 and X Shares) may be effected either by telephone on freephone 08085 440 000 or in writing to the ACD. The switching form may also be faxed to the ACD at 0844 892 2716 or +44 (0) 131 305 3289. Shareholders may be required to complete a switching form (which, in the case of joint Shareholders must be signed by all the joint holders). Switching forms may be obtained from the ACD.

Requests to switch Exempt Shares, Exempt L Shares 1 and X Shares must be made by submitting a switching form to the ACD at BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF. The completed switching form may also be faxed to the ACD at 0844 892 2716 or +44 (0)131 305 3289 with the original to be sent to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF.

The ACD may at its discretion impose a switching fee on the switching of Shares between Sub-Funds. Further details about the fee are set out on page 22.

If the switch would result in the shareholder holding a number of Old Shares or New Shares of a value which is less than the minimum holding in the Share Class concerned, the ACD may, if it thinks fit, convert the whole of the applicant's holding of Old Shares to New Shares or refuse to effect any switch of the Old Shares. No switch will be made during any period when the right of Shareholders to require the redemption of their Shares is suspended. The general provision on procedures relating to redemption will apply equally to a switch. A duly completed switching form must be received by the ACD before the valuation point on a Dealing Day in the Sub-Funds concerned to be dealt with at the prices at those valuation points on that Dealing Day, or at such other date as may be approved by the ACD. Switching requests received after a valuation point will be held over until the next day which is a Dealing Day in the relevant Sub-Fund or Sub-Funds.

The ACD may adjust the number of New Shares to be issued to reflect the imposition of any switching fee together with any other charges or levies in respect of the issue or sale of the New Shares or repurchase or cancellation of the Old Shares as may be permitted pursuant to the FCA Regulations.

Please note that a switch of Shares in one Sub-Fund for Shares in another Sub-Fund is treated as a redemption and sale and will, for persons subject to UK taxation, be a realisation for the purposes of capital gains taxation although a conversion of Shares between different Share Classes in the same Sub-Fund will not be deemed to be a realisation for the purposes of capital gains taxation.

A Shareholder who switches Shares in one Sub-Fund for Shares in any other Sub-Fund will not be given a right by law to withdraw from or cancel the transaction.

DEALING CHARGES

Initial Charge

The ACD may impose a charge on the purchase of Shares. The initial charge is payable to the ACD.

The current initial charge which may be levied in respect of the available Classes of Share in each Sub-Fund is set out in Appendix I as a percentage of the gross subscription amount invested by the prospective shareholders.

Redemption Charge

The ACD may impose a charge on the redemption of Shares. At present no redemption charge is levied. Shares issued while this Prospectus is in force will not be subject to any redemption charge in the future.

The ACD may introduce a redemption charge on Shares only in accordance with the FCA Regulations. In the event of a change to the rate or method of calculation of a redemption charge, details of the previous rate or method of calculation will be available from the ACD.

Conversion Fee

The ACD may impose a charge on the conversion of Shares from one Class in a Sub-Fund for Shares in another Class in the same Sub-Fund. The conversion fee will not exceed an amount equal to the then prevailing initial charge for the Class into which Shares are being converted as set out in Appendix I. The conversion fee is payable to the ACD.

Switching Fee

The ACD may impose a charge on the switching of Shares of a Sub-Fund for Shares of another Sub-Fund. The switching fee will not exceed an amount equal to the then prevailing initial charge for the Class into which Shares are being switched as set out in Appendix I. The switching fee is payable to the ACD.

Administration Charge – In Specie Redemption Charge

Where an in specie redemption is instructed by a Shareholder, the ACD reserves the right to make a charge per line of stock which is to be transferred. The charge will be deducted from the cash balance of the in specie redemption. Further details will be available from the ACD if this charge is imposed.

OTHER DEALING INFORMATION

Dilution Adjustment

The price of a Share in a Company is calculated by reference to the Net Asset Value of the Sub-Fund to which it relates. The Company's investments are valued on a mid-market basis in accordance with the FCA Regulations and the Instrument.

However, the actual cost of purchasing or selling investments for a Sub-Fund may deviate from the mid-market value used in calculating the price of Shares in the Sub-Fund, due to dealing costs such as broking charges, taxes, and any spread between the buying and selling prices of the underlying investments.

These dealing costs can have an adverse effect on the value of the Sub-Fund, known as "dilution".

The FCA Regulations allow the cost of dilution to be met directly from the relevant Sub-Fund's assets or to be recovered from investors on the purchase or redemption of Shares in the Sub-Fund *inter alia* by means of a dilution adjustment to the dealing price, which is the policy which has been adopted by the ACD.

To mitigate the effects of dilution, the ACD therefore has the discretion to make a dilution adjustment in the calculation of the dealing price and thereby adjust the dealing price of Shares in the Sub-Fund to take account of the dealing costs.

The need to make a dilution adjustment will depend on the volume of purchases or redemptions of Shares on any given day.

The ACD may make a discretionary dilution adjustment if in its opinion the existing Shareholders (for net purchases) or remaining Shareholders (for net redemptions) might otherwise be adversely affected. The ACD therefore reserves the right to impose a dilution adjustment in the following circumstances:

1. where a Sub-Fund is in continual decline (is suffering a net outflow of investment);

2. where the Sub-Fund is experiencing large levels of net subscriptions or net redemptions relative to its size;
3. in any other circumstances where the ACD believes it will be in the interests of shareholders to make a dilution adjustment.

This policy to swing the dealing price will be subject to regular review and may change.

The ACD's decision on whether or not to make a dilution adjustment, and at what level this adjustment might be made in particular circumstances or generally, will not prevent it from making a different decision in similar circumstances in the future.

Where a dilution adjustment is applied, it will increase the dealing price when there are net inflows into the relevant Sub-Fund and decrease the dealing price when there are net outflows. The dealing price of each Class of Share in a Sub-Fund will be calculated separately but any dilution adjustment will in percentage terms affect the dealing price of Shares of each Class identically.

As dilution is directly related to the inflows and outflows of monies from a Sub-Fund, it is not possible to predict accurately whether dilution will occur at any future point in time. Consequently it is also not possible to predict accurately how frequently the ACD will need to make such a dilution adjustment.

Estimates of the dilution adjustments based on assets held in each Sub-Fund and market conditions at the time of this Prospectus as well as the number of occasions on which the dilution adjustment was applied in the 6 month period to 31 December 2016 are set out below.

Sub-Fund	Estimated Dilution Adjustment applicable to purchases	Estimated Dilution Adjustment applicable to redemptions	Number of days on which dilution adjustment was applied in the 6 month period
BNY Mellon Long-Term Global Equity Fund	0.1705%	0.1099%	3
Insight Corporate Bond Fund (formerly Newton Corporate Bond Fund)	0.5619%	0.5619%	1
Insight Equity Income Fund	0.2613%	0.2373%	0
Insight Equity Income Booster Fund	0.7199%	0.2327%	0
Insight Global Absolute Return Fund	0.1080%	0.1006%	1
Insight Global Multi-Strategy Fund	0.1360%	0.1343%	1
Insight Inflation-Linked Corporate Bond Fund	0.5431%	0.5431%	0
Newton 50/50 Global Equity Fund	0.3134%	0.1030%	2
Newton Asian Income Fund	0.3753%	0.3836%	44
Newton Continental European Fund	0.1443%	0.0863%	2
Newton Emerging Income Fund	0.4148%	0.4743%	1
Newton Global Balanced Fund	0.2823%	0.0825%	0
Newton Global Dynamic Bond Fund	0.1899%	0.1899%	3
Newton Global Dynamic Bond Income Fund	0.2440%	0.2438%	1
Newton Global Emerging Markets Fund	0.2010%	0.2381%	4
Newton Global Equity Fund	0.1670%	0.1057%	1
Newton Global High Yield Bond Fund	0.4883%	0.4878%	12
Newton Global Income Fund (formerly Newton Global Higher Income Fund)	0.2566%	0.0920%	0

Sub-Fund	Estimated Dilution Adjustment applicable to purchases	Estimated Dilution Adjustment applicable to redemptions	Number of days on which dilution adjustment was applied in the 6 month period
Newton Global Opportunities Fund	0.0991%	0.0631%	2
Newton Index Linked Gilt Fund	0.0715%	0.0715%	33
Newton International Bond Fund	0.1055%	0.1055%	9
Newton Long Corporate Bond Fund	0.6487%	0.6487%	20
Newton Long Gilt Fund	0.0618%	0.0618%	30
Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund)	0.1743%	0.1023%	0
Newton Multi-Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund)	0.4789%	0.4518%	1
Newton Multi-Asset Growth Fund (formerly Newton Managed Fund)	0.3161%	0.1041%	0
Newton Multi-Asset Income Fund	0.4060%	0.3211%	8
Newton Oriental Fund	0.2388%	0.3040%	1
Newton Real Return Fund	0.1035%	0.08312%	1
Newton UK Equity Fund (formerly Newton Income Fund)	0.4551%	0.1096%	1
Newton UK Income Fund (formerly Newton Higher Income Fund)	0.4609%	0.1137%	0
Newton UK Opportunities Fund	0.4600%	0.1112%	6
The Boston Company US Opportunities Fund	0.0613%	0.0575%	28

Calculation of Dilution Adjustment

As explained above, the ACD may make a dilution adjustment when calculating the price of a Share. In deciding whether to make a dilution adjustment the ACD must use the following bases of valuations:

- When by reference to any valuation point the aggregate value of the Shares of all Classes in the Sub-Fund issued exceeds the aggregate value of Shares of all Classes cancelled (i.e. the Sub-Fund is experiencing a net inflow of investment):
 - any adjustment must be upwards;
 - and
 - the dilution adjustment must not exceed the ACD's reasonable estimate of the difference between what the price would have been had the dilution adjustment not been taken into account, and what the price would have been if the Scheme Property had been valued on the best available market offer basis plus dealing costs;
- or
- When by reference to any valuation point the aggregate value of the Shares of all Classes in the Sub-Fund cancelled exceeds the aggregate value of Shares of all Classes issued (i.e. the Sub-Fund is experiencing a net outflow of investment):
 - any adjustment must be downwards;
 - and
 - the dilution adjustment must not exceed the ACD's reasonable estimate of the difference between what the price would have been had the dilution adjustment not been taken into account, and what the price would have been if the Scheme Property had been valued on the best available market bid basis less dealing costs.

Issue and Cancellation of Shares in the Company

The ACD will issue and cancel Shares in the Company by making a record of the issue or cancellation of the Shares and the number of Shares in each Class concerned. Subject to and in accordance with the FCA Regulations, the issue or cancellation of Shares may take place through the Company directly.

In Specie Redemptions

If a Shareholder requests the redemption of Shares the ACD may arrange that, in place of payment of the price of the Shares in cash, the Company cancels the Shares and transfers Scheme Property or, if required by the Shareholder, the net proceeds of sale of relevant Scheme Property, to the Shareholder.

Before the proceeds of the redemption of Shares become payable, the ACD must give written notice to the Shareholder, not later than the close of business on the second day following the day of receipt of the request, that the Scheme Property or the proceeds of sale of Scheme Property will be transferred to that Shareholder. Where such a notice is served on a Shareholder, the Shareholder may serve a further notice on the ACD not later than the close of business on the fourth business day following the day of receipt by the Shareholder of the first mentioned notice, requiring the ACD instead of arranging for a transfer of Scheme Property, to arrange for a sale of that property and the payment to the Shareholder of the net proceeds of that sale.

The ACD will select the Scheme Property to be transferred in consultation with the Depositary. They must ensure that the selection is made with a view to achieving no more advantage or disadvantage to the redeeming Shareholder than to the continuing Shareholders.

In the case of in specie redemptions, the Scheme Property to be transferred is subject to stamp duty reserve tax unless the Scheme Property is transferred pro-rata.

In Specie Issue and Cancellation

The Depositary may arrange for the Company to issue or redeem Shares in exchange for assets other than money, but will only do so where it is satisfied that the Company's acquisition or redemption of those assets in exchange for the Shares concerned is not likely to result in any material prejudice to the interests of shareholders.

In relation to the issue of Shares, the Depositary will ensure that the beneficial interest in the assets is transferred to the Company with effect from the issue of the Shares.

The Depositary will not issue Shares in any Sub-Fund in exchange for assets the holding of which would be inconsistent with the investment objective of that Sub-Fund.

Restrictions and Compulsory Transfer and Redemption

The ACD may from time to time impose such restrictions as it may think necessary for the purpose of ensuring that no Shares are acquired or held by any person in circumstances:

1. which may constitute a breach of the law or governmental regulation (or any interpretation of a law or regulation by a competent authority) of any country or territory, including without limitation, any applicable exchange control regulation or by a U.S. Person;
2. which would (or would if other shares were acquired or held in like circumstances) result in the Company incurring any liability to taxation, withholding tax or suffering any other adverse consequence (including a requirement to register under any securities, investment or similar laws or governmental regulation of any country or territory); or
3. where the dealing activities of the person concerned may cause detriment to continuing Shareholders in the Company.

In this connection, the ACD may, inter alia, reject in its discretion any application for the purchase, redemption, conversion or switching of Shares and shall be entitled compulsorily to redeem and cancel any Shares held or beneficially owned by such a Shareholder in contravention of these restrictions.

Where a person becomes aware that he is holding Shares in contravention of the restrictions set out above, that person shall immediately notify the ACD and immediately redeem his Shares or transfer them to a person eligible to hold the Shares.

Income equalisation

Income equalisation applies in relation to all the Sub-Funds in the Company.

Part of the purchase price of a Share reflects accrued income received or to be received in the current distribution period. This is a capital amount and is returned to a Shareholder with the first allocation of income. Where accumulation Shares are held, the capital amount will be accumulated.

The amount of income equalisation is either the actual amount of income included in the issue price of that Share, or the average of all the amounts included in the price of all Shares issued or sold to Shareholders during the distribution period.

Suspension of Dealings in the Company

The ACD may, with the agreement of the Depositary, or must if the Depositary so requires, temporarily suspend, without notice to Shareholders, the issue, cancellation and redemption of Shares in the Company, if the ACD or the Depositary is of the opinion that

due to exceptional circumstances there is good and sufficient reason to do so having regard to the interests of Shareholders or potential Shareholders. The ACD and the Depositary must formally review the suspension at least every 28 days, and inform the FCA of the result of this review with a view to ending the suspension as soon as practicable after the exceptional circumstances have ceased.

Re-calculation of the Share price for the purpose of sales and purchases will commence on the next relevant valuation point following the ending of the suspension.

The ACD will notify Shareholders as soon as practicable after the commencement of the suspension, including details of the exceptional circumstances which have led to the suspension and giving Shareholders details of how to find further information about the suspension.

Where such a suspension takes place, the ACD will publish, on its website, sufficient details to keep Shareholders informed about the suspension, including if known, its possible duration.

The exceptional circumstances in which the ACD or the Depositary may require temporary suspension of the issue, cancellation and redemption of Shares, or any class of Shares in any or all the Sub-funds includes, but is not limited to the following: during any period when, in the opinion of the ACD or the Depositary: an accurate valuation of a Sub-fund cannot occur, including

- where one or more markets is unexpectedly closed or where dealing is suspended or restricted;
- during political, economic, military or other emergency; or
- during any breakdown in the means of communication or computation normally employed in determining the price or value of any of the investments of a Sub-fund or any Classes of Shares upon the decision of the ACD, having given sufficient notice to Shareholders, to terminate a Sub-fund (see section Winding up of the Company or a Sub-Fund of the Company).

Late Trading and Market Timing

"Late Trading" is the acceptance of a subscription, redemption, conversion or switch order received after the Company's applicable valuation point for that Dealing Day. Late Trading is not permitted. As such, orders will not be accepted using the price established at the valuation point for that Dealing Day if orders are received after that time.

Late Trading will not include a situation in which the ACD is satisfied that orders which are received after the valuation point have been made by investors before then (e.g. where the transmission of an order has been delayed for technical reasons).

In general, "market timing" refers to the investment behaviour of a person or group of persons buying, selling, conversion or switching Shares on the basis of predetermined market indicators. Market timing may also be characterised by transactions that seem to follow a timing pattern, or by frequent or large transactions in Shares. The ACD does not knowingly allow investments which are associated with market timing activities, as these may adversely affect the interests of all Shareholders, and will take active measures to frustrate such practices where it has reasonable grounds to suspect these strategies are being or may be attempted.

Anti-Money Laundering

As a result of legislation in force in the UK to prevent money laundering, persons conducting investment business are responsible for compliance with money laundering regulations. In order to implement these procedures the ACD may need to undertake an electronic identity verification process. In certain

circumstances investors may be asked to provide additional documentation when buying Shares initially or in respect of a subsequent subscription. Until satisfactory proof of identity is obtained, the ACD reserves the right to refuse to issue Shares or pay out money in respect of redemptions or distributions.

VALUATION OF THE COMPANY

General

The price of a Share in the Company is calculated by reference to the Net Asset Value of the Sub-Fund to which it relates. The Net Asset Value per Share of each Sub-Fund is currently calculated at 12:00 noon (UK time) on each Dealing Day, the valuation point.

There must be only a single price for any Share as determined from time to time by reference to a particular valuation point. The ACD may at any time during a business day carry out an additional valuation if the ACD considers it desirable to do so.

Calculation of the Net Asset Value

The value of the Scheme Property of the Company or of a Sub-Fund (as the case may be) shall be the value of its assets less the value of its liabilities determined in accordance with the following provisions.

All the Scheme Property (including receivables) of the Company (or the Sub-Fund) is to be included, subject to the following provisions:

1. Property which is not cash (or other assets dealt with in paragraph 2) or a contingent liability transaction shall be valued as follows and the prices used shall (subject as follows) be the most recent prices which it is practicable to obtain:
 - (a) units or shares in a collective investment scheme:
 - (i) if a single price for buying and selling units or shares is quoted, at that price;
or
 - (ii) if separate buying and selling prices are quoted, at the average of the two prices provided the buying price has been reduced by any initial charge included in it and the selling price has been increased by any exit or redemption charge attributable thereto;
or
 - (iii) if, in the opinion of the ACD, the price obtained is unreliable or no recent traded price is available or if no recent price exists, at a value which, in the opinion of the ACD, is fair and reasonable;
 - (b) any other transferable security:
 - (i) if a single price for buying and selling the security is quoted, at that price;
or
 - (ii) if separate buying and selling prices are quoted, the average of the two prices;
or
 - (iii) if, in the opinion of the ACD, the price obtained is unreliable or no recent traded price is available or if no price exists, at a value which, in the opinion of the ACD, is fair and reasonable;
 - (c) property other than that described in paragraphs 1 (a) and 1 (b) above, at a value which, in the opinion of the ACD, represents a fair and reasonable mid-market price.
2. Cash and amounts held in current and deposit accounts and in other time-related deposits shall be valued at their nominal values.
3. Property which is a contingent liability transaction shall be treated as follows:
 - (a) if a written option, (and the premium for writing the option has become part of the Scheme Property), deduct the amount of the net valuation of premium receivable. If the property is an off-exchange derivative the method of valuation shall be agreed between the ACD and the Depositary;
 - (b) if an off-exchange future, include at the net value of closing out in accordance with a valuation method agreed between the ACD and the Depositary;
 - (c) if any other form of contingent liability transaction, include at the net value of margin on closing out (whether as a positive or negative value). If the property is an off-exchange derivative, the method of valuation shall be agreed between the ACD and the Depositary.
4. In determining the value of the Scheme Property, all instructions given to issue or cancel shares shall be assumed to have been carried out (and any cash paid or received) whether or not this is the case.
5. Subject to paragraph 6 below, agreements for the unconditional sale or purchase of property which are in existence but uncompleted shall be assumed to have been completed and all consequential action required to have been taken. Such unconditional agreements need not be taken into account if made shortly before the valuation takes place and, in the opinion of the ACD, their omission will not materially affect the final net asset amount. Futures or contracts for differences which are not yet due to be performed and unexpired and unexercised written or purchased options shall not be included under this paragraph 5.
6. All agreements are to be included under paragraph 5 which are, or ought reasonably to have been, known to the person valuing the property.
7. Deduct an estimated amount for anticipated tax liabilities at that point in time including (as applicable and without limitation) capital gains tax, income tax, corporation tax, VAT, stamp duty and SDRT.
8. Deduct an estimated amount for any liabilities payable out of the Scheme Property and any tax thereon treating periodic items as accruing from day to day.
9. Deduct the principal amount of any outstanding borrowings whenever payable and any accrued but unpaid interest on borrowings.
10. Add an estimated amount for accrued claims for tax of whatever nature which may be recoverable.
11. Add any other credits or amounts due to be paid into the Scheme Property.
12. Add a sum representing any interest or any income accrued due or deemed to have accrued but not received.
13. Add the total amount of any cost determined to be, but not yet amortised relating to the authorisation and incorporation of the Company and of its initial offer or issue of Shares.
14. Currencies or values in currencies other than base currency or (as the case may be) the designated currency of a Sub-Fund shall be converted at the relevant valuation point at a rate of exchange that is not likely to result in any material prejudice to the interests of Shareholders or potential Shareholders.
15. Unreliable or stale pricing may occur if new price-sensitive information arises when securities exchanges are closed due to local exchange opening hours or public holidays. Unreliable or stale pricing may also occur as a result of events such as significant market movement in similar markets or industries, natural disasters or government actions.

16. As noted above, the ACD through its Fair Value Pricing Committee, may make a fair and reasonable price adjustment (Fair Value Price Adjustment) to the Net Asset Value with the aim of producing the 'fairest' dealing price and to protect the interests of all existing and prospective investors.

Price per Share in each Sub-Fund and each Class

The price per Share at which Shares are bought is the sum of the Net Asset Value of a Share and any initial charge. The price per Share at which Shares are redeemed is the Net Asset Value per Share less any applicable redemption charge and subject to any withholding tax or other deductions which may apply. In addition, there may, for both purchases and redemptions, be a dilution adjustment, as described on pages 23 - 24. For the avoidance of doubt, the Net Asset Value of a Share will be calculated to four (4) decimal places and on redemption, this value to four (4) decimal places will be used in the calculation of redemption monies payable. After this calculation redemption monies payable will be issued to two (2) decimal places.

Pricing Basis

The Company deals on a forward pricing basis. A forward price is the price calculated at the next valuation point after the receipt of a valid purchase or redemption instruction is accepted by the ACD.

Publication of Prices

The ACD will make available the daily prices of Shares on its website at: www.bnymellonim.com. The ACD may also, at its sole discretion, publish certain share prices on third party websites or in publications.

The most recent prices for the B Shares, Exempt Shares, Exempt L Shares 1, S Shares and X Shares will only be available on the above website.

In relation to Shares marketed outside of the UK, the most recent prices will be available on the above website and may also be published in a recognised national newspaper in each overseas jurisdiction, in accordance with the regulatory requirements of those jurisdictions where the Shares are registered and marketed.

RISK FACTORS

Potential investors should consider the following risk factors before investing in the Company (or in the case of specific risks applying to specific Sub-Funds in those Sub-Funds).

General

The investments of the Sub-Fund are subject to normal market fluctuations and other risks inherent in investing in securities. There can be no assurance that any appreciation in value of investments will occur. The value of investments and the income derived from them may fall as well as rise and investors may not recoup the original amount invested in the Sub-Fund. There is no assurance that the investment objectives of any Sub-Fund will actually be achieved.

Concentration Risk

The risk of concentration may arise if a Sub-Fund is predominantly invested in a single country and/or geographic area, or has limited industry diversification. Concentration risk can also occur when a Sub-Fund is invested in a limited number of securities.

Effect of Initial Charge or Redemption Charge

Where an initial charge or redemption charge is imposed, an investor who realises his Shares after a short period may not (even in the absence of a fall in the value of the relevant investments) realise the amount originally invested.

In particular, where a redemption charge is payable investors should note that the percentage rate at which the redemption charge is calculated is based on the market value rather than the initial value of the Shares. If the market value of the Shares has increased, the redemption charge will show a corresponding increase. Currently there is no redemption charge levied on Shares in any of the Sub-Funds. The Shares should, therefore, be viewed as a long term investment.

Suspension of Dealings in Shares

Investors are reminded that in certain circumstances their right to redeem, convert and switch Shares may be suspended (see section "Suspension of Dealings in the Company").

Currency Exchange Rates

Depending on an investor's currency of reference, currency fluctuations may adversely affect the value of an investment.

Political and/or Regulatory Risks

The value of a Sub-Fund's assets may be affected by uncertainties such as international political developments, changes in government policies, changes in taxation, restrictions on foreign investment and currency repatriation, currency fluctuations and other developments in the laws and regulations of countries in which investments may be made. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in certain countries in which investment may be made may not provide the same degree of investor protection or information to investors as would generally apply in major securities markets.

Currency Risk

Assets of a Sub-Fund may be denominated in a currency other than the base currency of the Sub-Fund and changes in the exchange rate between the base currency and the currency of the asset may lead to a depreciation of the value of the Sub-Fund's assets as expressed in the base currency. It may not be possible or practical to hedge against such exchange rate risk. The Investment Manager of the Sub-Fund may, but is not obliged to, mitigate this risk by using financial instruments.

A Sub-Fund may from time to time enter into currency exchange transactions either on a spot basis or by buying forward currency exchange contracts, including for purposes of hedging investments denominated in a foreign currency against either the base currency of the Sub-Fund ("Currency Hedging") or another currency ("Cross Currency Hedging"), with a view to managing currency exposures in an efficient manner in relation to its investment objective. Neither spot transactions nor forward currency exchange contracts prevent fluctuations in the prices of a Sub-Fund's investments or in foreign exchange rates, nor will they prevent loss if the prices of these investments or currency into which such investments are hedged should decline. Currencies into which investments may be hedged may be imperfectly correlated or uncorrelated with the base currency of a Sub-Fund. Performance of a Sub-Fund may be strongly influenced by movements in foreign exchange rates because currency positions held by a Sub-Fund may not correspond with the investments held or with the base currency of the Sub-Fund.

Counterparty Risk

Each of the Sub-Funds may be exposed to credit risk on the counterparties with which it trades in relation to options, total return swaps, futures and forward contracts and other derivative financial instruments that are not traded on an exchange. Counterparties are not afforded the same protections as may apply to those trading futures or options on an exchanges, such as the performance guarantee of an exchange clearing house. Each Sub-Fund will be subject to the possibility of the insolvency, bankruptcy or default of a counterparty with which the Sub-Funds trade such instruments, which could result in substantial losses to the relevant Sub-Fund or Sub-Funds.

Each of the Sub-Funds may also be exposed to a credit risk on counterparties with whom it trades securities, and may also bear the risk of settlement default, in particular in relation to debt securities such as bonds, notes and similar debt obligations or instruments.

Emerging Markets

Where Sub-Funds invest in overseas markets these investments may carry risks associated with failed or delayed settlement of market transactions and with the registration and custody of securities.

Investment in emerging markets may involve a higher than average risk.

Investors should consider whether or not investment in the Sub-Funds is either suitable for, or should constitute a substantial part of, an investor's portfolio.

Companies in emerging markets may not be subject:

- (a) to accounting, auditing and financial reporting standards, practices and disclosure requirements comparable to those applicable to companies in major markets;

- (b) to the same level of government supervision and regulation of stock exchanges as countries with more advanced securities markets.

Accordingly, certain emerging markets may not afford the same level of investor protection as would apply in more developed jurisdictions.

Restrictions on foreign investment in certain securities may be imposed on certain Sub-Funds and, as a result, may limit investment opportunities for the Sub-Funds. Substantial government involvement in, and influence on, the economy may affect the value of securities in certain emerging markets.

The reliability of trading and settlement systems in some emerging markets may not be equal to that available in more developed markets, which may result in delays in realising investments.

Lack of liquidity and efficiency in certain of the stock markets or foreign exchange markets in certain emerging markets may mean that from time to time the ACD may experience more difficulty in purchasing or selling holdings of securities than it would in a more developed market.

