

**Columbia Threadneedle (Lux)**  
Société d'Investissement à Capital Variable  
Registered Office: 31, Z.A. Bourmicht, L-8070 Bertrange  
Grand Duchy of Luxembourg  
R.C.S. Luxembourg B 244354  
(the “**SICAV**”)

**NOTICE TO THE SHAREHOLDERS OF**

**COLUMBIA THREADNEEDLE (LUX) – SUSTAINABLE OUTCOMES GLOBAL EQUITY**

**(THE “FUND”)**

**IMPORTANT**

15 September 2023

Dear Shareholder,

**Important information: Amendment to the investment policy and SFDR RTS Annex of the Fund to allow it to be categorised as Article 9 under the Sustainable Finance Disclosure Regulation (“SFDR”) and reduction of Operating Expenses.**

As you are an investor in the Fund, we are writing to inform you that the Board of Directors of the SICAV (the “**Board**”) are amending the investment policy of the Fund and its corresponding SFDR RTS Annex to allow the Fund to be categorised under Article 9 of the EU Regulation 2019/2088 on sustainability-related disclosures in the financial services sector (known as the Sustainable Finance Disclosure Regulation or “**SFDR**”). The Fund is currently classified under Article 8.

The Board is also reducing the Operating Expenses applicable to certain share classes of the Fund.

The investment policy and SFDR RTS Annex will be further amended to disclose that Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative (“**NZAMI**”) and has committed to an ambition, working in partnership with its clients, to reach net zero emissions by 2050 or sooner for a range of assets, including the Fund.

The amended investment policy and Operating Expense reductions will be adopted from 20 November 2023 (the “**Effective Date**”).

For any capitalised terms that are not specifically defined within this letter, please refer to the definition in the “Glossary” section of the Prospectus which is available on our website [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com).

**What is changing?**

The Fund will continue to target investment in companies that make positive contributions to sustainable outcomes for the environment and/or society through their products and services, and which display strong environmental, social and governance (“**ESG**”) practices. However, the investment policy will be amended to clarify that the Fund invests at least 80% of its total assets in sustainable investments within the meaning of Article 2(17) of SFDR and will be classified under Article 9 of SFDR. The Fund has already had the opportunity to test in practice the methodology for sustainable investments.

The Fund is expected to invest at least 90% of its assets in sustainable investments, but the minimum proportion of sustainable investments held by the fund is 80% to cover the fact that ancillary liquid assets may be held by the fund under unfavourable market conditions.

The investment manager applies Sustainable Outcomes Investment Guidelines in managing the fund. These Guidelines are comprised of two components: the application of a sustainable outcomes framework and the application of sustainable outcomes-based exclusions. Additionally, the investment manager will consider the principle adverse impacts (“**PAIs**”) of its investment decisions that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

As noted above, Columbia Threadneedle Investments is also a signatory to the NZAMI and has committed to an ambition, working in partnership with its clients, to reach net zero emissions by 2050 or sooner for a range of assets. The Fund will be managed in line with Columbia Threadneedle’s Net Zero methodology and the investment manager will use its proactive engagement with companies to assist with progressing this ambition.

The investment policy amendments have been summarised in Appendix A attached and will be reflected in the “Investment Objectives and Policies” section of the Prospectus and the SFDR RTS Annex from the Effective Date. Details regarding the Sustainable Outcomes Investment Guidelines and consideration of PAIs will be detailed in the SFDR RTS Annex of the Prospectus from the Effective Date and are summarised in Appendix B attached.

### Reduction of Operating Expenses

We regularly review our fees and charges and are committed to ensuring that these are fair and appropriate for investors. Following a recent review, the Board has also decided that the Operating Expenses applicable to certain share classes of the Fund will be reduced from the Effective Date.

The changes are set out in the table below:

Current			From the Effective Date		
Share Class	Asset Management Fee	Operating Expenses	Share Class	Asset Management Fee	Operating Expenses
<b>A Class</b>	1.50%	0.25%	<b>A Class</b>	1.50%	<b>0.20%</b>
<b>D Class</b>	2.00%	0.25%	<b>D Class</b>	2.00%	<b>0.20%</b>
<b>I Class</b>	0.65%	0.15%	<b>I Class</b>	0.65%	<b>0.10%</b>
<b>L Class</b>	0.35%	0.15%	<b>L Class</b>	0.35%	<b>0.10%</b>
<b>X Class</b>	0.00%	0.15%	<b>X Class</b>	0.00%	<b>0.10%</b>
<b>Z Class</b>	0.75%	0.20%	<b>Z Class</b>	0.75%	<b>0.15%</b>

### Why are we making changes relating to the investment policy of the Fund allowing a recategorisation as Article 9 under the SFDR?

