

SUPPLEMENTARY
INFORMATION
DOCUMENT (SID)

This Supplementary Information Document (SID) provides additional useful information you should be aware of before investing with Marlborough. It should be read in conjunction with the relevant Key Investor Information Document (KIID), so that you understand what you are buying. The terms in this SID form part of the terms of your investment in a Marlborough Fund.

Marlborough Fund Managers Ltd was launched in 1986 and has grown to offer access to many expert fund managers covering a number of the world's markets. Our range of collective investment schemes enables your money to be pooled with other investors' money. It is then used to invest in a number of different shares, bonds, funds or other assets.

This gives you a wide spread of various investments aimed to achieve growth, provide an income or a combination of the two. As a UK financial services provider Marlborough is authorised and regulated by the Financial Conduct Authority (FCA) and is a member of the Investment Association. Each of our collective investment schemes takes the form of either a unit trust or an OEIC.

If you require further information, please contact us

You can write to us at:

Marlborough Fund Managers Ltd,
Marlborough House,
59 Chorley New Road, Bolton BL1 4QP

You can call us on:

0808 145 2500

(+44 1204 380060 if you are calling from overseas)

If you are placing a deal you can call us direct on:

0808 145 2501

You can email us at:

enquiries@marlboroughfunds.com

www.marlboroughfunds.com

Nothing in this document should be interpreted as giving you financial advice. You should keep this document safe for future reference.

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WHAT IS A UNIT TRUST?

A unit trust is an authorised investment fund created in the legal structure of a trust, whose founding document is a trust deed to which the trustee and the firm that manages the fund are party. Marlborough acts as Authorised Fund Manager (AFM) to these funds.

WHAT IS AN OEIC?

An open-ended fund that takes the legal form of a company instead of a trust. Such a fund is commonly known as an 'OEIC' for short. Technically an OEIC created under the UK's regulatory framework for such funds is called an 'Investment Company With Variable Capital'. Marlborough acts as Authorised Corporate Director (ACD) to these funds.

1.

BUYING AND SELLING UNITS/SHARES

Can I buy units/shares?

You may buy units/shares in the Funds if you are aged 18 or over. You may buy units/shares within an ISA or on behalf of an eligible child through a Junior ISA, further details for which are provided in section 5 of the Marlborough Terms and Conditions (the **Ts&Cs**). The minimum investment for each fund can be found in the Prospectus of the relevant fund.

How do I invest?

Please complete the appropriate application form and send it by post to your Professional Adviser or to Marlborough Fund Managers Ltd together with a cheque made payable to Marlborough Fund Managers Ltd for the full amount. You may buy further units/shares in the same way, or by instructing us using the methods referred to in section 7.3 of the **Ts&Cs**. Alternatively, you may telephone our Dealing Team free on 0808 145 2501 for further information. Calls to this line may be recorded for your protection. It is important that you read the latest Key Investor Information Document (KIID) for a fund before you make any investment or top-up. We will ask you to confirm that you have done this before accepting an investment from you.

What happens next?

We will place your deal in accordance with section 7 of the **Ts&Cs**. Your investment will then be made in your

chosen fund(s) at the next available valuation point and we will send you a contract note. This will give you all the details about your investment such as the number of units/shares you receive, the price you paid and the date your investment was made. You should keep this document safe for future reference. For details of the valuation point for each fund please refer to the relevant Prospectus.

Can I switch between different funds?

Yes, you may switch from one Marlborough fund to another as set out in section 9 of the **Ts&Cs**.

How do I sell my units/shares?

You can instruct us to sell some or all of your units/shares at any time, either by writing to us or by calling our Dealing team free on 0808 145 2501. Instructions to sell units/shares are governed by sections 7.3 to 7.13 (inclusive) of the **Ts&Cs** and further details can be found in these sections of the **Ts&Cs**.

