



安盛環球基金

(下稱「本公司」)

盧森堡可變動資本投資公司

登記辦公室: 49, avenue J. F. Kennedy

L-1855 Luxembourg

商業登記編號: Luxembourg, B-63.116

2022年12月27日

本通知書為重要文件，請立即注意本通知書內容。

如有任何疑問，請尋求專業建議。

(本通知書為中文節譯本，僅列出與在台灣地區銷售子基金相關之內容)

親愛的股東：

謹通知 台端本公司之董事（下稱「董事」，或組成本公司董事會整體時，稱「董事會」）已決定對本公司公開說明書（下稱「公開說明書」）進行若干變更，俾使本公司得更有效率照應 台端之利益。

除本通知書中另有定義外，本通知書所使用之詞彙及表達方式與公開說明書所使用者具有相同意義。

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第 1 部分 – ESG

1. 依據SFDR二級立法揭露要求，新增締約前範本文件

歐盟執委會授權法規 2022/1288 號（下稱「**SFDR二級立法**」）業已經通過並於2022年7月25日公布於歐盟公報，該法規明定金融市場參與者及金融商品於依照2019年11月27日歐洲議會與理事會關於金融服務業永續相關揭露之歐盟2019/2088號法規（下稱「**SFDR**」）揭露永續相關資訊時，須使用之監管技術標準（簡稱 RTS）。

為於2023年1月1日前合乎**SFDR二級立法**之規範，本公司子基金（下稱「**子基金**」）凡符合SFDR第8條與第9條定義（下稱「**SFDR第8條產品**」與「**SFDR第9條產品**」）者，公開說明書將包含該子基金締約前範本文件，詳述SFDR所規定之揭露內容，含任何分類相關資訊在內。

是以，董事會決定針對符合SFDR第8條與第9條產品之各檔子基金，新增已完成之締約前範本文件作為公開說明書之新附錄。

董事會亦決定子基金已因應SFDR二級立法附錄之實施而調整ESG方法之敘述，則修改該等子基金之主要投資人資訊文件（KIID）。

另外，董事會決定修訂子基金增補文件中「投資策略」一節，針對符合SFDR第8條產品之子基金，新增以下提及SFDR二級立法附錄之免責聲明：「關於提倡環境及／或社會特色之更多資訊，可參考本子基金之相關**SFDR附錄**」；針對符合SFDR第9條產品之子基金，新增以下免責聲明：「關於永續投資之更多資訊，可參考本子基金之相關**SFDR附錄**」。

最後，董事會決定新增「金融商品」與「關鍵績效指標」（或簡稱「KPI」）之定義，這兩個名詞出現在SFDR二級立法附錄以及公開說明書主文之「具特定意涵用語」一節。

2. 修訂公開說明書前言之「永續投資及提倡ESG特色」一節

董事會經常審視依SFDR及2020年6月18日歐洲議會與理事會關於制定促進永續投資框架之歐盟2020/852號法規（下稱「**分類規則**」）所為之揭露，以因應市場演化及內部政策與方法之變更。

董事會決定修訂公開說明書前言之「永續投資及提倡ESG特色」一節如下：

- 載明安盛投資管理公司（「AXA IM」）之ESG標準適用於所有SFDR第8條與第9條子基金；
- 既然SFDR二級立法現已實施，故移除「(於相關監管技術準則(*Regulatory Technical Standards*)實施前)」之文字；

- 反映排除清單之更新如下，該清單主要用於評估「不造成重大損害」原則：

「SFDR規則：此等子基金於建構投資組合及投資過程適用產業排除政策、ESG標準政策並以ESG評分、ESG指標或聯合國永續性發展目標（下稱UN SDGs）作為額外投資選擇方法，詳見各檔子基金之相關SFDR附錄。「不造成重大損害」原則之考量係透過將最重大之ESG風險納入排除政策以及排除對UN SDGs具有顯著負面影響或ESG評等為CCC之發行人。盡職治理政策係透過與公司就永續性及治理議題進行直接對話，進一步減輕主要不利影響 (Principal Adverse Impacts)之風險。」

- 關於SFDR更新，新增與下列有關之免責聲明：(i)資料可得性與可靠性有其侷限，及(ii)市場實務或法規發展可能導致子基金之SFDR分類演變。
- 更新歐盟分類規則一節之相關揭露如下，以便(i)更新投資於分類規則相符投資之子基金名單，及(ii)闡明SFDR第8條產品亦可能部分投資於分類規則定義之永續投資：