Following the introduction of SFDR, investors are increasingly requiring investment funds to embed the development of sustainable finance into their investment process and through the objective of the funds. The changes being made will strengthen this commitment from an Article 8 to an Article 9 under the SFDR and also make the Fund suitable for investors with stronger sustainability preferences under MiFID II (the Markets in Financial Instruments Directive and Markets in Financial Instruments Regulation - collectively known as MiFID II).

As mentioned above, the Fund has already had the opportunity to test in practice the methodology for sustainable investments and shareholders should note that we do not expect the introduction of these

additional measures to result in significant changes to the way in which the Fund is currently managed or its risk profiles.

### **Why has Columbia Threadneedle Investments signed up to NZAMI?**

As a large global asset manager, we are committed to both delivering long-term financial returns for our clients, which includes managing the risks presented by climate change, and supporting the transition to a low-carbon economy. As such, we are a signatory to NZAMI, which is an international group of asset managers committed to supporting the goal of net zero greenhouse gas emissions (“net zero”), and working in partnership with our clients, we aspire to reach net zero by 2050 or sooner across all our assets under management, including the Portfolio.

Full details of the commitment made by NZAMI signatories can be found at the following website address: [www.netzeroassetmanagers.org/commitment/](http://www.netzeroassetmanagers.org/commitment/)

### **What does the NZAMI commitment mean for my investment?**

Primarily, we use active ownership to engage with companies within our portfolios to influence them to lower their carbon emissions. Our current aim is for each Portfolio to hold at least 70% of its portfolio emissions in net zero aligned or engaged companies, however this is not a binding target.

This approach is complemented by Columbia Threadneedle’s engagement focus list, where the goal is to work constructively with globally significant high-emitting companies to encourage them to align with a net zero trajectory. However, this could result in the divestment from the Portfolio of a small number of these companies if they are held in the Portfolio, if after a period of engagement, they fail to meet minimum expectations in relation to their climate policies.

Further details on the methodology we use can be found on our website [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com).

More immediately, and in addition to the existing revenue-based coal exclusions, the Portfolio will no longer be able to invest in companies that make new investments in coal mining or power generation projects. These exclusions are included in the SFDR RTS Annex of the Portfolio.

**Whilst net zero will become a continuing ambition of the Portfolio, it is not an outcome which is guaranteed, nor is any guarantee given that progress towards this ambition for the Portfolio will necessarily result in better returns for investors. A Portfolio’s progress towards this ambition may impact the performance of the Portfolio positively or negatively.**

### **What do I need to do?**

You do not need to do anything as a result of these changes, which will take effect automatically on the Effective Date.

We do not expect that the amendments to the investment policy and SFDR RTS Annex related to qualify as an Article 9 fund under SFDR to result in significant changes to the way in which the Fund is currently managed or the risk profile.

Shareholders should note that, once the above changes enter into effect, the new prospectus may be obtained at the registered office of the SICAV and will also be available on our website [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com), in accordance with the provisions of the Prospectus.

### **What can I do if I disagree with the changes?**

Shareholders may redeem their shares in the Fund, free of any charges, by submitting a written request to the Registrar and Transfer Agent: International Financial Data Services (Luxembourg) S.A. until 15.00 Luxembourg time on 19 November 2023. Such redemption or exchange requests will be processed in the normal manner in accordance with the “Redemption of Shares” section of the

Prospectus. Contact details for International Financial Data Services are available on the "Contact" section of our website [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com).

We are unable to provide financial or tax advice and we therefore suggest that you seek professional advice about potential tax implications.

### **Additional information**

If you have any other questions regarding this notice, please speak to your financial adviser.

