

### **Appendix**

### **Prospectus changes following updates to Fund Documents**

The table below shows the previous disclosure for the Fund's investment objective, investment policy and further information, as set out in the Prospectus, compared to the updated version.

#### Sterling Bond

	Previous	Updated
Investment Objective	The Fund's objective is to provide a combination of capital growth and income over a 5+ year time horizon.	The Fund's objective is to provide a combination of capital growth (to grow the value of your investment) and income over a 5+ year time horizon.  The Fund will aim to outperform (after the deduction of fees) the following composite Target Benchmark measured over a rolling 3 year time period: 80% Markit iBoxx Sterling Non Gilts Index TR and 20% FTSE
		Actuaries UK Conventional Gilts All Stocks TR.  It is expected that average outperformance for the Fund will typically not be greater than 0.10% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling 3 year period, although no level of outperformance is guaranteed.
Investment Policy	The Fund aims to achieve its objective by investing at least 80% in a wide range of bonds issued by companies or governments and denominated in Pounds Sterling.  To obtain exposure to these assets the Fund will invest directly. The Fund may also invest indirectly by purchasing units in Collective Investment Schemes managed by other companies and / or the ACD or other companies within the Santander Group.  Subject to the Constraint Benchmark and Tracking Error stated below, the ACD has the discretion to manage the Fund according to its investment views and opportunities identified as market and economic conditions change. It will select investments that it believes will best achieve the Fund's objective. An assessment will be completed on all investment opportunities before any investment decisions are made.	The Fund is actively managed and aims to achieve its objectives by investing at least 95% in bonds.  The Fund may invest:  • between 60-90% in bonds issued by companies, supranationals, and other non-sovereign entities; and  • between 10-40% in bonds issued by governments (typically these will be bonds issued by the UK Government).  It is expected that the Fund will typically invest at least 65% in bonds issued by companies.  The Fund may invest in developed markets globally but at least 95% of the Fund's assets must be denominated in or Hedged to Pounds Sterling.  The Fund will invest in bonds which are, at the time of purchase, investment grade. In addition, up to 10% of the Fund may be invested in bonds which are, at the time of purchase, sub-investment grade, and up to 5% of the Fund may be invested in bonds which are, at the time of purchase, unrated (where a Sub-Investment Manager will determine whether the bonds have quality equivalent to investment grade or sub-investment grade).

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At least 80% of the Fund will at all times be invested in the asset classes described above, but it has the flexibility to invest in other assets globally, such as bonds, shares, cash, near cash and other money market instruments.

The Fund is managed with reference to the following composite Constraint Benchmark: 80% Markit iBoxx Sterling Non Gilts Index, 20% FTSE Actuaries UK Conventional Gilts All Stocks Index. The Fund targets a maximum Tracking Error of 2% allowing it to vary a proportion of its investments from this Benchmark.

The Fund may use Derivatives for Efficient Portfolio Management.

The Fund's investment in bonds can include bonds which are "non-standard" (up to 25% of the Fund, although typically the Fund doesn't hold more than 5%). These may, for example, be bonds which can make payments earlier than their target maturity date, or have terms where the principal amount of the bond can be paid back over the term of the bond, instead of being paid at the bond's maturity date, or asset backed or mortgage backed securities (investments whose return is generated from and backed by a basket of debt, for example mortgages). With regard to asset backed and mortgage backed securities, the Fund's exposure will be limited to 10%.

The Fund may also invest a maximum of 5% in cash, cash like and other money market instruments.

At least 90% of the Fund will be invested directly. Up to 10% of the Fund can be invested indirectly by investing in units of Actively Managed and / or Passively Managed Collective Investment Schemes (which may be managed by the ACD, any Sub-Investment Manager or other companies, including within the Santander Group).

The Fund may use Derivatives for Efficient Portfolio Management (including hedging), where Derivatives are used to either reduce risk, reduce cost, or to generate additional capital or income without materially affecting the risk profile of the Fund.