「除下表所列子基金外，依SFDR歸類為第9條之子基金以及部分投資於永續資產之第8條子基金之最低環境永續投資應佔各檔子基金資產的 0%(包括賦能活動及過渡性活動)：」

子基金	與分類規則相符(包括賦能活動及過渡性活動)
AXA WORLD FUNDS ACT CLEAN ECONOMY ACT潔淨經濟基金	4%

最後，在設立一檔新子基金、SFDR重分類以及若干子基金更改名稱或重塑（如後文所述）之後，董事會決定更新此表格，包含子基金之SFDR分類。

3. 修訂公開說明書子基金增補文件之SFDR揭露資訊

符合SFDR第8條與第9條產品之子基金視其遵循之ESG策略而定，可區分為以下三次類別：

- SFDR第8條產品（採行法國金融市場管理局或簡稱AMF定義之「積極議合方法」），其可能有或沒有ESG標籤，承諾其最低永續投資（依SFDR定義）比例超過10%或50%或無任何承諾；
- 其他SFDR第8條產品（「非RI」或「非積極議合」），僅採行AXA IM產業排除政策與ESG標準（依公開說明書定義），承諾或未承諾其最低永續投資（依SFDR定義）比例超過10%；及
- SFDR第9條產品，有永續轉型資產、採取某SDG框架或影響力方法，其可能有或沒有ESG標籤。

依上述類別分類之子基金列於本通知書附錄1，其(i)反映子基金於重分類、重塑及修改投資策略後之狀態，及(ii)敘明該等方法之主要特色。請參考該附錄以了解各子基金所屬類別。

SFDR二級立法附錄之新增亦對符合SFDR第8條與第9條產品資格之子基金增補文件造成影響，因為ESG資訊原則上應主要載於SFDR二級立法附錄內容中，而非公開說明書主文中。

故董事會決定將符合SFDR第8條產品子基金之多數ESG相關資訊，從該等子基金增補文件中移至SFDR二級立法附錄，但附錄2詳述之特定必要資訊除外。

另外，董事會已依據前述及附錄2所述（除參考SFDR二級立法附錄之外），修訂符合SFDR第8條產品之子基金「投資策略」一節。

關於本公司之SFDR第9條子基金，董事會考量到ESG面向是該等子基金投資策略與目標之重要內容，因此，雖仍將減少ESG相關資訊量，但董事會決定保留部分關鍵資訊，以利投資人了解該等子基金有關非財務目標與策略之主要成分內容。

有鑑於此，董事會修訂SFDR第9條子基金增補文件，減少非財務目標與策略資訊之詳細程度，詳見附錄2。

上述變更不會對投資組合、風險狀況或費用產生實質性影響。

4. SFDR重分類

於SFDR二級立法即將實施，及自SFDR一級立法後所頒布其他規範之脈絡下，管理公司及董事會決定依SFDR將子基金之分類更新為第8條（適用提倡環境及／或社會特色之產品），而非SFDR第9條（適用於具有「永續投資」目標之產品）。

因此，董事會決定重新分類子基金安盛環球基金－泛靈頓歐洲小型企業基金（即將更名為安盛環球基金－歐洲小型企業股票基金），從SFDR第9條產品更改為SFDR第8條產品，並修改其相關增補文件與KIID：

；

雖子基金整體ESG方法並未明顯更改，但其投資目標與策略將進行修訂以反映該子基金將不再具有永續投資目標之事實，而是將採用ESG方法。該等措辭之更新主要將反映在子基金之SFDR二級立法附錄之揭露資訊中。

為清楚起見，該重新分類不會對子基金所考慮之投資組合組成、風險狀況或ESG標準產生重大影響。

不同意此異動之股東可於2023年2月27日以前免費申請贖回其股份。

第2部分 – 一般資訊

1. 管理公司之重整與變更

按，安盛投資管理（AXA Investment Managers）決定重整其盧森堡子公司暨本公司現行管理公司－安盛環球基金管理公司（AXA Funds Management）（下稱「AFM」），併入成為安盛投資管理另一子公司 AXA Investment Managers Paris（下稱「AXA IM Paris」）之盧森堡分公司。

