

SANLAM AFRICAN FRONTIER MARKETS FUND
Supplement to the Prospectus dated 9 March 2021
for Sanlam Universal Funds plc

This Supplement contains specific information in relation to Sanlam African Frontier Markets 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 Accel Income Fund
Sanlam Active UK 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 9 March 2021 (the "Prospectus") and the latest audited financial statements of the Company.

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.

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

Date: 9 March 2021

DIRECTORY

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Investment Objective and Policies

Investment Objective

The investment objective of the Fund is to achieve long-term capital growth.

Policy and Guidelines

The Fund will pursue its investment objective by investing in African equities which the Investment Manager has identified as being undervalued and offering above average growth potential. The Fund is actively managed and will invest in equity securities of companies listed on the African Recognised Exchanges and also in equities that may be listed and/or traded on exchanges and markets outside of Africa (such as US, Australia, Canada, EU Member States and Switzerland) as set out in Appendix I of the Prospectus, provided that the companies issuing such equities conduct all or a significant part of their business in Africa.

The Fund's investment policy will not be subject to any sector restrictions. Investors will gain exposure to African frontier markets through a concentrated portfolio of stocks.

The equity securities held by the Fund may include preference shares, ordinary shares and other securities with equity characteristics. When market conditions dictate a more defensive investment strategy and the Investment Manager considers it in the best interest of the Fund, the Fund may on a temporary basis, hold up to 30% of its Net Asset Value in liquid assets including but not limited to cash and cash equivalents (including but not limited to commercial paper, certificates of deposit, other money market instruments and treasury bills). These cash and money market instruments may be held in currencies other than the base currency of the Fund.

The Investment Manager follows a value-based, bottom-up approach to stock selection. Each member of the investment team conducts comprehensive fundamental research on companies identified for further scrutiny by an in-house screening process. The fundamental research process includes the use of proprietary historical and forward looking company financial models as well as management and site visits. Investment ideas are then generated by the team and price targets are established. These price targets form the basis of the investment decision.

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 has been submitted and cleared by the Central Bank.

The Fund measures its performance relative to a benchmark index (MSCI EFM Africa ex South Africa Index) (the "**Benchmark Index**") for reference or investor communication purposes, including in the Company's annual and half-yearly reports. As the Investment Manager seeks to outperform the benchmark over the medium to longer term, the Fund is managed in reference to the benchmark with a meaningful degree of overlap, though with some sizeable off benchmark positions that are expected to deliver outperformance. However the performance of the Fund relative to the Benchmark Index is not factored in any way into the investment process. Furthermore, the Benchmark Index does not constrain the Fund from being managed on a fully discretionary basis. The Benchmark Index captures large and mid cap representation across 1 emerging market country and 13 frontier markets countries. With 31 constituents, the index covers approximately 85% of the free float-adjusted market capitalization in each country.

As the Fund may invest up to 100% of its assets in equity securities of companies listed and traded in countries considered to be emerging or frontier markets by the Investment Manager, an investment into this Fund should not constitute a substantial portion of an investment portfolio and may not be appropriate for all investors.

More than 10% of the market value of the equity securities in the Fund may be invested in securities traded on markets or exchanges not having full membership of the World Federation of Stock Exchanges, provided that those markets and exchanges are listed in Appendix 1 of the

Prospectus and a comprehensive due diligence, as required by the South African Financial Services Board, has been carried out by the Manager.

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 may not, in aggregate, invest more than 10% of its Net Asset Value in any one collective investment scheme.
4. The Fund will not invest in securities that compel the Fund to accept physical delivery of a commodity.

Profile of a Typical Investor

The Fund is suitable for retail and institutional investors who are looking to achieve long-term capital growth. Investment in the Fund should be viewed as a medium to long term investment and therefore investors would be expected to have a reasonable tolerance for medium volatility of Net Asset Value from time to time.

Efficient Portfolio Management

The Fund may enter into Securities Financing Transactions in the form of securities lending arrangements. 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 is contained in the Prospectus.

SFDR Information

The Investment Manager is a signatory to the Principles for Responsible Investing (UN PRI), backed by the United Nations and subscribes to the Code for Responsible Investing in South Africa (CRISA). The Investment Manager believes that companies that manage their Sustainability Risks well will outperform their peers. However, Investment Manager generally does not include nor exclude any particular investment or industry based on Sustainability Risks alone. Accordingly, the Manager, in consultation with the Investment Manager, has made a determination based on the Fund's investment objective and strategy for the purposes of SFDR, that Sustainability Risks are currently not likely to have a material impact on the returns of the Fund. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities. Further information on the Investment Manager's responsible investment policy can be found on the Investment Manager's website at www.sanlaminvestments.com.