Liquidity Risk

Liquidity risk exists when particular investments are difficult to purchase or sell. A Fund's investment in illiquid securities may reduce the returns of the Fund because it may be unable to sell the illiquid securities at an advantageous time or price. Investments in foreign securities, derivatives or securities with substantial market and/or credit risk tend to have the greatest exposure to liquidity risk. Illiquid securities may be highly volatile and difficult to value.

Market Risk

Some of the exchanges in which a Sub-Fund may invest may be less well-regulated than those in developed markets and may prove to be illiquid, insufficiently liquid or highly volatile from time to time. This may affect the price at which a Sub-Fund may liquidate positions to meet redemption requests or other funding requirements.

It may not be possible for a Sub-Fund to repatriate capital, dividends, interest and other income from certain countries, or it may require government consents to do so. The Sub-Fund could be adversely affected by the introduction of, or delays in, or refusal to grant any such consent for the repatriation of funds or by any official intervention affecting the process of settlement of transactions. Economic or political conditions could lead to the revocation or variation of consent granted prior to investment being made in any particular country or to the imposition of new restrictions.

Dilution provision

Investors should note that where a dilution adjustment is not made, the Sub-Fund in question may incur dilution which may constrain capital growth (see section "Dilution Adjustment").

Investment in Smaller Companies

Certain Sub-Funds may invest in the smaller companies. The securities of smaller companies may possess greater potential for growth, but can also involve greater risks, such as limited product lines and markets, and financial or managerial resources. Trading in these securities may be subject to more abrupt price movements and greater fluctuations in available liquidity than trading in the securities of larger companies.

Investment in Sub-Investment Grade Bonds

Certain Sub-Funds (including, without limitation, the Insight Corporate Bond Fund (formerly Newton Corporate Bond Fund), the Newton Global Dynamic Bond Fund and the Newton Global Dynamic Bond Income Fund) may invest in sub-investment grade bonds. These bonds have a lower credit rating than investment grade bonds, and so a higher risk of default, and carry a higher degree of risk both to the income and capital value of these Sub-Funds.

Investment in High Yield Bonds

Certain Sub-Funds may invest in high yield bonds. With high yield bonds there is an increased risk of capital erosion through default or where the redemption yield is below the income yield, and economic conditions and changes to interest levels may significantly impact the value of such bonds.

Charges to Capital

Where the investment objective of a Sub-Fund is to treat the generation of income as a higher priority than capital growth, or the generation of income and capital growth have equal priority, all or part of the ACD's annual management charge and performance fee (where applicable) and in the case of certain specified Sub-Funds, other fees and expenses may be charged against capital instead of against income. This may constrain capital growth or result in capital erosion.

Segregated Liability Risk

Each Sub-Fund has a specific portfolio of assets and investments to which the Sub-Fund's assets and/or liabilities are attributable. While provisions of the OEIC Regulations provide for segregated liability between Sub-Funds, the concept of segregated liability is relatively new. Accordingly, where claims are brought by local creditors in foreign courts or under foreign law contracts, it is not yet known how those foreign courts will react to the relevant OEIC Regulations. There remains a possibility that a creditor might seek to attach or seize assets of one Sub-Fund in satisfaction of an obligation owed in relation to another Sub-Fund in a jurisdiction which would not recognize the principle of segregation of liability between Sub-Funds.

Liabilities of the Company

Shareholders are not liable for the debts of the Company. A Shareholder is not liable to make any further payment to the Company after he has paid the purchase price of the Shares.

Efficient Portfolio Management

Each Sub-Fund may make use of efficient portfolio management techniques to reduce risk and/or costs in the Sub-Fund and to produce additional capital or income in the Sub-Fund. Techniques used by the Sub-Fund may include, without limitation, using derivatives for hedging, borrowing, holding cash and stock lending.

Derivatives

All the Sub-Funds listed below may invest up to 100% in derivatives (including, without limitation, total return swaps or financial derivative instruments with the same characteristics) for investment purposes as well as for EPM:

1. Insight Corporate Bond Fund (formerly Newton Corporate Bond Fund)
2. Insight Global Absolute Return Fund
3. Insight Global Multi-Strategy Fund
4. Insight Inflation-Linked Corporate Bond Fund
5. Newton Global High Yield Bond Fund
6. Newton International Bond Fund
7. Newton Long Corporate Bond Fund
8. Newton Real Return Fund
9. Newton Global Balanced Fund
10. Newton Global Dynamic Bond Fund
11. Newton Global Dynamic Bond Income Fund
12. Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund)
13. Newton Multi-Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund)
14. Newton Multi-Asset Income Fund

All Sub-Funds may use derivatives (including, without limitation, total return swaps or financial derivative instruments with the same characteristics) for EPM purposes.

The use of derivatives (whether for EPM or investment purposes) may expose a Sub-Fund to a high degree of risk. An investment in derivatives may create leverage and so may result in greater fluctuations in the Net Asset Value of the Sub-Funds. Leverage includes obtaining exposure to an investment without the need to buy the investment itself (and at a cost to the Sub-Fund which is less than the price of buying the underlying investment). Leverage may increase the opportunity for gains but may magnify the effect of losses. As a result, losses may exceed the value of the Sub-Fund's investment in derivatives. The Investment Manager seeks to ensure that the use of derivatives does not materially alter the risk profile of the relevant Sub-Fund. The effect of the derivative strategies employed could be to amplify or dampen market movements, or to cause the Net Asset Value of the Sub-Fund to move in an opposite direction to that of the market. In some cases, the behaviour of derivatives could be counter-intuitive to that expected by investors who are accustomed to investment in traditional long only funds.

All Sub-Funds may make use of derivatives for EPM. These techniques aim to reduce risk and/or costs in the Sub-Funds, or to produce additional capital or income in the Sub-Funds. It is not intended that using derivatives for EPM will increase the volatility or alter the overall risk profile of the Sub-Funds. In adverse situations, however, a Sub-Fund's use of derivatives for EPM may become ineffective and a Sub-Fund may suffer significant loss as a result. A Sub-Fund's ability to use EPM strategies may be limited by market conditions, regulatory limits and tax considerations.

Any income or capital generated by EPM techniques will be paid to the relevant Sub-Fund.

The Insight Equity Income Booster Fund uses a derivatives strategy as allowable under EPM to generate additional income as part of the investment strategy. This may restrict potential gains in a rising market.

Please refer to Appendix I and Appendix II for further details about the use of derivatives for investment purposes and EPM purposes, and how the ACD calculates and manages global

exposure. Use of one or more separate counterparties will be made to undertake derivative transactions on behalf of these Sub-Fund and the Sub-Fund may be required to pledge or transfer collateral paid from within the assets of the relevant Sub-Fund to secure such contracts. There may be a risk that a counterparty will wholly or partially fail to honour their contractual arrangements under the arrangement with regards to the return of collateral and any other payments due to the relevant Sub-Fund. The ACD or the relevant Investment Manager measures the creditworthiness of counterparties as part of the risk management process. A counterparty may be an associate of the ACD or an Investment Manager which may give rise to a conflict of interest. Please see pages 41 - 42 for further details on the ACD's conflicts of interest policy.

Techniques in relation to derivatives

The FCA Regulations permit the ACD to use certain techniques when investing in derivatives in order to manage a Sub-Fund's exposure to particular counterparties, and in relation to the use of collateral to reduce overall exposure to OTC derivatives. For example, a Sub-Fund may take collateral from counterparties with whom they have an OTC derivative position, and use that collateral to net off against the exposure they have to the counterparty under that OTC derivative position, for the purposes of complying with counterparty spread limits. The FCA Regulations also permit a Sub-Fund to use derivatives to effectively short sell (agree to deliver the relevant asset without holding it in the scheme) under certain conditions.

It is not intended that the use of derivatives will cause the Net Asset Value of the relevant Sub-Fund to have a high volatility or otherwise cause its existing risk profile to change materially. However, where derivatives are used there remains a possibility that the unit price of the Sub-Fund may be more volatile than would otherwise have been the case.

Repurchase and reverse repurchase transactions risk

If the counterparty to a repurchase agreement fails to fulfil its commitment to repurchase the security in accordance with the terms of the agreement, the relevant Sub-Fund may incur a loss to the extent that the proceeds realised on the sale of the securities are less than the repurchase price.

Reverse repurchase agreements involve the risk that the market value of the securities sold by the Sub-Fund may decline below the prices at which the Sub-Fund is obliged to repurchase such securities under the agreement.

Stock lending arrangements risk

As with any lending, there are risks of delay and recovery. Should the borrower of securities fail financially or default in any of its obligations under any stock lending transaction, the collateral provided in connection with such transaction will be called upon. The value of the collateral will be maintained to equal or exceed the value of the securities transferred. However, there is a risk that the value of the collateral may fall below the value of the securities transferred.

Contracts for Difference and Equity Swaps

Certain Sub-Funds may invest in contracts for difference (CFDs) and total return equity swaps (equity swaps). The risks inherent in CFDs and equity swaps are dependent on the position that a Sub-Fund may take in the transaction: by utilising CFDs and equity swaps, a Sub-Fund may put itself in a "long" position on

the underlying value, in which case the Sub-Fund will profit from any increase in the underlying stock, and suffer from any fall. The risks inherent in a “long” position are identical to the risks inherent in the purchase of the underlying stock. Conversely, a Sub-Fund may put itself in a “short” position on the underlying stock, in which case the Sub-Fund will profit from any decrease in the underlying stock, and suffer from any increase. The risks inherent in a “short” position are greater than those of a “long” position: while there is a ceiling to a maximum loss in a “long” position if the underlying stock is valued at zero, the maximum loss of a “short” position is that of the increase in the underlying stock, an increase that, in theory, is unlimited.

It should be noted that a “long” or “short” CFD or equity swap position is based on the relevant Investment Manager’s opinion of the future direction of the underlying security. The position could have a negative impact on the Sub-Fund’s performance. However, there is an additional risk related to the counterparty when CFDs and equity swaps are utilised: the Sub-Fund runs the risk that the counterparty will not be in a position to make a payment to which it has committed. The relevant Investment Manager will ensure that the counterparties involved in this type of transaction are carefully selected and that the counterparty risk is limited and strictly controlled.

Taxation

The attention of investors is drawn to page 38 “Taxation”, and in particular the taxation liability arising on the occurrence of certain events such as the sale or other disposal of Shares or payment of dividends to Shareholders who are UK resident. In addition, investors should be aware that income or dividends received or profits realised may lead to additional taxation in their country of citizenship, residence, domicile and/or incorporation. Investors should consult their financial or other professional advisers on the possible tax or other consequences of subscribing, holding, transferring, conversion, switching, redeeming or otherwise dealing in the Shares under the laws of their countries of citizenship, residence and domicile.

Re-investment of Collateral from OTC Derivatives

Cash received as collateral from OTC derivatives transactions may be re-invested in shares or units issued by qualifying money market funds, including entities managed or operated by (or, for an investment company with variable capital, whose authorised corporate director is) the ACD or an associate of the ACD. To the extent that re-investment of collateral takes place in an associated qualifying money market fund of the ACD or an associate of the ACD, all transactions will be at arm’s length and will be executed as if effected in normal commercial terms. In particular, cash collateral re-invested in associated qualifying money market funds may be subject to a pro rata portion of that funds’ management fees which would be in addition to the annual management fees charged by the sub-fund. However, no additional initial charge will be levied by the associated qualifying money market fund in this situation.

Investment Exposure to Property

The Insight Global Absolute Return Fund and Insight Global Multi-Strategy Fund do not directly invest in property but do have indirect exposure to property and other real assets. Investments in property are relatively illiquid and more difficult to realise than other asset types, property values are based on judgements by the valuer and thus more subjective than a valuation based purely on fact.

Investment in Loan Participations

In purchasing loan participations, the Insight Inflation-Linked Corporate Bond will acquire contractual rights only against the seller, not the borrower. Payments due to the Sub-Fund will only be made to the extent received by the seller from the borrower. Accordingly, the Sub-Fund will assume the credit risk of both seller and borrower, as well as of any intermediate participant. The liquidity of assignments and participations is limited and a Sub-Fund anticipates that such securities could only be sold to a limited number of institutional investors. This will also make it more difficult to value a Sub-Fund and calculate the Net Asset Value per Share.

Investment in other collective investment schemes

To the extent a Sub-Fund invests in another collective investment scheme, a Sub-Fund will bear, along with the other investors, its portion of the expenses of the other collective investment scheme, including management, performance and/or other fees. These fees will be in addition to the management fees and other expenses which a Sub-Fund bears directly with its own operations.

In the case of the Insight Global Absolute Return Strategy and Insight Global Multi-Strategy Fund investments will be made in units or shares of collective investment schemes which are UCITS schemes.

Investment in Fixed Interest Securities

Fixed interest securities are particularly affected by trends in interest rates and inflation. If interest rates increase, capital values may fall and vice versa. Inflation will erode the real value of capital. In addition, issuers may not be able to honour repayment on bond they issue.

Unlike the income from a single fixed interest security, the level of income from a fund is not fixed and may go up and down.

The value of a fixed interest security will fall in the event of a default or reduced credit rating of the issuer. Generally, the higher the rate of interest, the higher the perceived credit risk of the issuer.

Investment in Asset backed securities

Asset backed securities are securities made up of pools of debt securities and securities with debt like characteristics. The collateral for these securities may include home loans, car and credit card payments, boat loans, computer leases, aeroplane leases and mobile home loans. Certain Sub-Funds may invest in these and other types of asset backed securities that may be developed in the future.

Asset backed securities may provide the relevant Sub-Fund with a less effective security interest in the related collateral than mortgage backed securities. Therefore, there is the possibility that the underlying collateral may not, in some cases, be available to support payments on these securities.

Investment in Mortgage backed securities

Mortgage backed securities are a form of security made up of pools of commercial or residential mortgages. Mortgage backed securities are generally subject to credit risks associated with the performance of the underlying mortgaged properties and to prepayment risk. As interest rates fall the underlying mortgages are likely to be prepaid shortening the term of the security and

therefore the relevant Sub-Fund may not recoup its initial investment. Where interest rates rise, prepayments may slow which may lengthen the term of the investment.

Lower rated mortgage backed securities in which certain Sub-Funds may invest are likely to be more volatile and less liquid, and more difficult to price accurately, than more traditional debt securities. These securities may be particularly susceptible to economic downturns. It is likely that an economic recession could disrupt severely the market for such securities and may have an adverse impact on the value of such securities.

Investment in exchange traded funds

Exchange traded funds represent a basket of securities that are traded on an exchange and may not necessarily trade at the net asset value of their underlying holdings. As a result, they may trade at a price that is above or below the value of the underlying portfolio.

Start-Up Periods for New Sub-Funds

New Sub-Funds may encounter start-up periods during which it will incur certain risks relating to the initial investment of newly contributed subscription monies. Moreover, the start-up periods will also represent a special risk in that the level of diversification of one or more of the Sub-Fund's trading strategies may be lower than in a fully committed portfolio or group of portfolios. The Investment Manager may employ different procedures for moving to a fully committed portfolio. These procedures will be based in part on market judgment. No assurance can be given that these procedures will be successful.

Cyber Security Risk

The Company, the ACD and their service providers (including the Investment Managers, the Administrator, the Depositary and its distributors) ("Affected Persons") may be susceptible to operational and information security and related risks of cyber security incidents. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyber security attacks include, but are not limited to, gaining unauthorised access to digital systems (e.g., through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information, corrupting data or causing operational disruption. Cyber attacks also may be carried out in a manner that does not require gaining unauthorised access, such as causing denial-of-service attacks on websites (i.e., efforts to make services unavailable to intended users). Cyber security incidents affecting the Affected Persons have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, including by interference with a fund's ability to calculate its NAV; impediments to trading for a Sub-Fund's portfolio; the inability of Shareholders to transact business with the Company; violations of applicable privacy, data security or other laws; regulatory fines and penalties; reputational damage; reimbursement or other compensation or remediation costs; legal fees; or additional compliance costs. Similar adverse consequences could result from cyber security incidents affecting issuers of securities in which a Sub-Fund invests, counterparties with which a Sub-Fund engages in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial institutions and other parties. While information risk management systems and business continuity plans have been developed which are designed to reduce the risks associated with cyber security, there are inherent limitations in any cyber security risk management systems or business continuity plans, including the possibility that certain risks have not been identified.

Volcker Rule

U.S. regulators have adopted the "Volcker Rule" which imposes a number of restrictions on financial organizations like The Bank of New York Mellon Corporation and its affiliates ("BNY Mellon"), but also provides various exemptions.

The Volcker Rule excludes "foreign public funds", such as the Sub-Funds of the Company, that meet certain criteria, including, in the case of the Sub-Funds, that ownership interests in the Sub-Funds be sold predominantly to persons other than BNY Mellon and its directors and employees (the regulators expect at least 85% of each Sub-Fund to be held by non-U.S. persons who are neither affiliated with, nor directors or employees of, BNY Mellon). Therefore, to the extent BNY Mellon directors and employees invest in a Sub-Fund and/or BNY Mellon provides seed capital to a Sub-Fund, BNY Mellon will be required to take steps to raise enough fund assets through investments by third parties and/or reduce its seed capital investments so that investments by BNY Mellon, its directors and employees will constitute less than 15% of the Sub-Fund within three years of the establishment of the Sub-Fund.

If directors and employees of BNY Mellon redeem their ownership interest in a Sub-Fund and/or BNY Mellon is required to divest some or all of its seed capital investments in a Sub-Fund, it will involve sales of portfolio holdings to raise cash. Such sales entail the following risks: remaining investors may own a larger percentage of the Sub-Fund; and it may increase Sub-Fund portfolio turnover rates with corresponding increased brokerage and transfer costs and expenses and tax consequences. Details of BNY Mellon's investment in each Sub-Fund, where applicable, are available upon request.

FEES AND EXPENSES

All fees or expenses payable out of the property of the Company are set out in this section.

General

Except as mentioned below, the fees, costs and expenses relating to the authorisation and incorporation and establishment of the Company, the offer of Shares, the preparation and printing of this Prospectus and the fees of the professional advisers to the Company in connection with the offer will be borne by the ACD or other companies in its group.

Each new Sub-Fund formed may bear its own direct establishment costs.

The Company may also pay out of Scheme Property charges and expenses incurred by the Company, which will include the following expenses:

1. the fees and expenses payable to the ACD (which will include the fees and expenses payable to each Investment Manager and the Administrator) and to the Depositary;
2. broker's commission, fiscal charges (including stamp duty, SDRT and any other transfer or financial transaction tax) and other disbursements which are necessary to be incurred in effecting transactions for the Sub-Funds and normally shown in contract notes, confirmation notes and difference accounts as appropriate;
3. taxation and duties payable in respect of the property of the Sub-Funds or the issue or redemption of Shares;
4. the audit fees of the Auditors and any expenses of the Auditors;
5. the fees of the FCA together with any corresponding periodic fees of any regulatory authority in a country or territory outside the UK in which Shares in the Company are or may be marketed;
6. the Depositary will also be reimbursed out of the property of the Company expenses incurred in performing the following activities and duties:
 - (a) Delivery of stock to the Depositary or custodian;
 - (b) Custody of assets;
 - (c) Collection of income and capital;
 - (d) Submission of tax returns;
 - (e) Handling tax claims;
 - (f) Preparation of the Depositary's annual report;
 - (g) Arranging insurance;
 - (h) Calling Shareholder meetings and otherwise communicating with Shareholders;
 - (i) Dealing with distribution warrants;
 - (j) Taking professional advice;
 - (k) Conducting legal proceedings;
 - (l) Such other duties as the Depositary is permitted or required by law to perform.
7. any VAT or similar tax relating to any charge or expense.

Charges to Capital or Income

Fees, charges and expenses are allocated between capital and income as set out in Appendix I in accordance with the FCA Regulations.

Charges Payable to the ACD

In payment for carrying out its duties and responsibilities, the ACD is entitled to take an annual management charge out of each Sub-Fund, calculated on a mid-market basis. The current management charges for the current Share Classes available in the Sub-Funds are set out in Appendix I.

The annual management charge is calculated and accrued daily. Each accrual is based on the NAV of the Sub-Fund applicable for the previous day plus/minus the current day's issues/cancellations and is payable monthly in arrears on the first business day of each month. Accrual periods run to the last business day of each month, except in the case of the last month of each of the quarterly, interim and annual accounting periods when it is the last calendar day of those months. In addition, accrual periods run to the last calendar day of each month for monthly distributing funds.

In addition to the annual management charge, the ACD or companies in its group will pay, on behalf of the Company, the following ongoing registration and general expenses:

1. fees and expenses in respect of establishing and maintaining the register of Shareholders and any sub register of Shareholders (as defined in the FCA Regulations);
2. any costs incurred in or about the listing of Shares in the Company on any Stock Exchange, and the issue, conversion and cancellation of Shares;
3. any costs incurred by the Company in publishing the price of the Shares;
4. any costs incurred in producing and dispatching any payments made by the Company, or the yearly and half-yearly reports of the Company;
5. any fees, expenses or disbursements of any legal or other professional adviser of the Company;
6. any costs incurred in taking out and maintaining an insurance policy in relation to the Company;
7. any costs incurred in respect of meetings of Shareholders convened for any purpose including those convened on a requisition by Shareholders not including the ACD or an associate of the ACD and otherwise communicating with Shareholders in accordance with FCA Regulations;
8. liabilities on unitisation, amalgamation or reconstruction including certain liabilities arising after transfer of property to the Sub-Funds in consideration for the issue of Shares as more fully detailed in the FCA Regulations;
9. interest on borrowings and charges incurred in effecting or terminating those borrowings or in negotiating or varying the terms of the borrowings;
10. any expense incurred in relation to company secretarial duties including the cost of maintenance of minute books and other documentation required to be maintained by the Company;
11. any payments otherwise due by virtue of the FCA Regulations;
- and
12. any value added or similar tax relating to any charge or expense.

In return for paying or satisfying the above ongoing registration and general expenses, the ACD will collect from the Company a charge as follows:

1. in respect of the following Share Classes the current charge is 0.10% per annum:
 - Sterling Income Shares,

- Sterling Income A Shares,
 - Sterling Accumulation Shares,
 - Euro Accumulation Shares,
 - Euro Income Shares,
 - USD Accumulation Shares, and
 - USD Income Shares
2. in respect of the following Share Classes the current charge is 0.08% per annum:
- B Shares
3. in respect of the following Share Classes the current charge is 0.03% per annum:
- F Shares,
 - Institutional Shares W,
 - Institutional Shares (Accumulation),
 - Institutional Shares (Income),
 - Institutional Shares (Accumulation) Euro,
 - Institutional Shares (Income) Euro,
 - Institutional Shares (Accumulation) USD,
 - Institutional Shares (Income) USD,
 - all Exempt Shares,
 - Exempt L Shares 1,
 - U Shares,
 - X Shares,
 - X Shares 1,
 - S Shares, and
 - P Shares.

The ACD may increase these rates by giving not less than 60 days notice before the change. The charge is calculated and accrued daily and payable monthly. Such a charge provides greater transparency for investors and certainty as to the level of such costs which they will bear as well as providing for simpler administration on the part of the ACD. The actual ongoing registration and general expenses paid by the ACD (or companies in its group) on behalf of the Company may be greater or less than the above mentioned charges received by the ACD from the Company. Therefore, the ACD (or companies in its group) will bear any excess of the actual ongoing registration and general expenses above the charges received from the Company. Conversely, the ACD will be entitled to retain any amount by which the charges received from the Company exceed the actual ongoing registration and general expenses paid.

The ACD is also entitled to all reasonable, properly vouched, out of pocket expenses incurred in the performance of its duties, including stamp duty and SDRT on transactions in Shares.

Where the investment objective of a Sub-Fund is to treat the generation of income as a higher priority than capital growth, or the generation of income and capital growth have equal priority, all or part of the ACD's fee and in the respect of certain sub-funds other fees and expenses, may be charged against capital instead of against income. This will only be done with the approval of the Depositary. This treatment of the ACD's fee will increase the amount of income available for distribution to Shareholders in the Sub-Fund concerned, but may constrain capital growth. At present the ACD's annual management charge in respect of the Newton Asian Income Fund, the Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund), the Newton Global High Yield Bond Fund, the Newton Global Dynamic Bond Fund, the Newton Global Dynamic Bond Income Fund and the Newton Real Return Fund are charged to capital. Since 01 August 2009, the annual management charge of the Newton UK Equity Fund (formerly Newton Income Fund) has also been charged to capital. The ACD's annual management charge and other fees and

expenses in respect of the Newton Emerging Income Fund, Newton Multi-Asset Income Fund, Insight Equity Income Fund, Insight Equity Income Booster Fund, Newton Global Income Fund (formerly Newton Global Higher Income Fund) and Newton UK Income Fund (formerly Newton Higher Income Fund) are charged to capital.

If a Share Class's expenses in any period exceed the income the ACD may take that excess from the capital property attributable to that Share Class.

The ACD may only increase the current rate or amount of its remuneration payable out of the Scheme Property or the initial charge or the registration fee in accordance with the FCA Regulations and after the ACD has made available the Prospectus to reflect the new rate and the date of its commencement.

The ACD may only introduce a new category of remuneration for its services payable out of the Scheme Property in accordance with the FCA Regulations and after it has made available a revised prospectus to reflect the introduction and the date of its commencement.

Investment Managers' Fees

The Investment Managers' fees and expenses (plus VAT thereon where applicable) will be paid by the ACD out of its own assets.

Depositary's Fee

The Depositary receives for its own account a periodic fee which will accrue monthly on the last day in each calendar month in respect of that day and the period since the last day in the preceding month and is payable within seven days after the last day in each month. The fee is calculated by reference to the value of each Sub-Fund on the last business day of the preceding month except for the first accrual which is calculated by reference to the first valuation point of each Sub-Fund. The fee is payable out of the property attributable to each Sub-Fund. The rate of the periodic fee is agreed between the ACD and the Depositary in accordance with the FCA Regulations and is subject to a current maximum of 0.5% per cent per annum of the value of the relevant Sub-Fund. The current charge is calculated on a sliding scale for each Sub-Fund on the following basis:

1. 0.025% per annum of the first £40 million of the Scheme Property;
2. 0.015% per annum of the next £40 million of the Scheme Property;
3. 0.005% per annum of the next £420 million of the Scheme Property;
4. 0.0020% per annum of the balance of the Scheme Property.

In addition to the periodic fee referred to above, the Depositary shall also be entitled to be paid transaction and custody charges in relation to transaction handling and safekeeping of the Scheme Property. Transaction charges vary from country to country, dependent on the markets and value of the stock involved, and, where levied, currently range from £8.50 to £45 for existing Sub-Funds and for new Sub-Funds investing in emerging markets the maximum charge will be £74 per transaction. These charges accrue at the time the transactions are effected and are payable as soon as is reasonably practicable, and in any event not later than the last business day of the month when the charges arose or as otherwise agreed between the Depositary and the ACD. Custody charges again vary from country to country depending on the markets and the value of the stock involved, and, where levied currently range from 0.002% per annum to 0.35% for existing Sub-Funds. For new Sub-Funds investing in emerging markets the maximum charges will increase to 0.45% per annum. Custody charges accrue and are payable as agreed from time to time by the ACD and the Depositary.

The Depositary's current rate of remuneration, transaction charges and custody charges may only be increased in accordance with the FCA Regulations and after the ACD has made available a revised prospectus showing the new charge and its commencement date.

The Company will also pay to the Depositary out of the Scheme Property the transaction fees and bank charges as the ACD and the Depositary shall from time to time agree.

In addition to the above fee payable to the Depositary, the amount payable to the Depositary out of the property by way of remuneration for its services may include charges in connection with its duties (or the exercise of powers conferred upon it by the FCA Regulations) referable to the maintenance of distribution accounts. The current rate of such charge is £1.25 per income Shareholder per Sub-Fund and may only be increased in accordance with the FCA Regulations and after the Shareholders have been given 60 days or more written notice of the increase.