Dilution levy

Funds included:

- Marlborough Multi Cap Income
- Marlborough US Multi-Cap Income
- Marlborough European Multi-Cap
- Marlborough Far East Growth
- Marlborough Emerging Markets Trust
- Marlborough Commodity

When you sell units/shares in a single priced fund(s) we may charge a dilution levy. This is calculated by considering the cost to the fund of selling some of its underlying assets. The reason for this is to ensure that the cost to the fund of selling some of its assets to pay for those shares being sold (such as transaction costs or bid / offer spreads) do not disadvantage any of the remaining investors. This levy is paid back into the fund. It is usually only charged where a large deal or series of small deals take place, as specified in the scheme prospectus.

Swinging single pricing of funds

Funds included:

- Marlborough Special Situations
- Marlborough UK Micro-Cap Growth
- Marlborough Nano-Cap Growth
- Marlborough Multi-Cap Growth
- Marlborough Extra Income
- Marlborough Global Bond
- Marlborough Bond Income
- Marlborough High Yield Fixed Interest
- Marlborough Cautious
- Marlborough Balanced
- Marlborough Global

When you buy or sell units/shares in single priced fund(s), we may adjust (swing) the single price up or down. If this adjustment is applied, the amount of any swing is based on the estimated costs of dealing in the underlying investments of the relevant Scheme, for example, any dealing spreads, taxes or broker commissions.

As the requirement to swing the price is directly related to the net issue and sale of units/shares in a Scheme, it is not possible to accurately predict when or how often dilution will occur in the future, however the ACD anticipates this to be infrequent.

Regular Savings

You may invest in the funds by making regular, monthly contributions by Direct Debit. Details concerning the setting up and operation of a regular savings plan can be found at sections 7.27 to 7.33 (inclusive) of the Ts&Cs. To set up a regular savings plan please complete the appropriate application form and send it by post to your Professional Adviser or to Marlborough Fund Managers Ltd as directed by section 7.28 of the Ts&Cs.

Cancellation Rights

If you have received investment advice we will send you a letter detailing your cancellation rights. Further details regarding cancellation rights are set out at section 14 of the Ts&Cs.

Investment Advice

Marlborough Fund Managers does not provide investment advice, tax advice or legal advice. You should therefore consider the terms of investment in any Fund carefully and, if in any doubt, seek professional advice before making any investment decisions.

Keeping track of your investment

You may telephone our Investor Support Team on freephone 0808 145 2500 to request a valuation of your investments with Marlborough. Fund prices are available on our website www.marlboroughfunds.com along with our Ts&Cs and other useful information. We also publish some price information in the Financial Times. Statements will be sent to you at least annually in accordance with the Ts&Cs.

Making a complaint

At Marlborough Fund Managers Ltd we try our best to ensure we provide the high level of service that we ourselves would expect to receive. We recognise however that sometimes you may not be completely satisfied and have cause to complain. If you have a complaint, please contact our Investor Support Team in the first instance on freephone 0808 145 2500 if you are calling from the UK (+44 1204 380060 if you are calling from overseas). We will then carry out a full investigation and respond to you as soon as possible. Full details of our complaints procedure are available on request. If you are not satisfied with our response you may then contact the Financial Ombudsman Service, Exchange Tower, London, E14 9SR (0207 964 1000) who may then review your complaint independently. Website: financial-ombudsman.org.uk.

Compensation

Marlborough Fund Managers Ltd is covered by the Financial Services Compensation Scheme. You may be entitled to compensation from the Scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim. Most types of investment business are covered for 100% of the first £50,000. Further information about compensation arrangements is available from the Financial Services Compensation Scheme at www.fscs.org.uk.

Data Protection

Marlborough Fund Managers Ltd is subject to the Data Protection Act 2018. For the purposes of data protection law

Marlborough Fund Managers is a data controller in respect of your personal data and we are responsible for ensuring that we use any personal data in compliance with data protection law. Details of how we process personal data can be found in our Data Protection Privacy Notice, which is available on our website. Section 21 of the Ts&Cs also sets out the terms upon which personal data is processed.

Anti-Money Laundering / Combating Terrorist Financing

Money laundering regulations require financial service companies to make checks on the source of all business. Further information regarding our customer verification, anti-money laundering and counter-terrorism financing policy is set out in the Ts&Cs and in the Prospectus for each Fund. If you have any queries on money laundering prevention please call the Investor Support Team free on 0808 145 2500.