Yours faithfully,

The Board

**Important information:** Your capital is at risk. Columbia Threadneedle (Lux) is a Luxembourg domiciled investment company with variable capital ("SICAV"), managed by Threadneedle Management Luxembourg S.A.. This material should not be considered as an offer, solicitation, advice or an investment recommendation. This communication is valid at the date of publication and may be subject to change without notice. Information from external sources is considered reliable but there is no guarantee as to its accuracy or completeness. The SICAV's current Prospectus, the Key Investor Information Document (KIID) / Key Information Document (KID) and the summary of investor rights are available in English and/or in local languages (where applicable) from the Management Company Threadneedle Management Luxembourg S.A., International Financial Data Services (Luxembourg) S.A., your financial advisor and/or on our website [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com). Threadneedle Management Luxembourg S.A. may decide to terminate the arrangements made for the marketing of the SICAV. Pursuant to article 1:107 of the Act of Financial Supervision, the sub-fund is included in the register that is kept by the AFM. Columbia Threadneedle (Lux) is authorised in Spain by the Comisión Nacional del Mercado de Valores (CNMV) and registered with the relevant CNMV's Register with number 2022. Past performance is calculated according to the BVI method in Germany.

Neither the SICAV nor any compartment has been approved by the Swiss Financial Market Supervisory Authority ("FINMA") for offering to non-qualified investors pursuant to Art. 120 para. 1 of the Swiss Federal Act on Collective Investment Schemes of 23 June 2006, as amended ("CISA"). In addition, the management company has not and does not intend to appoint a Swiss representative or a Swiss paying agent for the shares offered in Switzerland. Accordingly, the shares may only be offered or advertised, and this information may only be made available, in Switzerland to qualified investors within the meaning of CISA who are not high-net-worth individuals (or private investment structures established for high-net-worth individuals) having opted out to professional client status under Art. 5 para. 1 of the Swiss Federal Act on Financial Services. Investors in the shares do not benefit from the specific investor protection provided by CISA and the supervision by the FINMA in connection with the approval for offering.

Columbia Threadneedle (Lux) is a collective investment scheme pursuant to Section 235 of the United Kingdom's Financial Services and Markets Act 2000, as amended ("FSMA"). Notification has been made to the FCA under the National Private Placement Regime (NPPR) to market this fund in the UK. Prospective Investors are advised that all, or most, of the protections afforded by the United Kingdom regulatory system will not apply to an investment in the Fund and that compensation will not be available under the United Kingdom Financial Services Compensation Scheme.

In the EEA and Switzerland: Issued by Threadneedle Management Luxembourg S.A. registered with the Registre de Commerce et des Sociétés (Luxembourg), Registered No. B 110242, 44 rue de la Vallée, L-2661 Luxembourg, Grand Duchy of Luxembourg.

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**Columbia Threadneedle Investments is the global brand name of the Columbia and Threadneedle group of companies.**

## Appendix A - Changes to the investment policy of the Fund to allow it to be categorised as Article 9 under the SFDR and commitment to the Net Zero Asset Managers Initiative