Listing

Class A (USD) Shares, Class D (USD) Shares, Class G (USD) Shares, Class H (USD) Shares and Class I (USD) 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.

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 the Official List and to 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 Manager

Sanlam Investment Management (Pty) Limited

Sanlam Investment Management (Pty) Limited is a company incorporated in South Africa and having its registered office and place of business at 55 Willie van Schoor Avenue, Bellville 7530, South Africa. It provides, inter alia, discretionary portfolio management services and investment advisory services for private and institutional clients in all areas of international securities business. Sanlam Investment Management (Pty) Limited is regulated by the Financial Sector Conduct Authority in South Africa and is a wholly owned subsidiary of Sanlam Limited.

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. Such borrowings are permitted only to meet the Fund's obligation in relation to (i) the administration of the Fund relating to purchase or sale transaction; and/or (ii) the redemption or cancellation of shares in the Fund. Borrowings are only permitted for a period of up to 8 calendar days in respect of (i), and 61 calendar days in respect of (ii) in order to comply with the South African Financial Sector Conduct Authority's requirements and to allow for the Fund to be distributed to South African retail investors. However, at all times borrowings on behalf of the Fund will be in accordance with the Regulations and the requirements of the Central Bank.

Risk Factors

This Fund is a relatively high risk fund in relation to other asset classes due to its equity based investment approach and the frontier markets which it is invested in.

The main risks to the value of the Fund's assets arise from price volatility, liquidity constraints, and exchange rates. The risk factors set out in the "Risk Factors" section of the Prospectus apply to the Fund. In addition, the following risk factors apply.

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 an 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. In addition to the restrictions described above, Irish domestic law implementing EU and United Nations sanctions may limit, or prohibit, investment in particular African markets. Such sanctions may have an adverse impact on the operations of the Fund. No assurance can be given that the Fund will not be adversely affected by such sanctions. For instance if the Fund has an investment in a particular market and subsequently that particular market becomes the subject of an EU or UN sanction order, the Fund may have to sell investments at unfavourable prices and may as a result close.

Settlement and Clearing Risk

The trading and settlement practices on some of the exchanges or markets on which the Fund may invest may not be the same as those in more developed markets of the European Union and the United States. In particular, some or all of the following additional risks may be associated with settlement and clearing of securities transactions in emerging and frontier market countries. These additional risks include delays experienced in repatriation of sales proceeds due to local exchange controls, an uncertain legal and regulatory environment and the possibility that bargains may be settled by a free delivery of stock with payment of cash in an uncollateralised manner. That may increase settlement and clearing risk and/or result in delays in realising investments made by the Fund.

Depository Risk

Local custody services in some of the countries in which the Fund may invest may not be the same as those in more developed market countries and there is a transaction and custody risk involved in dealing in such markets.

Emerging and Frontier Markets

Investing in emerging and frontier 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.

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.

General

Holders of non-Base currency denominated Share Classes will be subject to exchange rate risk in relation to the Base currency. If necessary, a currency conversion may be carried out on subscription, redemption and switching of shares at prevailing exchange rates.

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 Depository 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 in any securities lending transactions, 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

It is the Directors' current intention not to distribute the profits of the Fund derived from its investments. All such profits shall be reinvested in the Fund.

Any amendment to the dividend policy will be provided for in an updated supplement and Shareholders will be notified in advance.

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

Class A (USD), Class G (USD), Class H (USD) and Class I (USD) Shares in the Fund are available for subscription to investors in certain of the Member States.

No further investments are permitted into the Class D (USD) Shares.

An application to buy any Shares should be made on the Application Form available from the Manager and be submitted to the Company c/o the Administrator, in writing or sent by facsimile, to be received by the Administrator on or prior to the Dealing Deadline for the relevant Dealing Day.

Base Currency

US Dollars

Business Day

Any day (except Saturday or Sunday) on which the banks in Dublin 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

The second and the fourth Friday of every month (or the next Business Day if that Friday is not a Business Day) and the last Business Day of the month; provided that there shall be at least one Dealing Day per

fortnight.

Valuation Point

Midnight (South African time) on each Dealing Day.

