

**SANLAM ACCEL INCOME FUND**  
**Supplement to the Prospectus dated 15 October 2020**  
**for Sanlam Universal Funds plc**

This Supplement contains specific information in relation to Sanlam Accel Income Fund (the "**Fund**"), a Fund of Sanlam Universal Funds plc (the "**Company**"), an open-ended umbrella type investment company with segregated liability between its Funds authorised by the Central Bank of Ireland (the "**Central Bank**") as an undertaking for collective investment in transferable securities pursuant to the Regulations. There are fifty-one other Funds of the Company in existence, namely:

Absa Africa Equity Fund  
Anchor Global Equity Fund  
Anchor Global Stable Fund  
Autus Global Equity Fund  
Bridge Global Equity Income Growth Fund  
Bridge Global Managed Growth Fund  
Bridge Global Property Income Fund  
Cameron Hume Global Fixed Income ESG Fund  
Denker Global Dividend Fund  
Denker Global Equity Fund  
Denker Global Financial Fund  
High Street Global Balanced Fund  
Perpetua Global Equity UCITS Fund  
P-Solve Inflation Plus Fund  
Rootstock Global Equity UCITS Fund  
Sanlam Active UK Fund  
Sanlam African Frontier Markets Fund  
Sanlam AI Global Managed Risk Fund  
Sanlam Centre Active US Treasury Fund  
Sanlam Centre American Select Equity Fund  
Sanlam Centre Global Listed Infrastructure Fund  
Sanlam Centre Global Select Equity Fund  
Sanlam Equity Allocation Fund  
Sanlam FOUR Active European Ex-UK Equity Fund  
Sanlam FOUR Enhanced Income Fund  
Sanlam FOUR UK Income Opportunities Fund  
Sanlam Global Bond Fund  
Sanlam Global Convertible Securities Fund  
Sanlam Global Emerging Markets Fund  
Sanlam Global High Quality Fund  
Sanlam Global Property Fund  
Sanlam Global Value Fund  
Sanlam Japan Equity Fund  
Sanlam Multi-Strategy Fund  
Sanlam Real Assets Fund  
Sanlam S&P Africa Tracker Fund  
Sanlam Stable Global Fund  
Sanlam Strategic Bond Fund  
Sanlam Strategic Cash Fund  
Sanlam US Absolute Return Fund  
Sanlam US Dividend Fund  
Sanlam US Dollar Enhanced Yield Fund  
Sanlam World Equity Fund  
Satrix Emerging Markets Equity Tracker Fund  
Satrix Europe Excluding UK Equity Tracker Fund  
Satrix Global Factor Enhanced Equity Fund  
Satrix North America Equity Tracker Fund  
Satrix UK Equity Tracker Fund  
Satrix World Equity Tracker Fund

SIIP India Opportunities Fund  
Wisian Capital South Africa Equity Fund

**This Supplement forms part of and should be read in conjunction with the Prospectus dated 15 October 2020 (the "Prospectus") and the latest audited financial statements of the Company.**

**Investment in the Fund should be viewed as medium to long term.**

The Directors of the Company, whose names appear in the "Directors of the Company" section of the Prospectus, accept responsibility for the information contained in the Prospectus and this Supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

**Shareholders should note that all the fees and expenses of the Fund, including the management fee, may be charged to the capital of the Fund. Thus on redemption of holdings shareholders may not receive back the full amount invested and this will have the effect of lowering the capital value of the shareholders investment.**

Words and expressions defined in the Prospectus, unless the context otherwise requires, shall have the same meaning when used in this Supplement.

Date: 15 October 2020

**DIRECTORY**

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## **Investment Objective and Policies**

### **Investment Objective**

The investment objective of the fund is to provide income to investors and capital growth over the long term.

