



C WorldWide Fund Management S.A.
Société Anonyme
1, rue Schiller L-2519 Luxembourg RCS Luxembourg B.53.022

Notice to the unitholders of C WorldWide (the “Fund”)

1. Notice to all unitholders of the Fund

C WorldWide Fund Management S.A., the management company ("Management Company") of the Fund, wishes to inform all unitholders of certain changes set out in the prospectus of the Fund.

Swing pricing

In order to be compliant with the indications of the CSSF on the Swing Pricing Mechanism, more details have been added in section “7. Net asset value” of the Prospectus, to outline the appointment of a swing pricing committee and the establishment of robust swing pricing mechanism policy.

Benchmark Regulation

Based on the communication of CSSF regarding the ESMA Q&A on the benchmark regulation (see Q5.5) and ESMA Q&A on the UCITS Directive, and in order to ensure alignment between KIID and Prospectus disclosures on benchmarks, a specific description of the application of the Benchmark Regulation has been included under section 23 of the Prospectus and information concerning the management of each sub-fund of the Fund have been included under Section “6. Objective and Investment policy of the sub-funds” of the Prospectus. It has been clearly stated that the asset allocation of each sub-fund of the Fund is not defined by any benchmark.

DAC 6

Following the entry into force of the law implementing Directive (EU) 2018/822 (“DAC 6”) which introduces new reporting obligations on Luxembourg intermediaries that design, market or implement reportable cross-border tax arrangements, a specific section concerning this reporting obligation has been included under Section “18. Taxation” of the Prospectus.

Anti-Money Laundering

The paragraph “Anti-Money Laundering and Fight against Financing of Terrorism” included under section “8. Issue of units” of the Prospectus has been updated with more details on the applicable legal framework and of the main applicable obligations.

Techniques and instruments

Further clarifications have been included in each supplement of the Prospectus that the sub-funds do not employ any techniques and instruments relating to transferable securities and money market instruments, such as securities lending, repurchase and reverse repurchase transactions, buy-sell back or sell-buy back transactions.

Confidentiality and professional secrecy

The appointed Registrar and Transfer Agent RBC Investor Services Bank S.A. (“RBC”), informed C WorldWide Fund Management (the Management Company) that it may be required to disclose and transfer personal and confidential data about you and, as the case maybe, individuals related to you (the “Related Individuals”) (the “Data Transfer”) to other entities in the RBC Group or to third-party sub-contractors (together the “Sub-contractors”) (such as identification data – including the Unitholder and/or the Related Individual’s name, address, national identifiers, date and country of birth, etc. – account information, contractual and other documentation and transaction information).



Confidential Information may be transferred to Sub-contractors established in countries where professional secrecy or confidentiality obligations are not equivalent to the Luxembourg professional secrecy obligations applicable to RBC. In any event, RBC is legally bound to, and has committed to C WorldWide that it will enter into outsourcing arrangements with Sub-contractors which are either subject to professional secrecy obligations by application of law or which will be contractually bound to comply with the Data Protection Luxembourg Laws.

RBC further committed to C WorldWide that it will take reasonable technical and organisational measures to ensure the confidentiality of the Confidential Information subject to the Data Transfer and to protect Confidential Information against unauthorised processing. Confidential Information will therefore only be accessible to a limited number of persons within the relevant Sub-contractor, on “a need to know” basis and following the principle of the “least privilege”. Unless otherwise authorised/required by law, or in order to comply with requests from national or foreign regulatory authorities or law enforcement authorities, the relevant Confidential Information will not be transferred to entities other than the Sub-contractors.

You have the opportunity to object to the transfer of your Confidential Information to Sub-contractors by RBC by sending a written notification to C WorldWide within thirty (30) calendar days from the date of this Notification Letter.

These changes will come into effect as of December 18, 2020.

2. Notice to the unitholders of C WorldWide Nordic (ISIN: LU0086738027, LU0112055859, LU0429109886, LU1477740879, LU1477740952, LU2072096519)

The Management Company wishes to inform all unitholders of C WorldWide Nordic of a change in the investment policy of the sub-fund.

Hereinafter, the sub-fund will specifically avoid investments in companies with principal activities in production and distribution of tobacco products, production and distribution of weapons or technology and software which is specifically designed to facilitate the production of weapons, exploration, production, extraction, refining, transportation, storage and power generation related to thermal coal and oil & gas, production and distribution of alcohol and production and distribution of gambling products and services.

Furthermore, details have been included that additional possible exposure to securities not admitted to a regulated market nor dealt with on another market which is regulated, operates regularly and is recognised and open to the public can be no more than 10% of the sub-fund’s net assets.

The number of companies in which the sub-fund will invest has been set in the range of 25-35 companies, in order to gain a high knowledge of each investment.

An adjustment of the focus of investments and limitation of the portfolio with long-term attractive equities has been done.

The risk disclaimers have been updated in light of the above.

This change will come into effect as of December 18, 2020.



The unitholders of the sub-fund may redeem their units free of charges within a term of one month from the publication of this notice, i.e. until January 18, 2021 at 03.00pm (CET) if they do not agree with the amendment mentioned.

3. Notice to the unitholders of C WorldWide Sweden Small Cap (ISIN: LU0424682077, LU0718525552, LU1802315959, LU1802316098, LU1477742149, LU2072097244)

The Management Company wishes to inform all unitholders of C WorldWide Sweden Small Cap of a change the investment policy of the sub-fund.

It has been detailed that the sub-fund will invest in small cap and mid cap companies of which the market cap of the company at the time of the “initial” investment does not exceed 1% of the total Swedish regulated markets.

Hereinafter, the sub-fund will specifically avoid investments in companies with principal activities in production and distribution of alcohol, production and distribution of tobacco products, production and distribution of weapons or technology and software specifically designed to facilitate the production of weapons, production and distribution of gambling products and services, production and distribution of pornography, exploration, production, extraction, refining, transportation, storage and power generation related to thermal coal and oil & gas, production and distribution of any other goods and services which may be deemed by the Investment Manager to be of an unethical nature.

These changes will come into effect as of December 18, 2020.

The unitholders of the sub-fund may redeem their units free of charges within a term of one month from the publication of this notice, i.e. until January 18, 2021 at 03.00pm (CET) if they do not agree with the amendment mentioned.

A revised prospectus of the Fund that includes the changes described in the above notices will be available free of charge at the registered office of the Management Company.

Luxembourg, December 18, 2020

C WorldWide Fund Management S.A.