In addition to the above fee, expenses and disbursements of the Depositary arising from the following may be reimbursed to the Depositary out of the property of the scheme:

1. the collection of dividends, interest and any other income;
2. the conversion of foreign currency;
3. expenses in relation to borrowings, stock lending or other permitted transactions;
4. communications with any parties (including telex, facsimile, SWIFT and electronic mail);
5. expenses in relation to taxation matters;
6. expenses in relation to insurance matters;
7. reasonable legal costs and expenses incurred in preparing the Depositary's annual report to Shareholders. On a winding up of the Company, termination of a Sub-Fund or the redemption of all outstanding Shares of a Class, the Depositary is entitled to its pro rata fees and expenses to the date of such winding up, termination or redemption and any additional expenses necessarily realised in settling or receiving any outstanding obligations.

Subject to current revenue law and practice, VAT at the prevailing rate may be payable in addition to the Depositary's remuneration and these expenses.

In addition to the above fee, the Depositary will also be entitled to payment and reimbursement of all costs, liabilities and expenses properly incurred in the performance of, or arranging the performance of, functions conferred on it by the Instrument, the FCA Regulations or by the general law.

Allocation of Fees and Expenses between Sub-Funds

All the above fees, duties and charges (other than those borne by the ACD) will be charged to the Sub-Fund in respect of which they were incurred but where an expense is not considered to be attributable to any one Sub-Fund, the expense will normally be allocated to all Sub-Funds pro-rata to the value of the Net Assets of the Sub-Funds, although the ACD has discretion to allocate these fees and expenses in a manner which it considers fair to Shareholders generally.

SHAREHOLDER MEETINGS AND VOTING RIGHTS

Requisitions of Meetings

The ACD or the Depositary may requisition a general meeting at any time. However, the Company has dispensed with the requirement to hold annual general meetings.

Shareholders may also requisition a general meeting of the Company. A requisition by Shareholders must state the objects of the meeting, be dated, be signed by Shareholders who, at the date of the requisition, are registered as holding not less than one-tenth in value of all Shares then in issue and the requisition must be deposited at the head office of the Company. The ACD or the Depositary must convene a general meeting no later than eight weeks after receipt of the requisition.

Notice of Quorum

Shareholders will receive at least 14 days' notice of a Shareholders' meeting and are entitled to be counted in the quorum and vote at such meeting either in person or by proxy. The quorum for a meeting is two Shareholders, present in person or by proxy at the meeting. The quorum for an adjourned meeting is one Shareholder entitled to be counted in a quorum present in person or by proxy. Notices of meetings and adjourned meetings will be sent to Shareholders at their registered addresses.

Voting Rights

At a meeting of Shareholders, on a show of hands every Shareholder who (being an individual) is present in person or (being a corporation) is present by its representative properly authorised in that regard, has one vote.

On a poll vote, a Shareholder may vote either in person or by proxy. The voting rights attaching to each Share are the proportion of the voting rights attached to all the Shares in issue that the price of the Share bears to the aggregate price(s) of all the Shares in issue at the date seven days before the notice of meeting is sent out. In the case of joint Shareholders, only the vote of the first named in the register of Shareholders can be taken.

A Shareholder entitled to more than one vote need not, if he votes, use all his votes or cast all the votes he uses in the same way.

Except where the FCA Regulations or the Instrument require an extraordinary resolution (which needs 75% of the votes cast at the meeting to be in favour if the resolution is to be passed), any resolution required by the FCA Regulations will be passed by a simple majority of the votes validly cast for and against the resolution.

The ACD may not be counted in the quorum for a meeting and neither the ACD nor any associate (as defined in the FCA Regulations) of the ACD is entitled to vote at any meeting of the Company except in respect of Shares which the ACD or associate holds on behalf of or jointly with a person who, if the registered Shareholder, would be entitled to vote and from whom the ACD or associate has received voting instructions.

"Shareholders" in this context means shareholders on the relevant Sub-Fund register(s) on the date seven days before the notice of the relevant meeting was deemed to have been served but excludes holders who are known to the ACD not to be Shareholders at the time of the meeting.

Class and Sub-Fund Meetings

The above provisions, unless the context otherwise requires, apply to Class meetings and meetings of Sub-Funds as they apply to general meetings of Shareholders.

Variation of Class Rights

The rights attached to a Class or Sub-Fund may not be varied without the sanction of a resolution passed at a meeting of Shareholders of that Class or Sub-Fund by a seventy-five per cent majority of those votes validly cast for and against the resolution.

The information below is a general guide based on current UK law and HM Revenue & Customs practice, both of which are subject to change. It summarises the tax position of the Sub-Funds and of investors who are UK resident and hold Shares as investments (except where otherwise indicated).

Prospective investors who are in any doubt about their tax position, or who may be subject to tax in a country other than the UK, are recommended to take professional advice.

The Sub-Funds

Each Sub-Fund will be treated as a separate entity for UK tax purposes.

The Sub-Funds are generally exempt from UK tax on capital gains realised on the disposal of investments (including interest-paying securities and derivatives but excluding non-reporting offshore funds) held within them.

Dividends from both UK and non-UK companies are generally exempt from tax when received by a Sub-Fund. The Sub-Funds will each be subject to corporation tax at 20% on most other types of income but after deducting allowable management expenses and the gross amount of any interest distributions. Where a Sub-Fund suffers foreign tax on income received, this will generally be a cost to the Sub-Fund but in some cases may be deducted from the UK tax due on that income.

The Sub-Funds will make dividend distributions except where over 60% of a Sub-Fund's property has been invested throughout the distribution period in interest-paying investments, in which case it will make interest distributions.

Shareholders

■ Income - Equity Sub-Funds

The Sub-Funds shown as Equity Sub-Funds for tax purposes in Appendix I will pay any distributable income as dividend distributions (which will be automatically retained in the Sub-Fund in the case of accumulation Shares).

The notional 10% tax credit that has historically been attached to all UK dividends has been abolished with effect from 6 April 2016. For dividends declared from that date onwards all individual taxpayers will have an annual tax-free allowance of £5,000. Dividend income in excess of this amount will be taxed at tiered rates depending on the investor's other taxable income, that is, 7.5% for basic rate taxpayers, 32.5% for higher rate taxpayers and 38.1% for additional rate taxpayers. Corporate Shareholders who receive dividend distributions may have to divide them into two (in which case the division will be indicated on the tax voucher). Any part representing (broadly) income exempt from corporation tax will be treated as dividend income (that is, franked investment income) and no further tax will be due on it. The remainder will be received as an annual payment after deduction of income tax at the basic rate, and corporate Shareholders may, depending on their circumstances, be liable to tax on the grossed up amount.

■ Income - Bond Sub-Funds

The Sub-Funds shown as Bond Sub-Funds for tax purposes in Appendix I will pay any distributable income as interest distributions (which will be automatically retained in the Sub-Fund in the case of accumulation Shares).

Interest distributions are made after basic rate income tax has been deducted to be paid to HM Revenue & Customs (except as described below). A tax voucher showing the total interest distribution before the deduction of tax (gross interest), and where relevant the tax deducted and the amount of the interest distribution after tax has been deducted (net interest) will be supplied to Shareholders.

For UK resident individual Shareholders, the tax deducted will satisfy in full the tax liability on the interest of Shareholders subject to basic rate income tax. For Shareholders who are starting rate income tax payers part of the tax deducted will satisfy their tax liability and part may be reclaimed from HM Revenue & Customs. Shareholders who are higher rate tax payers will have to pay further income tax (equivalent to 25% of their net receipt) and additional rate tax payers will also have to pay further tax (equivalent to 31.25% of their net receipt). Non-taxpayers may reclaim the tax deducted from HM Revenue & Customs. Where Shares are held through ISAs, the ISA manager may reclaim any tax deducted. Finance Act 2016 introduced a personal savings allowance for interest received by individuals on or after 6 April 2016. The allowance is £1,000 for basic rate taxpayers, £500 for higher rate taxpayers and nil for additional rate taxpayers. Savings income covered by the allowance attracts a zero rate of income tax and the allowance operates in conjunction with the starting rate, rather than replacing it. Individuals may reclaim tax deducted on savings income that is below the allowance.

Shareholders subject to UK corporation tax may, depending on their circumstances, be liable to tax on the gross interest in which case they will receive credit for any income tax deducted, or they may reclaim any deducted.

The ACD may pay or accumulate interest distributions without deducting income tax from them in the case of certain types of investor. These include companies, ISA managers, Shareholders who are not ordinarily resident in the UK, pension funds and charities. Any eligible investor who wishes to benefit from this should contact the ACD who will provide an appropriate form to be completed and returned to it.

Non-UK resident Shareholders may be entitled to a refund from HM Revenue & Customs of the tax deducted from their interest distributions (or a proportion of it). This will depend on their personal circumstances and the terms of any double taxation agreement between their country of residence and the UK.

Following the introduction of the personal savings allowance (as outlined above), the UK government has announced that authorised funds will no longer be required to deduct tax from interest distributions with effect from 6 April 2017. Shareholders will be responsible for accounting to HMRC for any tax on distributions received or accumulated in circumstances where they receive interest in excess of any personal savings allowance.

Appendix I highlights those Bond Sub-Fund Classes in respect of which tax will continue to be deducted from interest distributions made between the date of this Prospectus and 6 April 2017.

Income Equalisation

The first income allocation received by an investor after buying Shares may include an amount of income equalisation. This is effectively a repayment of the income equalisation paid by the investor as part of the purchase price. It is a return of capital, and is not taxable. This amount should be deducted from the cost of the Shares when calculating the gain for capital gains tax purposes.

Gains

Shareholders who are resident in the UK for tax purposes may, depending on their personal circumstances, be liable to capital gains tax on gains arising on the sale or other disposal of Shares (but not on switches between Classes within a Sub-Fund).

Corporate Shareholders in the Bond Sub-Funds which are subject to corporation tax must treat their shareholding as a creditor relationship subject to fair value accounting.

Part of any increase in value of accumulation Shares represents accumulated income (including income equalisation). These amounts may be added to the allowable cost when calculating the capital gain realised on their disposal.

Individual Shareholders will find further information in the HM Revenue & Customs Help Sheets for the capital gains tax pages of their tax returns.

Stamp Duty Reserve Tax and Other Transfer or Financial Transaction Tax

An SDRT liability will arise on Sub-Funds which invest in assets liable to SDRT (e.g. UK shares, calculated at 0.50%). An increasing number of jurisdictions are introducing transfer or financial transaction taxes.

Foreign Account Tax Compliance Act and Other Reporting Obligations

The Hiring Incentives to Restore Employment Act was signed into US law in March 2010. It includes provisions generally known as FATCA and regulations implementing these provisions were issued in January 2013. The intention of these is that details of US investors (which are defined in a similar but not the same way as US Persons) holding assets outside the US will be reported by financial institutions to the US Internal Revenue Service ("IRS"), as a safeguard against US tax evasion. To discourage non-US financial institutions from staying outside this regime, US securities held by any financial institution that does not register with the IRS and comply with the regime will be subject to a US withholding tax of 30% on gross sales proceeds and income. The regime is being phased in from 1 July 2014.

The UK has entered into an intergovernmental agreement (the "IGA") with the US. Under the IGA, UK financial institutions are required to report this information to HM Revenue & Customs ("HMRC") and HMRC will then forward this information to the IRS. Foreign financial institutions ("FFIs") which are resident in the UK will not be required to enter into an FFI agreement with the IRS or withhold on payments to non-participating FFIs, provided that they comply with the UK's regulations implementing the UK's IGA.

The Company is registered as a 'Reporting UK Financial Institution', and intends to comply with the IGA. In order to comply with the IGA, the Company must obtain information in respect of all Shareholders so as to be able to identify accounts held by US investors and report information to HMRC. The UK's IGA requires Shareholders to provide information to the Company that they may not have previously provided. The Company, the ACD and/or the Administrator may also request further information or clarification from Shareholders for the above purposes.

FATCA has been subject to changes and there may still be further changes to it. Shareholders who are concerned about FATCA should consult their own tax advisors as to its potential impact on them.

Shareholders should be aware that a number of other jurisdictions are introducing information reporting requirements similar to FATCA, with the result that the Company may be required to request information from them and provide it to HMRC (or other relevant fiscal authorities).

Common Reporting Standards

The Common Reporting Standard for Automatic Exchange of Financial Information ("CRS") was developed by the Organisation for Economic Co-Operation and Development ("OECD") to counter tax evasion by means of exchange of information. It builds upon the information sharing achieved through the recently repealed EU Savings Directive (2003/48/EC) and draws extensively on the intergovernmental approach used to implement FATCA. The United Kingdom and over 90 other jurisdictions will enter into multilateral arrangements modelled on CRS, which will apply in the United Kingdom with an effective date of 1 January 2016.

The United Kingdom is among a group of countries which have committed to the early adoption of CRS, with the first data exchange to take place in September 2017.

The Company will be obliged to determine the tax resident status of all existing Shareholders in order to identify which Shareholders are reportable pursuant to CRS. All Shareholders subscribing to the Company after 1 January, 2016 will be required to certify their tax residency status in the application form.

The Company will then be required to provide certain information to HMRC about Shareholders resident or established in the jurisdictions which are party to such arrangements. HMRC will then pass this information to the tax authorities of the relevant jurisdiction.

There is no requirement to withhold tax under CRS.

WINDING UP OF THE COMPANY OR A SUB-FUND OF THE COMPANY

The Company shall not be wound up except as an unregistered company under Part V of the Insolvency Act 1986 or under the FCA Regulations. A Sub-Fund must not be terminated except under the FCA Regulations or wound up except under Part V of the Insolvency Act 1986 as an unregistered company.

Where the Company is wound up or a Sub-Fund terminated under the FCA Regulations, the winding up or termination may only be commenced following approval by the FCA. The FCA may only give its approval if the ACD provides a statement (following an investigation into the affairs of the Company) either that the Company or the Sub-Fund will be able to meet its liabilities within 12 months of the date of the statement, or that the Company will be unable to do so. The Company or the Sub-Fund may not be wound up under the FCA Regulations if there is a vacancy in the position of ACD at the relevant time.

The Company may be wound up or a Sub-Fund may be terminated under the FCA Regulations if:

1. an extraordinary resolution to that effect is passed by Shareholders;
or
2. the period (if any) fixed for the duration of the Company or a particular Sub-Fund by the Instrument expires, or the event (if any) occurs on the occurrence of which the Instrument provides that the Company or a particular Sub-Fund is to be wound up or terminated (for example, if the Share capital of the Company is below its prescribed minimum or (in relation to any Sub-Fund) the Net Asset Value of the Sub-Fund is less than £10 million, or if a change in the laws or regulations of any country means that, in the ACD's opinion, it is desirable to terminate the Sub-Fund);
3. on the date of effect stated in any agreement by the FCA to a request by the ACD for the winding up of the Company or the termination of the Sub-Fund;
4. on the effective date of a duly approved scheme of arrangement which is to result in the Company ceasing to hold any Scheme Property;
5. in the case of a Sub-Fund, on the effective date of a duly approved scheme of arrangement which is to result in the Sub-Fund ceasing to hold any Scheme Property;
or
6. on the date when all the Sub-Funds fall within paragraph 5 above or have otherwise ceased to hold any Scheme Property, notwithstanding that the Company may have assets and liabilities that are not attributable to any particular Sub-Fund.

On the occurrence of any of the above:

1. COLL 6.2 (Dealing), COLL 6.3 (Valuation and Pricing) and COLL 5 (Investment and Borrowing Powers) will cease to apply to the Company or the relevant Sub-Fund;
2. except in respect of the final cancellation, the Company will cease to issue and cancel Shares in the Company or the Sub-Fund and the ACD shall cease to sell or redeem Shares or arrange for the Company to issue or cancel them for the Company or the Sub-Fund;
3. no transfer of a Share shall be registered and no other change to the register shall be made without the sanction of the ACD;

4. where the Company is being wound up, the Company shall cease to carry on its business except in so far as it is beneficial for the winding up of the Company;
and
5. the corporate status and powers of the Company and, subject to paragraphs 1 and 4 above, the powers of the ACD shall remain until the Company is dissolved.

The ACD shall, as soon as practicable after winding up of the Company or termination of the Sub-Fund has commenced, realise the assets and meet the liabilities of the Company or the Sub-Fund and, after paying out or retaining adequate provision for all liabilities properly payable and retaining provision for the costs of winding up, arrange for the Depositary to make one or more interim distributions out of the proceeds to Shareholders proportionately to their rights to participate in the Scheme Property of the Company or the Sub-Fund. When the ACD has caused all of the Scheme Property to be realised and all of the liabilities of the Company or the Sub-Fund to be realised, the ACD shall arrange for the Depositary to also make a final distribution to Shareholders on or prior to the date on which the final account is sent to Shareholders of any balance remaining in proportion to their holdings in the Company or the Sub-Fund.

As soon as reasonably practicable after completion of the winding up of the Company or the termination of the Sub-Fund, the ACD shall notify the FCA that it has done so.

On completion of a winding up of the Company, the Company will be dissolved and any money (including unclaimed distributions) standing to the account of the Company, will be paid into court within one month of dissolution.

Following the completion of the winding up of the Company, or the termination of the Sub-Fund, the Depositary shall notify the FCA that it has done so.

Following the completion of the winding up of the Company, or the termination of a Sub-Fund, the ACD must prepare a final account showing how the winding up took place and how the Scheme Property was distributed. The auditors of the Company shall make a report in respect of the final account stating their opinion as to whether the final account has been properly prepared. This final account and the auditors' report must be sent to the FCA and to each Shareholder.

GENERAL INFORMATION

Accounting Periods

The annual accounting period of the Company ends each year on 30 June. The interim accounting period ends each year on 31 December.

Income Allocations

Allocations of income are made in respect of the income available for allocation in each accounting period.

Distributions of income for each Sub-Fund are paid on or before the annual income allocation date and, in the case of certain Sub-Funds, on or before the interim income allocation date(s). The relevant annual and interim income allocation dates are shown in Appendix I.

A reinvestment facility is available. If a distribution remains unclaimed for a period of six years after it has become due, it will be forfeited and will revert to the Company.

The amount available for distribution in any accounting period is calculated by taking the aggregate of the income received or receivable for the account of the relevant Sub-Fund in respect of that period, and deducting the charges and expenses of the relevant Sub-Fund paid or payable out of income in respect of that accounting period. The ACD then makes any other adjustments as it considers appropriate (and after consulting the auditors as appropriate) in relation to taxation, income equalisation, income unlikely to be received within 12 months following the relevant income allocation date, income which should not be accounted for on an accrual basis because of lack of information as to how it accrues, transfers between the income and capital account and any other adjustments (including for amortisation) which the ACD considers appropriate after consulting the auditors.

Annual Reports

The annual reports of the Company will be published within four months of each annual accounting period and half-yearly reports will be published within two months of each interim accounting period. The long form annual and half yearly reports will be made available to investors on request. The short form annual and half yearly reports will be sent to investors within four months of the interim and annual accounting period.

Documents of the Company

The following documents may be inspected free of charge between 9.00 a.m. and 5.00 p.m. (UK time) every business day at the registered offices of the ACD at BNY Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA:

- the most recent annual and half-yearly long and short reports of the Company;
- the Prospectus;
- the Instrument; and
- the material contracts referred to below.

Shareholders may obtain copies of the above documents from the ACD. The ACD may make a charge at its discretion for copies of these documents (apart from the most recent annual and half yearly long and short reports of the Company, the Prospectus and the Instrument which are available free of charge).

Material Contracts

The following contracts, not being contracts entered into in the ordinary course of business, have been entered into by the Company and are, or may be, material:

1. the ACD Agreement dated 16 June 1999 between the Company and the ACD;
2. the Depositary Agreement dated 7 February 2003 between the Company, the Depositary and the ACD and novated in favour of the Depositary with effect from 17 October 2011 and as amended from time to time;
3. the Investment Management Agreement dated 16 June 1999 between the Company, the ACD and Newton, as amended from time to time;
4. the Investment Management Agreement dated 27 August 2007 between the Company, the ACD and Walter Scott;
5. the Investment Management Agreement dated 30 January 2012 between the Company, the ACD and The Boston Company Asset Management LLC; and
6. the Investment Management Agreement dated 9 February 2013 between the Company, the ACD and Insight.

Details of the above contracts are given in the section "Management and Administration" starting on page 15.

Best Execution

The ACD's best execution policy sets out the basis upon which the ACD will effect transactions and place orders for the Company while complying with its obligations under the FCA Regulations to obtain the best possible result for the Company. Details of the best execution policy are available from the ACD on written request.

Strategy for the Exercise of Voting Rights

The ACD has a strategy for determining when and how voting rights attached to ownership of Scheme Property are to be exercised for the benefit of the Company. A summary of this strategy is available from the ACD on written request. Further details of the actions taken on the basis of this strategy for the Company are also available from the ACD on written request.

Conflicts of Interest

The ACD, the Investment Managers and other companies within the ACD's and/or the Investment Managers' groups may, from time to time, act as investment manager or advisers to other funds which follow similar investment objectives to those of the relevant Sub-Fund. On occasion the Investment Managers may also act as investment adviser or discretionary investment adviser to clients who invest in Sub-Funds of the Company such that a significant proportion of a Sub-Fund's Shares in issue may be owned by advisory and/or discretionary management client(s) of the investment adviser. It is therefore possible that the ACD and/or the Investment Managers may in the course of their business have potential conflicts of interest with the Company, or that a conflict exists between the Company and other funds managed or other client assets advised by the ACD or Investment Managers respectively. Each of the ACD and the Investment Managers will, however, have regard in such event to its obligations under the ACD Agreement and the Investment Management Agreement

respectively and, in particular, to its obligation to act in the best interests of the Company so far as practicable, having regard to its obligations to other clients, when undertaking any investment business where potential conflicts of interest may arise. Where a conflict of interest cannot be avoided, the ACD and the Investment Managers will seek to ensure that the Company and other collective investment schemes it manages are fairly treated.

The ACD acknowledges that there may be some situations where the organisational or administrative arrangements in place for the management of conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of the Company or its Shareholders will be prevented. Should any such situations arise the ACD will disclose these to Shareholders in the report and accounts or other appropriate format.

Inducements

■ Financial Intermediary Commission:

For investors in the Company that purchase Shares through a broker or other financial intermediary, please note that the ACD, the Investment Managers and/or their respective related companies may pay such intermediary initial and renewal commission for the sale of the Shares and related services at their discretion. These charges are paid by the ACD, Investment Managers or their respective related companies out of their own charges and do not result in any additional charges to the Company.

■ Dealing Arrangements and Inducements:

The Investment Managers use dealing commission that they pay to brokers to cover costs relating to the execution of trades on behalf of the Company, and, in the case of bundled commission, to purchase research services from brokers or third parties. The Investment Managers consider this use of commission to be beneficial to the Company and its Shareholders, as it enables them to obtain valuable research and execution services in a cost effective manner.

In many cases, the research services will be provided by the broker and the Investment Managers will include payment for the research services alongside the execution cost in their commission payment to the broker. In other cases the research services will be provided by a third party, in which case the cost of the services will be met by requesting a broker to pay the third party a portion of the commission that the broker has received, being an amount over and above what was justified by the broker's own services.

The Investment Managers currently receive the following goods and services under their dealing arrangements in accordance with FCA guidance:

1. goods and services relating to the execution of trades:
 - market information services (excluding data feeds);
2. goods and services relating to the provision of research:
 - research from third party information providers;
 - broker led research;
 - and
 - non-broker led research.

Disclosures

The ACD will make those disclosures to the Company regarding inducements as are required under the FCA Regulations.

Class Action Litigation

From time to time the ACD is asked to consider participation in litigation relevant to the Sub-Funds. Typically that litigation takes the form of proposed or actual class, group or collective litigation (referred to generally as class actions) where eligible investors are either invited to "opt-in" to litigation or "opt-out" (i.e. to choose not to participate). In respect of opt-out class actions, eligible investors automatically comprise the class and are eligible to participate in any successful judgment or settlement unless they actively elect to opt-out. In respect of opt-in class actions, eligible investors are required to actively opt-in to the class action in order to comprise the class and participate in any successful judgment or settlement. The ACD has delegated responsibility for considering participation in both opt-in and opt-out class action litigation to the Class Actions Committee (the "Committee") pursuant to the terms of a Class Actions Policy (the "Policy"). The Policy provides that the default position in respect of opt-out class actions is that a Sub-Fund will not opt-out of such class actions, save in the event that there are considered to be compelling reasons, determined in the Committee's sole discretion, for doing so. That is primarily because participation in opt-out class actions rarely gives rise to any risk or cost to a Sub-Fund. As regards opt-in class actions, however, participation in such litigation is rarely cost, risk and obligation free and, in fact, such costs, risks and obligations can be significant. On that basis, a Sub-Fund will not opt-in to such class actions save in the event that there are considered to be compelling reasons, determined in the Committee's sole discretion, for doing so. In the event that the Committee determines that there are compelling reasons for opting-out of an opt-out class action, or opting-in to an opt-in class action, it would expect to consult with legal advisors, the Depositary, the relevant Investment Manager and any other relevant service providers before any action is taken by a Sub-Fund. The costs in doing so will ordinarily be for the account of the relevant Sub-Fund. In the event that a Sub-Fund participates in a class action which is ultimately successful, any financial award received from that action shall be to the benefit of the Sub-Fund as a whole, as opposed to any particular type of investor. It is possible, therefore, that those investors who were invested in the relevant Sub-Fund at the time that the underlying cause of action in the claim arose, or when the relevant Sub-Fund incurred costs relating to participation in the class action, do not ultimately benefit from the award in the class action; for example, if they have redeemed prior to the date of receipt of the award.

Complaints

Complaints concerning the operation or marketing of the Company may be referred to BNY Mellon Fund Managers Limited, Client Service Centre, PO Box 366, Darlington, DL1 9RF or, if preferred, direct to the Financial Ombudsman Service, Exchange Tower, London, E14 9SR.

Risk Management

A statement on the methods used for risk management in connection with the Sub-Funds and the quantitative limits used together with the current risk yields of the main categories of investment is available from the ACD on request.

Past Performance Details

Details of the past performance of the Sub-Funds of the Company are contained in Appendix V.

APPENDIX I

Sub-Fund Details

Investment of the assets of each of the Sub Funds must comply with the FCA Regulations and its own investment objective and policy. The Company is a UCITS scheme and each Sub-Fund would be classified as a UCITS scheme if separately authorised. Details of each Sub-Fund's investment objective and policy are set out in this Appendix I together with information regarding available Share Classes, charges, minimum investment levels and distribution dates. A detailed statement of the investment and borrowing restrictions applicable to the Company is set out in Appendix II. The additional eligible securities and derivatives markets on which the Sub-Funds may invest are contained in Appendix III and Appendix IV respectively. Appendix V contains the past performance details for each Sub-Fund.