按，此項重整案之執行基本上透過將AFM併入之AXA IM Paris（下稱「合併」），並成立盧森堡分公司以安頓AXA IM Paris之盧森堡員工。該合併將於[2023年2月28日生效]。

按，董事會已收到合併案對本公司投資人將無任何重大不利後果之確認書，尤其AXA IM Paris於進行合併期間及合併後不論在公司方面或在員工方面皆維持高度之營運持續性，並持續對CSSF與投資人負報告義務與責任，更顯示合併案並無不利。AXA IM Paris將繼續善用其在盧森堡之長期能見度，繼續以盧森堡當地團隊作為與CSSF、當地供應商及必要時與投資人間之溝通橋梁。

故董事會決議，經 CSSF 事前核准後，於公開說明書及子基金 KIID 中反映合併所致之管理公司變更。

與該重組有關之費用將由 AXA IM Paris 承擔。

因此，董事會決定更新公開說明書及子基金之關鍵投資人資訊(KIIDs) 或零售及保險投資產品組合提供重要資訊文件(PRIIPs)之關鍵投資人資訊，以於任何有關部分反映該合併所導致之管理公司變更。

此異動不會對投資人之投資產生實質性影響，亦不會增加任何費用。此異動將於 2023 年 2 月 28 日生效。

2. 子基金更名

董事會決定下列子基金更名如下：

- 「安盛環球基金－泛靈頓歐洲房地產基金」更名為「安盛環球基金－歐洲房地產股票基金」；
- 「安盛環球基金－泛靈頓歐洲小型企業基金」更名為「安盛環球基金－歐洲小型企業股票基金」。

(合稱為「子基金之新名稱」)

董事會並決議更新公開說明書及關鍵投資人資訊及零售及保險投資產品組合提供重要資訊文件(PRIIPs)之關鍵投資人資訊，以反映子基金之新名稱。

3. ACT潔淨經濟基金之投資目標與策略插入關於目標投資市場之特定揭露資訊

董事會決定修訂以下子基金之「投資目標與策略」一節，以便（在毋須實質修訂目標投資市場本身之下）釐清有關目標投資市場之措辭，如下表所述：

子基金名稱	原措辭	新措辭
安盛環球基金 – ACT潔淨經濟基金	子基金投資於從事潔淨經濟發展活動之全球公司之股票，該等活動可進行能源轉型及資源優化活動。	本子基金投資於全球任何市值公司之股票。

4. 插入洗錢防制條文

董事會決定於公開說明書一般性內容中新增下列有關洗錢防制條文之語句並移除現有條文，以便跟進洗錢防制之最新進展：

「SICAV、管理公司及登記代理人應遵守國際與盧森堡關於防制洗錢及防制資助恐怖分子之相關法律與規範，包括但不限於 2004 年 11 月 12 日有關打擊洗錢及資恐之盧森堡法暨其修訂內容（下稱「洗錢防制法」），及 2012 年 12 月 14 日有關打擊洗錢及資恐之 CSSF 第 12-02 號規例暨其修訂內容（下稱「AML/CFT 規則」）。AML/CFT 規則要求 SICAV 從風險敏感性之基礎上，確認及查核投資人身分（以及如受益權人非投資人時，該受益權人身分）以及投資資金出處、資金來源與（依其情形）財富來源，並持續監測與該投資人間之業務關係。投資人身分之查核應依據自可靠獨立來源取得之文件、資料或資訊。投資人應依據其類型與類別，向登記代理人提供申請表上所列之資訊。

SICAV、管理公司及登記代理人應制定適當洗錢防制控制措施，並要求提供所有必要文件以確認及查核任何投資人之身分與狀況、業務關係之性質與預設目的及申購價款來源。登記代理人（以及（依其情形）管理公司）有權要求提供更多資訊至合理滿意其確實了解該投資人身分與經濟目的為止，俾遵守AML/CFT規則，此外也可能要求提供確認以便驗證任何資金往來銀行帳戶之所有權。再者，任何投資人在變更股份受益權人身分之前，皆須事前通知登記代理人。