#### **Investment Strategy and Process**

The ACD's investment philosophy is that the Fund's investment objectives can be achieved from a consistent process using skilled investment managers focused on long term investment views.

The ACD has appointed Sub-Investment Managers to provide investment management services in relation to specified allocations of the assets of the Fund. The proportion of the Fund's assets under the management of each of the ACD and Sub-Investment Managers (each such portion of the Fund a "Mandate") is determined by the ACD. The ACD selects Sub-Investment Managers based on their ability to deliver the relevant outperformance target associated with each Mandate.

The ACD has in place an internal analysis and due diligence process to select and monitor the management of each Mandate, and it can change the management of a Mandate, or the Mandate itself, at its discretion when it believes that this is in the best interests of Shareholders in the Fund.

The Fund is actively managed which means that the ACD and, subject to the investment guidelines agreed with the ACD, each Sub-Investment Manager, will have the discretion to select assets for its respective Mandate according to its investment views and opportunities identified as market and economic conditions change, and it will select investments that it believes will best achieve each Mandate's outperformance target. An assessment will be completed, by the ACD or the relevant Sub-Investment Manager, on investment opportunities before investment decisions are made on their respective Mandates.

In respect of the Fund's objective to outperform the Target Benchmark, the ACD will put in place a set of investment guidelines, in respect of each Mandate, which need to be considered when assets are selected. As an example, in respect of each Mandate with a Sub-Investment Manager:

a separate outperformance target is in place for the relevant Sub-Investment Manager to aim

for. This target relates to outperformance relative to an Index in the Fund's Target Benchmark. However it will be calculated on a different basis to the Fund's objective to outperform the Target Benchmark as it will be calculated before, not after, the deduction of the Fund's fees, but this is aligned with the investment objectives of the Fund overall; and

 each Sub-Investment Manager will consider a range of risk management measures (described below) which reference the Target Benchmark. These will be commensurate to any outperformance target (as noted above) in place.

The ACD will manage its Mandate in line with the Fund's objective to outperform the Target Benchmark and is also subject to the Fund level Tracking Error, described below, as a risk management measure.

Although the ACD and each Sub-Investment Manager may have a different investment style or bias, each Mandate will be managed in such a way as to ensure that the aim of the Fund as a whole is to meet its investment objectives.

The ACD has appointed:

- one Sub-Investment Manager to manage Mandates which make up approximately 70% of the Fund. When selecting bonds, it will consider credit risk (the potential risk that issuers of bonds will be unable to honour their payment obligations), and how changing interest rates might impact the value of a bond in order to help determine which bonds to invest in. For example increasing interest rates will usually lower the value of an existing bond, and if the bond has a long time until maturity there could be more of an impact on its value. Therefore the Sub-Investment Manager may choose to reduce a Mandate's sensitivity to a change in interest rates if it expects them to rise or vice versa. When selecting company bonds, it will assess a company with respect to four key factors: industry attractiveness, competitive position, management quality and financial position, to assign a score which it will consider as part of its overall selection process. It will aim to select bonds which it believes are attractively priced and will help the Mandates meet their respective outperformance targets. When selecting Government bonds (typically UK Government bonds) it will use a number of tools to assess the impact of key economic and socio-political factors in order to determine a forward-looking view on the medium and long-term risk that the UK Government may be unable to meet its payment obligations on the bonds. In doing so, it will consider factors such as the UK Government's cash flow;
- one Sub-Investment Manager to manage a Mandate of approximately 21% of the Fund. When
  selecting bonds, it will consider, among other factors, bond issuers and different sectors and
  industries and will aim to select bonds which it believes are undervalued and which may deliver
  attractive investment returns; and
- the ACD manages the remaining approximately 9%. It will invest in Collective Investment Schemes which offer indirect exposure to bonds it believes will help the Fund to achieve its investment objectives. The ACD will favour Actively Managed Collective Investment Schemes.

On the basis of any individual outperformance target, and risk management measures, relevant to the Mandates, it is expected that average outperformance for the Fund will typically not be greater than 0.10% per annum (after the deduction of fees) in excess of the Target Benchmark measured over a rolling three

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year period. Outperformance targets for the Mandates (and therefore their contribution to any Fund level outperformance) are targets only and are not guaranteed.