BNY Mellon Long-Term Global Equity Fund

Investment Manager:	Walter Scott & Partners Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve long-term capital appreciation through investments in predominantly equity securities of companies located throughout the world.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company) and warrants.</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>As at the date of this Prospectus the Sub-Fund does not use TRS. However, the ACD reserves the right to permit the Sub-Fund to enter into such arrangements in the future.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£150,000,000	As agreed	As Agreed	None**	N/A	0%	0.60%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£500,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Corporate Bond Fund ***

(formerly Newton Corporate Bond Fund)

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to generate a total return (being a combination of income and capital growth).</p> <p>The policy of the Sub-Fund is to aim to achieve the objective principally through investment in Sterling denominated (or hedged back to Sterling) investment grade corporate bond securities and asset backed securities and other debt instruments. Investment may be in both fixed and variable rate debt instruments.</p> <p>The Sub-Fund may also invest in sub-investment grade corporate bond and other fixed income securities, collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), cash and near cash, other transferable securities, money market instruments (including deposits and loans) and derivatives.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Value at Risk (relative VaR) (Please see Paragraphs 35 and 36 of Appendix II for further details).
Reference Portfolio	Markit iBoxx GBP Collateralized & Corporate Index
Maximum level of leverage (%) based on Sum of Notionals approach (which is the sum of the absolute notional value of each derivative position)	The level of leverage is not expected to exceed 350% of the Net Asset Value of the Sub-Fund. (Please see Paragraph 36 of Appendix II for further details). Whilst the ACD does not expect the level of leverage to exceed this level, levels of leverage may vary and may exceed this maximum level under certain circumstances (e.g. very low market liquidity).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Equity Income Fund

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to provide an above average and increasing income, together with long term capital growth.</p> <p>The policy of the Sub-Fund is to invest primarily in the shares of UK listed companies.</p> <p>The Sub-Fund may also invest in other transferable securities, collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), cash and near cash, deposits and money market instruments.</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Equity Income Booster Fund

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to provide an enhanced level of income with potential for capital growth. The policy of the Sub-Fund is to invest primarily in UK listed equity and equity related securities.</p> <p>In addition the Sub-Fund will employ derivatives strategies for efficient portfolio management purposes only. Specifically, the Sub-Fund will utilise a derivatives strategy designed to generate additional income.</p> <p>The Sub-Fund may also invest in other transferable securities (including those listed outside of the UK), collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), cash and near cash, deposits and money market instruments.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 July
Interim income allocation date(s):	The second last business day of each month

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Global Absolute Return Fund

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to deliver positive returns on an annual basis with the prospect of attractive long-term capital growth.</p> <p>The Sub-Fund aims to deliver cash (3 month GBP LIBOR) +4% on a rolling annualised 5 year basis before fees. However, a positive return is not guaranteed and a capital loss may occur.</p> <p>The policy of the Sub-Fund is to gain exposure through a dynamic allocation to a range of asset classes including: fixed income, cash, near cash and deposits, equities, property, commodities and infrastructure. Exposure to these will be achieved through investment in collective investment schemes, transferable securities, money market instruments, deposits and derivatives. Investment in property, commodities and infrastructure will be indirect. The Sub-Fund may also use collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company) to gain exposure to absolute return strategies and may use derivatives to obtain long and short exposures.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Value at Risk (absolute VaR) (Please see Paragraphs 35 and 36 of Appendix II for further details).
Maximum level of leverage (%) based on Sum of Notionals approach (which is the sum of the absolute notional value of each derivative position)	The level of leverage is not expected to exceed 600% of the Net Asset Value of the Sub-Fund. (Please see Paragraph 36 of Appendix II for further details). Whilst the ACD does not expect the level of leverage to exceed this level, levels of leverage may vary and may exceed this maximum level under certain circumstances (e.g. very low market liquidity).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Global Multi-Strategy Fund

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth.</p> <p>The policy of the Sub-Fund is to gain exposure through a dynamic asset allocation to a range of asset classes including: fixed income, cash, near cash and deposits, equities, property, commodities and infrastructure. Exposure to these asset classes will be achieved through investment in collective investment schemes, transferable securities, money market instruments, deposits and derivatives. Investment in property, commodities and infrastructure will be indirect. The Sub-Fund may invest in any geographic or economic sectors of the world. The Sub-Fund may also use collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company) to gain exposure to absolute return strategies and may use derivatives to obtain long and short exposures.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Value at Risk (absolute VaR) (Please see Paragraphs 35 and 36 of Appendix II for further details).
Maximum level of leverage (%) based on Sum of Notionals approach (which is the sum of the absolute notional value of each derivative position)	The level of leverage is not expected to exceed 600% of the Net Asset Value of the Sub-Fund. (Please see Paragraph 36 of Appendix II for further details). Whilst the ACD does not expect the level of leverage to exceed this level, levels of leverage may vary and may exceed this maximum level under certain circumstances (e.g. very low market liquidity).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
S Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	Yes, £50	0%	1.00%
S Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	Yes, £50	0%	1.00%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Global Select Bond Fund ***

(formerly Insight Strategic Bond Fund)

(Not available for investment, this Sub-Fund is being terminated)

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve a total return.</p> <p>The policy of the Sub-Fund is to invest principally in any one or a combination of the following: corporate bonds; government bonds; asset backed securities; other debt instruments; and derivatives relating to these securities. Investment may be in both fixed and variable rate debt instruments and investment may include sub-investment grade securities.</p> <p>The Sub-Fund may also invest in other transferable securities as well as collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), deposits, cash and near cash, money market instruments and other derivatives.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.65%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.65%
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Insight Inflation-Linked Corporate Bond Fund ***

Investment Manager:	Insight Investment Management (Global) Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to generate attractive returns relative to UK inflation levels over the medium to long term.</p> <p>The policy of the Sub-Fund is to invest primarily in inflation-linked corporate bonds and/or the following other assets which in combination provide the investment characteristics of inflation-linked corporate bonds: corporate bonds; government and public securities; other debt securities; and derivatives (including inflation and credit derivatives).</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), deposits, cash and near cash, other transferable securities, money market instruments and other derivatives.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 30% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 20% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Value at Risk (absolute VaR) (Please see Paragraphs 35 and 36 of Appendix II for further details).
Maximum level of leverage (%) based on Sum of Notionals approach (which is the sum of the absolute notional value of each derivative position)	The level of leverage is not expected to exceed 350% of the Net Asset Value of the Sub-Fund. (Please see Paragraph 36 of Appendix II for further details). Whilst the ACD does not expect the level of leverage to exceed this level, levels of leverage may vary and may exceed this maximum level under certain circumstances (e.g. very low market liquidity).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.10%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.10%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.35%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton 50/50 Global Equity Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub Fund is to invest in a broad spread of UK and international securities to achieve income and capital growth over the longer term.</p> <p>The Sub-Fund will be managed to a benchmark of approximately 50% UK equities and 50% international equities.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	30 September
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.60%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Asian Income Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve income together with long-term capital growth predominantly through investments in securities in the Asia Pacific ex. Japan (including Australia and New Zealand) region.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	1, 7-9, , 11-13, 21, 23, 25, 27, 29, 32, 33
Invest in additional eligible derivatives markets in Appendix IV	6, 7-9, 13
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
P Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	0%	1.00%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	1.50%
Euro Income Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	1.50%
Institutional Shares (Accumulation) Euro	EUR	€250,000	€50,000	€250,000	None**	N/A	0%	1.00%
Institutional Shares (Income) Euro	EUR	€250,000	€50,000	€250,000	None**	N/A	0%	1.00%
USD Accumulation Shares	USD	\$5,000	\$1,000	\$5,000	None**	N/A	0%	1.50%
USD Income Shares	USD	\$5,000	\$1,000	\$5,000	None**	N/A	0%	1.50%
Institutional Shares (Accumulation) USD	USD	\$250,000	\$50,000	\$250,000	None**	N/A	0%	1.00%
Institutional Shares (Income) USD	USD	\$250,000	\$50,000	\$250,000	None**	N/A	0%	1.00%

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
X Shares (Accumulation) USD	USD	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
Institutional Shares W (Accumulation) USD	USD	\$10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income) USD	USD	\$10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Continental European Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth from a portfolio of predominantly European securities.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	31, 34
Invest in additional eligible derivatives markets in Appendix IV	None
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	2.00%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Emerging Income Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve income together with long-term capital growth predominantly through investments in a diversified portfolio of securities in global emerging markets.</p> <p>The Sub-Fund may from time to time hold a concentrated portfolio because of its investments in a limited number of securities. The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	1, 2, 7-9, 11-13, 20, 21, 23, 24, 27, 29, 30, 32, 33, 37, 39-50
Invest in additional eligible derivatives markets in Appendix IV	6, 10, 13, 17-27
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Balanced Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise returns by investing predominantly in a worldwide portfolio of equities and fixed interest securities.</p> <p>The Sub-Fund may also invest in derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	30 September
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.45%
Exempt Shares 1 (Income)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.45%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.60%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Dynamic Bond Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise the total return from income and capital growth from a globally diversified portfolio of predominantly higher yielding corporate and government fixed interest securities. The Sub-Fund is managed to seek a minimum return of cash (1 month GBP LIBOR) + 2% per annum over 5 years before fees. In so doing we aim to achieve a positive return on a rolling 3 year basis. However, a positive return is not guaranteed and a capital loss may occur.</p> <p>The Sub-Fund may also invest in deposits, derivative instruments, forward transactions, approved money market instruments and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	30 November, 28 February, 31 May

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.40%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.40%
X Shares 1 (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares 1 (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Dynamic Bond Income Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to provide income from a global portfolio of fixed interest securities.</p> <p>The investment policy of the Sub-Fund is to gain exposure, through a flexible allocation, to a broad range of primarily fixed interest securities. The Sub-Fund also has the flexibility to invest in currencies, cash, near cash and deposits, warrants, property, commodities and approved money market instruments. Exposure to these asset classes is expected to be achieved through investment in a combination of transferable securities, collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company) and derivatives. To the extent the Sub-Fund gains exposure to property or commodities, such exposure may be through exchange listed securities and/or collective investment schemes.</p> <p>The Sub-Fund may invest in any geographic or economic sector, including emerging markets. The Sub-Fund may invest in fixed income securities which are rated below investment grade (BBB-) as rated by Standard & Poor's (or equivalent recognised rating agency).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management. The Sub-Fund could invest a significant portion of the portfolio in cash/cash-like securities during extreme market conditions.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Securities Financing Transactions Regulation disclosures	<p>The extent of Securities Financing Transactions for this Sub-Fund is limited to that of lending of securities within the portfolio. A further explanation of the Company's Stock Lending arrangements is detailed in sections 47 & 48 of Appendix II of this Prospectus.</p> <p>The expected usage of SFT's for this Sub-Fund will not exceed 15% of the assets under management.</p>
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 July
Interim income allocation date(s):	The second last business day of each month

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.40%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.40%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	As agreed	0.50%

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	As agreed	0.50%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Emerging Markets Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve long term capital growth.</p> <p>The investment policy of the Sub-Fund is to invest predominantly in equity and equity related securities (these may include, but are not limited to, ETFs, REITs, P Notes and convertible bonds).</p> <p>The Sub-Fund will invest predominantly in companies listed, traded, located or deriving at least half of their revenue or income from emerging market countries across the world.</p> <p>The Sub-Fund may also invest in other transferable securities, collective investment schemes (including, but not limited to another Sub-Fund or Sub-Funds of the Company), money market instruments, cash, near cash and deposits.</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Meaning of "emerging market countries"	The Manager currently defines emerging market countries as those countries that are included in the MSCI Emerging Markets and Frontier indices.
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	1, 3, 4-9, 13-22, 23, 24, 25, 26-27
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.60%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.60%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Equity Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth from a portfolio of international securities.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	0%	0.60%
Exempt Shares 3 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	2.00%
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global High Yield Bond Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve a high yield from a globally diversified portfolio which may include but is not limited to fixed interest bonds and other debt instruments (such as floating rate notes and index-linked notes).</p> <p>The Sub-Fund may also invest in deposits, derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company). At least 80% of the Sub-Fund's assets should be in Sterling denominated assets or hedged back to Sterling.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	17-27
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 July
Interim income allocation date(s):	The second last business day of each month

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
P Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	0%	1.00%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Income Fund

(formerly Newton Global Higher Income Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve increasing annual distributions together with long-term capital growth from investing predominantly in global securities.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
U Shares (Accumulation)	GBP	£100,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%
U Shares (Income)	GBP	£100,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Global Opportunities Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve long-term capital growth from a concentrated portfolio predominantly invested in the securities of companies located worldwide. The Sub-Fund does not have a bias towards any economic sector or company size.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Index Linked Gilt Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise returns by investment in a portfolio of predominantly sterling index linked gilts.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	None
Invest in additional eligible derivatives markets in Appendix IV	None
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.20%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton International Bond Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise the total return from income and capital growth in the world bond markets through investment predominantly in Government and other public securities.</p> <p>The Sub-Fund may also invest in deposits, derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.00%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.50%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.30%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	1.50%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Long Corporate Bond Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise returns through investment in predominantly sterling denominated fixed interest securities excluding gilts.</p> <p>The Sub-Fund may also invest in deposits, derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7.00%	0.20%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.30%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Provided that the minimum holding investment is maintained.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Long Gilt Fund ***

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Bond
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise returns through investment in securities issued or guaranteed by the UK Government or the Governments of foreign countries or corporate bodies.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.50%
Exempt Shares 2 (Accumulation)***	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.20%
X Shares (Accumulation)***	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Provided that the minimum holding investment is maintained.

** Provided that the minimum holding investment is maintained.

*** Tax will be deducted from any interest distributions made between the date of this Prospectus and 6 April 2017.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Multi-Asset Balanced Fund

(formerly Newton Balanced Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve a balance between capital growth and income predominantly from a portfolio of UK and international securities.</p> <p>The policy of the Sub-Fund is to gain exposure to a range of asset classes including, without limitation, equities, fixed income, property, commodities, cash, near cash and deposits.</p> <p>Exposure to these asset classes will be achieved through investment in transferable securities, approved money market instruments, warrants, derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company). To the extent the Sub-Fund gains exposure to property or commodities, such exposure may be through exchange listed securities and/or collective investment schemes.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£200,000	£250,000	None**	N/A	0%	1.00%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Multi-Asset Diversified Return Fund

(formerly Newton Phoenix Multi-Asset Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve long-term capital growth in excess of cash (1 Month GBP LIBOR) +3% p.a. over 5 years before fees, from a balanced portfolio diversified across a range of assets. A positive return is not guaranteed and a capital loss may occur.</p> <p>The policy of the Sub-Fund is to gain exposure to a range of asset classes including, without limitation, equities, fixed income, property, commodities, currencies, cash, near cash and deposits.</p> <p>Exposure to these asset classes will be achieved through investment in transferable securities, collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company), warrants, derivative instruments, forward transactions, deposits and approved money market instruments. To the extent the Sub-Fund gains exposure to property or commodities, such exposure may be through exchange listed securities and/or collective investment schemes. Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	0%	0.45%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.625%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Multi-Asset Growth Fund

(formerly Newton Managed Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth and income from a portfolio of UK and international securities. The policy of the Sub-Fund is to gain exposure to a range of asset classes including, without limitation, equities, fixed income, property, commodities, cash, near cash and deposits.</p> <p>Exposure to these asset classes will be achieved through investment in transferable securities, approved money market instruments, warrants and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company). To the extent the Sub-Fund gains exposure to property or commodities, such exposure may be through exchange listed securities and/or collective investment schemes.</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	30 September
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Multi-Asset Income Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The investment objective is to provide income with the potential for capital growth over the longer term.</p> <p>The investment policy of the Sub-Fund is to gain exposure through a flexible asset allocation to a broad diversified range of asset classes including, without limitation, equities, fixed interest securities, currencies, cash, near cash and deposits, warrants, property, commodities and approved money market instruments. Exposure to these asset classes is expected to be achieved through investment in a combination of transferable securities, collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company) and derivatives. To the extent the Sub-Fund gains exposure to property or commodities, such exposure may be through exchange listed securities and/or collective investment schemes.</p> <p>The Sub-Fund will not have any restrictions on the proportion of the Sub-Fund allocated to any of these asset classes. The Sub-Fund may invest in any geographic or economic sectors of the world.</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 July
Interim income allocation date(s):	The second last business day of each month

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.25%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.625%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.75%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	0%	0.45%

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Exempt Shares 1 (Income)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	0%	0.45%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.625%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.625%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.50%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.50%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Oriental Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth by investing in securities predominantly Asian and in Pacific markets including Australia and New Zealand but excluding Japan.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	1, 7-9, 11-13, 21, 23, 25, 27, 29, 32, 33, 39-50
Invest in additional eligible derivatives markets in Appendix IV	6, 13, 17-27
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	2.00%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
P Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	0%	1.00%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton Real Return Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve significant real rates of return in Sterling terms predominantly from a portfolio of UK and international securities. The Sub-Fund is managed to seek a minimum return of cash (1 month GBP LIBOR) +4% per annum over 5 years before fees. In so doing we aim to achieve a positive return on a rolling 3 year basis. However, a positive return is not guaranteed and a capital loss may occur.</p> <p>The Sub-Fund may also invest in deposits, approved money market instruments, derivative instruments, forward transactions and collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for investment purposes as well as for efficient portfolio management.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that from 15 November 2005, 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	30 September
Interim income allocation date(s):	28 February

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income A Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Income Shares	GBP	£20,000	£1,000	£20,000	None**	N/A	0%	1.00%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£75,000,000	£1,000	£40,000,000	None**	N/A	7.00%	0.65%
Exempt Shares 1 (Income)	GBP	£75,000,000	£1,000	£40,000,000	None**	N/A	7.00%	0.65%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 2 (Income)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 3 (Accumulation)	GBP	£150,000,000	£1,000	£80,000,000	None**	N/A	0%	0.60%
Exempt Shares 3 (Income)	GBP	£150,000,000	£1,000	£80,000,000	None**	N/A	0%	0.60%
Exempt Shares 4 (Accumulation)	GBP	£250,000,000	£1,000	£150,000,000	None**	N/A	0%	0.55%
Exempt Shares 4 (Income)	GBP	£250,000,000	£1,000	£150,000,000	None**	N/A	0%	0.55%
Exempt L Shares 1 (Accumulation)	GBP	£150,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%***
Exempt L Shares 1 (Income)	GBP	£150,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%***
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
U Shares (Accumulation)	GBP	£100,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%
U Shares (Income)	GBP	£100,000,000	As Agreed	As Agreed	None**	N/A	0%	0.65%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

*** The annual management charge may vary from time to time at the ACD's discretion, but will not exceed the stated amount. Any variation will be disclosed to eligible investors.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton UK Equity Fund

(formerly Newton Income Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to achieve capital growth and income from a portfolio of predominantly UK securities. The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that from 1 August 2009, 100% of the annual management charge may be charged to capital.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7.00%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Exempt Shares 3 (Accumulation)	GBP	£5,000,000	£1,000	£200,000	None**	N/A	0%	0.60%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton UK Income Fund

(formerly Newton Higher Income Fund)

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	The objective of the Sub-Fund is to achieve increasing distributions on a calendar year basis with long term capital growth. The Sub-Fund will invest predominantly in companies listed or located in the UK. The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company). Derivatives may be used for efficient portfolio management only.
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge and other fees and expenses may be charged to capital.
Securities Financing Transactions Regulation disclosure	The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 10% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund. Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 August
Interim income allocation date(s):	28 February, 31 May, 30 November

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Institutional Shares (Income)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Newton UK Opportunities Fund

Investment Manager:	Newton Investment Management Limited
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub-Fund is to maximise long-term capital growth from a concentrated portfolio primarily invested in the securities of UK companies. The Sub-Fund does not have a bias towards any economic sector or company size.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	All markets listed
Invest in additional eligible derivatives markets in Appendix IV	All markets listed
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of TRS shall be 100% and in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of TRS will exceed 30% and in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As Agreed	As Agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
X Shares (Accumulation)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
X Shares (Income)	GBP	As Agreed	As Agreed	As Agreed	None**	N/A	As Agreed	None†
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

The Boston Company US Opportunities Fund

(formerly BNY Mellon American Fund)

Investment Manager:	The Boston Company Company Asset Management, LLC
Type of Fund:	UCITS scheme
Status of the Sub-Fund for tax purposes	Equity
Investment objective and policy:	<p>The objective of the Sub Fund is to achieve capital growth from a portfolio of predominantly US securities.</p> <p>The Sub-Fund may also invest in collective investment schemes (including but not limited to another Sub-Fund or Sub-Funds of the Company).</p> <p>Derivatives may be used for efficient portfolio management only.</p>
Invest in any Regulated Market in an EEA State	Yes
Invest in additional eligible securities markets in Appendix III	3, 4, 5, 38-49
Invest in additional eligible derivatives markets in Appendix IV	3, 17-26
Charges to capital or income	The ACD and the Depositary have agreed that 100% of the annual management charge may be charged to income.
Securities Financing Transactions Regulation disclosure	<p>The maximum exposure of the Sub-Fund in respect of SFTs shall be 100% of the Net Asset Value of the Sub-Fund. However, the Investment Manager does not anticipate that the Sub-Fund's exposure in respect of SFTs will exceed 15% of the Net Asset Value of the Sub-Fund.</p> <p>As at the date of this Prospectus the Sub-Fund does not use TRS. However, the ACD reserves the right to permit the Sub-Fund to enter into such arrangements in the future.</p> <p>Additional detail on the SFTR and the use of SFTs and TRS is given in the Prospectus at Appendix II under the section headed "Investment and Financial Techniques" and in the "Risk Factors".</p>
Measurement of Global Exposure	Commitment Approach (Please see Paragraph 37 of Appendix II for further details).
Final accounting date:	30 June
Interim accounting date(s):	31 December
Income allocation date(s):	31 October
Interim income allocation date(s):	N/A

Share Classes		Investment Minima					Charges	
Class	Currency	Minimum initial investment	Minimum subsequent investment	Minimum holding investment	Minimum redemption	Regular savings facility*	Initial Charge	Annual management charge
Sterling Income Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Sterling Accumulation Shares	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	1.50%
Institutional Shares W (Accumulation)	GBP	£10,000,000	As agreed	As agreed	None**	N/A	0%	0.75%
Institutional Shares W (Income)	GBP	£10,000,000	As agreed	As agreed	None**	N/A	0%	0.75%
Institutional Shares (Accumulation)	GBP	£250,000	£50,000	£250,000	None**	N/A	0%	1.00%
Exempt Shares 1 (Accumulation)	GBP	£50,000,000	£1,000	£200,000	None**	N/A	7%	0.50%
Exempt Shares 2 (Accumulation)	GBP	£500,000	£1,000	£200,000	None**	N/A	0%	0.75%
Euro Accumulation Shares	EUR	€5,000	€1,000	€5,000	None**	N/A	0%	2.00%
F Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.55%
F Shares (Income)	GBP	As agreed	As agreed	As agreed	None**	N/A	0%	0.55%
B Shares (Accumulation)	GBP	£1,000	£250	£1,000	None**	N/A	0%	0.85%
B Shares (Income)	GBP	£1,000	£250	£1,000	None**	Yes, £50	0%	0.85%
X Shares (Accumulation)	GBP	As agreed	As agreed	As agreed	None**	Yes, £50	As agreed	None†

* Figure shown is the per month regular savings minimum.

** Provided that the minimum holding investment is maintained.

† An annual management charge is payable at a level separately agreed between the parties outside of the Sub-Fund.

Investment and Borrowing Powers

The Scheme Property of each of the Sub-Funds will be invested with the aim of achieving the investment objective of that Sub-Fund but subject to the limits on investment set out in Chapter 5 of the FCA Regulations that are applicable to UCITS schemes.

These limits apply to each Sub-Fund as summarised below.

1. Prudent spread of risk

- 1.1 The ACD must ensure that, taking account of the investment objectives and policy of each Sub-Fund, the Scheme Property of each Sub-Fund aims to provide a prudent spread of risk. The ACD's investment policy may mean that at times, where it is considered appropriate, the property of each Sub-Fund will not be fully invested and that prudent levels of liquidity will be maintained.

2. Valuation

- 2.1 The value of the Scheme Property of each Sub-Fund means the net value of the Scheme Property of that Sub-Fund determined in accordance with the FCA Regulations, after deducting any outstanding borrowings, whether immediately due to be repaid or not.
- 2.2 When valuing the Scheme Property of each Sub-Fund:
 - 2.2.1 the time as at which the valuation is being carried out ("the relevant time") is treated as if it were a valuation point, but the valuation and the relevant time do not count as a valuation or a valuation point for the purposes of the FCA Regulations;
 - 2.2.2 initial outlay is regarded as remaining part of the Scheme Property of the Sub-Fund;

and
 - 2.2.3 if the ACD, having taken reasonable care, determines that the Sub-Fund will become entitled to any unrealised profit which has been made on account of a transaction in derivatives, that prospective entitlement is regarded as part of the Scheme Property of that Sub-Fund.

3. Cover

- 3.1 Where the FCA Regulations allow a transaction to be entered into or an investment to be retained only if possible obligations arising out of the investment transactions or out of the retention would not cause any breach of any limits in the FCA Regulations, it must be assumed that the maximum possible liability of the Sub-Fund under any other of those rules has also to be provided for.
- 3.2 Where a rule in the FCA Regulations permits an investment transaction to be entered into or an investment to be retained only if that investment transaction, or the retention, or other similar transactions, are covered:
 - 3.2.1 it must be assumed that in applying any of those rules, the Sub-Fund must also simultaneously satisfy any other obligation relating to cover;

and
 - 3.2.2 no element of cover must be used more than once.

4. UCITS schemes - general

- 4.1 The Scheme Property of each Sub-Fund must, subject to its investment objective and policy and except where otherwise provided in the FCA Regulations, only consist of any or all of:
 - 4.1.1 transferable securities;
 - 4.1.2 permitted units in collective investment schemes;
 - 4.1.3 approved money-market instruments;
 - 4.1.4 permitted derivatives and forward transactions;

and
 - 4.1.5 permitted deposits.
- 4.2 Transferable securities and approved money-market instruments held within a Sub-Fund must (subject to paragraphs 4.3 and 4.4) be:
 - 4.2.1 admitted to or dealt on an eligible market as described below; or
 - 4.2.2 for an approved money-market instrument not admitted to or dealt in on an eligible market within paragraph 11.1;

or
 - 4.2.3 recently issued transferable securities (provided that the terms of issue include an undertaking that application will be made to be admitted to an eligible market; and such admission is secured within a year of issue).
- 4.3 Not more than 10% in value of the Scheme Property of a Sub-Fund is to consist of transferable securities, which are not approved securities and approved money-market instruments (other than those that are referred to in paragraph 4.2.2).
- 4.4 The requirements on spread and investment in government and public securities do not apply until the expiry of a period of six months after the date of effect of the authorisation order in respect of a Sub-Fund (or on which the initial offer commenced if later) provided that the requirement to maintain prudent spread of risk is complied with.
- 4.5 It is not intended that a Sub-Fund will have an interest in any immovable property or tangible movable property.

5. Transferable Securities

- 5.1 A transferable security is an investment which is any of the following:
 - 5.1.1 a share;
 - 5.1.2 a debenture;
 - 5.1.3 an alternative debenture;
 - 5.1.4 a government and public security;
 - 5.1.5 a warrant;

or
 - 5.1.6 a certificate representing certain securities.
- 5.2 An investment is not a transferable security if the title to it cannot be transferred, or can be transferred only with the consent of a third party.

- 5.3 In applying paragraph 5.1 to an investment which is issued by a body corporate, and which is a share or a debenture, the need for any consent on the part of the body corporate or any members or debenture holders of it may be ignored.
- 5.4 An investment is not a transferable security unless the liability of the holder of it to contribute to the debts of the issuer is limited to any amount for the time being unpaid by the holder of it in respect of the investment.

6. Investment in transferable securities

- 6.1 A Sub-Fund may invest in a transferable security only to the extent that the transferable security fulfils the following criteria:
- 6.1.1 the potential loss which the Sub-Fund may incur with respect to holding the transferable security is limited to the amount paid for it;
 - 6.1.2 its liquidity does not compromise the ability of the ACD to comply with its obligation to redeem shares at the request of any qualifying shareholder under the FCA Regulations;
 - 6.1.3 reliable valuation is available for it as follows:
 - 6.1.3.1 in the case of a transferable security admitted to or dealt in on an eligible market, where there are accurate, reliable and regular prices which are either market prices or prices made available by valuation systems independent from issuers;
 - 6.1.3.2 in the case of a transferable security not admitted to or dealt in on an eligible market, where there is a valuation on a periodic basis which is derived from information from the issuer of the transferable security or from competent investment research;
 - 6.1.4 appropriate information is available for it as follows:
 - 6.1.4.1 in the case of a transferable security admitted to or dealt in on an eligible market, where there is regular, accurate and comprehensive information available to the market on the transferable security or, where relevant, on the portfolio of the transferable security;
 - 6.1.4.2 in the case of a transferable security not admitted to or dealt in on an eligible market, where there is regular and accurate information available to the ACD on the transferable security or, where relevant, on the portfolio of the transferable security;
 - 6.1.5 it is negotiable;
 - and
 - 6.1.6 its risks are adequately captured by the risk management process of the ACD.
- 6.2 Unless there is information available to the ACD that would lead to a different determination, a transferable security which is admitted to or dealt in on an eligible market shall be presumed:
- 6.2.1 not to compromise the ability of the ACD to comply with its obligation to redeem Shares at the request of any qualifying Shareholder;
 - and
 - 6.2.2 to be negotiable.