### **Policy and Guidelines**

The Fund is actively managed and shall seek to achieve its investment objective by following a fund of funds approach and accordingly up to 100% of the Net Asset Value of the Fund may be invested in Underlying Funds (as described below), subject to a maximum of 20% in any one collective investment scheme. The Fund may, where the Investment Manager considers it in the best interests of the Fund, invest directly in the securities listed below in which an Underlying Fund may invest. Where the Fund intends to invest directly in such securities, the Fund shall comply with the investment restrictions below.

“Underlying Fund” means UCITS funds domiciled in a Member State and other open-ended collective investment schemes that satisfy the requirements of the Central Bank, being Guernsey Class A Schemes, Jersey Recognised Funds and Isle of Man Authorised Schemes, including other schemes managed by the Manager or its affiliates. Investment in units of UCITS or AIFs will be limited to collective investment schemes which adhere to similar restrictions as those applying to the Fund.

The Underlying Funds will follow an investment strategy that seeks to provide income and the potential for capital growth to its investors through direct investment in global equities (including ordinary shares, common stocks and other securities with equity characteristics including preferred stock), cash, cash equivalents (including commercial paper and certificates of deposits), money market instruments (including banker's acceptance and notice deposits), global bonds (which may be government and/or corporate, fixed and/or floating and of investment grade), real estate investment trusts and global equity linked securities (which may include, but are not limited to, such instruments as common stock and shares) which are listed on a Recognised Market (as set out in Appendix II of the Prospectus) or recently issued transferable securities which will be admitted to official listing on a stock exchange or other market within one year. The Underlying Funds must comply with the investment restrictions of the Fund as outlined below.

The Fund may measure its performance relative to a Benchmark Index for reference or investor communication purposes, including in the Company's annual and half-yearly reports, and may use the Benchmark Index to measure the risk of the Fund. However, the performance of the Fund relative to the Benchmark Index is not factored in any way into the investment process and the Fund does not operate any form of target to outperform the Benchmark Index. Furthermore, the Benchmark Index does not constrain the Fund from being managed on a fully discretionary basis. The "**Benchmark Index**" is the Accel Green Risk Benchmark which is a weighted composite of the following indices: 25% FTSE All-Share Index; 20% MSCI World Index ex UK; 5% MSCI Emerging Markets Index; 22.5% iBoxx Sterling Corporate All Maturities Index; 22.5% iBoxx Sterling Gilts All Maturities Index; and 5% 7-Day LIBID Index.

### **The Fund may invest up to 100% of its assets in collective investment schemes.**

It is not the intention of the Fund to use financial derivative instruments and the Fund will not do so until a risk management process and updated Supplement has been submitted and cleared by the Central Bank.

The Fund may charge all the fees and expenses of the Fund, including the management fee, to capital please see the section entitled "Risk Factors" for more detail.

### **Asset Allocation Strategy**

The Fund has an asset allocation policy consisting of allocating 50% of its Net Asset Value to Underlying Funds which have exposure to equities and 50% of its Net Asset Value to Underlying Funds which have exposure to fixed income securities as further detailed above. In certain market conditions (such as where an Underlying Fund is unavailable) and where the Investment Manager considers it to be in the best interest of the Shareholders, the Investment Manager may invest directly in the securities in which an Underlying

Fund may invest. The actual assets purchased by the Fund will be intended to produce an enhanced yield from assets with overall risk characteristics similar to this policy.

### **Investment Restrictions**

The general investment restrictions contained in the "Investment Restrictions" section of the Prospectus shall apply. In addition, the following investment restrictions shall apply to the Fund:

1. Short selling of securities is not permitted.
2. The Fund may not be geared or leveraged through investment in any security.
3. The Fund will not invest more than 20% of its Net Asset Value in any one Underlying Fund.
4. The Fund will not invest in any one Underlying Fund which itself can invest more than 10% of its Net Asset Value in other collective investment schemes.
5. The Fund will not invest more than 30% of its Net Asset Value in AIF collective investment schemes.
6. The Fund will not invest in unregulated schemes.
7. The Fund will not invest in other fund of fund schemes or in other feeder schemes.
8. Where the Fund invests in shares of an Underlying Fund or any other collective investment scheme managed by the same management company or by an associated or related company, the manager of the scheme in which the investment is being made must waive the preliminary/initial/redemption charge and any management fee which it would normally charge.
9. The Fund will not invest in exchange traded funds which are capable of obtaining leveraged exposure to underlying assets.
10. Any commission received by the Investment Manager in consideration of an investment in an Underlying Fund will be paid into the Fund.