Dealing Deadline

In respect of a Dealing Day, 4.00 p.m. (Irish time) seven (7) Business Day prior to the relevant Dealing Day

The Directors reserve the right to waive the notice period at their discretion provided such applications are received before 4.00 p.m. (Irish time) on the Business Day prior to the relevant Dealing Day.

Minimum Shareholding

| | |
|---------------|-----------------|
| Class A (USD) | US\$ 100,000 |
| Class D (USD) | US\$ 20,000,000 |
| Class G (USD) | US\$ 50,000,000 |
| Class H (USD) | US\$ 50,000,000 |
| Class I (USD) | US\$ 1,000,000 |

The Directors may, in their absolute discretion permit a higher or lower Minimum Shareholding and Shareholders shall be notified in advance of any such change.

No Shareholder shall be entitled to realise part only of his holding of Shares of any class in the Fund (subject to the discretion of the Directors) if such realisation would result in his holding of Shares of such class after such realisation being below the Minimum Shareholding.

Minimum Initial Investment Amount

| | |
|---------------|-----------------|
| Class A (USD) | US\$ 100,000 |
| Class D (USD) | US\$ 20,000,000 |
| Class G (USD) | US\$ 50,000,000 |
| Class H (USD) | US\$ 50,000,000 |
| Class I (USD) | US\$ 1,000,000 |

The Directors may, in their absolute discretion permit a higher or lower Minimum Initial Investment Amount.

Minimum Additional Investment Amount

None

Preliminary Charge

Five per cent of the Net Asset Value per Share (plus VAT, if any). The Manager may waive in whole or in part the Preliminary Charge.

Repurchase Fee

Up to three per cent of the Net Asset Value per Share (plus VAT, if any) for Class G (USD) and Class I (USD) Shares. The Directors may waive in whole or in part the Repurchase Fee. There is no repurchase fee on Class A (USD), Class D (USD) and Class H (USD) Shares.

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 Directors at their

absolute discretion). In the case of repurchases, two (2) Business Days after the relevant Dealing Day or, if later, four Business Days after the receipt of the relevant duly signed repurchase documentation and in any case within 14 calendar days of the Dealing Deadline.

Charges and Expenses

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

The Manager will pay out of its fees, the fees and expenses of any Investment Transition Manager, the Distributors and the fees of the Investment Manager and any investment manager subsequently appointed to the Fund.

Annual Management Fees

The Manager will be entitled to receive from the Company an annual fee of up to a maximum of 1.75% of the Net Asset Value of the Class A (USD) and 1% of the Net Asset Value of the Class I (USD) Shares, and 0.75% of the Net Asset Value of the Class D (USD) Shares and 1.5% of the Net Asset Value of the Class G (USD) Shares.

The Manager is not entitled to any fee in respect of the Class H (USD) Shares out of the Net Asset Value of the Fund but will agree a separate fee with each shareholder of Class H (USD) Shares to be paid directly to the Manager by such shareholder. The Class H (USD) Shares are available only to certain categories of investors as determined by the Manager in its absolute discretion and at fees negotiated directly with those investors by the Manager. The primary purpose of the Class H (USD) Shares is to facilitate investors who are investing in the Fund indirectly through arrangements managed by the Manager or Investment Manager or any associated party, thereby avoiding double-charging of fees. 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.

Performance Fees

The Manager shall be entitled to receive out of the assets of the Fund a performance fee in respect of each performance period for the Class A (USD) and Class I (USD) Shares (each, an "**Applicable Class**"). The Manager may, at its absolute discretion, rebate to any Shareholder the whole or portion of the performance fee paid by that Shareholder. The performance periods comprise each successive twelve month period from 1 January to 31 December (each a "**Performance Period**"), save that the first such period for each relevant class shall be from the date of the last crystallisation on 30 June 2020 and ending on 31 December 2021.

- (a) The performance fee shall be equal to 20%, for the Class A (USD) Shares, and 10%, for the Class I (USD) Shares respectively, of the outperformance of A over B ("A" and "B" as defined below).
- (b) "**A**" means the difference between the Net Asset Value of the Fund attributable to the Applicable Class ("**the Applicable Class NAV**") at the end of the relevant Performance Period and the Applicable Class NAV at the High Water Mark Date (as defined below), prior to any accrual for performance fees (but after accruing for all other fees and expenses) and adjusting for subscriptions and redemptions during the relevant Performance Period.
- (c) "**B**" means the difference between the MSCI EFM Africa ex ZA Daily Net TR Index (Bloomberg Code:MSEIAZUN:IND) (the "**Benchmark**") at the end of the relevant Performance Period and the Benchmark at the relevant High Water Mark Date (i.e. the same period over which the relevant A is measured), provided that the Benchmark will always be indexed to the Applicable Class NAV at the relevant High Water Mark Date.
- (d) "**High Water Mark Date**" means the last day of any Performance Period in respect of which a Performance Fee was charged or, if no Performance Fee has been charged to date, the Business Day immediately following the closing of the Initial Offer Period.