- 6.3 Not more than 5% in value of a Sub-Fund is to consist of warrants.

7. Closed end funds constituting transferable securities

- 7.1 A unit in a closed end fund shall be taken to be a transferable security for the purposes of investment by a Sub-Fund, provided it fulfils the criteria for transferable securities set out in paragraph 6, and either:
- 7.1.1 where the closed end fund is constituted as an investment company or a unit trust;
 - 7.1.2 it is subject to corporate governance mechanisms applied to companies;
 - and
 - 7.1.3 where another person carries out asset management activity on its behalf, that person is subject to national regulation for the purpose of investor protection;
- or
- 7.2 where the closed end fund is constituted under the law of contract:
- 7.2.1 it is subject to corporate governance mechanisms equivalent to those applied to companies;
 - and
 - 7.2.2 it is managed by a person who is subject to national regulation for the purpose of investor protection.

8. Transferable securities linked to other assets

- 8.1 A Sub-Fund may invest in any other investment which shall be taken to be a transferable security for the purposes of investment by a Sub-Fund provided the investment:
- 8.1.1 fulfils the criteria for transferable securities set out in paragraph 6;
 - and
 - 8.1.2 is backed by or linked to the performance of other assets, which may differ from those in which a Sub-Fund can invest.
- 8.2 Where an investment in paragraph 6 contains an embedded derivative component (see paragraph 19.5), the requirements of this section with respect to derivatives and forwards will apply to that component.

9. Approved Money-Market Instruments

- 9.1 An approved money-market instrument is a money-market instrument which is normally dealt in on the money market, is liquid and has a value which can be accurately determined at any time.
- 9.2 A money-market instrument shall be regarded as normally dealt in on the money market if it:
- 9.2.1 has a maturity at issuance of up to and including 397 days;
 - 9.2.2 has a residual maturity of up to and including 397 days;
 - 9.2.3 undergoes regular yield adjustments in line with money market conditions at least every 397 days;
 - or
 - 9.2.4 has a risk profile, including credit and interest rate risks, corresponding to that of an instrument which has a maturity as set out in paragraphs 9.2.1 or 9.2.2 or is subject to yield adjustments as set out in paragraph 9.2.3.

- 9.3 A money-market instrument shall be regarded as liquid if it can be sold at limited cost in an adequately short time frame, taking into account the obligation of the ACD to redeem Shares at the request of any qualifying Shareholder.
- 9.4 A money-market instrument shall be regarded as having a value which can be accurately determined at any time if accurate and reliable valuations systems, which fulfil the following criteria, are available:
- 9.4.1 enabling the ACD to calculate a net asset value in accordance with the value at which the instrument held in the portfolio could be exchanged between knowledgeable willing parties in an arm's length transaction;
and
- 9.4.2 based either on market data or on valuation models including systems based on amortised costs.
- 9.5 A money-market instrument that is normally dealt in on the money market and is admitted to or dealt in on an eligible market shall be presumed to be liquid and have a value which can be accurately determined at any time unless there is information available to the ACD that would lead to a different determination.

10. Eligible markets regime: purpose

- 10.1 To protect investors, the markets on which investments of the Sub-Fund are dealt in or traded on should be of an adequate quality ("eligible") at the time of acquisition of the investment and until it is sold.
- 10.2 Where a market ceases to be eligible, investments on that market cease to be approved securities. The 10% restriction on investing in non approved securities applies and exceeding this limit because a market ceases to be eligible will generally be regarded as an inadvertent breach.
- 10.3 A market is eligible for the purposes of the rules if it is:
- 10.3.1 a regulated market;
or
- 10.3.2 a market in an EEA State which is regulated, operates regularly and is open to the public.
- 10.4 A market not falling within paragraph 10.3 is eligible for the purposes of the FCA Regulations if:
- 10.4.1 the ACD, after consultation with and notification to the Depositary, decides that market is appropriate for investment of, or dealing in, the Scheme Property;
- 10.4.2 the market is included in a list in the Prospectus;
and
- 10.4.3 the Depositary has taken reasonable care to determine that:
- 10.4.3.1 adequate custody arrangements can be provided for the investment dealt in on that market;
and
- 10.4.3.2 all reasonable steps have been taken by the ACD in deciding whether that market is eligible.
- 10.5 In paragraph 10.4 a market must not be considered appropriate unless it is regulated, operates regularly, is recognised as a market or exchange or as a self regulating organisation by an overseas regulator, is open to the public, is adequately liquid and has adequate arrangements for unimpeded transmission of income and capital to or for the order of investors.

- 10.6 Subject to Appendix I, the additional eligible securities and derivatives markets in which a Sub-Fund may invest are set out in Appendix III and Appendix IV.

11. Money-market instruments with a regulated issuer

- 11.1 In addition to instruments admitted to or dealt in on an eligible market, a Sub-Fund may invest in an approved money-market instrument provided it fulfils the following requirements:
- 11.1.1 the issue or the issuer is regulated for the purpose of protecting investors and savings;
and
- 11.1.2 the instrument is issued or guaranteed in accordance with paragraph 12.
- 11.2 The issue or the issuer of a money-market instrument, other than one dealt in on an eligible market, shall be regarded as regulated for the purpose of protecting investors and savings if:
- 11.2.1 the instrument is an approved money-market instrument;
- 11.2.2 appropriate information is available for the instrument (including information which allows an appropriate assessment of the credit risks related to investment in it), in accordance with paragraph 13;
and
- 11.2.3 the instrument is freely transferable.

12. Issuers and guarantors of money-market instruments

- 12.1 A Sub-Fund may invest in an approved money-market instrument if it is:
- 12.1.1 issued or guaranteed by any one of the following:
- 12.1.1.1 a central authority of an EEA State or, if the EEA State is a federal state, one of the members making up the federation;
- 12.1.1.2 a regional or local authority of an EEA State;
- 12.1.1.3 the European Central Bank or a central bank of an EEA State;
- 12.1.1.4 the European Union or the European Investment Bank;
- 12.1.1.5 a non-EEA State or, in the case of a federal state, one of the members making up the federation;
- 12.1.1.6 a public international body to which one or more EEA States belong;
- or
- 12.1.2 issued by a body, any securities of which are dealt in on an eligible market;
or
- 12.1.3 issued or guaranteed by an establishment which is:
- 12.1.3.1 subject to prudential supervision in accordance with criteria defined by European Community law;
or
- 12.1.3.2 subject to and complies with prudential rules considered by the FCA to be at least as stringent as those laid down by European Community law.

- 12.1.4 An establishment shall be considered to satisfy the requirement in paragraph 12.1.3.2 if it is subject to and complies with prudential rules, and fulfils one or more of the following criteria:
- 12.1.4.1 it is located in the European Economic Area;
 - 12.1.4.2 it is located in an OECD country belonging to the Group of Ten;
 - 12.1.4.3 it has at least investment grade rating;
 - 12.1.4.4 on the basis of an in-depth analysis of the issuer, it can be demonstrated that the prudential rules applicable to that issuer are at least as stringent as those laid down by European Community law.

13. Appropriate information for money-market instruments

- 13.1 In the case of an approved money-market instrument within paragraph 12.1.2 or which is issued by an authority within paragraph 12.1.1.2 or a public international body within paragraph 12.1.1.6 but is not guaranteed by a central authority within paragraph 12.1.1.1, the following information must be available:
- 13.1.1 information on both the issue or the issuance programme, and the legal and financial situation of the issuer prior to the issue of the instrument, verified by appropriately qualified third parties not subject to instructions from the issuer;
 - 13.1.2 updates of that information on a regular basis and whenever a significant event occurs;
 - and
 - 13.1.3 available and reliable statistics on the issue or the issuance programme.
- 13.2 In the case of an approved money-market instrument issued or guaranteed by an establishment within paragraph 12.1.3, the following information must be available
- 13.2.1 information on the issue or the issuance programme or on the legal and financial situation of the issuer prior to the issue of the instrument;
 - 13.2.2 updates of that information on a regular basis and whenever a significant event occurs;
 - and
 - 13.2.3 available and reliable statistics on the issue or the issuance programme, or other data enabling an appropriate assessment of the credit risks related to investment in those instruments.
- 13.3 In the case of an approved money-market instrument:
- 13.3.1 within paragraphs 12.1.1.1, 12.1.1.4 or 12.1.1.5;
 - or
 - 13.3.2 which is issued by an authority within paragraph 12.1.1.2 or a public international body within paragraph 12.1.1.6 and is guaranteed by a central authority within paragraph 12.1.1.1;
- 13.4 information must be available on the issue or the issuance programme, or on the legal and financial situation of the issuer prior to the issue of the instrument.

14. Spread: general

- 14.1 This rule on spread does not apply to government and public securities.
- 14.2 For the purposes of this requirement companies included in the same group for the purposes of consolidated accounts as defined in accordance with

Directive 83/349/EEC or in the same group in accordance with international accounting standards are regarded as a single body.

- 14.3 Not more than 20% in value of the Scheme Property of a Sub-Fund is to consist of deposits with a single body.
- 14.4 Not more than 5% in value of the Scheme Property of a Sub-Fund is to consist of transferable securities or approved money-market instruments issued by any single body.
- 14.5 The limit of 5% in paragraph 14.4 is raised to 10% in respect of up to 40% in value of the Scheme Property of a Sub-Fund. Covered bonds need not be taken into account for the purposes of applying the limit of 40%.
- 14.6 The limit of 5% in paragraph 14.4 is raised to 25% in value of the Scheme Property in respect of covered bonds, provided that when a Sub-Fund invests more than 5% in covered bonds issued by a single body, the total value of covered bonds held must not exceed 80% in value of the Scheme Property.
- 14.7 In applying paragraphs 14.4 and 14.5 certificates representing certain securities are to be treated as equivalent to the underlying security.
- 14.8 The exposure to any one counterparty in an OTC derivative transaction must not exceed 5% in value of the Scheme Property of a Sub-Fund. This limit is raised to 10% where the counterparty is an Approved Bank.
- 14.9 Subject to paragraph 17.1, not more than 10% in value of the Scheme Property of a Sub-Fund is to consist of the units of any one collective investment scheme.
- 14.10 Not more than 20% in value of the Scheme Property of a Sub-Fund is to consist of transferable securities or approved money-market instruments issued by the same group (as referred to in paragraph 14.2).
- 14.11 In applying the limits in paragraphs 14.3, 14.4, 14.5, 14.7 and 14.8, and subject to paragraph 14.6, not more than 20% in value of the Scheme Property of a Sub-Fund is to consist of any combination of two or more of the following:
 - 14.11.1 transferable securities or money-market instruments issued by;
 - or
 - 14.11.2 deposits made with;
 - or
 - 14.11.3 exposures from OTC derivatives transactions made with a single body.

15. Counterparty Risk and Issuer concentration

- 15.1 The counterparty risk arising from an OTC derivative transaction is subject to the limits set out in paragraph 14.8 and paragraph 14.11
- 15.2 When calculating the exposure to a counterparty in accordance with the limits in paragraph 14.8 the ACD must use the positive mark-to-market value of the OTC derivative contract with that counterparty.
- 15.3 The ACD may net the OTC derivative positions with the same Counterparty, provided:
 - 15.3.1 it is able legally to enforce netting agreements with the counterparty on behalf of the Sub-Fund; and
 - 15.3.2 the netting agreements in paragraph 15.3.1 do not apply to any other exposures the Sub-Fund may have with that same counterparty.

- 15.4 The ACD may reduce the exposure of the Scheme Property to a counterparty to an OTC derivative transaction through the receipt of collateral. Collateral received must be sufficiently liquid so that it can be sold quickly at a price that is close to its pre-sale valuation.
- 15.5 The ACD must take collateral into account in calculating exposure to counterparty risk in accordance with the limits in paragraph 14.8 when it passes collateral to the counterparty to an OTC derivative transaction on behalf of a Sub-Fund.
- 15.6 Collateral passed in accordance with paragraph 15.5 may be taken into account on a net basis only if the ACD is able legally to enforce netting arrangements with this counterparty on behalf of the Sub-Fund.
- 15.7 The ACD must calculate the issuer concentration limits referred to in paragraph 14.11 on the basis of the underlying exposure created through the use of OTC derivatives in accordance with the commitment approach.
- 15.8 In relation to exposures arising from OTC derivative transactions, as referred to in paragraph 14.8 the ACD must include in the calculation any counterparty risk relating to the OTC derivative transactions.

16. Spread: Government and public securities

- 16.1 The following paragraph applies to government and public securities ("such securities").
- 16.2 Where no more than 35% in value of the Scheme Property of a Sub-Fund is invested in such securities issued by any one body, there is no limit on the amount which may be invested in such securities or in any one issue.
- 16.3 A Sub-Fund may invest more than 35% in value of its Scheme Property in such securities issued by any one body provided that:
 - 16.3.1 the ACD has before any such investment is made consulted with the Depositary and as a result considers that the issuer of such securities is one which is appropriate in accordance with the investment objectives of the authorised fund;
 - 16.3.2 no more than 30% in value of the Scheme Property of the Sub-Fund consists of such securities of any one issue;
 - 16.3.3 the Scheme Property of the Sub-Fund includes such securities issued by that or another issuer, of at least six different issues;
 - and
 - 16.3.4 the disclosures required by the FCA have been made.
- 16.4 In relation to such securities:
 - 16.4.1 issue, issuer and guarantor include guarantee, guaranteed and guarantor;
 - and
 - 16.4.2 an issue differs from another if there is a difference as to repayment date, rate of interest, guarantor or other material terms of the issue.
- 16.5 The rules in paragraph 16.3 are intended to apply to the following Sub-Funds and accordingly more than 35% of the Scheme Property of those Sub-Funds is or may be invested in such securities.
 - 16.5.1 The Instrument provides that for the Newton Index Linked Gilt Fund, the Newton International Bond Fund, the Newton Global Dynamic Bond Fund, the Newton Global Dynamic Bond Income Fund, the Newton Long Gilt Fund, the Newton Multi-Asset Income Fund and the Newton Multi-

Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund), up to 100% of the assets of the Sub-Funds may be invested in government and public securities issued by or on behalf of the Government of the UK, the Scottish Administration, the Executive Committee of the Northern Ireland Assembly, the National Assembly of Wales, or the governments of Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Japan, Liechtenstein, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland and the United States or by one of the following international organisations: African Development Bank, Asian Development Bank (ADB), Council of Europe Development Bank, Deutsche Ausgleichsbank (DTA), Eurofima, European Bank for Reconstruction and Development (EBRD), European Investment Bank (EIB), Inter-American Development Bank (IADB), International Bank for Reconstruction and Development (IBRD), International Finance Corporation (IFC), Kreditanstalt für Wiederaufbau (KfW), and the Nordic Investment Bank (NIB).

- 16.5.2 The Instrument provides that for the Insight Inflation-Linked Corporate Bond Fund, up to 100% of the assets of the Sub-Funds may be invested in government and public securities issued by or on behalf of the Government of the UK, the Scottish Administration, the Executive Committee of the Northern Ireland Assembly and the National Assembly of Wales.

- 16.6 Notwithstanding paragraph 14.1 and subject to paragraphs 16.2 and 16.3, in applying the 20% limit in paragraph 14.11, with respect to a single body, government and public securities issued by that body shall be taken into account.

17. Investment in collective investment schemes

- 17.1 A Sub-Fund may invest in units in a collective investment scheme ("Second Scheme") provided the Second Scheme satisfies all of the following conditions and provided that no more than 10% of the value of the Scheme Property of the Sub-Fund is invested in second schemes within paragraphs 17.1.1.1 to 17.1.1.5:
 - 17.1.1 The Second Scheme must be one that:
 - 17.1.1.1 complies with the conditions necessary for it to enjoy the rights conferred by the UCITS Directive;
 - or
 - 17.1.1.2 is recognised under the provisions of section 272 of the Act (Individually recognised overseas schemes) that is authorised by the supervisory authorities of Guernsey, Jersey or the Isle of Man (provided the requirements of article 50 (1)(e) of the UCITS Directives are met);
 - or
 - 17.1.1.3 is authorised as a non-UCITS retail scheme (provided the requirements of article 50(1)(e) of the UCITS Directive are met);
 - or
 - 17.1.1.4 is authorised in another EEA State (provided the requirements of article 50 (1)(e) of the UCITS Directive are met);

17.1.1.5 be authorised by competent authority of an OECD member country (other than another EEA State) which has:

- a) signed the IOSCO Multilateral Memorandum of Understanding; and
- b) approved the scheme's management company, rules and depositary/custody arrangements; provided the requirements of article 50 (1)(e) of the UCITS Directive are met);

17.1.2 the Second Scheme complies where relevant with paragraphs 17.2, 17.3 and 17.5 to 17.8;

17.1.3 the Second Scheme has terms which prohibit more than 10% in value of the Scheme Property consisting of units in collective investment schemes;

and

17.1.4 for the purposes of paragraphs 17.1.2, 17.1.3 and 14, a Sub-Fund of an umbrella scheme is to be treated as if it were a separate scheme.

Investment in associated collective investment schemes

17.2 Investment may only be made in another collective investment scheme (the "Second Associate Scheme") managed or operated by (or, for an investment company with variable capital, whose authorised corporate director is) the ACD or an associate of the ACD if the Prospectus clearly states that the property of that Sub-Fund may include such units, and paragraphs 17.5 to 17.8 are complied with.

17.3 The scheme property attributable to a Sub-Fund may include Shares in another Sub-Fund of the Company (the "Second Umbrella Fund") if the Prospectus of the Company clearly states that the scheme property attributable to that Sub-Fund may include Shares in a Second Umbrella Fund and, paragraphs 17.5 to 17.8 are complied with but subject to the requirements of paragraph 17.4.

17.4 A Sub-Fund may invest in or dispose of Shares of a Second Umbrella Fund provided that:

17.4.1 the Second Umbrella Fund does not hold Shares in any other Sub-Fund;

17.4.2 the requirements set out at paragraphs 17.2, 17.3 and 17.5 to 17.8 are complied with;

and

17.4.3 the investing or disposing Sub-Fund must not be a feeder UCITS to the Second Umbrella Fund.

17.5 Where a Sub-Fund of the Company invests in or disposes of units in a Second Associate Scheme or Second Umbrella Fund, the ACD must pay the amounts referred to in 17.6 and 17.7 to that Sub-Fund by the close of business on the fourth business day following the date of agreement to invest or dispose.

17.6 On investment, the amount referred to in paragraph 17.5 is either:

17.6.1 any amount by which the consideration paid by the Sub-Fund for the units in the Second Associate Scheme or Second Umbrella Fund exceeds the price that would have been paid for the benefit of the Second Associate Scheme or Second Umbrella Fund had the units been newly issued or sold by it;

or

17.6.2 if such price cannot be ascertained by the ACD, the maximum amount of any charge permitted to be made by the seller of units in the Second Associate Scheme or Second Umbrella Fund.

17.7 On disposal, the amount referred to in paragraph 17.5 is any charge made for the account of the authorised fund manager or operator of the Second Associate Scheme or Second Umbrella Fund or an Associate of any of them in respect of the disposal.

17.8 In this clause 17:

17.8.1 any addition to or deduction from the consideration paid on the acquisition or disposal of units in the Second Associate Scheme or Second Umbrella Fund, which is applied for the benefit of the Second Associate Scheme or Second Umbrella Fund and is, or is like, a dilution levy made is to be treated as part of the price of the units and not as part of any charge;

and

17.8.2 any switching or conversion charge made in respect of an exchange of units in one fund or separate part of the Second Associate Scheme or Second Umbrella Fund for units in another fund or separate part of that scheme is to be included as part of the consideration paid for the units.

Miscellaneous

17.9 Each Sub-Fund may invest in units of collective investment schemes which are managed or operated by (or, for an investment company with variable capital, whose authorised corporate director is) the ACD or an associate of the ACD.

17.10 Without limiting paragraph 17.9, the Insight Global Absolute Return Fund and the Insight Global Multi-Strategy Fund may invest up to 100% of their scheme property in units of such associated schemes. The overall level of management fees that may be charged to these funds, including the annual management charge of collective investment schemes in which the fund invests will not exceed 7% of the scheme property per annum.

18. Investment in nil and partly paid securities

18.1 A transferable security or an approved money-market instrument on which any sum is unpaid falls within a power of investment only if it is reasonably foreseeable that the amount of any existing and potential call for any sum unpaid could be paid by the Sub-Fund, at the time when payment is required, without contravening the FCA Regulations.

19. Derivatives: General

Under the COLL Sourcebook, derivatives are permitted for UCITS schemes for investment purposes or for the purposes of EPM or both. The Manager seeks to ensure that the use of derivatives does not materially increase the volatility or alter the risk profile of the relevant Sub-Fund but this may not always be possible and using derivatives in the portfolio may increase risk and result in greater fluctuations on the Net Asset Value of the Sub-Funds than if derivatives were not used. Please read the risk warnings in "Risk Factors" section of this Prospectus for details of the risks which may arise from the use of derivatives in a Sub-Fund.

19.1 The following Sub-Funds will not invest in derivatives, except for the purposes of EPM as described below:

- BNY Mellon Long-Term Global Equity Fund
- Newton 50/50 Global Equity Fund

- Newton Asian Income Fund
- Newton Continental European Fund
- Newton Emerging Income Fund
- Newton Global Equity Fund
- Newton Global Income Fund (formerly Newton Global Higher Income Fund)
- Newton Global Opportunities Fund
- Newton Long Gilt Fund
- Newton Index Linked Gilt Fund
- Newton Multi-Asset Growth Fund (formerly Newton Managed Fund)
- Newton Oriental Fund
- Newton UK Equity Fund
- Newton UK Income Fund (formerly Newton Higher Income Fund)
- Newton UK Opportunities Fund and
- The Boston Company US Opportunities Fund.

The following Sub-Funds may invest up to 100% in derivatives in addition to EPM:

- Insight Corporate Bond Fund (formerly the Newton Corporate Bond Fund)
- Insight Global Absolute Return Fund
- Insight Global Multi-Strategy Fund
- Insight Inflation-Linked Corporate Bond Fund
- Newton Global Balanced Fund
- Newton Global Dynamic Bond Fund
- Newton Global Dynamic Bond Income Fund
- Newton Global High Yield Bond Fund
- Newton International Bond Fund
- Newton Long Corporate Bond Fund
- Newton Multi-Asset Balanced Fund (formerly Newton Balanced Fund)
- Newton Multi-Asset Income Fund
- Newton Multi-Asset Diversified Return Fund (formerly Newton Phoenix Multi-Asset Fund) and
- Newton Real Return Fund.

Any investment in derivatives is not expected to materially change the risk profile of these Sub-Funds. Derivative use is not intended to increase the volatility of the Sub-Funds and may indeed reduce volatility.

- 19.2 A transaction in derivatives or a forward transaction must not be effected for a Sub-Fund unless the transaction is of a kind specified in paragraph 20 and the transaction is covered, as required by paragraph 33.
- 19.3 Where a Sub-Fund invests in derivatives, the exposure to the underlying assets must not exceed the limits set out in paragraphs 14 and 16 except for index based derivatives where the rules below apply.
- 19.4 Where a transferable security or an approved money-market instrument embeds a derivative, this must be taken into account for the purposes of complying with this section.
- 19.5 A transferable security or an approved money-market instrument will embed a derivative if it contains a component which fulfils the following criteria:
- 19.5.1 by virtue of that component some or all of the cash flows that otherwise would be required by the transferable security or approved money-market instrument which functions as host

contract can be modified according to a specified interest rate, financial instrument price, foreign exchange rate, index of prices or rates, credit rating or credit index or other variable, and therefore vary in a way similar to a stand-alone derivative;

- 19.5.2 its economic characteristics and risks are not closely related to the economic characteristics and risks of the host contract;
- and
- 19.5.3 it has a significant impact on the risk profile and pricing of the transferable security or approved money-market instrument.
- 19.6 A transferable security or an approved money-market instrument does not embed a derivative where it contains a component which is contractually transferable independently of the transferable security or the approved money-market instrument. That component shall be deemed to be a separate instrument.
- 19.7 Where a scheme invests in an index based derivative, provided the relevant index falls within paragraph 21 the underlying constituents of the index do not have to be taken into account for the purposes of paragraphs 14 and 16. This relaxation is subject to the ACD continuing to ensure that the Scheme Property provides a prudent spread of risk.

Please refer to “Risk Factors” section above for a description of the risk factors associated with investments in derivatives.

20. Permitted transactions (derivatives and forwards)

- 20.1 A transaction in a derivative must be in an approved derivative; or be one which complies with paragraph 24.
- 20.2 A transaction in a derivative must have the underlying consisting of any or all of the following to which the scheme is dedicated:
- 20.2.1 transferable securities permitted under paragraphs 4.2.1 and 4.2.3,
- 20.2.2 approved money-market instruments permitted under paragraphs 4.2.1 and 4.2.3,
- 20.2.3 permitted deposits,
- 20.2.4 permitted derivatives under this paragraph,
- 20.2.5 collective investment scheme units permitted under paragraph 17,
- 20.2.6 financial indices which satisfy the criteria set out in paragraph 21,
- 20.2.7 interest rates,
- or
- 20.2.8 foreign exchange rates and currencies.
- 20.3 A transaction in an approved derivative must be effected on or under the rules of an eligible derivatives market.
- 20.4 A transaction in a derivative must not cause a Sub-Fund to diverge from its investment objectives as stated in the Instrument and the most recently published version of this Prospectus.
- 20.5 A transaction in a derivative must not be entered into if the intended effect is to create the potential for an uncovered sale of one or more transferable securities, approved money-market instruments, units in collective investment schemes, or derivatives.
- 20.6 Any forward transaction must be with an Eligible Institution or an Approved Bank.

- 20.7 A derivative includes an instrument which fulfils the following criteria:
- 20.7.1 it allows the transfer of the credit risk of the underlying independently from the other risks associated with that underlying;
 - 20.7.2 it does not result in the delivery or the transfer of assets other than those referred to in paragraph 4.1 including cash;
 - 20.7.3 in the case of an OTC derivative, it complies with the requirements in paragraph 24;
 - 20.7.4 its risks are adequately captured by the risk management process of the ACD, and by its internal control mechanisms in the case of risks of asymmetry of information between the ACD and the counterparty to the derivative, resulting from potential access of the counterparty to non-public information on persons whose assets are used as the underlying by that derivative.
- 20.8 A Sub-Fund may not undertake transactions in derivatives on commodities.

21. Financial indices underlying derivatives

- 21.1 The financial indices referred to in paragraph 20.2.6 are those which satisfy the following criteria:
- 21.1.1 the index is sufficiently diversified;
 - 21.1.2 the index represents an adequate benchmark for the market to which it refers;
 - and
 - 21.1.3 the index is published in an appropriate manner.
- 21.2 A financial index is sufficiently diversified if:
- 21.2.1 it is composed in such a way that price movements or trading activities regarding one component do not unduly influence the performance of the whole index;
 - 21.2.2 where it is composed of assets in which a Sub-Fund is permitted to invest, its composition is at least diversified in accordance with the requirements with respect to spread and concentration set out in this section;
 - and
 - 21.2.3 where it is composed of assets in which a Sub-Fund cannot invest, it is diversified in a way which is equivalent to the diversification achieved by the requirements with respect to spread and concentration set out in this section.
- 21.3 A financial index represents an adequate benchmark for the market to which it refers if:
- 21.3.1 it measures the performance of a representative group of underlyings in a relevant and appropriate way;
 - 21.3.2 it is revised or rebalanced periodically to ensure that it continues to reflect the markets to which it refers, following criteria which are publicly available;
 - and
 - 21.3.3 the underlyings are sufficiently liquid, allowing users to replicate it if necessary.
- 21.4 A financial index is published in an appropriate manner if:

- 21.4.1 its publication process relies on sound procedures to collect prices, and calculate and subsequently publish the index value, including pricing procedures for components where a market price is not available;
 - and
 - 21.4.2 material information on matters such as index calculation, rebalancing methodologies, index changes or any operational difficulties in providing timely or accurate information is provided on a wide and timely basis.
- 21.5 Where the composition of underlyings of a transaction in a derivative does not satisfy the requirements for a financial index, the underlyings for that transaction shall where they satisfy the requirements with respect to other underlyings pursuant to paragraph 21.1.2 be regarded as a combination of those underlyings.