Current Investment Objective and Policy	Investment Objective and Policy as from the Effective Date
<p><b>Objective</b> to generate capital growth through investment in companies that are positively exposed to sustainable outcome themes through their products and services and display strong or improving environmental, social and governance (ESG) practices.</p> <p><b>Index</b> MSCI ACWI Index. <i>For performance measurement.</i></p> <p><b>Investment Policy</b> The fund is actively managed and invests a minimum of 90% of its total net assets in the equity securities of companies globally, including through depositary receipts. Such investment may include the equity securities of companies in emerging market countries which may represent a core part of the fund's investments.</p> <p>For the purposes of managing liquidity, the fund may hold ancillary liquid assets (i.e. bank deposits at sight) and may hold bank deposits, money market instruments or money market funds for treasury purposes. In normal market conditions, investment in these assets and instruments will not exceed 10% of the fund's net asset value.</p> <p>The investment manager focusses on selecting companies delivering sustainable outcomes or progressing towards the delivery of sustainable outcomes, as outlined in the fund's Sustainable Outcomes Investment Guidelines. Those companies will offer products and services aligned to the fund's sustainable outcome themes and demonstrate strong or improving ESG practices.</p> <p>The fund is actively managed in reference to the MSCI ACWI Index. The fund looks to outperform the index over rolling 5 year periods, after deduction of charges. The index is broadly representative of the companies in which the fund invests and provides a suitable target index against which fund performance will be measured and evaluated over time. Accordingly, the index is not designed to specifically consider environmental or social characteristics. The investment manager has discretion to select investments with weightings different to the index, and that are not in the index, and the fund may display significant divergence from the index.</p> <p>Guidelines on the level of risk relative to the index will be considered as part of the investment manager's risk monitoring process, to ensure the overall level of risk is broadly consistent with the index. In keeping with its Sustainable Outcomes Investment Guidelines, the fund may not invest in some sectors and companies in the index.</p> <p><b>Sustainable Outcomes Investment Guidelines:</b> The investment manager has developed its own Sustainable Outcomes Investment criteria for the fund as set out in its Sustainable Outcomes Investment Guidelines, which may be amended from time to time. These are specific to the fund and are over and above the investment manager's normal responsible investment practices.</p>	<p><b>Objective</b> to generate capital growth by investing in companies globally that are delivering positive sustainable outcomes for the environment and/or society through their products and services, and display strong environmental, social and governance (ESG) practices.</p> <p><b>Index</b> MSCI ACWI Index. <i>For performance measurement.</i></p> <p><b>Investment Policy</b> The fund is actively managed and invests at least 90% of its total net assets in the equity securities of companies located anywhere in the world, including through depositary receipts, subject to the fund's sustainable outcomes criteria. This includes companies located in emerging market countries which may represent a core part of the fund's investments.</p> <p>For the purposes of managing liquidity, the fund may hold ancillary liquid assets (i.e. bank deposits at sight), and may also hold bank deposits, money market instruments or money market funds for treasury purposes. In normal market conditions, investment in these assets or instruments will not exceed 10% of the fund's net asset value.</p> <p>The fund is actively managed in reference to the MSCI ACWI Index. The fund looks to outperform the index over rolling 5-year periods, after deduction of charges. The index is broadly representative of the companies in which the fund invests and provides a suitable target index against which fund performance will be measured and evaluated over time. The index is used for the purposes above and is not intended to be aligned with or used to attain the sustainable investment objective of the fund.</p> <p>The investment manager has discretion to select investments with weightings different to the index, and that are not in the index, and as a result of its sustainable investment objective, the fund will display significant divergence from the index.</p> <p>Deviations from the index, including guidance on the level of risk relative to the index, will be considered as part of the investment manager's risk monitoring process.</p> <p><b>Sustainable Outcomes Investment Guidelines:</b> The investment manager has developed its own Sustainable Outcomes Investment Guidelines for the fund, which may be amended from time to time. The two main components of these Guidelines are the application of a sustainable outcomes framework and the application of sustainable outcomes-based exclusions. The investment manager considers the principal adverse impacts ("PAIs") of its investment decisions that may negatively harm sustainability factors through exclusions, investment research and monitoring and engagement of companies. The Sustainable Outcomes Investment Guidelines and consideration of PAIs are described in the SFDR RTS Annex.</p>

The fund's Sustainable Outcomes Investment Guidelines are available on request and on the Columbia Threadneedle Investments website.

There are two main components to the Sustainable Outcomes Investment Guidelines as outlined below:

Within the universe of approved investments, the framework against which the investment manager will assess its investments may include the extent to which companies:

- currently have the potential and are seeking to develop products and services that contribute towards a better future (such as in education, clean technology, healthcare, safety and security);
- evidence strong or improving ESG practices within their sectors which means that the investment manager may invest in companies that at the time of investment do not demonstrate strong ESG practices, but are in the process of transitioning to such practices.

The investment manager will apply sustainable outcome-based exclusion screening to the fund's investments, which aims to exclude companies that are unable to satisfy the fund's Sustainable Outcomes Investment Guidelines from time to time. By way of example, it may seek to exclude companies where a substantial element of the business revenue is derived from products or services such as alcohol, tobacco, gambling, adult entertainment, the manufacture of military weapons, civilian firearms and nuclear power.

The investment manager will apply these non-financial selection criteria to at least 90% of the total net assets of the fund, excluding ancillary liquid assets, bank deposits, money market funds or money market instruments for liquidity or treasury purposes, and will use measurement methods such as responsible investment rating and sustainable outcome-based exclusion screening to ensure that the fund's ESG profile and exposure to sustainable outcome themes exceeds that of the index. In addition to these measurements, the investment manager will publish an annual impact report.

The investment manager will monitor its investments against the fund's Sustainable Outcomes Investment Guidelines and may engage in dialogue with such companies if it believes that the standards and practices applied by these companies can be improved. In evaluating the investment universe, the investment manager may refer to additional sources, such as external rating providers that score companies on their ESG performance, as well as the investment manager's own analysis and expertise in this area.

The fund is categorised as one that promotes environmental or social characteristics under EU Regulation 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR), and does not have a "sustainable investment" objective as defined by SFDR.

#### **Derivatives and techniques**

The fund may use derivatives for hedging (reducing risks), but not for investment purposes.

