

荷寶基金通知

2021 年 6 月 16 日

富達投信甫於近日接獲「荷寶基金系列」之通知事項。相關書件如附件所示供參。

若您對本通知有任何相關問題，歡迎聯絡您專屬的業務專員。富達證券營業讓與予富達投信後，目前富達投信未擔任該系列基金之銷售機構，若有其他相關問題，建議您可洽詢該系列基金之總代理人。

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【富達投信獨立經營管理】各基金經金管會核准或同意生效，惟不表示絕無風險，基金經理公司以往之經理績效不保證基金之最低投資收益，基金經理公司除盡善良管理人之注意義務外，不負責各基金之盈虧，亦不保證最低之收益，投資人申購前應詳閱基金公開說明書。有關基金應負擔之費用(境外基金含分銷費用)已揭露於基金之公開說明書或投資人須知中，投資人索取公開說明書或投資人須知，可至富達投資服務網 <http://www.fidelity.com.tw>或境外基金資訊觀測站 <http://www.fundclear.com.tw>查詢，或請洽富達投信或銷售機構索取。Fidelity 富達, Fidelity International, 與Fidelity International 加上其F標章為FIL Limited 之商標。FIL Limited 為富達國際有限公司。富達證券投資信託股份有限公司為FIL Limited 在台投資100%之子公司。110台北市信義區忠孝東路五段68號11樓，富達投信服務電話 0800-00-9911。

SITE 2016 09-007

野村證券投資有限公司 函



地址：110 台北市信義路五段 7 號 30 樓
聯絡電話：02-8758 1574
聯絡人：黃久俐

受文者：如行文單位

發文日期：中華民國 110 年 5 月 28 日

發文字號：野村信字第 1100000291 號

速別：普通件

密等及解密條件或保密期限：

附件：中、英文股東通知書

主旨：謹函轉本公司總代理之荷寶資本成長基金系列境外基金(下稱本基金)公開說明書之變更事項。

說明：

一、本公司經金融監督管理委員會核准，擔任荷寶資本成長基金系列境外基金之總代理人在國內募集及銷售，合先敘明。

二、茲略摘要本次董事會通知本基金公開說明書之變更事項：

1. 更新公開說明書「2.9 稅項」乙節有關永續投資之認購稅(「taxe d'abonnement」)稅率。
2. 更新公開說明書「3.13 基準指標規則」乙節。
3. 更新公開說明書「附件三一財務風險管理」中流動性風險乙節之敘述，以作為財務風險管理之一環。

三、上述變更將反映於新版公開說明書中，而該等公開說明書及重要投資人資訊亦可至境外基金資訊觀測站(<http://www.fundclear.com.tw>)下載。

總經理

馬文玲

正本：彰化商業銀行股份有限公司、臺灣土地銀行股份有限公司、台灣新光商業銀行股份有限公司、台灣中小企業銀行股份有限公司、第一商業銀行股份有限公司、合作金庫商業銀行股份有限公司、兆豐國際商業銀行股份有限公司、凱基商業銀行股份有限公司、柏瑞證券投資信託股份有限公司、中租證券投資顧問股份有限公司、核聚證券投資顧問股份有限公司、新光證券投資信託股份有限公司、安泰商業銀行股份有限公司、鉅亨證券投資顧問股份有限公司、三信商業銀行股份有限公司、容海國際證券投資顧問股份有限公司、星展(台灣)商業銀行股份有限公司、王道商業銀行股份有限公司、基富通證券股份有限公司、高雄銀行股份有限公司、聯邦商業銀行股份有限公司、新光人壽保險股份有限公司

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(節譯文)

荷寶資本成長基金

可變資本投資公司

6 route de Trèves, L-2633 Senningerberg

盧森堡大公國

盧森堡商業登記處編號：B 58.959

(「**本基金**」)

致本基金股東通知書

掛號郵寄

盧森堡，2021年5月28日

親愛的投資人，

台端為本基金之股東，本基金之董事會（「**董事會**」）謹通知台端若干有關本基金及其子基金（「**子基金**」）之變更。

1. 更新有關永續投資之認購稅（「**taxe d'abonnement**」）稅率

公開說明書「2.9 稅項」乙節中已包含盧森堡就集合投資計劃(UCIs)投資之經濟活動中，若符合2020年6月18日之2020/852號歐盟規則第3條關於建立促進永續投資框架之定義之環境永續者，則採用遞減之稅率。

2. 更新「**基準指標規則**」乙節

公開說明書「3.13 基準指標規則」乙節已更新，以反映自英國脫歐後，由於有關使用指數作為金融工具及金融契約或衡量投資基金績效之基準指標之2016年6月8日2016/1011號歐盟規則（「**基準指標規則**」）已不再適用於英國基準指標管理機構，子基金使用之基準指標之英國管理機構已從「歐洲證券及市場管理局（「**ESMA**」）管理機構及第三方國家之基準指標之登記名冊」中刪除。