### **Efficient Portfolio Management**

The Fund may enter into Securities Financing Transactions in the form of securities lending arrangements for efficient portfolio management purposes only. Further details in respect of Securities Financing Transactions and applicable limits are set out in the Prospectus under the heading "Repurchase/Reverse Repurchase Agreements and Securities Lending". Securities lending is used to generate additional income for the Fund with an acceptably low level of risk.

Further details on the requirements relating to such Securities Financing Transactions and the Collateral Policy for the Fund are contained in the Prospectus.

### **Profile of a Typical Investor**

The Fund is suitable for retail and institutional investors who are looking to achieve a regular income stream together with the potential for long-term capital growth. Investors should note the risk factor relating to charging fees and expenses, including the management fee, to capital in this regard. Investment in the Fund should be viewed as a medium term investment and therefore investors would be expected to have a reasonable tolerance for medium volatility of Net Asset Value from time to time.

### **Listing**

The Class A Net Accumulation Shares and Class A Net Income Shares issued in respect of the Fund are admitted to listing on the Official List and to trading on the Global Exchange Market ("GEM") of Euronext Dublin. No application has been made to list the Class A Net Accumulation Shares and Class A Net

Income Shares on any other stock exchange.

**GEM is not a “regulated market” as defined under the Directive on Markets in Financial Instruments 2014/65/EU.**

Neither the admission of the Shares to listing on the Official List and trading on the Global Exchange Market of Euronext Dublin nor the approval of this Supplement pursuant to the listing requirements of Euronext Dublin shall constitute a warranty or representation by Euronext Dublin as to the competence of service providers to or any other party connected with the Fund, the adequacy of information contained in this Supplement or this Prospectus or the suitability of the Fund for investment purposes.

As at the date of this Supplement, no Director nor their spouses nor their infant children or any person closely associated have any interest in the Shares of the Fund or any options in respect of such capital.

As at the date of this document the Fund does not have any loan capital (including term loans) outstanding or created but unissued or any outstanding mortgages, charges, debentures or other borrowings or indebtedness in the nature of borrowings, including bank overdrafts, liabilities under acceptance (other than normal trade bills) or acceptance credits, hire purchase or finance lease commitments, guarantees or other contingent liabilities which are material in nature.

The Directors confirm that there has been no significant change in the financial or trading position of the Company since 31 December 2018, the date of the latest financial statements of the Company.

**Investment Managers**

The investment manager currently appointed to the Fund is:

**Sanlam Investments UK Limited**

Sanlam Investments UK Limited is a company incorporated under the laws of the United Kingdom and having its registered office at Monument Place, 24 Monument Street, London, EC3R 8AJ, United Kingdom. Sanlam Investments UK Limited provides investment management and advisory services to collective investment schemes and is regulated by the Financial Conduct Authority.

**Borrowings**

In accordance with the general provisions contained in the “Borrowing and Lending Powers” section of the Prospectus, the Fund may borrow up to 10% of its Net Asset Value on a temporary basis.

**Risk Factors**

The risk factors set out in the “Risk Factors” section of the Prospectus apply to the Fund. In addition, the following risk factors apply to the Fund:

*Charging Fees and Expenses to Capital*

Fees and expenses of the Fund, including management fees, may be charged to the capital of the Fund. Thus, on redemptions of holdings shareholders may not receive back the full amount invested and this will have the effect of lowering the capital value of their investment. There is a greater risk therefore that capital may be eroded and “income” will be achieved by foregoing the potential for future capital growth of your investment and the value of future returns may also be diminished. Investors should note however that distributions made during the life of the Fund are a form of capital reimbursement.