股份之申購若以間接方式透過代表第三人進行投資之中介機構為之，則可允許SICAV、管理公司及登記代理人依洗錢防制法第3-3條所述條件，仰賴由此等中介機構執行之客

戶身分辨識與查核措施。前揭條件尤其要求中介機構採行符合洗錢防制法所載規定之客戶審查與帳務紀錄要求，並受有管轄權監督機關以符合此等法規之方式予以監督。前述中介機關必須向登記代理人提供(i)投資人、投資人之代理人及受益權人身分之資訊，(ii)資金來源相關資訊，及(iii)於SICAV及／或管理公司要求時，立即提供相關申購申請表所記載可用以驗證投資人（及如適用時，所有受益權人）身分之客戶審查文件副本。

SICAV及管理公司已與多家經銷商訂定合約（後者可能再與分銷商訂定合約），依據該等合約，經銷商同意擔任或可指派代名人透過其設施為投資人申購股份。依該等職權，經銷商得以代名人義代表個人投資人執行股份之申購、轉換及贖回，並要求將該等機構以代名人義登記在本SICAV股東名冊中。此情況下，代名人／經銷商會設置自己之帳務紀錄，並向投資人提供該人所持有股份之個別資訊。

若未能提供SICAV、管理公司及登記代理人為遵守其AML/CFT規則所負義務而視為必要之前揭資訊與文件，則可能導致延誤或拒絕申購或轉換申請及／或延誤贖回申請或股息支付。此情況下概不負任何利息、成本或補償責任。當股份發行後，亦須已完成完整之登記資訊並取得適當之業務關係文件後，始能辦理贖回或轉換。

管理公司依據洗錢防制法第3(7)和第4(1)條，進行特定之客戶審核與一般監控，並從資產負債表之負債與資產面皆採行預防措施（即，列入子基金之投資／撤資決策中）。

依洗錢防制法第3(7)和第4(1)條，本SICAV亦須採行有關子基金資產之預防措施。管理公司使用風險基礎法，評估股份與服務之提供對於犯罪所得透過處置、分層化與整合方式流入金融體系所呈現之潛在脆弱程度。

依2020年12月19日關於實施金融事務限制措施之盧森堡法，任何盧森堡自然人或法人，以及在盧森堡領土或從盧森堡領土運作之其他任何自然人或法人，皆應適用國際金融制裁。因此，子基金投資於資產前，管理公司至少限度應確保該等資產或發行人名稱通過目標性金融制裁名單之過濾。」

5. 插入管理公司薪酬政策之特定揭露資訊

依據有關施行 UCITS 指令之 ESMA 常見問答集（ESMA34-43-392）之規定，董事會決定更新公開說明書「管理公司」一節中「薪酬政策」小節，加入有關管理公司提供折讓之資訊。此更新並非因該政策有任何改變，而係為資訊透明之目的。

6. 更新「通知與發佈」一節

董事會決定更新公開說明書中一般性內容之「通知與發佈」一節，以便加入可於特殊情況下透過網站公告作為股東通知之可能性（相關法令另有其他規定者除外）。

7. 加強對貨幣市場工具、貨幣市場基金及銀行存款風險之揭露

依2010年12月17日法律之CSSF常見問題解答，董事會已決定加強與貨幣市場工具、貨幣市場基金及銀行存款風險曝險相關之揭露，以提高透明度，並於適用之情況下修改相關子基金增補文件（未實質改變投資策略）。

子基金之名稱	加強揭露
安盛環球基金—泛靈頓歐洲房地產基金(將更名為安盛環球基金—歐洲房地產股票基金)	子基金亦可將其最多三分之一之淨資產投資於貨幣市場工具、貨幣市場基金及銀行存款。

此變更不會對投資組合、風險狀況或子基金之費用產生重大影響。

8. 其他

最後，董事會決定實施其他小幅之更改、修訂、澄清、更正、調整及／或更新，包括更新參照內容及定義詞彙之調整，包含如下：

- 就以下內容更新公開說明書：(i)子基金順序，(ii)目錄及(iii)各相關子基金之ESG分類表格；
- 更新「具特定意涵用語」一節，新增關鍵績效指標(KPI)之定義與金融商品之定義；
- 為了資訊透明之目的而更新公開說明書一般性內容之「風險」一節，在「絕對回報策略風險」與「合成空頭部位之風險」子節中新增提前返還風險之用語如下：「持有合成空頭部位亦涉及提前買回風險，因出借方可能隨時提前要求返還借入之證券。」
- 更新「UCITS 之一般投資規則」一節，以便 (i) 闡明定期存款及現金之相關規定，以及 (ii) 更新子基金最多得向任何一個發行機構投資 25%之擔保債券之說明。