這些英國管理機構現在屬於符合第三方國家之管理機構，但受惠於基準指標規則至2021年12月31日之過渡期者。在該等期間，第三方國家基準指標縱未被包含於ESMA登記名冊上，該等基準指標仍可繼續供子基金使用。

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3. [與台灣無關，略譯]
4. [與台灣無關，略譯]
5. [與台灣無關，略譯]
6. [與台灣無關，略譯]
7. [與台灣無關，略譯]
8. [與台灣無關，略譯]
9. **更新流動性風險乙節之敘述，以作為財務風險管理之一環**

於公開說明書「附件三—財務風險管理」中，流動性風險乙節之敘述已更新，以符合ESMA訂定之關於可轉讓證券集體投資計劃(UCITS)與另類投資基金(AIFs)之流動性壓力測試之指引，及盧森堡金融市場監督機構證券金融監督委員會(CSSF)之19/733號通函中關於國際證券管理機構組織(IOSCO)就開放式UCIs之流動性風險管理之建議。

10. [與台灣無關，略譯]
11. [與台灣無關，略譯]

除上述另有說明者外，變更將自[公開說明書生效日]起生效。

請注意，經修訂之公開說明書將自2021年6月28日起，得於本基金之註冊辦事處索取。

謹提醒股東，依公開說明書之規定，本基金不收取任何買回費用，不同意上述變更之股東得買回其股份而毋庸支付任何費用。

除另有定義者外，本函中任何定義詞彙應與公開說明書內之定義相同。

倘台端需要任何進一步之資訊（或於可索取後要求更新之公開說明書之副本），請聯繫台端通常之（荷寶）業務人員或本基金註冊辦事處，或得瀏覽下列網站：
www.robeco.com/riam。

誠摯地，
荷寶資本成長基金董事會

Robeco Capital Growth Funds
Société d'investissement à capital variable
6 route de Trèves, L-2633 Senningerberg
Grand Duchy of Luxembourg
R.C.S. Luxembourg: B 58.959
(the "Fund")

NOTICE TO SHAREHOLDERS OF THE FUND

By registered mail

Luxembourg, 28 May 2021

Dear Investor,

As a Shareholder in the Fund, the board of directors of the Fund (the "**Board of Directors**") hereby informs you of certain changes concerning the Fund and its sub-funds (the "**Sub-funds**").

1. Update of the subscription tax ("*tax d'abonnement*") rates with regard to sustainable investments

Under section "2.9 Taxation" of the Prospectus, it has been included that Luxembourg introduced a graduated rate reduction for UCIs invested in economic activities that qualify as environmentally sustainable within the meaning of Article 3 of Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

2. Update of the "Benchmark Regulation" section

The section "3.13 Benchmark Regulation" of the Prospectus has been updated in order to reflect that, following the UK's withdrawal from the EU, UK administrators of benchmarks used by the Sub-funds have been deleted from the "ESMA register of administrators and third-country benchmarks" as Regulation (EU) 2016/1011 of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the "Benchmark Regulation") is no longer applicable to UK benchmark administrators.

These UK administrators now qualify as third country administrators but benefit from the Benchmark Regulation transitional period until 31 December 2021. During that period, third country benchmarks can continue to be used by the Sub-funds, even if these are not included in the ESMA register.

3. Change of name and SFDR classification of the Sub-fund Robeco Emerging Credits

Under "Appendix I – Regional Bond Sub-funds" of the Prospectus, the disclosures relating to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("**SFDR**") have been amended as the Sub-fund will now be classified as Article 9 of SFDR, meaning that it will have sustainable investment as objective. This is achieved by investing in companies whose business models and operational practices are aligned with targets defined by the 17 UN SDGs.

In light of the above, the name of the Sub-fund “Robeco Emerging Credits” will be changed to “RobecoSAM Emerging SDG Credits” to align with its sustainable investment objective.

This change will be effective as from 28 June 2021.

4. Clarification of the investment objective for the Sub-funds RobecoSAM Global SDG Equities and RobecoSAM Global SDG Engagement Equities and update of benchmark disclosures

Under “Appendix I – Global Equity Sub-funds”, the investment objectives of the Sub-funds RobecoSAM Global SDG Equities and RobecoSAM Global SDG Engagement Equities have been clarified as follows with regards to the sustainability approach of their respective management:

i) RobecoSAM Global SDG Equities:

“The Sub-fund has as its sustainable investment objective to advance the United Nations Sustainable Development Goals (UN SDGs) by investing in companies whose business models and operational practices are aligned with targets defined by the 17 UN SDGs. The Sub-fund also aims to provide long term capital growth and to integrate ESG (i.e. Environmental, Social and corporate Governance) while at the same time integrating sustainability risks in the investment process.”

ii) RobecoSAM Global SDG Engagement Equities:

“The Sub-fund has as its sustainable investment objective to drive a clear and measurable improvement in a company's contribution to the United Nations Sustainable Development Goals (UN SDGs) over three to five years. The Sub-fund aims to motivate invested companies to improve their fulfilment of the UN SDGs by actively engaging and having an active dialogue with these companies. The Sub-fund also aims to provide long term capital growth and to integrate ESG (i.e. Environmental, Social and corporate Governance) while at the same time integrating sustainability risks in the investment process.”