Regulatory Status

The funds are authorised collective investment schemes as defined in the Financial Services and Markets Act 2000 and are regulated by the FCA. The funds are all authorised unit trusts/OEICs and are governed by the FCA's Collective Investment Schemes (COLL) Sourcebook and their respective trust deed or instrument of incorporation. Details concerning the regulatory status and structure of each fund are set out in the relevant Prospectus. All documentation will be provided in English and contracts are subject to English law.

2.

CLIENT MONEY

Cash - protecting your money

We are required to comply with the FCA's client money rules, as set out in Chapter 7 of the FCA's Client Assets sourcebook (CASS) (the 'Client Money Rules').

For further information supporting the protection of client money, refer to the Ts&Cs under sections 7, 8, 10, 12.3 (A), & 17.4.

Interest

As set out at section 7.14 of the Ts&Cs, no interest will be paid on un-invested cash held for your Account.

Client Classification

All investors are classified as Retail Investors.

Conflicts of Interest

We operate a Conflicts of Interest Policy which sets out how we avoid, manage and minimise any potential conflicts of interest. Our policy and associated procedures aim to ensure that a conflict of interest does not arise. In the event that a conflict of interest between Marlborough Fund Managers, our investors or our employees cannot be avoided we will ensure it is effectively managed and that we treat our customers fairly.

3.

INVESTING VIA A STOCKS AND SHARES ISA

Marlborough ISAs

An ISA is a scheme of investment managed in accordance with the ISA Regulations under terms agreed between the ISA Manager and the Investor (Marlborough Fund Managers Terms and Conditions).

Income and gains generated by ISA investments are exempt from any further UK income tax as well as capital gains tax in the hands of the investor.

Anyone aged 18 or over may invest in a stocks & shares ISA, provided they are resident in the UK for tax purposes. This includes members of the armed forces, the Foreign Office and other Crown employees together with their spouses or those in a civil partnership overseas.

There are two ISA components available; a Stocks and Shares ISA and a Cash ISA. Marlborough Fund Managers Ltd only offer the stocks and shares component in the form of funds it manages, although you may open a cash ISA with a different provider. Each tax year you may open one stocks and shares ISA and one cash ISA only.

You may also transfer existing ISAs from previous tax years between providers without affecting your current year's allowance.

You can invest up to £20,000 in the 2020/2021 tax year in our stocks and shares ISA, providing you have not

already contributed to another stocks and shares ISA this tax year. If you have also paid into a cash ISA, then this allowance is reduced by the amount you paid in. You are responsible for ensuring you keep within the allowance.

Further details concerning the terms and operation of ISAs can be found in the Marlborough Fund Managers Terms and Conditions, including opening an MFM ISA (section 5.6) and transferring an existing ISA to Marlborough Fund Managers (section 5.10).

How do I invest via a Marlborough Stocks and Shares ISA?

Subject to the Ts&Cs, you may invest by completing an ISA Application Form, which can be obtained from our website, or by calling our Investor Support Team free on 0808 145 2500.

Can I transfer an existing ISA to Marlborough?

Yes. You may transfer an ISA in accordance with section 5.10 of the Ts&Cs.

How does tax affect my ISA?

Any capital gains or income from investments in an ISA are free from income tax and capital gains tax. If your fund pays interest on distributions they are paid without deduction of any tax. If your fund pays dividend

distributions they are also paid without deduction of any tax.

Are there any additional risks associated with investing in a Marlborough ISA?

The risks are the same as those associated with all stock market investments and with the specific fund(s) you choose.

These can be found in the Prospectus. In addition, it should be noted that the favourable tax treatment given to ISAs may not be maintained. The rates of and relief from taxation depend on your own circumstances and may change over time.

Regular Savings ISA

You may also invest in the funds by making regular, monthly contributions into an ISA in the same way as you would with regular savings outside an ISA.

How do I sell my Marlborough ISA?

You may sell all or part of your ISA holding with Marlborough by writing to us, ensuring your instruction is signed, or by calling our Dealing Team free on 0808 145 2501. We will send a cheque for the proceeds in accordance with the Ts&Cs.

Junior ISA

Marlborough also offer Junior Stocks and Shares ISAs, further details are available on our website or by calling 0808 145 2500.