* *

除管理公司之重整與異動外，包含本函所載變更之公開說明書將於 2023 年 1 月 1 日生效。

安盛環球基金

董事會

敬上

附錄：

附錄 1 – 三種主要 ESG 類別之分類列表

附錄 2 – SFDR 二級立法施行後之子基金增補文件主要更新內容

附錄 3 – 擬插入SFDR附錄之AFM積極議合及SRI標籤子基金（適用第8或9條）之相關特定資訊

附錄 1
三種主要 ESG 類別之分類列表

屬於 AMF「積極議合方法」之第 8 條產品				
具有永續投資最低比例>10%之標籤	具有永續投資最低比例>50%之標籤	第 8 條產品，未設永續投資之最低比例且無標籤	第 8 條產品，永續投資最低比例>10%但無標籤	第 8 條產品，永續投資最低比例>50%但無標籤
安盛環球基金－泛靈頓歐洲小型企業基金（即將更名為安盛環球基金－歐洲小型企業股票基金）	N/A	N/A	N/A	N/A
安盛環球基金－最佳收益基金				

其他第 8 條產品（「非 RI」或稱「非積極議合」）	
其他第 8 條產品，未設永續投資之最低比例	其他第 8 條產品，永續投資最低比例>10%
安盛環球基金－美國非投資等級債券基金	安盛環球基金－泛靈頓歐洲房地產基金(即將更名為安盛環球基金－歐洲房地產股票基金)
	安盛環球基金－泛靈頓新興市場基金

設有永續投資目標之第 9 條產品		
基金名稱	方法	標籤
安盛環球基金－ACT 潔淨經濟基金	著重於永續目標及/或綠色、社會或永續債券之影響力基金	ISR 標籤

附錄 2
SFDR 二級立法施行後之子基金增補文件主要更新內容：

I. 積極議合之第 8 條產品

	積極議合之第 8 條產品
目標	追求[財務目標]並採合於ESG之方法。
策略	[刪除所有ESG資訊，以下列段落取代之：]

	<p>本子基金提倡環境及／或社會特色，投資於對環境、治理與社會（簡稱「ESG」）實務已實施良好管理制度之證券。</p> <p>關於提倡環境與社會特色之更多資訊，可參考本子基金之相關SFDR附錄。</p>
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II. 其他第8條產品（「非RI」或稱「非積極議合」

目標	不變（未提及ESG）
策略	<p>[財務策略不變。插入下列段落：]</p> <p>本子基金提倡環境及／或社會特色。</p> <p>關於提倡環境與社會特色之更多資訊，可參考本子基金之相關SFDR附錄。</p>

III. 著重於永續轉型資產／與永續目標一致及／或綠色、社會或永續債券之影響力基金

[刪除所有ESG資訊，以下列段落取代之：]

	<u>著重於永續轉型資產之基金</u>	<u>與永續目標一致及／或綠色、社會或永續債券之影響力基金</u>	<u>SDGs</u>
目標	<u>（台灣未銷售此類基金）</u>	投資於公司商業模式及／或經營方法符合一項或數項聯合國永續發展目標(SDGs)定義之目標且能創造財務與社會價值之企業，並採取影響力方法，以期追求[財務目標]，及追求能促進SDGs之永續投資目標。	<u>（台灣未銷售此類基金）</u>
策略		<p>[財務策略說明]</p> <p>本子基金最多可將 10%淨資產投資於歸類為第 9 條 SFDR 產品之 UCITS 及／或 UCI（貨幣市場基金除外）。</p> <p>本子基金旨在長期支持聯合國制定之永續發展目標(SDGs)，著重 [列出主題或SDGs]。</p> <p>[針對投資於股票之子基金：]本子基金對上市資產採用AXA IM的影響力方法，請詳見 https://www.axa-im.com/responsible-</p>	