The Fund may charge fees and expenses to capital to preserve income and to maximise the payment of dividends to Shareholders.

*Segregated Liability between the Funds*

Liabilities of one sub-fund of the Company will not impact on nor be paid out of the assets of another sub-fund of the Company. While the provisions of the Companies Act 2014 provide for segregated liability between sub-funds, these provisions have yet to be tested in foreign courts, in particular, in satisfying local creditors' claims. Accordingly it is not free from doubt that the assets of any sub-fund may be exposed to the liabilities of other sub-funds of the Company. As of the date of the Prospectus the Directors are not aware of any existing or contingent liability of any sub-fund of the Company.

#### *Political and/or Regulatory Risks*

The value of the 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 investment 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.

#### *Conflict of Interest regarding the appointment of Investment Managers*

The Manager may appoint Investment Managers to the Fund which may be subsidiaries, affiliates, associates or entities in which the Sanlam group have an economic interest.

#### *Emerging Markets*

Investing in emerging markets involves additional risks and special considerations not typically associated with investing in other more established economies or securities markets. Such risks may include (i) increased risk of nationalisation or expropriation of assets or confiscatory taxation; (ii) greater social, economic and political uncertainty, including war; (iii) higher dependence on exports and the corresponding importance of international trade; (iv) greater volatility, less liquidity and smaller capitalisation of securities markets; (v) greater volatility in currency exchange rates; (vi) greater risk of inflation; (vii) greater controls on foreign investment and limitations on repatriation of invested capital and on the ability to exchange local currencies for US dollars; (viii) increased likelihood of governmental decisions to cease support of economic reform programmes or to impose centrally planned economies; (ix) differences in auditing and financial reporting standards which may result in the unavailability of material information about issuers; (x) less extensive regulation of the securities markets; (xi) longer settlement periods for securities transactions and less reliable clearance and custody arrangements; (xii) less protection through registration of assets and (xiii) less developed corporate laws regarding fiduciary duties of officers and directors and protection of shareholders.

#### *Duplication of Costs*

It should be noted that the Fund incurs the costs of its own management and other service providers as set out under the Charges and Expenses section below. In addition, to the extent the Fund invests in open-ended collective investment schemes, it will bear its proportion of the fees paid by such schemes to their investment manager and other service providers. There may also be performance fees payable at the underlying scheme level. The semi-annual and annual reports of the Company shall provide information on the specific open-ended collective investment schemes which the Fund invests in including their regulatory status and the specific fees paid by the Fund to such schemes.

#### *Legal Risk*

Legal risk is the risk of loss due to unexpected application of a law or regulation, or because contracts are not legally enforceable or documented correctly in the context of financial derivative instruments.

#### *Investments in Collective Investment Schemes*

The Fund may invest a portion of its assets in collective investment schemes and investors should be aware of the potential exposure to the asset classes of those underlying collective investment schemes in the context of all of their investments.

The investments of the Company are subject to normal market fluctuations and other risks inherent in investing in securities or other instruments and there can be no assurance that the investment objectives will actually be achieved. In particular the value of investments may be affected by uncertainties such as international, political and economic developments or changes in government policies.

#### *Real Estate Investment Trusts (REITS) Risk*

REITS may be affected by changes in the value of the underlying property owned by the trusts. Equity REITS are dependent upon management skills, may not be diversified and are subject to the risks of financing projects. Such trusts are also subject to heavy cash flow dependency and self-liquidation. The ability to trade REITS in the secondary market can be more limited than other stocks.