- (e) The performance fees accrued and crystallised in each Performance Period will be subject to a cap to ensure that no more than 3.0%, with respect to the Class A (USD) Shares, and 2.5%, with respect to the Class I (USD) Shares, and as may be agreed between the Manager and any holder of the Class H (USD) Shares, of the Applicable Class NAV at the end of the relevant Performance Period, prior to any accrual for performance fees (but after accruing for all other fees and expenses) will be taken by the Manager.
- (f) Where the relevant class has underperformed the Index during a Performance Period (where A-B is a negative number), the Manager will not repay any amounts of performance fee paid out of the assets of the Fund attributable to the relevant class in respect of previous Performance Periods but no further performance fees will be charged until such time as any underperformance (A less than B) is recaptured by the Applicable Class (i.e. until A-B, measured over the period commencing on the relevant High Water Mark Date, becomes positive).
- (g) For the Performance Period in which any underperformance is first recaptured, the performance fee will be calculated in accordance with paragraph (f) above, with the performance fee only taking into account any subsequent outperformance (A and B will both be measured since the relevant High Water Mark Date). Performance fee calculations in subsequent Performance Periods will revert to being based on the performance over the relevant Performance Period as calculated in accordance with paragraph (a) above.
- (h) The performance fees shall be calculated by the Administrator (subject to verification by the Depositary) and accrued in the Net Asset Value per Share calculated in respect of each Dealing Day based on the performance to date of the relevant Applicable Class during that Performance Period. Performance fees, if any, shall be paid after each Performance Period end date and will be the accrued performance fees for each Applicable Class at the Performance Period end date.

Net realised and unrealised capital gains plus net realised and unrealised capital losses as of the relevant Valuation Point shall be taken into account in calculating the Net Asset Value per Share. As a result, performance fees may be paid on unrealised gains which may subsequently never be realised.

Benchmarks will take account of income and capital gains/losses.

For a description of the manner in which the Performance Fee is borne by each Share and the time of payment, see the section entitled "Equalisation Policy".

Equalisation Policy

Shares are acquired at a price based on the Net Asset Value per Share. When Shares are subscribed for, certain adjustments will be made to reduce inequities that could otherwise result to the Shareholder or to the Fund. This is done so that: (i) the Performance Fee paid to the Manager is charged only to those Shares which have appreciated in value since their acquisition, (ii) all Shareholders of an Applicable Class will have the same amount per Share at risk, and (iii) all Shares in the same Applicable Class have the same Net Asset Value per Share in that Applicable Class (the "**Applicable Class NAV per Share**").

(A) If Shares are subscribed for at a time when the Applicable Class NAV per Share is less than the Applicable Class NAV per Share on the relevant High Water Mark Date, (the "**High Water Mark**") the investor will be required to pay a Performance Fee with respect to any subsequent appreciation in the value of those Shares. With respect to any appreciation in the value of those Applicable Shares from the Applicable Class NAV per Share at the date of subscription up to the High Water Mark, the Performance Fee will be charged at the end of each Performance Period by redeeming such number of the investor's Shares of the Applicable Class as have an aggregate Net Asset Value (after accrual for any Performance Fee) equal to a percentage of any such appreciation of the Applicable Class NAV (a "**Performance Fee Redemption**"). The aggregate Applicable Class NAV of the Shares so redeemed will be paid to the Manager as a Performance Fee. Performance Fee Redemptions are employed to ensure that the Fund maintains a uniform Applicable Class NAV per Share of each Applicable Class. As regards the investor's remaining Shares of the Applicable Class, any appreciation in the Applicable Class NAV per Share of

those Shares above the High Water Mark of that Applicable Class will be charged a Performance Fee in the normal manner described above.