		investing/impact-investing/listed-assets 。	
		關於永續投資之更多資訊，可參考本子基金之相關SFDR附錄。	

附錄3

擬插入SFDR附錄之AFM積極議合及SRI標籤子基金（適用第8或9條）之相關特定資訊

I. 選擇法	
採取減少 20%投資範圍之方法（同類最佳或整體最佳）：	採取 ESG 評分上調法
<p>本金融商品針對投資範圍始終採用「SRI方法=「整體最佳」]選擇法。該 ESG 選擇法包括優先考慮從非財務角度取得最高評級之發行機構，而不考慮其活動產業為何，並接受產業偏誤，因總體上經認定較良性之產業將佔更高比例。依據 AXA IM 產業排除與 ESG 標準政策及 [SRI 標準]之組合，選擇法將投資範圍減少 20%以上，但排除輔助持有之現金及團結性資產。</p> <p>或</p> <p>本金融商品針對投資範圍始終採用「SRI方法=「同類最佳」]選擇法。該 ESG 選擇法包括優先考慮從非財務角度取得最高評級之發行機構，不依股票市場指數或客製之投資範圍偏袒或排除某一產業。依據 AXA IM 產業排除與 ESG 標準政策及 [SRI 標準]之組合，選擇法將投資範圍減少 20%以上，但排除輔助持有之現金及團結性資產。</p> <p><u>本金融商品最多可將10%淨資產投資於前述所定義之投資範圍以外之證券（但由公開發行公司所發行之債券及其他債務證券、輔助持有之現金及團結性資產除外），惟前提是該發行機構依選擇標準係屬合格發行機構。</u></p>	N/A
II. 關鍵績效指標(KPI)（部分基金雖未被授予 SRI 標籤，但除前述選擇法之外可能亦自願承諾將超越 2 項 ESG KPIs 之績效）	
KPI 之超越	
本金融商品始終以下列額外財務關鍵績效指標能超越績效指標（或投資範圍）為目標： <u>[ISR 標籤 KPI 1]及[ISR 標籤 KPI 2]。</u>	
KPI 覆蓋率	
下列最低覆蓋率適用融商品投資組合（即至少達淨資產之某百分比，但不含由公開發行公司所發行之債券及其他債務證券、輔助持有之現金及團結性資產）： <u>(ii) [ISR 標籤 KPI 1]為 90%，及 iii) [ISR 標籤</u>	

KPI 2] 為 70%。

III. ESG 覆蓋率（已適用採取積極議合方法之所有子基金）

除公開發行公司所發行之債券及其他債務證券、輔助持有之現金及團結性資產外，投資組合內 ESG 分析覆蓋率為淨資產之 90%。



AXA WORLD FUNDS
(the "Company")
A Luxembourg Société d'Investissement à Capital Variable

Registered Office: 49, avenue J. F. Kennedy
L-1855 Luxembourg
Commercial Register: Luxembourg, B-63.116

27 December 2022

THIS DOCUMENT IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION.
IF IN DOUBT, PLEASE SEEK PROFESSIONAL ADVICE.

Dear Shareholders,

We are pleased to inform you that the directors of the Company (the "**Directors**" or together composing the board of directors of the Company, also referred to as the "**Board**") have decided to introduce a number of changes to the prospectus of the Company (the "**Prospectus**"), which will enable it to look after your interests more effectively.

Except as otherwise specified in this notice, words and expressions contained hereafter shall have the same meaning as in the Prospectus.

PART 1 – ESG

1. Addition of the pre-contractual templates pursuant to SFDR Level II disclosures
2. Amendment of the "Sustainable Investments and promotion of ESG characteristics" section in the introductory part of the Prospectus
3. Amendment of SFDR disclosures in the Sub-Fund's supplements of the Prospectus
4. SFDR recategorization

PART 2 - GENERAL

1. Restructuring and replacement of the Management Company
2. Renaming of certain Sub-Funds
3. Insertion of a specific disclosure in the Investment Objective and Strategy of AXA WF – ACT Clean Economy regarding the targeted investments market
4. Insertion of an Anti-Money Laundering clause
5. Insertion of a specific disclosure in the remuneration policy of the Management Company
6. Update of the "Notices and Publications" section
7. Enhancement of disclosures on exposure to money market instruments, money market funds and bank deposits
8. Miscellaneous

1. Addition of the pre-contractual templates pursuant to SFDR Level II disclosures

The Commission Delegated Regulation (EU) 2022/1288 (“**SFDR Level II**”), setting out the regulatory technical standards (RTS) to be used by financial market participants and financial products when disclosing sustainability-related information under the 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 (the “**SFDR**”) has been adopted and published on 25 July 2022 in the Official Journal of the EU.