The information relating to the benchmarks of the Sub-funds have also been updated in order to clarify their use.

There will be no change in the way these Sub-funds are managed nor to the asset allocation of their portfolio or their risk profile.

5. Amendment Share Class type RobecoSAM Smart Mobility Equities

Under “Appendix I – Theme Equity Sub-funds”, the Share Class type for Class S and SH Shares has been amended from “Distributing” to “Accumulating”. As pointed out in section 2.1 of the Prospectus, all Class S and SH Shares are accumulating, it was incorrectly stated in Appendix I that this was a distributing Share Class.

6. Update of the investment policy of the Sub-fund RobecoSAM SDG High Yield Bonds

Under “Appendix I – Global Bond Sub-funds”, the following provision has been deleted from the investment restrictions of the Sub-fund:

“The Sub-fund will not invest in securities that are “distressed” or “defaulted” at the time of their purchase by the Sub-fund.”

The wording was removed to in order to ensure coherence with the other Sub-funds and the Sub-fund will continue not to actively invest in distressed/defaulted securities.

7. Update of the investment policy of the Sub-fund RobecoSAM Climate Global Credits

Under "Appendix I – Global Bond Sub-funds", it has been clarified that the Sub-fund will not invest into assets with a rating lower than "B-" by at least one of the recognised rating agencies.

8. Update of the additional investment restrictions applicable to the Sub-fund Robeco Sustainable European Stars Equities

Due to the UK' withdrawal from the EU, the Sub-fund is investing less than 75% of its assets in Equity or Equity related securities issued by companies incorporated in countries being a member of the EU or the European Economic Area. However, under the French "Plan d'Epargne en Actions", a grandfathering period applies until 30 September 2021 for the investment in UK securities. The Sub-fund has the intention to meet the necessary requirements to be able to apply this grandfathering period in order to enable clients, investing via a French "Plan d'Epargne en Actions" to adjust their investments in Robeco Sustainable European Stars Equities accordingly. After 30 September 2021, Robeco Sustainable European Stars Equities will cease to be eligible to French "Plan d'Epargne en Actions".

9. Update of the description of liquidity risk section as part of the financial risk management

Under "Appendix III –Financial Risk Management" of the Prospectus, the description of liquidity risk section has been updated in compliance with ESMA Guidelines on liquidity stress testing in UCITS and AIFs and CSSF Circular 19/733 regarding the IOSCO recommendations on liquidity risk management for open-ended UCIs.

10. Adjustment of the maximum and expected levels of leverage of some Sub-funds using the VaR approach

Under "Appendix III – Financial Risk Management", paragraph "Global exposure calculation", the maximum and expected levels of leverage of the following Sub-funds have been adjusted as follows:

- Sub-fund Robeco QI Global Multi-Factor Credits: the expected level of leverage will be lowered from 125% to 100%;
- Sub-fund RobecoSAM Global Green Bonds: the expected level of leverage will be lowered from 150% to 100%;
- Sub-fund Robeco All Strategy Euro Bonds: the expected level of leverage will be increased from 50% to 100%;
- Sub-fund Robeco QI Dynamic High Yield: the maximum expected level of leverage will be increased from 250% to 300%;
- Sub-fund RobecoSAM SDG High Yield Bonds: the expected level of leverage will be lowered from 150% to 75% and the maximum expected level of leverage from 300% to 200%;
- Sub-fund Robeco QI Multi Factor Absolute Return: the expected level of leverage will be increased from 600% to 650%.

For the avoidance of doubt, shareholders should note that this change is driven by the observed leverage used in the past and not by a change in the investment policy of these Sub-funds.

11. Amendment levels of securities lending of the RobecoSAM Climate Global Sub-funds

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Under “Appendix IV – Financial Derivative Instruments, Efficient Portfolio Management Techniques and Instruments”, paragraph “Levels securities lending and repurchase agreements”, the maximum level of securities lending has been lowered from 100% to 75% of the net assets of the Sub-funds RobecoSAM Climate Global Credits, RobecoSAM Climate Global Bonds, and RobecoSAM Climate Global Government Bonds.

Unless otherwise indicate above, the changes will become effective as from [the effective date of the Prospectus].

Please note that the revised Prospectus will be available at the registered office of the Fund as from 28 June 2021.

Shareholders are reminded that, as provided in the Prospectus, the Fund does not charge any redemption fee and Shareholders who disagree with the changes outlined above may redeem their Shares free of charge.

Any defined term in this letter shall have the same meaning as in the Prospectus unless otherwise defined herein.

Should you require any further details (or require a copy of the updated Prospectus, once available), please contact your usual (Robeco) sales person or the registered office of the Fund or you can visit the website at www.robeco.com/riam.

Yours faithfully,
The Board of Directors of Robeco Capital Growth Funds