22. Transactions for the purchase of property

A derivative or forward transaction which will or could lead to the delivery of property for the account of a Sub-Fund may be entered into only if that property can be held for the account of the Sub-Fund, and the ACD having taken reasonable care determines that delivery of the property under the transaction will not occur or will not lead to a breach of the FCA Regulations.

23. Requirement to cover sales

No agreement by or on behalf of a Sub-Fund to dispose of property or rights may be made unless the obligation to make the disposal and any other similar obligation could immediately be honoured by the Sub-Fund by delivery of property or the assignment (or, in Scotland, assignation) of rights, and the property and rights above are owned by the Sub-Fund at the time of the agreement. This requirement does not apply to a deposit.

24. OTC transactions in derivatives

- 24.1 Any transaction in an OTC derivative under paragraph 20 must be:
- 24.1.1 with an approved counterparty; a counterparty to a transaction in derivatives is approved only if the counterparty is an Eligible Institution or an Approved Bank; or a person whose permission (including any requirements or limitations), as published in the FCA Register or whose Home State authorisation, permits it to enter into the transaction as principal off-exchange;
 - 24.1.2 on approved terms; the terms of the transaction in derivatives are approved only if the ACD carries out at least daily a reliable and verifiable valuation in respect of that transaction corresponding to its fair value and which does not rely only on market quotations by the counterparty, and the ACD can enter into one or more further transactions to sell, liquidate or close out that transactions at any time at its fair value;
 - 24.1.3 capable of reliable valuation; a transaction in derivatives is capable of reliable valuation only if the ACD having taken reasonable care determines that, throughout the life of the derivative (if the transaction is entered into), it will be able to value the investment concerned with reasonable accuracy; on the basis of an up-to-date market value which the ACD and the Depositary have agreed is reliable; or, if that value

is not available, on the basis of a pricing model which the ACD and the Depositary have agreed uses an adequate recognised methodology;

and

- 24.1.4 subject to verifiable valuation; a transaction in derivatives is subject to verifiable valuation only if, throughout the life of the derivative (if the transaction is entered into) verification of the valuation is carried out by an appropriate third party which is independent from the counterparty of the derivative, at an adequate frequency and in such a way that the ACD is able to check it; or a department within the ACD which is independent from the department in charge of managing the Scheme Property and which is adequately equipped for such a purpose.

- 24.2 For the purposes of 24.1.3 "fair value" is the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction.

- 24.3 In respect of its obligations under Chapter 5 of the COLL Sourcebook ("Investment and Borrowing Powers"), the Depositary must take reasonable care to ensure that the ACD has systems and controls that are adequate to ensure compliance with paragraph 24.1.

25. Valuation of OTC Derivatives

- 25.1 For the purposes of the valuation of OTC derivatives the ACD must:

- 25.1.1 establish, implement and maintain arrangements and procedures which ensure appropriate, transparent and fair valuation of the exposures of the Sub-Fund to OTC derivatives; and

- 25.1.2 ensure that the fair value of OTC derivatives is subject to adequate, accurate and independent assessment.

- 25.2 Where the arrangements and procedures referred to in paragraph 25.1 involve the performance of certain activities by third parties, the ACD must comply with the requirements in the FCA source book SYSC 8.1.13 R (Additional requirements for a management company) and the COLL 6.6A.4 R (5) and (6) (Due diligence requirements of AFMs of UCITS schemes and EEA UCITS schemes).

- 25.3 The arrangements and procedures referred to in this paragraph must be:

- 25.3.1 adequate and proportionate to the nature and complexity of the OTC derivative concerned;

and

- 25.3.2 adequately documented.

26. Risk management

- 26.1 The ACD uses a risk management process (including a risk management policy in accordance with COLL 6.12), enabling it to monitor and measure at any time the risk of a Sub-Fund's positions and their contribution to the overall risk profile of the Sub-Funds.

- 26.2 Before using the process, the ACD will notify the FCA of the details of the risk management process. The following details of the risk management process must be regularly notified to the FCA and at least on an annual basis:

- 26.2.1 a true and fair view of the types of derivatives and forward transactions to be used within a Fund together with their underlying risks and any relevant quantitative limits;

and

- 26.2.2 the methods for estimating risks in derivative and forward transactions.

- 26.3 The ACD must notify the FCA in advance of any material alteration to the details above.

27. Investment in deposits

- 27.1 A Sub-Fund may invest in deposits only if they are with an Approved Bank and which are repayable on demand or have the right to be withdrawn, and mature in no more than 12 months.

28. Significant influence

- 28.1 The Company must not acquire transferable securities issued by a body corporate and carrying rights to vote (whether or not on substantially all matters) at a general meeting of that body corporate if:

- 28.1.1 immediately before the acquisition, the aggregate of any such securities held by the Company gives the Company power to influence significantly the conduct of business of that body corporate;

or

- 28.1.2 The acquisition gives the Company that power.

- 28.2 For the purpose of paragraph 28.1.1 the Company is to be taken to have power significantly to influence the conduct of business of a body corporate if it can, because of the transferable securities held by it, exercise or control the exercise of 20% or more of the voting rights in that body corporate (disregarding for this purpose any temporary suspension of voting rights in respect of the transferable securities of that body corporate).

29. Concentration

The Company:

- 29.1 must not acquire transferable securities (other than debt securities) which:

- 29.1.1 do not carry a right to vote on any matter at a general meeting of the body corporate that issued them;

and

- 29.1.2 represent more than 10% of those securities issued by that body corporate;

- 29.2 must not acquire more than 10% of the debt securities issued by any single issuing body;

- 29.3 must not acquire more than 25% of the units in a collective investment scheme;

- 29.4 must not acquire more than 10% of the money-market instruments issued by any single body;

and

- 29.5 need not comply with the limits in paragraphs 29.2 to 29.4 if, at the time of the acquisition, the net amount in issue of the relevant investment cannot be calculated.

30. Schemes replicating an index

- 30.1 Notwithstanding paragraph 14, a Sub-Fund may invest up to 20% in value of the Scheme Property in shares and debentures which are issued by the same body where the stated investment policy is to replicate the composition of a relevant index as defined in paragraph 31.

- 30.2 Replication of the composition of a relevant index shall be understood to be a reference to replication of the composition of the underlying assets of that index,

including the use of techniques and instruments permitted for the purpose of efficient portfolio management.

- 30.3 The limit in paragraph 30.1 can be raised up to 35% in value of the Scheme Property, but only in respect of one body and where justified by exceptional market conditions.

31. Relevant indices

- 31.1 The indices referred to in paragraph 30 are those which satisfy the following criteria:
- 31.1.1 the composition is sufficiently diversified;
 - 31.1.2 the index represents an adequate benchmark for the market to which it refers;
 - and
 - 31.1.3 the index is published in an appropriate manner.
- 31.2 The composition of an index is sufficiently diversified if its components adhere to the spread and concentration requirements in this section.
- 31.3 An index represents an adequate benchmark if its provider uses a recognised methodology which generally does not result in the exclusion of a major issuer of the market to which it refers.
- 31.4 An index is published in an appropriate manner if:
- 31.4.1 it is accessible to the public;
 - 31.4.2 the index provider is independent from the index-replicating Sub-Fund; this does not preclude index providers and the Sub-Fund from forming part of the same group, provided that effective arrangements for the management of conflicts of interest are in place.

32. Derivatives exposure

- 32.1 A Sub-Fund may invest in derivatives and forward transactions as long as the exposure to which the Sub-Fund is committed by that transaction itself is suitably covered from within its Scheme Property. Exposure will include any initial outlay in respect of that transaction.
- 32.2 Cover ensures that a Sub-Fund is not exposed to the risk of loss of property, including money, to an extent greater than the net value of the Scheme Property. Therefore, the Sub-Fund must hold Scheme Property sufficient in value or amount to match the exposure arising from a derivative obligation to which the Sub-Fund is committed. Paragraph 33 sets out detailed requirements for cover of a Sub-Fund.
- 32.3 Cover used in respect of one transaction in derivatives or a forward transaction must not be used for cover in respect of another transaction in derivatives or a forward transaction.

33. Cover for investment in derivatives

- 33.1 A Sub-Fund may invest in derivatives and forward transactions as part of its investment policy provided:
- 33.1.1 its global exposure relating to derivatives and forward transactions held in a Sub-Fund does not exceed the net value of the Scheme Property.
 - 33.1.2 its global exposure to the underlying assets does not exceed in aggregate the investment limits laid down in paragraph 14.

34. Daily calculation of global exposure

- 34.1 Global exposure is calculated daily.

- 34.2 Exposure must be calculated taking into account the current value of the underlying assets, the counterparty risk, future market movements and the time available to liquidate the positions.

35. Calculation of global exposure

- 35.1 The ACD must calculate the global exposure of any Sub-Fund it manages either as:
- 35.1.1 the incremental exposure and leverage generated through the use of derivatives and forward transactions (including embedded derivatives as referred to in paragraph 19.5 ("Derivatives: General")), which may not exceed 100% of the net value of the Scheme Property;
 - or
 - 35.1.2 the market risk of the Scheme Property.
- 35.2 Global exposure of a Sub-Fund must be calculated by using:
- 35.2.1 the commitment approach;
 - or
 - 35.2.2 the value at risk approach ("VaR").
- 35.3 The ACD must ensure that the method selected in paragraph 35.2 is appropriate, taking into account:
- 35.3.1 the investment strategy pursued by a Sub-Fund;
 - 35.3.2 the types and complexities of the derivatives and forward transactions used;
 - and
 - 35.3.3 the proportion of the Scheme Property comprising derivatives and forward transactions.
- 35.4 Where a Sub-Fund employs techniques and instruments including repo contracts or stock lending transactions in accordance with paragraph 47 ("Stock Lending") in order to generate additional leverage or exposure to market risk, the ACD must take those transactions into consideration when calculating global exposure.

36. VaR approach

- 36.1 VaR is a measure of the maximum expected loss at a given confidence level over a specified time period due to market risk. In calculating VaR, the ACD uses historical data on the performance assets. The period used for this purposes is the "observation period".
- 36.1.1 The "relative VaR" method is used to calculate the global exposure of the following Sub-Fund:
 - Insight Corporate Bond Fund.
 - 36.1.2 The "absolute VaR" method is used to calculate the global exposure of the following Sub-Funds:
 - Insight Global Absolute Return Fund;
 - Insight Global Multi-Strategy Fund; and
 - Insight Inflation Linked Corporate Bond Fund.
- 36.2 As a result of the use of financial derivative instruments, the above Sub-Funds may each leverage their position to generate a notional exposure in excess of their Net Asset Value. The VaR for these Sub-Funds will be calculated daily using a 99% confidence level, one week (5 business days) holding period and calculated on an historic basis using at least 1 year of daily returns (the "observation period").
- "Absolute" VaR is the VaR of a Sub-Fund expressed as a percentage of the Net Asset Value of the Fund. For example, if a Sub-Fund calculates a VaR of 5% of NAV based on a 99% confidence level on a one week (five business days) holding period, this means

that, under normal market conditions, the Sub-Fund can be 99% confident that the Sub-Fund will not suffer a loss of more than 5% of the NAV over a one week period. For Sub-Funds using absolute VaR, the ACD has set a maximum VaR limit which is set out in Appendix I. Absolute VaR is generally an appropriate approach for Sub-Funds that do not have an identifiable benchmark or for Sub-Funds investing in multi-asset classes which do not define their investment target in relation to a benchmark but rather to an absolute return target.

“Relative VaR” is the absolute VaR of a Sub-Fund expressed as a multiple of the VaR of a benchmark or reference portfolio (i.e. a portfolio similar to the Sub-Fund’s portfolio but which does not include derivatives). The reference portfolio for VaR purposes may be different from the benchmark used for performance calculation. For a Sub-Fund that uses the relative VaR approach, the relative VaR on the Sub-Fund’s portfolio must not exceed twice the VaR on the comparable benchmark or reference portfolio. The holding period and historical observation period may change provided that they are in accordance with the requirements of the FCA.

If, on any particular day, the calculation showed the relative or absolute VaR to be above the maximum VaR limit, the ACD would need to take steps to change the portfolio so that the VaR came back to within the maximum VaR limit.

37. Commitment approach

- 37.1 All Sub-Funds not using the VaR approach for the calculation of global exposure will use the commitment approach.
- 37.2 Where the ACD uses the commitment approach for the calculation of global exposure, it must:
 - 37.2.1 ensure that it applies this approach to all derivative and forward transactions (including embedded derivatives as referred to in paragraph 19.5 (“Derivatives: General”)), whether used as part of the Sub-Fund’s general investment policy, for the purposes of risk reduction or for the purposes of efficient portfolio management; and
 - 37.2.2 convert each derivative or forward transaction into the market value of an equivalent position in the underlying asset of that derivative or forward (standard commitment approach).

The ACD may use other calculation methods which are equivalent to the standard commitment approach. The ACD may take account of netting and hedging arrangements when calculating global exposure of a Sub-Fund where those arrangements do not disregard obvious and material risks and result in a clear reduction in risk exposure. Where the use of derivatives or forward transactions does not generate incremental exposure for a Sub-Fund, the underlying exposure need not be included in the commitment calculation. Where the commitment approach is used, temporary borrowing arrangements entered into on behalf of a Sub-Fund in accordance with paragraph 39 need not form part of the global exposure calculation.

- 37.3 Cash obtained from borrowing, and borrowing which the ACD reasonably regards an Eligible Institution or an Approved Bank to be committed to provide, is available for cover under the previous paragraph 33 except where paragraph 37.4 below applies.
- 37.4 Where, for the purposes of this paragraph a Sub-Fund borrows an amount of currency from an Eligible Institution or an Approved Bank; and keeps an amount in another currency, at least equal to such borrowing for the time on deposit with the lender (or his agent or nominee), then this applies as if the borrowed currency, and not the deposited currency, were part of the Scheme Property.

38. Cash and near cash

- 38.1 Cash and near cash must not be retained in the Scheme Property of a Sub-Fund except to the extent that this may reasonably be regarded as necessary in order to enable:
 - 38.1.1 the pursuit of the Sub-Fund’s investment objectives;
 - or
 - 38.1.2 redemption of units;
 - or
 - 38.1.3 efficient management of the Sub-Fund in accordance with its investment objectives;
 - or
 - 38.1.4 other purposes which may reasonably be regarded as ancillary to the investment objectives of the Sub-Fund.
- 38.2 During the period of any initial offer, the Scheme Property of a Sub-fund may however consist of cash and near cash without limitation.

39. General power to borrow

- 39.1 The Company may in accordance with this paragraph and paragraph 40, borrow money for the use of a Sub-Fund on terms that the borrowing is to be repayable out of the Scheme Property of that Sub-Fund. This power to borrow is subject to the obligation of the Sub-Fund to comply with any restriction in the Instrument.
- 39.2 The Company may borrow only from an Eligible Institution or an Approved Bank.
- 39.3 The ACD must ensure that any borrowing is on a temporary basis and that borrowings are not persistent, and for this purpose the ACD must have regard in particular to:
 - 39.3.1 the duration of any period of borrowing;
 - and
 - 39.3.2 the number of occasions on which resort is had to borrowing in any period.
- 39.4 The ACD must ensure that no period of borrowing exceeds three months, whether in respect of any specific sum or at all, without the prior consent of the Depositary. The Depositary may only give its consent on such conditions as appear to the Depositary appropriate to ensure that the borrowing does not cease to be on a temporary basis only.
- 39.5 These borrowing restrictions do not apply to “back to back” borrowing for currency hedging purposes.
- 39.6 The Company must not issue any debenture unless it acknowledges or creates a borrowing that complies with this paragraph 39.

40. Borrowing limits

- 40.1 The ACD must ensure that a Sub-Fund's borrowing does not, on any business day, exceed 10% of the value of the Scheme Property of that Sub-Fund.
- 40.2 This paragraph does not apply to "back to back" borrowing for currency hedging purposes.
- 40.3 In this paragraph 40, "borrowing" includes, as well as borrowing in a conventional manner, any other arrangement (including a combination of derivatives) designed to achieve a temporary injection of money into the Scheme Property in the expectation that the sum will be repaid.

41. Restrictions on lending of money

- 41.1 None of the money in the Scheme Property of a Sub-Fund may be lent and, for the purposes of this prohibition, money is lent by the Sub-Fund if it is paid to a person ("the payee") on the basis that it should be repaid, whether or not by the payee.
- 41.2 Acquiring a debenture is not lending for the purposes of paragraph 41.1; nor is the placing of money on deposit or in a current account.
- 41.3 Paragraph 41.1 does not prevent the Company from providing an officer of the Company with funds to meet expenditure to be incurred by him for the purposes of the Company (or for the purposes of enabling him properly to perform his duties as an officer of the Company) or from doing anything to enable an officer to avoid incurring such expenditure.

42. Restrictions on lending of property other than money

- 42.1 The Scheme Property of a Sub-Fund other than money must not be lent by way of deposit or otherwise.
- 42.2 Transactions permitted by paragraph 47 are not lending for the purposes of paragraph 42.
- 42.3 The Scheme Property of a Sub-Fund must not be mortgaged.
- 42.4 Where the transactions in derivatives or forward transactions are used for the account of the authorised fund in accordance with any of the rules in Chapter 5 of the COLL Sourcebook, nothing in this rule prevents the Company or the Depositary at the request of the Company from:
 - 42.4.1 (lending, depositing, pledging or charging Scheme Property for margin requirements;
or
 - 42.4.2 transferring Scheme Property under the terms of an agreement in relation to margin requirements, provided that the ACD reasonably considers that both the agreement and the margin arrangements made under it (including in relation to the level of margin) provide appropriate protection to shareholders.

43. General power to accept or underwrite placings

- 43.1 Any power in Chapter 5 of the COLL Sourcebook to invest in transferable securities may be used for the purpose of entering into transactions to which this section applies, subject to compliance with any restriction in the Instrument.
- 43.2 This section applies, subject to paragraph 43.3, to any agreement or understanding:
 - 43.2.1 which is an underwriting or sub-underwriting agreement;
or

- 43.2.2 which contemplates that securities will or may be issued or subscribed for or acquired for the account of a Sub-Fund.

43.3 Paragraph 43.2 does not apply to:

- 43.3.1 an option;
or
- 43.3.2 a purchase of a transferable security which confers a right:
 - 43.3.2.1 to subscribe for or acquire a transferable security;
or
 - 43.3.2.2 to convert one transferable security into another.
- 43.3.3 The exposure of a Sub-Fund to agreements and understandings within paragraph 43.2 must, on any business day:
 - 43.3.3.1 be covered in accordance with the requirements of paragraph 33;
and
 - 43.3.3.2 be such that, if all possible obligations arising under them had immediately to be met in full, there would be no breach of any limit in Chapter 5 of the COLL Sourcebook.

44. Guarantees and indemnities

- 44.1 The Company or the Depositary for the account of the Company must not provide any guarantee or indemnity in respect of the obligation of any person.
- 44.2 None of the Scheme Property of a Sub-Fund may be used to discharge any obligation arising under a guarantee or indemnity with respect to the obligation of any person.
- 44.3 Paragraphs 44.1 and 44.2 do not apply in respect of a Sub-Fund to:
 - 44.3.1 any indemnity or guarantee given for margin requirements where the derivatives or forward transactions are being used in accordance with the FCA Regulations;
 - 44.3.2 an indemnity falling within the provisions of regulation 62(3) (Exemptions from Liability to be Void) of the OEIC Regulations;
 - 44.3.3 an indemnity (other than any provision in it which is void under regulation 62 of the OEIC Regulations) given to the Depositary against any liability incurred by it as a consequence of the safekeeping of any of the Scheme Property by it or by anyone retained by it to assist it to perform its function of the safekeeping of the Scheme Property;
and
 - 44.3.4 an indemnity given to a person winding up a scheme if the indemnity is given for the purposes of arrangements by which the whole or part of the property of that scheme becomes the first property of a Sub-Fund and the holders of units in that scheme become the first shareholders in the Sub-Fund.

45. Efficient Portfolio Management

- 45.1 The ACD may use the Scheme Property of a Sub-Fund for the purposes of EPM.

45.2 To achieve EPM the ACD will use derivative transactions or forward currency transactions as appropriate. The ACD may also use stock lending as per paragraph 47. However such transactions must be:

- 45.2.1 economically appropriate in that they are realised in a cost effective way;
- 45.2.2 fully covered by assets within the Sub-Fund;
or
- 45.2.3 used to achieve one or more of the following:
 - 45.2.3.1 a reduction in risk,
 - 45.2.3.2 a reduction in cost,
 - 45.2.3.3 the generation of additional capital or income for the Sub-Fund with a level of risk which is consistent with the risk profile of the Sub-Fund.

Therefore, no transaction may be undertaken under these provisions if it could reasonably otherwise be regarded as speculative.

45.3 Transactions deemed to offer an acceptable low level of risk under paragraph 45.2.3.3 above may include those where the:

- 45.3.1 transactions take advantage of pricing imperfections in relation to the acquisition and disposal (or disposal and acquisition) of rights in relation to the same or equivalent property;
or
- 45.3.2 transactions where the Sub-Fund receives a premium for the writing of a covered call or put option, even if the benefit arising is obtained at the expense of the chance of greater possible future benefit.

46. General

- 46.1 It is not intended that any Sub-Fund will have an interest in any immovable property or tangible movable property.
- 46.2 A potential breach of any of these limits does not prevent the exercise of rights conferred by investments held by the Sub-Fund but, in the event of a consequent breach, the ACD must then take such steps as are necessary to restore compliance with the investment limits as soon as practicable having regard to the interests of Shareholders.

47. Stock Lending

- 47.1 The Depositary at the request of the Company, may enter into stock lending or repo transactions for the account of the Company. The entry is permitted for the generation of additional income for the benefit of the Company, and hence for its investors.
- 47.2 The specific method of stock lending permitted in this section is in fact not a transaction which is a loan in the normal sense. Rather it is an arrangement of the kind described in section 263B of the Taxation of Chargeable Gains Act 1992, under which the lender transfers securities to the borrower otherwise than by way of sale and the borrower is to transfer those securities, or securities of the same type and amount, back to the lender at a later date. In accordance with good market practice, a separate transaction by way of transfer of assets is also involved for the purpose of providing collateral to the "lender" to cover him against the risk that the future transfer back of the securities may not be satisfactorily completed.

47.3 The stock lending permitted by this section may be exercised by the Company when it reasonably appears to the Company to be appropriate to do so with a view to generating additional income for the Sub-Fund with an acceptable degree of risk.

47.4 The Company or the Depositary at the request of Company may enter into a stock lending arrangement of the kind described in section 263B of the Taxation of Chargeable Gains Act 1992 (without extension by section 263C), but only if:

- 47.4.1 all the terms of the agreement under which securities are to be reacquired by the Depositary for the account of the Company, are in a form which is acceptable to the Depositary and are in accordance with good market practice;
- 47.4.2 the counterparty is:
 - 47.4.2.1 an authorised person;
or
 - 47.4.2.2 a person authorised by a Home State regulator;
or
 - 47.4.2.3 a person registered as a broker-dealer with the Securities and Exchange Commission of the United States of America;
or
 - 47.4.2.4 a bank, or a branch of a bank, supervised and authorised to deal in investments as principal, with respect to OTC derivatives by at least one of the following federal banking supervisory authorities of the United States of America:
 - a) the Office of the Comptroller of the Currency;
 - b) the Federal Deposit Insurance Corporation;
 - c) the Board of Governors of the Federal Reserve System;
and
 - d) the Office of Thrift Supervision,

and

47.4.3 collateral is obtained to secure the obligation of the counterparty under the terms referred to in paragraph 47.4.1 and the collateral is:

- 47.4.3.1 acceptable to the depositary;
- 47.4.3.2 adequate;
and
- 47.4.3.3 sufficiently immediate.

47.5 The counterparty for the purpose of paragraph 47.4 is the person who is obliged under the agreement referred to in paragraph 47.4.1 to transfer to the depositary the securities transferred by the depositary under the stock lending arrangement or securities of the same kind.

Paragraph 47.4.3 does not apply to a stock lending transaction made through Euroclear Bank SA'NV's Securities Lending and Borrowing Programme.

47.6 The Depositary must ensure that the value of the collateral at all times is at least equal to the value of the securities transferred by the Depositary. This duty may be regarded as satisfied in respect of collateral the validity of which is about to expire or has expired where

the Depositary takes reasonable care to determine that sufficient collateral will again be transferred at the latest by the close of business on the day of expiry.

47.7 Any agreement for transfer at a future date of securities or of collateral (or of the equivalent of either) may be regarded, for the purposes of valuation under the COLL Sourcebook, as an unconditional agreement for the sale or transfer of property, whether or not the property is part of the property of the Company.

47.8 There is no limit on the value of the Scheme Property of a Company which may be the subject of stock lending transactions.

47.9 Securities Financing Transactions Regulation ("SFTR")
The European Parliament passed the SFTR which came into force on 12th January 2016. The following mandatory disclosures are being made for all new Sub-Funds launched after the SFTR came into force.

The extent of Securities Financing Transactions ("SFT"s) in each Sub-Fund is limited to that of lending of securities within the portfolio as set out within this section (section 47) and the Miscellaneous section (section 48) below.

Additionally, the Stock Lending arrangements carry the following risk:

Certain Sub-Funds may engage in securities lending activities. As with any lending, there are risks of delay and recovery. Should the borrower of securities fail financially or default in any of its obligations under any securities lending transaction, the collateral provided in connection with such transaction will be called upon. The value of the collateral will be maintained to equal or exceed the value of the securities transferred. However, there is a risk that the value of the collateral may fall below the value of the securities transferred.

In addition to 47.8, the Manager has a self-imposed guideline restriction on stock lending to limit such usage to 15% of the AUM of the respective Sub-Fund and the expected usage of SFT's for each Sub-Fund will not exceed this limit.

Any revenue generated through stock lending will be split 20% with the agent lender and 80% with the respective sub-fund.

48. Miscellaneous

48.1 A Sub-Fund's exposure to any single counterparty to a securities lending or an OTC derivative transaction may not exceed the relevant limits in paragraph 14.

48.2 The Sub-Fund is permitted to balance exposure to any counterparty by taking or giving 'collateral'. Collateral is a pledge of an asset as security for one party's risk exposure to the other. The Sub-Funds can accept cash, certain government bonds and high grade corporate bonds as eligible collateral for OTC derivatives or certain government bonds and baskets of certain equities for securities lending transactions.

48.3 Sometimes the Sub-Fund, or the OTC derivative counterparty, will apply a 'haircut' to non-cash collateral. A haircut is a nominal reduction applied to the market value of collateral to provide a buffer against rises and falls in the value or the exposure of that type of collateral.

48.4 The value of collateral, taking account of haircuts, is regularly adjusted to maintain the agreed level/range of exposure to the Sub-Fund.

For collateral received as part of OTC derivative transactions, a Sub-Fund will become the (legal) owner of the collateral when it is taken but places it with the Depositary for safekeeping.

For collateral received as part of securities lending, it will be held by a tri-party agent. A tri-party agent generally acts a settlement and collection service for securities and collateral between the lender and the borrower and maintains the value, quality and performance of the collateral.

48.5 The Sub-Fund is entitled to reinvest cash collateral but this is subject to certain liquidity and risk management requirements.

Investment and Financial Techniques

Certain Sub-Funds may enter into TRS and may engage in SFTs, being repurchase or reverse-repurchase transactions and stock lending in accordance with the FCA Regulations and normal market practice. Any such use of SFTs and TRS will be consistent with the investment objective and policy of the relevant Sub-Fund and, where utilised, any assets of such Sub-Fund may be subject to SFTs and/or TRS.

Total return swaps

A TRS is a contract whereby one party (e.g. the total return payer) agrees to make a series of payments to another party (e.g. the receiver) based on the change in the market value of the assets underlying such contract (which can include a security or baskets thereof or eligible index) during the specified period. In exchange, the other party to the contract agrees to make a series of payments calculated by reference to an interest rate and/or some other agreed-upon amount (including the change in market value of other underlying assets).