(B) If Shares are subscribed for at a time when the Applicable Class NAV per Share is greater than the High Water Mark of the Applicable Class, the investor will be required to pay an amount in excess of the then current Applicable Class NAV per Share of the Applicable Class equal to a percentage of the difference between the then current Applicable Class NAV per Share of the Applicable Class (before accrual for the Performance Fee) and the High Water Mark of the Applicable Class (an "**Equalisation Credit**"). At the date of subscription, the Equalisation Credit will equal the Performance Fee per Share accrued with respect to the other Shares of the same Applicable Class in the Fund (the "**Maximum Equalisation Credit**"). The Equalisation Credit is payable to account for the fact that the Applicable Class NAV per Share has been reduced to reflect an accrued Performance Fee to be borne by existing Shareholders of the same Applicable Class and serves as a credit against Performance Fees that might otherwise be payable by the Applicable Class but that should not, in equity, be charged against the Shareholder making the subscription because, as to such Shares, no favourable performance has yet occurred. The Equalisation Credit ensures that all holders of Shares of the same Applicable Class have the same amount of capital at risk per Share. The additional amount invested as the Equalisation Credit will be at risk in the Fund and will therefore appreciate or depreciate based on the performance of the Applicable Class of Shares subsequent to the issue of the relevant Shares but will never exceed the Maximum Equalisation Credit. In the event of a decline as at any Valuation Point in the Applicable Class NAV per Share of those Shares, the Equalisation Credit will also be reduced by an amount equal to a percentage of the difference between the Applicable Class NAV per Share of the relevant Class of Shares (before accrual for the Performance Fee) at the date of issue and as at that Valuation Point. Any subsequent appreciation in the Applicable Class NAV per Share of the relevant Applicable Class will result in the recapture of any reduction in the Equalisation Credit but only to the extent of the previously reduced Equalisation Credit up to the Maximum Equalisation Credit. At the end of each Performance Period, if the Applicable Class NAV per Share (before accrual for the Performance Fee) exceeds the High Water Mark of the relevant Applicable Class, that portion of the Equalisation Credit equal to a percentage of the relevant Applicable Class of the excess, multiplied by the number of Shares of that Applicable Class subscribed for by the Shareholder, will be applied to subscribe for additional Shares of that Applicable Class for the Shareholder. Additional Shares of that Applicable Class will continue to be so subscribed for at the end of each Performance Period until the Equalisation Credit, as it may have appreciated or depreciated in the Fund after the original subscription for Shares of that Applicable Class was made, has been fully applied. If the Shareholder redeems his Shares of that Applicable Class before the Equalisation Credit has been fully applied, the Shareholder will receive additional redemption proceeds equal to the Equalisation Credit then remaining multiplied by a fraction, the numerator of which is the number of Shares of that Applicable Class being redeemed and the denominator of which is the number of Shares of that Applicable Class held by the Shareholder immediately prior to such redemption in respect of which an Equalisation Credit was paid on subscription.

Other Fees and Expenses

The Investment Manager shall be responsible for its own costs and out of pocket expenses incurred in the performance of its duties as Investment Manager of the Fund.

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 assets of the Fund (plus VAT if any) and its 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.

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 shall 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, which are estimated not to exceed €25,000 will be borne by the Fund and amortised over the first five years of the fund's operation (or such shorter period as may be determined by the Directors at their discretion) 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

Investment Management Agreement

The Investment Management Agreement dated 31 March 2004 between the Manager and Sanlam Investment Management (Pty) Limited as supplemented by the Supplemental Investment Management Agreement dated 13 August 2004 (as amended and supplemented) (together the "**Agreement**") provides that the appointment of Sanlam Investment Management (Pty) Limited will continue in force unless and until terminated by the Manager giving not less than 30 days' written notice to Sanlam Investment Management (Pty) Limited or by Sanlam Investment Management (Pty) Limited giving not less than 90 days' written notice to the Manager. However, in certain circumstances the Agreement may be terminated without a minimum period of notice by either party. The Agreement limits the liability of Sanlam Investment Management (Pty) Limited to the Manager to losses arising by reason of the fraud, negligence, wilful default or wilful misfeasance of Sanlam Investment Management (Pty) Limited in the performance or non-performance of its duties. The Agreement also provides that Sanlam Investment Management (Pty) Limited shall indemnify the Manager to the extent that any claims, costs, direct damages, direct losses or expenses are attributable to the fraud, negligence, wilful default or wilful misfeasance by Sanlam Investment Management (Pty) Limited in the performance or non-performance of its duties.

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