#### **Strategy**

A concentrated global equity strategy with a focus on high quality companies that seeks to deliver both positive sustainable outcomes and financial returns.

Columbia Threadneedle Investments is a signatory to the Net Zero Asset Managers Initiative ("NZAMI") and has committed to an ambition, in partnership with clients, to reach net zero emissions by 2050 or sooner for a range of assets, including the fund. Accordingly, the investment manager will use proactive engagement with companies to assist with progressing this ambition. If after an appropriate period of engagement, a high emitting company held in the fund does not show progress in meeting minimum standards considered necessary for continued investment, then the fund will disinvest from the company.

#### **Derivatives and techniques**

The fund may use derivatives for hedging (reducing risks), but not for investment purposes.

#### **Strategy**

A concentrated global equity strategy with a focus on high quality companies that seeks to deliver both positive sustainable outcomes and financial returns.

#### **SFDR Information**

The fund is considered to be within the scope of Article 9 of SFDR as it has sustainable investment as its objective.

Further information on the fund's investment guidelines is included in the Sustainable Outcomes Investment Guidelines available at [columbiathreadneedle.com](http://columbiathreadneedle.com). The investment manager publishes a sustainable outcome report each year which is also available at [www.columbiathreadneedle.com](http://www.columbiathreadneedle.com).

Please also refer to the General Sustainability Disclosures Appendix in this Prospectus for further information.

Information about the sustainable investment objective of the Portfolio is available in the SFDR RTS of this Prospectus.

## Appendix B – Sustainable Outcomes Investment Guidelines and PAIs

As from the Effective Date, the Fund will pursue a sustainable objective of providing positive sustainable outcomes for the environment and/or society by investing in companies whose activities are aligned with one of the eight environmental or social themes of the Fund, which are in turn directly linked to the Sustainable Development Goals (“SDGs”), and display strong environmental, social and governance (“ESG”) practices.

To achieve its sustainable investment objective, the Fund expects to invest at least 90%<sup>1</sup> of its total assets in sustainable investments within the meaning of SFDR. Sustainable investments are considered for this Fund to be the equity securities of companies globally that are delivering positive sustainable outcomes through their products and/or services in line with one or more of the fund’s eight environmental or social themes, as set out below:

- Good health and well-being;
- Reduced inequalities;
- Decent work and economic growth;
- Sustainable cities and communities;
- Quality education;
- Affordable and clean energy;
- Industry, innovation and infrastructure; and
- Responsible consumption and production.

The investment manager will only consider companies that generate sales from products and/or services that are net positively aligned (i.e. sales that have a positive sustainable contribution are offset by any sales that have a negative sustainable contribution). In addition, the investment manager will apply a set of revenue-based exclusions and will not invest in companies which derive revenue above certain thresholds from industries or activities that the investment manager considers are contrary to the goals of making positive contributions to society and/or the environment. Such as, but not limited to, tobacco production and distribution, alcohol production and distribution, thermal coal power generation and conventional weapons. The investment manager also excludes companies that breach accepted international standards and principles as determined by the investment manager, such as, but not limited to, the United Nations Global Compact, the International Labour Organization Labour Standards, and the United Nations Guiding Principles on Business and Human Rights.

The investment manager of the Fund will proactively consider the PAIs of the investment decisions it makes for the Fund that may negatively harm sustainability factors through a combination of exclusions, investment research and monitoring and engaging with investee companies.

More information on how the Fund will consider the PAIs of its investment decisions on sustainability factors will be made available in the annual reports.

Investments will be assessed to ensure they do not significantly harm (DNSH) sustainability objectives using an in-house data driven model and investment team due diligence and will be hence reported as social investments.

The model will identify harm by using a quantitative threshold against a selection of principal adverse impact indicators. Issuers which fall below these thresholds will be flagged as potentially harmful. This will then be considered taking account of the materiality of the harm, whether harm has or is occurring, and whether mitigating activities are underway to address harm. Where data is not available, investment teams will endeavour to satisfy that no significant harm has taken place by deploying their best efforts to obtain the information by carrying out additional research or making reasonable assumptions through desk-based research or engagement with the management team of the company.

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<sup>1</sup> Even though the fund is expected to invest at least 90% of its assets in sustainable investments, the minimum proportion of sustainable investments held by the fund is 80% to cover the fact that ancillary liquid assets may be held by the fund under unfavourable market conditions, as described below in the asset allocation section.