#### *Fixed Interest Securities*

Fixed interest securities (such as bonds) are particularly affected by trends in interest rates and inflation. If interest rates go up, the value of capital may fall and vice versa. The value of a fixed interest security may fall in the event of a default or reduced credit rating of the issuer.

#### *Currency Exchange Rates*

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

#### *Efficient Portfolio Management Risk*

The Company on behalf of the Fund may enter securities lending arrangements for efficient portfolio management purposes. Investors should be aware that from time to time, the Fund may engage with securities lending agents that are related parties to the Depositary or other service providers of the Company. Such engagement may on occasion cause a conflict of interest with the role of the Depositary or other service provider in respect of the Company. Please refer to the section entitled "Portfolio Transactions and Conflicts of Interest" in the Prospectus for further details on the conditions applicable to any such related party transactions. The identity of any such related parties will be specifically identified in the Company's semi-annual and annual reports.

#### *Reinvestment of Cash Collateral Risk*

As the Fund may reinvest cash collateral received, subject to the conditions and within the limits laid down by the Central Bank, the Fund will be exposed to the risk associated with such investments, such as failure or default of the issuer of the relevant security.

#### *Securities Lending Risk*

There are risks associated with the Fund engaging in securities lending. As with any extensions of credit, 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. A securities lending transaction will involve the receipt of collateral. However there is a risk that the value of the collateral may fall and the Fund suffer loss as a result.

#### **Dividend Policy**

The Directors may declare such dividends during the year as they in their sole and absolute discretion may determine provided that such declaration of dividends is notified in advance to Shareholders. It is the Directors current intention to declare dividends for the Class A Net Income Shares on a monthly basis. Under the Articles of Association, dividends may be paid out of the profits, being (i) the accumulated revenue (consisting of all revenue accrued including interest and dividends) less expenses and/or (ii) realised and unrealised capital gains on the disposal/valuation of investments and other funds less realised and unrealised accumulated capital losses of the Fund.

It is not the current intention of the Directors to declare a dividend in relation to the Class A Net Accumulation Shares. The net income attributable to these Shares shall be retained within the Fund and

the value of the Shares shall rise accordingly.

The Manager has obtained UK "reporting fund" status for accounting periods commencing 1 January 2012 in respect of each of the Share Classes. In broad terms a "reporting fund" is an offshore fund that meets certain upfront and annual reporting requirements to HM Revenue & Customs and its Shareholders. Once reporting fund status is obtained from HM Revenue & Customs for the relevant classes it will remain in place permanently, provided the annual requirements are complied with. UK Shareholders who hold their interests in the Share Classes at the end of the reporting period to which the reported income relates, subject to their personal circumstances, will normally be liable to either income tax or corporation tax on the higher of any cash distribution paid and the full reported amount. The reported income will be deemed to arise to UK Shareholders on the date the report is issued by the Company.

**Investors should refer to their tax advisors in relation to the implications of these Share classes obtaining such status and any payment of dividends. Please see the section entitled "United Kingdom" under the "Taxation" section of the Prospectus for further details.**

### **Key Information for Buying and Selling**

#### **Base Currency**

Sterling.

#### **Business Day**

Any day (except Saturday or Sunday) on which the banks in Dublin and London are open for business and such other days as the Directors may, with the consent of the Depositary, determine and notify in advance to Shareholders.

#### **Dealing Day**

Any Business Day.

#### **Dealing Deadline**

In respect of a Dealing Day, 4.00 p.m. (Irish time) on the Business Day immediately preceding a Dealing Day.

#### **Minimum Shareholding**

Class A Net Accumulation Shares	GBP£1,000
Class A Net Income Shares	GBP£1,000

#### **Minimum Initial Investment Amount**

Class A Net Accumulation Shares	GBP£1,000
Class A Net Income Shares	GBP£1,000

The Manager may, in its absolute discretion, waive or reduce the amounts set out above under Minimum Shareholding, Minimum Initial Investment Amount and Minimum Additional Investment Amount.