To the extent relevant, a Sub-Fund may use total return swaps to gain exposure to an asset without owning it or taking physical custody of it. For example, if a Sub-Fund invests in a total return swap on an underlying security, it will receive the price appreciation of the underlying security in exchange for payment of an agreed-upon fee.

A Sub-Fund may use total return swaps to more efficiently express a view in a given position and/or to gain or reduce exposure in a more cost effective manner and/or reduce risk. Total return swaps are typically used on single reference entities. Additionally, total return swaps can be used to hedge existing long positions or exposures. Accordingly, the underlying strategy and composition of the investment portfolio of TRS will be consistent with the investment policy of the Sub-Fund.

As at the date of this Prospectus, whilst all Sub-Funds may use TRS or financial derivative instruments with the same characteristics (as part of their derivative usage) for efficient portfolio management or, in the case of the following Sub-Funds also for investment purposes:

1. Insight Corporate Bond Fund;
2. Insight Global Absolute Return Fund;
3. Insight Global Multi-Strategy Fund;
4. Insight Inflation-Linked Corporate Bond Fund;
5. Newton Global Balanced Fund;
6. Newton Global Dynamic Bond Fund;
7. Newton Global Dynamic Bond Income Fund;
8. Newton Global High Yield Bond Fund;

9. Newton International Bond Fund;
10. Newton Long Corporate Bond Fund;
11. Newton Multi-Asset Balanced Fund;
12. Newton Multi-Asset Diversified Return Fund;
13. Newton Multi-Asset Income Fund; and
14. Newton Real Return Fund,
15. it is not expected that the following Sub-Funds: (i) BNY Mellon Long-Term Global Equity Fund, (ii) Insight Equity Income Fund (iii) Insight Equity Income Booster Fund and (iv) The Boston Company US Opportunities Fund will use such instruments. However, the ACD reserves the right to permit such Sub-Funds to use such instruments in the future.

Repurchase / reverse repurchase agreements and stock lending agreements

A stock lending agreement is an agreement under which title to the “loaned” securities is transferred by a “lender” to a “borrower” with the borrower contracting to deliver “equivalent securities” to the lender at a later date. Stock lending aims to generate additional income with an acceptable degree of risk.

Repurchase agreements are transactions in which one party sells a security to the other party with a simultaneous agreement to repurchase the security at a fixed future date at a stipulated price reflecting a market rate of interest unrelated to the coupon rate of the securities. A reverse repurchase agreement is a transaction whereby the Sub-Fund purchases securities from a counterparty and simultaneously commits to resell the securities to the counterparty at an agreed upon date and price. An Sub-Fund may enter into repurchase agreements for the purpose of generating additional capital or income, for reducing costs or risk and/or otherwise to more efficiently express a view in a given position.

Securities Financing Transactions

SFTs and TRS will only be entered with “approved counterparties” as defined in the FCA Regulations and further described above in paragraphs 24 and 47 of this Appendix II. Any counterparty shall also be subject to an appropriate internal credit assessment carried out by the Company, which shall include amongst other considerations, external credit ratings of the counterparty, the regulatory supervision applied to the relevant counterparty, industry sector risk and concentration risk.

Subject to this, the ACD has discretion as to the appointment of counterparties when entering into SFTs and TRS in furtherance of the Sub-Funds’ investment objectives and policies. It is not possible to comprehensively list in this Prospectus all the counterparties as they may change from time to time.

The counterparty does not have discretion over the composition or management of a Sub-Fund’s portfolio or over any underlying of financial derivative instruments used by a Sub-Fund and counterparty approval is not required for any investment decision made by an Investment Manager regarding a Sub-Fund. However, the ACD reserves the right to permit the granting of such discretion with the agreement of the relevant Investment Manager.

With the exception of revenues generated through stock lending, all revenues arising from SFTs and TRS, net of any direct and indirect operational costs and fees arising, will be retained by the relevant Sub-Fund. Any revenue generated through stock lending will be split 20% with the agent lender and 80% with the respective sub-fund.

Any entities who receive revenue from stock lending or use of other SFTs shall be outlined in the annual report of the Company, which shall indicate if the entities are related to the ACD or the Depositary.

The maximum percentage of a Sub-Fund’s assets that may be the subject of SFTs and/or TRS and the expected percentage of such usage is set out in the details for each Sub-Fund in Appendix I to this Prospectus.

The section above entitled “Risk Factors” provides a description of the risks associated with investments in derivatives, repurchase and reverse repurchase agreements, stock lending and the management of collateral.

The ACD will disclose in the Company’s annual report certain information regarding its use of SFTs and TRS.

With the exception of collateral received as part of a stock lending transaction, the assets of a Sub-Fund that are subject to SFTs and TRS are held by the Depositary for safekeeping. For collateral received as part of stock lending, it will be held by a tri-party agent. A tri-party agent generally acts a settlement and collection service for securities and collateral between the lender and the borrower and maintains the value, quality and performance of the collateral.

Collateral

Collateral obtained under an SFT or TRS must meet the criteria set out in the COLL Sourcebook, as further described above in this Appendix II. The types of assets that may be received as collateral in respect of SFTs and TRS will be of high quality and may include (i) cash (with the exception of stock lending transactions where cash is not used as collateral), (ii) sovereign bonds, (iii) supranational debt obligations, (iv) FTSE 100 DBV (Class F10) as defined in the CREST Reference Manual and (v) equity securities.

Collateral received must be issued by an entity that is independent from the counterparty and is not expected to display a high correlation with the performance of the counterparty. Collateral must also be sufficiently diversified in terms of country, markets and issuers.

Any collateral obtained by a Sub-Fund under an SFT or TRS will be valued daily at mark-to-market prices. Sometimes the Sub-Fund, or the OTC derivative counterparty, will apply a ‘haircut’ to non-cash collateral. A haircut is a nominal reduction applied to the market value of collateral to provide a buffer against rises and falls in the value or the exposure of that type of collateral. Daily variation margin may be used if the value of collateral, as adjusted for any haircut, falls below the value of the relevant counterparty exposure.

The reuse of collateral is limited by the COLL Sourcebook to certain asset classes. Such reuse should neither result in a change to a Sub-Fund’s investment objectives nor increase substantially its risk profile.

As at the date of this Prospectus, whilst all Sub-Funds may reuse collateral in line with the limitations in the COLL Sourcebook, no Sub-Funds currently reuse collateral. However, the ACD reserves the right to permit such reuse of collateral in the future.

APPENDIX III

List of Additional Eligible Securities Markets

Australia	1. Australian Stock Exchange	United Arab Emirates	35. Abu Dhabi Securities Exchange (ADX) 36. Dubai Financial Market (DFM) 37. Qatar Stock Exchange
Brazil	2. BM&F BOVESPA SA	United Kingdom	38. Alternative Investment Market
Canada	3. The OTC market in Canadian Government Securities conducted by primary dealers selected by the Bank of Canada 4. Toronto Stock Exchange 5. TSX Venture Exchange	USA	39. NASDAQ 40. New York Stock Exchange 41. NYSE MKT LLC 42. NASDAQ PHLX LLC 43. NASDAQ OMX BX 44. Chicago Stock Exchange 45. NYSE Arca 46. National Stock Exchange 47. OTC Bulletin Board 48. ICMA 49. The OTC market in US government securities conducted by primary dealers selected by the Federal Reserve Bank of New York 50. NYSE MKT LLC
Channel Islands	6. Channel Islands Stock Exchange		
China	7. Shanghai Stock Exchange 8. Shenzhen Stock Exchange		
Hong Kong	9. Hong Kong Exchange 10. Hong Kong Exchanges & Clearing Limited		
India	11. Bombay Stock Exchange 12. National Stock Exchange of India		
Indonesia	13. Indonesia Stock Exchange, ISX (Bursa Efek Indonesia)		
Israel	14. Tel-Aviv Stock Exchange		
Japan	15. Tokyo Stock Exchange 16. Osaka Stock Exchange 17. Nagoya Stock Exchange 18. Sapporo Securities Exchange 19. JASDAQ		
Kenya	20. Nairobi Securities Exchange		
Korea (Republic of)	21. Korea Exchange (KRX)		
Kuwait	22. Kuwait Stock Exchange (KSE)		
Malaysia	23. Bursa Malaysia Berhad		
Mexico	24. Mexican Stock Exchange		
New Zealand	25. New Zealand Stock Exchange		
Oman	26. Muscat Securities Market (MSM)		
Philippines	27. Philippine Stock Exchange		
Russia	28. Moscow Exchange (MICEX)		
Singapore	29. Singapore Exchange		
South Africa	30. JSE Securities Exchange		
Switzerland	31. SIX Swiss Exchange AG		
Taiwan	32. Taiwan Stock Exchange		
Thailand	33. The Stock Exchange of Thailand (SET)		
Turkey	34. Istanbul Stock Exchange		

APPENDIX IV

List of Additional Eligible Derivatives Markets

Australia	1. Australian Stock Exchange (ASX)
Brazil	2. BM&F Bovespa SA
Canada	3. Montreal Exchange
France	4. NYSE Euronext Paris
Germany	5. Eurex Deutschland
Hong Kong	6. Hong Kong Exchange
Japan	7. Osaka Securities Exchange (OSE) 8. Tokyo Stock Exchange (TSE) 9. Tokyo Financial Exchange Inc.
Korea (Republic of)	10. Korea Exchange (KRX)
Russia	11. Moscow Exchange (MICEX)
South Africa	12. JSE Securities Exchange
Singapore	13. Singapore Exchange
Spain	14. MEFF Sociedad Holding (Mercado Espanol de Futuros Financieros)
Sweden	15. NASDAQ OMX Stockholm AB
Switzerland	16. Eurex Zurich
USA	17. Chicago Board Options Exchange (CBOE) 18. New York Mercantile Exchange (NYMEX) 19. NASDAQ PHLX LLC 20. CME Group Inc. 21. New York Stock Exchange 22. New York Futures Exchange (NYFE) 23. Chicago Mercantile Exchange 24. ICE Futures US 25. NYSE MKT LLC 26. Chicago Board of Trade (CBOT) 27. CBOE Futures Exchange (CFE)

APPENDIX V

Past Performance Details

Past performance is not a guide to future performance. The value of investments and the income from them is not guaranteed and can fall as well as rise due to stock market and currency movements. When you sell your investment you may get back less than you originally invested.

STERLING INCOME AND STERLING INCOME A SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund				28/09/2007	12.24	15.23	8.72	4.96	25.02
Insight Corporate Bond Fund				03/11/1997	14.12	0.77	8.80	-0.94	11.13
Insight Equity Income Fund	*			09/02/2013	N/A	N/A	2.59	-0.26	14.06
Insight Equity Income Booster Fund	*			09/02/2013	N/A	N/A	1.85	-1.41	14.35
Insight Global Absolute Return Fund				11/02/2013	N/A	N/A	3.95	-2.18	3.71
Insight Global Multi-Strategy Fund				09/02/2013	N/A	N/A	4.74	-1.53	10.27
Insight Global Select Bond Fund	*		7	09/02/2013	N/A	N/A	3.23	2.33	1.58
Insight Inflation-Linked Corporate Bond Fund				09/02/2013	N/A	N/A	3.69	-1.73	8.42
Newton Asian Income Fund	!			30/11/2005	21.46	-1.27	10.35	-8.51	29.67
Newton Continental European Fund				01/06/1987	18.47	24.65	-1.62	8.42	14.24
Newton Emerging Income Fund	*			04/10/2012	N/A	-7.57	0.29	-13.58	28.85
Newton Global Dynamic Bond Fund	!			28/04/2006	-0.139.78	1.14	1.71	-1.36	2.87
Newton Global Dynamic Bond Income Fund	!			09/05/2016	N/A	N/A	N/A	N/A	0.90
Newton Global Emerging Markets Fund				27/07/2015	N/A	N/A	N/A	N/A	21.13
Newton Global Equity Fund				01/06/1987	11.46	23.43	10.06	8.12	19.72
Newton Global High Yield Bond Fund	!			02/10/2000	21.79	5.28	-1.63	-3.52	13.34
Newton Global Income Fund	*		5	30/11/2005	10.19	14.19	8.22	9.10	28.50
Newton Global Opportunities Fund				01/07/2005	10.47	20.16	11.26	10.95	21.92
Newton International Bond Fund				01/02/1991	-1.33	-8.45	5.34	0.21	22.25
Newton Multi-Asset Balanced Fund	!		2	04/11/1986	5.26	11.07	5.04	1.82	12.43
Newton Multi-Asset Diversified Return Fund			4	25/11/2006	7.60	5.21	5.59	-0.17	10.52
Newton Multi-Asset Growth Fund			3	19/03/1990	11.38	20.72	9.69	8.78	10.47
Newton Multi-Asset Income Fund				04/02/2015	N/A	N/A	N/A	N/A	17.49
Newton Oriental Fund				30/11/1990	10.06	-3.81	3.33	-6.73	23.70
Newton Real Return Fund	!			01/09/1993	3.40	5.29	3.08	0.93	3.76
Newton Real Return Fund A	!			30/10/2000	2.98	4.88	2.67	0.52	3.35
Newton UK Equity Fund	!			01/05/1985	17.86	17.47	6.49	10.55	4.43
Newton UK Income Fund	*		6	01/06/1987	8.54	18.93	5.54	5.96	8.44
Newton UK Opportunities Fund				08/02/2002	12.26	21.52	9.61	12.17	5.71
The Boston Company US Opportunities Fund			1	31/10/1986	9.52	33.65	13.70	5.77	24.16

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Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
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- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
- 7 The name of the Sub-Fund was changed on 1 February 2016 from Insight Strategic Bond Fund to Insight Global Select Bond Fund. The Sub-Fund was closed on 28 March 2017.

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STERLING ACCUMULATION SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Equity Income Fund	*			09/02/2013	N/A	N/A	2.59	-0.26	14.07
Insight Equity Income Booster Fund	*			09/02/2013	N/A	N/A	1.85	-1.40	14.33
Insight Global Absolute Return Fund				09/02/2013	N/A	N/A	4.01	-2.18	3.71
Insight Global Multi-Strategy Fund				09/02/2013	N/A	N/A	4.74	-1.53	10.28
Insight Global Select Bond Fund	*		7	09/02/2013	N/A	N/A	3.23	2.33	1.59
Insight Inflation-Linked Corporate Bond Fund				09/02/2013	N/A	N/A	3.69	-1.73	8.42
Newton Emerging Income Fund	*			04/10/2012	N/A	-7.54	0.29	-13.59	28.85
Newton Global Emerging Markets Fund				25/07/2015	N/A	N/A	N/A	N/A	21.13
Newton Global Income Fund	*		5	14/03/2012	N/A	14.20	8.22	9.10	28.49
Newton Multi-Asset Diversified Return Fund			4	25/11/2006	7.61	5.20	5.59	-0.16	10.52
The Boston Company US Opportunities Fund			1		N/A	N/A	14.35	6.39	24.87

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Source: Lipper Hindsight

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 - 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
 - 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
 - 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
 - 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
 - 7 The name of the Sub-Fund was changed on 1 February 2016 from Insight Strategic Bond Fund to Insight Global Select Bond Fund. The Sub-Fund was closed on 28 March 2017.

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INSTITUTIONAL SHARES W (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Corporate Bond Fund~				03/09/2012	N/A	1.33	9.30	-0.45	11.63
BNY Mellon Long-Term Global Equity Fund^				30/08/2012	N/A	16.18	9.63	5.82	26.07
Insight Equity Income Fund^	*			09/02/2013	N/A	N/A	3.44	0.56	15.00
Insight Equity Income Booster Fund^	*			09/02/2013	N/A	N/A	2.49	-0.77	15.08
Insight Global Absolute Return Fund^				11/02/2013	N/A	N/A	4.97	-1.84	4.40
Insight Global Multi-Strategy Fund^				11/02/2013	N/A	N/A	5.56	0.87	11.06
Newton Asian Income Fund^	!			30/08/2012	N/A	-0.44	11.26	-7.80	30.71
Newton Continental European Fund^				30/08/2012	N/A	25.70	-0.84	9.31	15.20
Newton Emerging Income Fund^	*			15/10/2012	N/A	-6.78	1.11	-12.90	29.90
Newton Global High Yield Bond Fund [∞]	!			03/09/2012	N/A	-5.88	-1.16	-2.92	13.96
Newton Global Equity Fund^				03/09/2012	N/A	24.45	10.92	9.01	20.71
Newton Global Emerging Markets Fund^				27/07/2015	N/A	N/A	N/A	N/A	22.05
Newton Global Income Fund^	*		5	04/09/2012	N/A	15.14	9.12	10.00	29.55
Newton Global Opportunities Fund^				04/09/2012	N/A	21.13	12.16	11.91	22.92
Newton Multi-Asset Balanced Fund^	!		2	31/08/2012	N/A	11.98	5.90	2.78	13.49
Newton Multi-Asset Diversified Return Fund^			4	03/09/2012	N/A	6.02	6.39	0.63	11.40
Newton Multi-Asset Growth Fund^			3	03/09/2012	N/A	21.72	10.59	9.80	11.52
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	17.49
Newton Oriental Fund^				03/09/2012	N/A	-3.06	4.18	-5.99	24.70
Newton Real Return Fund^	!			05/09/2012	N/A	5.56	3.35	1.17	4.03
Newton UK Equity Fund^	!			03/09/2012	N/A	18.45	7.37	11.45	5.28
Newton UK Income Fund^	*		6	04/09/2012	N/A	19.96	6.40	6.81	9.33
Newton UK Opportunities Fund^				03/09/2012	N/A	22.53	10.48	13.09	6.58
The Boston Company US Opportunities Fund^			1	30/08/2012	N/A	34.73	14.64	6.66	25.18
Insight Global Select Bond Fund~	*		7	11/02/2013	N/A	N/A	3.69	2.80	2.16
Insight Inflation-Linked Corporate Bond Fund~				11/02/2013	N/A	N/A	4.24	-1.20	9.00
Newton Global Dynamic Bond Fund~	!			03/09/2012	N/A	1.81	2.35	-0.61	3.58
Newton International Bond Fund~				04/09/2012	N/A	-8.03	5.82	0.67	22.79

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Source: Lipper Hindsight

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- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from Institutional Shares W (Net Accumulation) to Institutional Shares W (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from Institutional Shares W (Net Accumulation) to Institutional Shares W (Accumulation).
- ∞ The name of the Share Class was changed on 1 March 2017 from Institutional Shares W (Net Accumulation) to Institutional Shares W (Accumulation).
- † As of the date of this Prospectus there are no Shares in issue. No past performance data is currently available.
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
- 2 The name of the Sub-Fund was changed on 2 January 2015 from Newton Balanced Fund to Newton Multi-Asset Balanced Fund.
- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
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INSTITUTIONAL SHARES W (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund^				30/8/2012	N/A	16.09	9.62	5.83	26.06
Insight Equity Income Fund^	*			09/02/2013	N/A	N/A	3.45	0.56	15.01
Insight Equity Income Booster Fund^	*			09/02/2013	N/A	N/A	2.56	-0.76	15.10
Insight Global Absolute Return Fund^				11/02/2013	N/A	N/A	4.94	-1.81	4.30
Insight Global Multi-Strategy Fund^				11/02/2013	N/A	N/A	5.55	-0.87	11.06
Newton Asian Income Fund^	!			30/8/2012	N/A	-0.47	11.26	-7.77	30.71
Newton Continental European Fund^				30/08/2012	N/A	25.70	-0.83	9.31	15.18
Newton Emerging Income Fund^	*			04/10/2012	N/A	-6.80	1.11	-12.87	20.89
Newton Global Dynamic Bond Income Fund ∞	!	#		09/05/2016	N/A	N/A	N/A	N/A	N/A
Newton Global High Yield Bond Fund ∞	!			03/09/2012	N/A	5.87	-1.15	-2.92	13.96
Newton Global Emerging Markets Fund^				25/07/2015	N/A	N/A	N/A	N/A	22.04
Newton Global Equity Fund^			5	03/09/2012	N/A	24.45	10.92	9.01	20.71
Newton Global Income Fund^	*		5	04/09/2012	N/A	15.13	9.12	9.99	29.55
Newton Global Opportunities Fund^				04/09/2012	N/A	21.15	12.17	11.89	22.92
Newton Multi-Asset Balanced Fund^	!		2	31/08/2012	N/A	11.99	5.90	2.79	13.48
Newton Multi-Asset Diversified Return Fund^			4	05/09/2012	N/A	6.01	6.40	0.63	11.39
Newton Multi-Asset Growth Fund^			3	30/08/2012	N/A	21.71	10.59	9.81	11.51
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	18.13
Newton Oriental Fund^				04/09/2012	N/A	-3.07	4.17	-5.96	24.70
Newton Real Return Fund^	!			30/8/2012	N/A	5.55	3.35	1.17	4.03
Newton UK Equity Fund^	!			05/09/2012	N/A	18.44	7.37	11.45	5.29
Newton UK Income Fund^	*		6	04/09/2012	N/A	19.92	6.41	6.83	9.34
Newton UK Opportunities Fund^				05/09/2012	N/A	22.53	10.48	13.09	6.59
The Boston Company US Opportunities Fund^			1	30/8/2012	N/A	34.74	14.57	6.65	25.19
Insight Corporate Bond Fund~				03/09/2012	N/A	1.33	9.30	-0.49	11.63
Insight Global Select Bond Fund~	*		7	11/02/2013	N/A	N/A	3.69	2.80	2.15
Insight Inflation-Linked Corporate Bond Fund~				11/02/2013	N/A	N/A	4.25	-1.20	9.01
Newton Global Dynamic Bond Fund~	!			03/09/2012	N/A	1.83	2.34	-0.61	3.57
Newton International Bond Fund~				04/09/2012	N/A	-8.03	5.81	0.67	22.81

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Source: Lipper Hindsight

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- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from Institutional Shares W (Net Income) to Institutional Shares W (Income).
- ^ The name of the Share Class was changed on 3 February 2017 from Institutional Shares W (Net Income) to Institutional Shares W (Income).
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- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
- 2 The name of the Sub-Fund was changed on 2 January 2015 from Newton Balanced Fund to Newton Multi-Asset Balanced Fund.
- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
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INSTITUTIONAL SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	
BNY Mellon Long-Term Global Equity Fund				24/08/2007	12.87	15.88	9.33	5.56	25.75
Insight Global Absolute Return Fund				09/02/2013	N/A	N/A	4.86	-1.86	4.30
Insight Global Multi-Strategy Fund				09/02/2013	N/A	N/A	5.45	-0.99	10.94
Insight Inflation-Linked Corporate Bond Fund				09/02/2013	N/A	N/A	4.23	-1.22	9.00
Newton Asian Income Fund	!			30/11/2005	22.18	-0.69	10.99	-8.02	30.40
Newton Emerging Income Fund	*			15/10/2012	N/A	-7.03	0.86	-13.09	29.58
Newton Global Income Fund	*		5	30/11/2005	10.84	14.85	8.84	9.72	29.23
Newton Index Linked Gilt Fund				08/11/2005	-0.30	-0.50	19.37	-0.97	25.88
Newton International Bond Fund				07/12/2005	-0.88	-8.04	5.82	0.66	22.78
Newton Long Corporate Bond Fund				24/10/2006	12.41	-1.07	15.37	-0.80	14.36
Newton Long Gilt Fund				08/11/2005	2.45	-6.26	23.64	-0.14	17.71
Newton Multi-Asset Balanced Fund	!		2	05/06/2006	5.87	11.72	5.64	2.40	13.07
Newton Multi-Asset Growth Fund			3	12/06/2006	12.02	21.42	10.32	9.39	11.10
Newton Oriental Fund				25/01/2007	10.69	-3.26	-3.92	-6.20	24.40
Newton Real Return Fund	!			30/06/2009	3.47	5.37	3.13	0.98	3.82
Newton UK Equity Fund	!			11/04/2005	18.56	18.17	7.10	11.18	5.01
Newton UK Income Fund	*		6	11/04/2005	9.17	19.66	6.15	6.56	9.06
Newton UK Opportunities Fund				25/05/2005	12.92	22.24	10.20	12.80	6.32
The Boston Company US Opportunities Fund			1	24/04/2012	N/A	34.42	14.35	6.39	24.87

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Source: Lipper Hindsight

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- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund..
- 2 The name of the Sub-Fund was changed on 2 January 2015 from Newton Balanced Fund to Newton Multi-Asset Balanced Fund.
- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.

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INSTITUTIONAL SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Global Multi-Strategy Fund				09/02/2013	N/A	N/A	5.46	-1.00	10.94
Insight Global Select Bond Fund	*		7	15/02/2015	N/A	N/A	N/A	N/A	2.01
Insight Inflation-Linked Corporate Bond Fund				09/02/2013	N/A	N/A	4.23	-1.19	9.00
Newton Asian Income Fund	!			30/11/2005	22.15	-0.71	10.98	-8.00	30.41
Newton Emerging Income Fund	*			15/10/2012	N/A	-6.99	0.85	-13.08	29.57
Newton Global Dynamic Bond Fund	!			28/04/2006	10.38	1.70	2.23	-0.76	3.44
Newton Global Income Fund	*		5	30/11/2005	10.83	14.84	8.84	9.72	29.21
Newton International Bond Fund				24/04/2007	-0.88	-8.03	5.81	0.66	22.79
Newton UK Equity Fund	!			23/06/2006	18.54	18.15	7.10	11.18	5.02
Newton UK Income Fund	*		6	30/11/2005	9.15	19.62	6.15	6.57	9.06

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Source: Lipper Hindsight

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- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- 2 The name of the Sub-Fund was changed on 31 March 2010 from Newton 60/40 Global Equity Fund to Newton 50/50 Global Equity Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
- 7 The name of the Sub-Fund was changed on 1 February 2016 from Insight Strategic Bond Fund to Insight Global Select Bond Fund. The Sub-Fund was closed on 28 March 2017.

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EXEMPT SHARES 1 (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2014 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund^				17/09/2014	N/A	N/A	N/A	5.98	N/A
Newton 50/50 Global Equity Fund^				15/02/1999	12.75	18.51	5.59	4.81	13.54
Newton Continental European Fund^				01/08/2000	19.73	26.00	-0.57	9.59	15.47
Newton Global Balanced Fund^				23/09/1998	6.88	14.74	7.40	3.70	14.43
Newton Global Equity Fund^				02/02/2006	12.66	24.75	11.19	9.28	21.00
Newton Long Corporate Bond Fund~				29/06/2000	13.70	0.01	16.55	0.17	15.39
Newton Multi-Asset Diversified Return Fund^				30/09/2015	N/A	N/A	N/A	N/A	11.58
Newton Multi-Asset Income Fund^				02/10/2015	N/A	N/A	N/A	N/A	18.58
Newton Oriental Fund^				01/08/2009	11.25	-2.79	4.44	-5.73	25.01
Newton Real Return Fund^	!			29/02/2012	N/A	5.66	3.43	1.25	4.10
Newton UK Equity Fund^	!			02/04/2012	N/A	18.76	7.64	11.73	5.56
Newton UK Income Fund^	*		6	11/10/2002	9.71	20.26	6.68	7.10	9.61
The Boston Company US Opportunities Fund^			1	01/08/2000	10.67	35.09	14.93	6.91	25.50

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Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from Exempt Shares 1 (Gross Accumulation) to Exempt Shares 1 (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from Exempt Shares 1 (Net Accumulation) to Exempt Shares 1 (Accumulation).
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.