In order to comply by 1 January 2023 with **SFDR Level II**, pre-contractual templates detailing the content of the disclosures required under the SFDR, including any taxonomy-related information, have been included in the Prospectus for each of the Company’s sub-funds (the “**Sub-Funds**”, each a “**Sub-Fund**”) that are caught by articles 8 and 9 of the SFDR (“**SFDR Article 8 Products**” and “**SFDR Article 9 Products**”).

Therefore, the Board has decided to add the completed pre-contractual templates as new annexes to the Prospectus for each of the Sub-Funds qualifying as SFDR Article 8 and 9 Products.

The Board furthermore decided to amend the KIIDs or key information documents for packaged retail and insurance-based investment products (PRIIPs)(KID) when available of the Sub-Funds where the description of the ESG approach has been adapted in the context of the implementation of the SFDR level II annexes.

In addition, the Board has decided to amend the “Investment Strategy” section of the supplements of the Sub-Funds that qualify as SFDR Article 8 Products to add the following disclaimer referring to the SFDR Level II annexes: “*More information about the promotion of environmental and/or social characteristics is available in the relative SFDR Annex of the Sub-Fund*”, and for those Sub-Funds that qualify as SFDR Article 9 Products to add the following disclaimer: “*More information about sustainable investment is available in the relative SFDR Annex of the Sub-Fund*”.

The Board has finally decided to add the definitions of “Financial Product” and “Key Performance Indicators” (or “KPI”) that are used in the SFDR Level II annexes in the section “Terms with Specific Meanings”, in the main body of the Prospectus.

2. Amendment of the “Sustainable Investments and promotion of ESG characteristics” section in the introductive part of the Prospectus

The Board often reviews the disclosures to be made under the SFDR and the Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (the “**Taxonomy Regulation**”) in light of market evolution and changes in internal policies and approaches.

The Board has decided to amend the “Sustainable Investments and promotion of ESG characteristics” section in the introductive part of the Prospectus as described hereunder:

- To specify that AXA IM’s ESG Standards apply to all SFDR Article 8 and 9 Sub-Funds;
- Remove the reference to “(before implementation of the relevant Regulatory Technical Standards)” as SFDR Level II will now be implemented;
- To reflect the update of the exclusion list that is notably used to assess the “do no significant harm” principle, as follows:

“With regards to SFDR: These Sub-Funds apply sectorial exclusions, ESG standard policies and additional investments’ selectivity approach based on ESG Score, ESG indicators or United Nation Sustainable Development Goals (UN SDGs) in portfolio construction and investment processes as detailed in each Sub-Fund’s relevant SFDR Annex. The “do no significant harm”

principle is considered through, exclusion policies of the most material ESG risks and exclusion of issuers with significant negative impact on UN SDGs or having a CCC ESG rating. Stewardship policies are an additional risk mitigation on Principal Adverse Impacts through direct dialogue with companies on sustainability and governance issues.”

- With respect to the SFDR update, to add disclaimers regarding (i) the limitations in terms of data availability and reliability and (ii) the potential evolution of the SFDR classification of the Sub-Funds due to market practice or regulatory developments.
- To update the Taxonomy section in order to (i) update the list of Sub-Funds investing in Taxonomy-aligned investments and (ii) clarify that SFDR Article 8 Products may also partially invest in the sustainable investments under the Taxonomy Regulation, by updating the relevant disclosure as follows:

“The minimum underlying environmentally sustainable investments of the Sub-Funds categorized as Article 9 and some Article 8 investing in sustainable assets under SFDR should represent 0% of each Sub-Fund’s assets (including in enabling and transitional activities), with the exception of the Sub-Funds listed in the below table:

Sub-Funds	Taxonomy alignment (including enabling and transitional activities)
AXA WORLD FUNDS ACT CLEAN ECONOMY	4%

The Board finally has decided to update the table including the SFDR classification of the Sub-Funds following the SFDR reclassification and the renaming or reshaping of certain Sub-Funds (as described below).