#### **Minimum Additional Investment Amount**

None

#### **Preliminary Charge**

No Preliminary Charge will be charged by the Fund.

#### **Repurchase Fee**

No Repurchase Fee will be charged by the Fund.

### **Conversion Fee**

No conversion fee will be charged by the Fund.

### **Settlement Date**

In the case of applications, close of business on the Business Day preceding the relevant Dealing Day (or up to four Business Days after the relevant Dealing Day as may be permitted by the Manager at its absolute discretion). In the case of repurchases, four Business Days after the relevant Dealing Day or, if later, four Business Days after the receipt of the relevant duly signed repurchase documentation.

### **Valuation Point**

Midnight (South African time) on each Dealing Day.

### **Charges and Expenses**

#### **Fees of the Manager, any Investment Transition Manager, the Depositary, the Administrator, the Investment Managers and the Distributors.**

The Manager will be entitled to receive from the Company an annual fee of 1% of the Net Asset Value of the Fund. These fees will accrue and be calculated on each Dealing Day and be payable monthly in arrears. The Manager will be responsible for all its own out of pocket costs and expenses.

The Manager will pay out of its fees, the fees and expenses of any Investment Transition Manager, the Distributors, the fees of the Investment Manager and the management fees of any Underlying Fund in which the Fund invests.

In respect of the administration services, the Administrator will be entitled to receive out of the assets of the Fund an annual fee which will not exceed 0.03% of the Net Asset Value of the Fund (plus VAT if any) in the performance of its duties as Administrator of the Fund. These fees shall accrue and be calculated on each Dealing Day and shall be payable monthly in arrears.

In respect of the registrar and transfer agency services, the Administrator will be entitled to receive from the Company out of the assets of the Fund an annual fee which will not exceed US\$2,500 plus \$1,000 for each additional share class greater than four, together with reasonable costs and expenses incurred by the Administrator in the performance of its duties as Administrator of the Fund. These fees shall accrue and be calculated on each Dealing Day and shall be payable monthly in arrears. The Administrator shall also be entitled to be reimbursed out of the assets of the Fund all agreed transaction charges (which will be charged at normal commercial rates).

The Depositary will be entitled to receive from the Company out of the assets of the Fund an annual trustee fee which will not exceed 0.02% of the Net Asset Value of the Fund (plus VAT, if any) together with reasonable costs and expenses incurred by the Depositary in the performance of its duties as Depositary of the Fund. These fees shall accrue and be calculated on each Dealing Day and shall be payable monthly in arrears. The Depositary shall also be entitled to be reimbursed out of the assets of the Fund all agreed safekeeping fees, expenses and all agreed transaction charges (which will be charged at normal commercial rates).

The cost of establishing the Fund, obtaining authorisation from any authority, regulatory or other body, listing the Shares on Euronext Dublin, filing fees and the preparation and printing of this Supplement, marketing costs and the fees of all professionals relating to it, did not exceed €25,000 and are being borne by the Fund and amortised over the five years following the first issue of Shares in the Fund.

This section should read in conjunction with the section entitled "Charges and Expenses" in the Prospectus.

## **Material Contracts**

The Investment Management and Advisory Agreement dated 1 January 2011 as amended between the Manager and Sanlam International Investments Limited, as novated by a Deed of Novation, dated 20 July 2015, between the Manager, Sanlam International Investments Limited and Sanlam Investments UK Limited, provides that the appointment of Sanlam Investments UK Limited will continue in force unless and until terminated by the Manager giving not less than 30 days' written notice to Sanlam Investments UK Limited or by Sanlam Investments UK Limited giving not less than 90 days' written notice to the Manager although in certain circumstances the Agreement may be terminated forthwith by notice in writing by either party; the Agreement contains certain indemnities in favour of the Manager arising by reasons of the fraud, bad faith, negligence or wilful default of Sanlam Investments UK Limited in the performance or non-performance of its duties