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EXEMPT SHARES 2 (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2014 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund^				24/08/2007	13.15	16.17	9.61	5.82	26.06
Newton 50/50 Global Equity Fund^				30/11/2005	12.63	18.39	5.48	4.70	13.44
Newton Global Balanced Fund^				14/04/2005	6.80	14.65	7.30	3.59	14.32
Newton Global Dynamic Bond Fund~	!			28/04/2006	11.78	2.76	3.16	0.14	4.35
Newton Global Equity Fund^				07/10/2004	12.93	24.62	11.08	9.17	20.88
Newton Global Income Fund^	*		5	14/02/2013	N/A	N/A	9.11	10.00	29.55
Newton Global Opportunities Fund^				01/07/2005	11.38	21.15	12.16	11.93	22.91
Newton Index Linked Gilt Fund~				23/02/1998	0.50	0.07	19.89	-0.68	26.49
Newton International Bond Fund~				18/05/2007	-0.32	-7.58	6.37	1.13	23.37
Newton Long Corporate Bond Fund~				06/05/2005	13.58	-0.08	16.44	0.07	15.28
Newton Long Gilt Fund~				01/02/1998	3.30	-5.48	24.65	0.55	18.43
Newton Multi-Asset Diversified Return Fund^			4	27/11/2006	8.28	5.91	6.29	0.62	11.39
Newton Real Return Fund^	!			28/10/2004	3.68	5.57	3.34	1.17	4.03
Newton UK Equity Fund^	!			14/09/2004	N/A	N/A	N/A	N/A	N/A
Newton UK Income Fund^	*		6	26/01/2005	9.44	20.00	6.41	6.82	9.33
Newton UK Opportunities Fund^				31/01/2005	13.20	22.54	10.48	13.09	6.58

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Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- ~ The name of the Share Class was changed on 3 January 2017 from Exempt Shares 2 (Gross Accumulation) to Exempt Shares 2 (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from Exempt Shares 2 (Net Accumulation) to Exempt Shares 2 (Accumulation).
- ∞ The name of the Share Class was changed on 1 March 2017 from Exempt Shares 2 (Gross Accumulation) to Exempt Shares 2 (Accumulation).
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.

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EXEMPT SHARES 2 (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Global Dynamic Bond Fund ~	!			11/06/2013	N/A	N/A	3.17	0.13	4.34
Newton Global Dynamic Bond Income Fund ∞	!	#		09/05/2016	N/A	N/A	N/A	N/A	N/A
Newton Global Income Fund^	*		5	04/08/2006	11.10	15.14	9.12	9.99	29.55
Newton Global Opportunities Fund^				11/06/2013	N/A	N/A	12.16	11.89	22.91
Newton Real Return Fund^	!			14/08/2009	3.66	5.57	3.35	1.15	4.03

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- † As of the date of this Prospectus there are no Shares in issue. No past performance data is currently available.
- ~ The name of the Share Class was changed on 3 January 2017 from Exempt Shares 2 (Gross Income) to Exempt Shares 2 (Income).
- ^ The name of the Share Class was changed on 3 February 2017 from Exempt Shares 2 (Net Income) to Exempt Shares 2 (Income).
- ∞ The name of the Share Class was changed on 1 March 2017 from Exempt Shares 2 (Gross Income) to Exempt Shares 2 (Income).
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.

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EXEMPT SHARES 3 (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Global Equity Fund^				01/10/2008	12.39	24.44	10.91	9.02	20.70
Newton UK Equity Fund^	!			02/04/2012	N/A	18.64	7.53	11.62	5.45

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- ^ The name of the Share Class was changed on 3 February 2017 from Exempt Shares 3 (Net Accumulation) to Exempt Shares 3 (Accumulation).

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EXEMPT L SHARES 1 (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Real Return Fund^	!	#		16/12/2015	N/A	N/A	N/A	N/A	N/A

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ^ The name of the Share Class was changed on 3 February 2017 from Exempt L Shares 1 (Net Income) to Exempt L Shares 1 (Income).

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F SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Corporate Bond Fund~				08/04/2015	N/A	N/A	N/A	N/A	11.79
Insight Inflation-Linked Corporate Bond Fund~				08/04/2015	N/A	N/A	N/A	N/A	9.14
Newton Global Emerging Markets Fund^				17/07/2015	N/A	N/A	N/A	N/A	22.23
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	18.27
The Boston Company US Opportunities Fund^			1	30/04/2014	N/A	N/A	N/A	6.86	25.43

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Source: Lipper Hindsight

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- ~ The name of the Share Class was changed on 3 January 2017 from F Shares (Net Accumulation) to F Shares (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from F Shares (Net Accumulation) to F Shares (Accumulation).
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.

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F SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Corporate Bond Fund~				08/04/2015	N/A	N/A	N/A	N/A	11.77
Insight Inflation-Linked Corporate Bond Fund~				08/04/2015	N/A	N/A	N/A	N/A	9.13
Newton Global Emerging Markets Fund^				27/07/2015	N/A	N/A	N/A	N/A	22.25
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	18.27
The Boston Company US Opportunities Fund^			1	30/04/2014	N/A	N/A	N/A	6.86	25.43

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

~ The name of the Share Class was changed on 3 January 2017 from F Shares (Net Income) to F Shares (Income).

^ The name of the Share Class was changed on 3 February 2017 from F Shares (Net Income) to F Shares (Income).¹ The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.

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P SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014		31/12/2015 to 30/12/2016
Newton Global High Yield Bond Fund	!			15/10/2012	N/A	5.36	-1.59	-3.80	13.39

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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- ∞ The name of the Share Class was changed on 1 March 2017 from P Shares (Net Accumulation) to P Shares (Accumulation).

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P SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund^	!			20/09/2012	N/A	-0.72	10.99	-7.99	30.39
Newton Oriental Fund^				22/06/2012	N/A	-3.27	-3.93	-6.20	24.41

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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S SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Global Multi-Strategy Fund^				09/02/2013	N/A	N/A	6.00	-1.32	10.73

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

^ The name of the Share Class was changed on 3 February 2017 from S Shares (Net Accumulation) to S Shares (Accumulation).

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S SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Insight Global Multi-Strategy Fund^				09/02/2013	N/A	N/A	6.01	-1.28	10.73

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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EURO ACCUMULATION SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			05/03/2012	N/A	-0.78	10.11	-7.98	28.61
Newton Continental European Fund				27/01/2000	17.45	24.58	-2.36	8.56	12.76
Newton Global Equity Fund				10/01/2000	10.51	23.41	9.21	8.25	18.15
Newton International Bond Fund				07/03/2000	-2.07	-8.43	4.66	0.42	20.77
Newton Oriental Fund				14/01/2000	9.13	-3.86	2.57	-6.63	22.07
The Boston Company US Opportunities Fund			1	07/03/2000	N/A	34.24	12.90	5.92	22.57

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.

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EURO INCOME SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			05/03/2012	N/A	-0.79	10.08	-7.94	28.64

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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INSTITUTIONAL SHARES (ACCUMULATION) EURO				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			30/01/2012	N/A	-0.26	10.72	-7.46	29.31

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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INSTITUTIONAL SHARES (INCOME) EURO				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	
Newton Asian Income Fund	!			05/03/2012	N/A	-0.27	-10.73	-7.41	29.36

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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INSTITUTIONAL SHARES (ACCUMULATION) USD				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			02/04/2012	N/A	-0.36	11.34	-7.62	29.12

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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INSTITUTIONAL SHARES (INCOME) USD				Launch Date For Share Class	% Growth				
					31/12/2010 to 31/12/2011	31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015
Newton Asian Income Fund	!			02/04/2012	N/A	-0.39	11.31	-7.55	29.14

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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B SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund^				25/09/2012	N/A	15.80	9.26	5.49	25.82
Insight Equity Income Fund^	*			11/02/2013	N/A	N/A	3.10	0.24	14.77
Insight Equity Income Booster Fund^	*			11/02/2013	N/A	N/A	2.24	-1.01	14.91
Insight Global Absolute Return Fund^				11/02/2013	N/A	N/A	4.69	-1.95	4.19
Insight Global Multi-Strategy Fund^				11/02/2013	N/A	N/A	5.32	-1.06	10.82
Newton Asian Income Fund^	!			01/10/2012	N/A	-0.74	10.90	-8.07	30.46
Newton Continental European Fund^				27/09/2012	N/A	25.29	-1.16	8.96	14.96
Newton Emerging Income Fund^	*			23/10/2012	N/A	-7.08	0.80	-13.15	29.65
Newton Global High Yield Bond Fund ∞	!			04/10/2012	N/A	5.56	-1.43	3.25	13.72
Newton Global Emerging Markets Fund^				27/07/2015	N/A	N/A	N/A	N/A	21.89
Newton Global Equity Fund^				08/10/2012	N/A	24.05	10.55	8.66	20.47
Newton Global Income Fund^	*		5	01/10/2012	N/A	14.78	8.77	9.63	29.30
Newton Global Opportunities Fund^				25/09/2012	N/A	20.75	11.81	11.54	22.68
Newton Multi-Asset Balanced Fund^	!		2	28/09/2012	N/A	11.64	5.57	2.33	13.19
Newton Multi-Asset Diversified Return Fund^			4	26/09/2012	N/A	5.76	6.14	0.36	11.18
Newton Multi-Asset Growth Fund^			3	05/10/2012	N/A	21.34	10.24	9.32	11.23
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	17.93
Newton Oriental Fund^				26/09/2012	N/A	-3.39	-3.84	-6.25	24.49
Newton Real Return Fund^	!			08/10/2012	N/A	5.30	3.07	0.92	3.88
Newton UK Equity Fund^	!			09/10/2012	N/A	18.09	7.02	11.10	5.09
Newton UK Income Fund^	*		6	03/10/2012	N/A	19.57	6.08	6.48	9.12
Newton UK Opportunities Fund^				27/09/2012	N/A	22.14	10.12	12.74	6.37
The Boston Company US Opportunities Fund^			1	24/09/2012	N/A	34.32	14.27	6.31	24.93
Insight Corporate Bond Fund~				04/10/2012	N/A	1.00	9.00	-0.73	11.45
Insight Global Select Bond Fund~	*		7	11/02/2013	N/A	N/A	3.43	2.56	1.83
Insight Inflation-Linked Corporate Bond Fund~				11/02/2013	N/A	N/A	3.98	-1.43	8.80
Newton Global Dynamic Bond Fund~	!			02/10/2012	N/A	1.53	2.07	-0.93	3.37
Newton International Bond Fund~				03/10/2012	N/A	-8.27	5.54	0.41	22.58

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- ~ The name of the Share Class was changed on 3 January 2017 from B Shares (Net Accumulation) to B Shares (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from B Shares (Net Accumulation) to B Shares (Accumulation).
- ∞ The name of the Share Class was changed on 1 March 2017 from B Shares (Net Accumulation) to B Shares (Accumulation).
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
- 2 The name of the Sub-Fund was changed on 2 January 2015 from Newton Balanced Fund to Newton Multi-Asset Balanced Fund.
- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
- 7 The name of the Sub-Fund was changed on 1 February 2016 from Insight Strategic Bond Fund to Insight Global Select Bond Fund. The Sub-Fund was closed on 28 March 2017.

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B SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund^				25/09/2012	N/A	15.80	9.26	5.50	25.82
Insight Equity Income Fund^	*			11/02/2013	N/A	N/A	3.12	0.24	14.79
Insight Equity Income Booster Fund^	*			11/02/2013	N/A	N/A	2.24	-1.01	14.92
Insight Global Absolute Return Fund^				11/02/2013	N/A	N/A	4.70	-1.95	4.19
Insight Global Multi-Strategy Fund^				11/02/2013	N/A	N/A	5.34	-1.12	10.82
Newton Asian Income Fund^	!			01/10/2012	N/A	-0.77	10.90	-8.07	30.47
Newton Continental European Fund^				27/09/2012	N/A	25.27	-1.15	8.94	14.96
Newton Emerging Income Fund^	*			23/10/2012	N/A	-7.10	0.79	-13.15	29.64
Newton Global High Yield Bond Fund ∞	!			04/10/2012	N/A	5.56	-1.43	-3.24	13.72
Newton Global Emerging Markets Fund^				27/07/2015	N/A	N/A	N/A	N/A	21.89
Newton Global Equity Fund^				08/10/2012	N/A	24.05	10.55	8.68	20.48
Newton Global Income Fund^	*		5	01/10/2012	N/A	14.76	8.77	9.65	29.29
Newton Global Opportunities Fund^				25/09/2012	N/A	20.77	11.80	11.51	22.69
Newton Multi-Asset Balanced Fund^	!		2	28/09/2012	N/A	11.64	5.57	2.33	13.20
Newton Multi-Asset Diversified Return Fund^			4	26/09/2012	N/A	5.76	6.14	0.33	11.17
Newton Multi-Asset Growth Fund^			3	05/10/2012	N/A	21.32	10.24	9.31	11.24
Newton Multi-Asset Income Fund^				04/02/2015	N/A	N/A	N/A	N/A	17.94
Newton Oriental Fund^				26/09/2012	N/A	-3.38	3.84	-6.28	24.46
Newton Real Return Fund^	!			08/10/2012	N/A	5.30	3.08	0.92	3.88
Newton UK Equity Fund^	!			09/10/2012	N/A	18.06	7.03	11.10	5.07
Newton UK Income Fund^	*		6	03/10/2012	N/A	19.51	6.08	6.48	9.15
Newton UK Opportunities Fund^				27/09/2012	N/A	22.12	10.13	12.73	6.37
The Boston Company US Opportunities Fund^			1	24/09/2012	N/A	34.33	14.27	6.30	24.95
Insight Corporate Bond Fund~				04/10/2012	N/A	1.02	9.00	-0.70	11.44
Insight Global Select Bond Fund~	*		7	11/02/2013	N/A	N/A	3.44	2.55	1.86
Insight Inflation-Linked Corporate Bond Fund~				11/02/2013	N/A	N/A	3.98	-1.44	8.79
Newton Global Dynamic Bond Fund~	!			02/10/2012	N/A	1.55	2.08	-0.92	3.37
Newton International Bond Fund~				03/10/2012	N/A	-8.29	5.53	0.34	22.59

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from B Shares (Net Income) to B Shares (Income).
- ^ The name of the Share Class was changed on 3 February 2017 from B Shares (Net Income) to B Shares (Income).
- ∞ The name of the Share Class was changed on 3 February 2017 from B Shares (Net Income) to B Shares (Income).
- 1 The name of the Sub-Fund was changed on 13 February 2014 from BNY Mellon American Fund to The Boston Company US Opportunities Fund.
- 2 The name of the Sub-Fund was changed on 2 January 2015 from Newton Balanced Fund to Newton Multi-Asset Balanced Fund.
- 3 The name of the Sub-Fund was changed on 2 January 2015 from Newton Managed Fund to Newton Multi-Asset Growth Fund.
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
- 7 The name of the Sub-Fund was changed on 1 February 2016 from Insight Strategic Bond Fund to Insight Global Select Bond Fund. The Sub-Fund was closed on 28 March 2017.

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U SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Global Income Fund^	*		5	30/04/2014	N/A	N/A	N/A	10.12	29.67
Newton Real Return Fund^	!			08/01/2015	N/A	N/A	N/A	N/A	4.10

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.

^ The name of the Share Class was changed on 3 February 2017 from U Shares (Net Accumulation) to U Shares (Accumulation).

5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.

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U SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Global Income Fund^	*		5	30/04/2014	N/A	N/A	N/A	10.12	29.67
Newton Real Return Fund^	!			08/01/2015	N/A	N/A	N/A	N/A	4.12

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.

^ The name of the Share Class was changed on 3 February 2017 from U Shares (Net Income) to U Shares (Income).

5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.

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USD ACCUMULATION SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			02/04/2012	N/A	-0.92	10.72	-8.16	28.41

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.

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USD INCOME SHARES				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund	!			02/04/2012	N/A	-0.94	10.71	-8.09	28.44

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.

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X SHARES 1 (ACCUMULATION)~				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Global Dynamic Bond Fund	!			19/02/2009	11.21	2.47	2.92	0.06	4.22

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

- ! These Sub-Funds take their annual management charges from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- ~ The name of the Share Class was changed on 3 January 2017 from X Shares (Net Accumulation) to X Shares 1 (Accumulation).

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X SHARES (ACCUMULATION)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
BNY Mellon Long-Term Global Equity Fund [^]				17/12/2010	14.01	17.04	10.44	6.62	27.01
Newton Global High Yield Bond Fund [∞]	!			19/02/2009	23.12	6.41	-0.69	-2.31	14.53
Newton Global Equity Fund [^]				10/09/2007	13.23	25.38	11.75	9.83	21.60
Newton Global Income Fund [^]	*		5	01/10/2007	11.92	16.00	9.92	10.81	30.48
Newton Global Opportunities Fund [^]				12/12/2006	12.23	22.05	12.98	12.73	23.83
Newton Multi-Asset Diversified Return Fund [^]			4	21/05/2013	N/A	N/A	6.92	1.12	11.95
Newton Real Return Fund [^]	!			27/02/2006	4.29	6.22	3.97	1.78	4.66
Newton UK Equity Fund [^]	!			19/02/2009	19.75	19.36	8.17	12.29	6.08
Newton UK Income Fund [^]	*		6	02/04/2007	10.20	20.86	7.20	7.63	10.15
Newton UK Opportunities Fund [^]				02/04/2007	14.05	23.46	11.25	13.96	7.39
Insight Inflation-Linked Corporate Bond Fund [~]				06/11/2013	N/A	N/A	4.66	-0.81	9.44
Newton Global Dynamic Bond Fund [~]	!			18/02/2011	12.23	3.17	3.57	0.54	4.77
Newton Index Linked Gilt Fund [~]				01/10/2007	0.70	0.30	20.12	-0.48	26.74
Newton Long Corporate Bond Fund [~]				02/04/2007	13.93	0.22	16.78	0.37	15.62
Newton Long Gilt Fund [~]				02/04/2007	3.52	-5.28	24.90	0.75	18.65

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from X Shares (Gross Accumulation) to X Shares (Accumulation).
- ^ The name of the Share Class was changed on 3 February 2017 from X Shares (Net Accumulation) to X Shares (Accumulation).
- ∞ The name of the Share Class was changed on 1 March 2017 from X Shares (Net Accumulation) to X Shares (Accumulation).
- 4 The name of the Sub-Fund was changed on 2 January 2015 from Newton Phoenix Multi-Asset Fund to Newton Multi-Asset Diversified Return Fund.
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.

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X SHARES (INCOME)				Launch Date For Share Class	% Growth				
					31/12/2011 to 30/12/2012	31/12/2012 to 30/12/2013	31/12/2013 to 30/12/2014	31/12/2014 to 30/12/2015	31/12/2015 to 30/12/2016
Newton Asian Income Fund^	!			02/04/2010	23.37	0.30	12.04	-7.22	31.45
Newton Emerging Income Fund^	*			04/10/2012	N/A	-6.11	1.82	-12.29	30.72
Newton Global Dynamic Bond Income Fund Δ	!	#		09/05/2016	N/A	N/A	N/A	N/A	N/A
Newton Global High Yield Bond Fund ∞	!			25/05/2011	23.09	6.41	-0.68	-2.35	14.52
Newton Global Emerging Markets Fund^			8	25/07/2015	N/A	N/A	N/A	N/A	22.95
Newton Global Income Fund^	*		5	08/10/2010	11.91	15.99	9.92	10.81	30.48
Newton Real Return Fund^	!			15/07/2009	0.514.28	6.21	3.97	1.77	4.65
Newton UK Income Fund^	*		6	08/10/2010	10.18	20.83	7.22	7.63	9.06
Newton Global Dynamic Bond Fund~	!			11/10/2010	11.21	2.46	2.93	0.05	4.22
Newton Index Linked Gilt Fund~				26/05/2011	-4.92	-0.10	19.85	-0.63	26.39
Newton Long Corporate Bond Fund~				18/11/2013	N/A	N/A	15.85	-0.41	14.81

Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. All figures are in GBP terms. The impact of the initial charge, which may be up to 4%, can be material on the performance of your investment. Performance figures including the initial charge are available upon request.

Source: Lipper Hindsight

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- * These Sub-Funds take their annual management charges and other fees and expenses from the capital of the Sub-Fund. Investors should be aware that there is a potential for capital erosion.
- # As this Share Class was only recently launched, there is insufficient data to provide past performance information.
- ~ The name of the Share Class was changed on 3 January 2017 from X Shares (Net Income) X Shares (Income).
- ^ The name of the Share Class was changed on 3 February 2017 from X Shares (Net Income) to X Shares (Income).
- ∞ The name of the Share Class was changed on 1 March 2017 from X Shares (Net Income) to X Shares (Income).
- Δ The name of the Share Class was changed on 1 March 2017 from X Shares (Gross Income) to X Shares (Income).
- 5 The name of the Sub-Fund was changed on 1 April 2015 from Newton Global Higher Income Fund to Newton Global Income Fund.
- 6 The name of the Sub-Fund was changed on 1 April 2015 from Newton Higher Income Fund to Newton UK Income Fund.
- 8 Performance data shown in this table from 31/12/2012 to 30/12/2014 is the actual past performance of the X Units (Net Income) unit class of the Newton Global Emerging Markets Fund ("NGEMF Unit Trust"), an authorised unit trust with the same investment objectives, policies and strategy as the Newton Global Emerging Markets Fund. Newton Investment Management Limited, the investment manager of the Newton Global Emerging Markets Fund, was also the investment manager of the NGEMF Unit Trust. The NGEMF Unit Trust was closed for winding up on 25 July 2015, and all of the NGEMF Unit Trust's assets were transferred to the Newton Global Emerging Markets Fund at its launch on 25 July 2015. Fund performance run as total return including reinvested income net of UK tax and annual charges, but excluding initial charge. Past performance is not a reliable indicator of future performance.

APPENDIX VI

List of other Authorised Collective Investment Schemes Operated by the ACD

The ACD is also the authorised corporate director or authorised fund manager of the following open-ended investment companies and unit trusts:

- BNY Mellon Charities Funds
- BNY Mellon Managed Funds I
- BNY Mellon Managed Funds II
- Newton Maiden Fund
- Newton Osprey Fund
- Newton SRI Fund for Charities

APPENDIX VII

List of Sub-Delegates appointed in respect of Financial Instruments in Custody

Argentina	Citibank N.A.Argentina	Indonesia	Deutsche Bank AG, Jakarta 7th Floor, Deutsche Bank Building Jl. Imam Bonjol No.80 Jakarta 10310 Indonesia
Australia	The Hongkong and Shanghai Banking Corporation Limited Australia Branch	Ireland	The Bank of New York Mellon
	Citigroup Pty Limited	Israel	Bank Hapoalim B.M.
Austria	UniCredit Bank Austria AG	Italy	Italian CSD, Monte Titoli
	Citibank N.A. (Milan)	Ivory Coast	Please see WAEMU market
Bahrain	HSBC Bank Middle East Limited	Japan	Mizuho Bank Ltd The Bank of Tokyo-Mitsubishi UFJ, Limited
Bangladesh	The Hongkong and Shanghai Banking Corporation Ltd	Jordan	Standard Chartered Bank
Belgium	Citibank Europe Plc	Kenya	CfC Stanbic Bank Limited
Bermuda	HSBC Bank Bermuda Limited	Kuwait	HSBC Bank Middle East Ltd, Kuwait
Botswana	Stanbic Bank Botswana Limited	Latvia	AS SEB banka
Brazil	Citibank N.A.Brazil Itaú Unibanco S.A	Lebanon	HSBC Bank Middle East Limited- Beirut Branch
Bulgaria	Citibank Europe plc, Bulgaria Branch	Lithuania	AB SEB Bankas
Canada	CIBC Mellon Trust Company (CIBC Mellon)	Luxembourg	Euroclear Bank
Cayman islands	The Bank of New York Mellon	Malawi	Standard Bank Limited
Channel Islands	The Bank of New York Mellon	Malaysia	Deutsche Bank (Malaysia) Berhad
Chile	Banco de Chile Itaú Corpbanca S.A.	Malta	The Bank Of New York Mellon SA/NV, Asset Servicing, Niederlassung Frankfurt am Main
China	HSBC Bank Company Limited (China)	Mauritius	The Hong Kong and Shanghai Banking Corporation Ltd
Colombia	Cititrust Colombia S.A. Sociedad Fiduciara	Mexico	Banco Nacional de Mexico S.A
Costa Rica	Banco Nacional de Costa Rica	Morocco	Citibank Maghreb
Croatia	Privredna Banka Zagreb d.d.	Namibia	Standard Bank Namibia Limited
Cyprus	BNP Paribas Securities Services,S.C.A Athens	Netherlands	The Bank of New York Mellon SA/NV
Czech Republic	Citibank Europe Plc, Organizacni Slozka	New Zealand	National Australia Bank Limited
Denmark	Skandinaviska Enskilda Banken, AB (Publ)	Niger	Please see WAEMU market
Egypt	HSBC Bank Egypt S.A.E.	Nigeria	Stanbic IBTC Bank Plc
Estonia	Seb Pank AS	Norway	Skandinaviska Enskilda Banken AB, (Publ)
Eurocleat	Euroclear Bank Clearstream Banking S.A	Oman	HSBC Bank Oman S.A.O.G.
Finland	Skandinaviska Enskilda Banken AB, (Publ)	Pakistan	Deutsche Bank AG
France	(BNP Paribas Securities Services S.C.A Citibank Europe Plc	Palestinian Autonomous Area	HSBC Bank Middle East Limited- Palestinian Autonomous Area Branch
Germany	The Bank of New York Mellon SA/NV, Asset Servicing, Niederlassung Frankfurt am Main	Panama	Citibank N.A., Panama Branch
Ghana	Stanbic Bank Ghana Limited	Peru	Citibank Del Peru S.A.
Greece	BNP Paribas Securities Services, S.C.A Athens	Philippines	Deutsche Bank AG
Guinea Bissau	Please see WAEMU market	Poland	ING Bank Slaski S.A
Hong Kong	The Hong Kong and Shanghai Banking Corporation Ltd	Portugal	Citibank Europe Plc
Hungary	Citibank Europe plc. Hungarian Branch Office	Qatar	HSBC Bank Middle East Limited, Doha
Iceland	Landsbankinn hf	Romania	Citibank Europe Plc, Romania Branch
India	Deutsche Bank AG The Hong Kong and Shanghai Banking Corporation Ltd	Russia	PJSC ROSBANK Deutsche Bank Ltd AO Citibank
		Saudi Arabia	Stanbic Bank Zambia Ltd
		Serbia	UniCredit Bank Serbia JSC

Singapore	DBS Bank Ltd
	United Overseas Bank Ltd
Slovak Republic	Citibank Europe pobočka zahraničnej banky
Slovenia	UniCredit Banka Slovenia d.d.
South Africa	The Standard Bank of South Africa Limited
South Korea	The Hong Kong and Shanghai Banking Corporation Ltd
	Deutsche Bank AG
Spain	Santander Investment S.A
	Banco Bilbao Vizcaya Argentaria, S.A. (bonds)
Sri Lanka	The Hong Kong and Shanghai Banking Corporation Ltd
Swaziland	Standard Bank Swaziland Limited
Sweden	Skandinaviska Enskilda Banken AB, (Publ)
Switzerland	Credit Suisse AG
Taiwan	HSBC Bank (Taiwan)Limited
Tanzania	Stanbic Bank Tanzania Limited, Stanbic House, PO Box 72647, Dar es Salaam
Thailand	The Hongkong and Shanghai Banking Corporation Ltd
Togo	Société Générale de Banques en Côte d'Ivoire
Tunisia	Banque Internationale Arabe de Tunisie
Turkey	Deutsche Bank A.S.
Uganda	Stanbic Bank Uganda Ltd
Ukraine	ING Bank Ukraine
United Arab Emirates-ADX	HSBC Bank Middle East Limited, Dubai
United Arab Emirates-DFM	HSBC Bank Middle East Limited, Dubai
United Arab Emirates-NASDAQ	HSBC Bank Middle East Limited, Dubai
United Kingdom	The Bank of New York Mellon
	Depository and Clearing Centre (DCC) Deutsche Bank AG, London Branch
United States	The Bank of New York Mellon
	HSBC Bank, USA, N.A
Uruguay	Banco Itaú Uruguay S.A.
Venezuela	Citibank N.A. Sucursal Venezuela
Vietnam	HSBC Bank (Vietnam) Ltd
WAEMU (West African Economic and Monetary Union)	Société Générale de Banques en Côte d'Ivoire
Zambia	Stanbic Bank Zambia Ltd
Zimbabwe	Stanbic Bank Zimbabwe Limited

■ The Company

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