The Fund's strategy is complemented by the deployment of Derivatives for Efficient Portfolio Management. It is expected that Derivatives will be used regularly in circumstances such as managing risk, for example to manage currency risk by hedging to Pounds Sterling or to manage interest rate risk, or responding quickly to developments in financial markets.

The Fund overall will typically be managed with a Tracking Error (against the Target Benchmark) of up to 2%. The Tracking Error of the Fund's portfolio may occasionally (for instance during volatile market conditions) be higher than 2% provided this is consistent with the investment strategy of the Fund. The Sub-Investment Managers are also subject to some investment restrictions which reference an Index in the Target Benchmark, relating to issuer credit rating, and the overall average period of time it takes for income and capital of the bonds in the Fund to be paid compared to the Target Benchmark, as part of their investment processes. These are risk management measures.

The risk management measures mean that although the Sub-Investment Managers and the ACD have discretion to select investments for their respective Mandate, the degree to which each Mandate is permitted to deviate from an index in the Target Benchmark will be restricted, which will limit the extent to which the Fund overall might outperform the Target Benchmark. The Sub-Investment Managers and the ACD do not have to invest in the same assets that make up an Index in the Target Benchmark or in the same amounts, and may hold significantly fewer assets than those which make up an Index in the Target Benchmark, but some of the Mandates' investments will reflect the constituents of an Index in the Target Benchmark. The Fund as a whole may, therefore, diverge from the Target Benchmark, and may hold significantly fewer assets than those which make up the Target Benchmark but some of the Fund's investments will reflect constituents of the Target Benchmark.

### Further Information

The Constraint Benchmark for the Fund is a composite of different Indices as shown above, which means the ACD is specifically limited to manage the Fund, and make any decisions to invest or not invest in an asset, with reference to this Benchmark. When managing by reference to this Benchmark, the ACD may diverge from the assets contained within the Constraint Benchmark and retains discretion regarding the selection and weighting of assets providing it stays within the Tracking Error stated above. This Constraint Benchmark has been selected for the Fund as it best represents the investments that the ACD has to choose from as specified in its investment objective and policy.

Variable remuneration of individual fund managers for the Fund is determined by assessing a number of different factors. Insofar as these relate to investment performance, any assessment will be made by The Target Benchmark for the Fund has been selected as it is representative of the Fund's investment in bonds and therefore broadly in line with the investment policy of the Fund.

The Target Benchmark is provided by IHS Markit Benchmark Administration Limited and FTSE International Limited, respectively, which as at the date of this Prospectus are included in the public register of administrators and benchmarks established and maintained by the FCA.

In respect of the Fund's objective to outperform the Target Benchmark after the deduction of fees, the term "fees" includes all fees, costs, charges, expenses and liabilities which are deducted from the value of Fund property for the purpose of calculating its NAV.

If the ACD considers that the Fund's Target Benchmark should be amended as a result of changes to, or evolution of, external market conditions and provided there is no material change to the risk profile of the Fund, it may implement this change after providing Shareholders with reasonable notice in advance.

Variable remuneration of those individuals employed by the ACD who are responsible for: managing a Mandate; and / or the selection and ongoing oversight of the Sub-Investment Managers, is determined by assessing a number of different factors. Insofar as these relate to investment performance of the Fund,

comparing Fund performance relative to the Constraint Benchmark as well as a commercial peer group of competitor funds with similar investment objectives and policies.

As an alternative or in addition to the ACD's management of the Fund, the ACD may appoint Sub-Investment Managers who will provide investment management services in relation to specified allocations of the assets of the Fund. The proportion of the Fund's assets under the management of each Sub-Investment Manager (and the ACD, if applicable) will be determined by the ACD and varied at its discretion.

any assessment may be made by comparing Fund performance relative to the Target Benchmark, and may also include a comparison against a commercial peer group of competitor funds with similar investment objectives and policies.