3. Amendment of SFDR disclosures in the Sub-Fund’s supplements of the Prospectus

The Sub-Funds that qualify as SFDR Article 8 and 9 Products can be divided in the following three sub-categories, depending on the ESG strategy that they follow:

- (i) SFDR Article 8 Products (considered as following the “Significantly Engaging Approach” by the French *Autorité des Marchés Financiers* or AMF), and which may have an ESG label or not, with a commitment to make a minimum portion of sustainable investments (within the meaning of the SFDR) above 10% or 50% or without any commitment;
- (ii) Other SFDR Article 8 Products (“non-RI” or “Non-Significantly Engaging”) that only apply the AXA IM Sectorial Exclusion policies and ESG Standards (as defined in the Prospectus), with or without a commitment to make a minimum portion of sustainable investments (within the meaning of the SFDR) above 10%; and
- (iii) SFDR Article 9 Products, with either sustainable transitional assets, a SDG Framework or an Impact approach and which may have an ESG label or not.

The Sub-Funds are listed and categorised in the above-mentioned categories in [Annex 1](#) of this notice, which (i) reflect the state of the Sub-Funds after the reclassification, reshaping and investment strategy amendments, and (ii) describes the main features of the approaches. Please refer to that annex to see under what category each Sub-Fund is listed.

The inclusion of the SFDR Level II annexes has also an impact on the Supplements of the Sub-Funds that qualify as SFDR Article 8 and 9 Products, as ESG information should in principle be mainly included in the SFDR Level II annexes rather than the main body of the Prospectus.

The Board has decided therefore to move most ESG related information from the Supplements of Sub-Funds that qualify as SFDR Article 8 Products to the SFDR Level II annexes, except for certain necessary information as detailed in [Annex 2](#).

In addition, the Board has amended the “Investment Strategy” section of the Sub-Funds that qualify as SFDR Article 8 Products in accordance with the above and as described in [Annex 2](#) (in addition to the reference to the SFDR Level II annexes).

For the Article 9 SFDR Sub-Funds of the Company, the Board considers that the ESG aspects are a substantial part of the Sub-Funds' investment strategy and objective. As such, although the quantity of ESG related information will indeed be reduced, the Board has decided to nonetheless maintain some key information so to allow investors to understand the main components of the non-financial objective and strategy of these Sub-Funds.

Consequently, the Board has amended the Supplements of the Article 9 SFDR Sub-Funds to reduce the level of details regarding the non-financial objective and strategy, as more detailed in [Annex 2](#).

These changes will have no material impact on the portfolio composition, the risk profiles or the fees.

4. SFDR recategorization

In the context of the up-coming enforcement of SFDR Level II and other regulatory positions released since SFDR Level I, the Management Company and the Board have decided to update the classification of certain Sub-Funds to article 8 according to SFDR, which applies to products promoting environmental and/or social characteristics, and not as an article 9 according to SFDR, which applies to products having "a sustainable investment" objective.

As a result, the Board has decided to reclassify the Sub-Fund "AXA WF – Framlington Europe Small Cap (to be renamed AXA WF – Europe Small Cap)" from SFDR Article 9 Product to SFDR Article 8 Product and amend its respective supplement and, as the case may be, its KIIDs or KIDs when available accordingly.

As such, its investment objective and strategy will be amended to reflect the fact that the Sub-Fund will not have a sustainable investment objective anymore but will apply an ESG approach. These wording updates will mainly be made in the disclosures of the Sub-Fund's SFDR Level II annex.

For the sake of clarity, such reclassifications will not have a material impact on the portfolio composition, the risk profile or the ESG criteria taken into consideration by the Sub-Fund.

Shareholders who do not agree with such change may request the redemption of their shares free of charge until 27 January 2023.

PART 2 – GENERAL

1. Restructuring and replacement of the Management Company

AXA Investment Managers has decided to proceed with the restructuring of AXA Funds Management (“**AFM**”), its Luxembourg subsidiary and the current management company of the Company, into a Luxembourg branch of AXA Investment Managers Paris (“**AXA IM Paris**”), another of its subsidiaries.

The contemplated restructuring would essentially be effected via the merger into AXA IM Paris of AFM, (the “**Merger**”) and the creation of a Luxembourg branch to lodge the Luxembourg employees of AXA IM Paris. The Merger will be effective on 28 February 2023.

The Board has received the confirmation of the absence of any material adverse consequence for the investors in the Company resulting from the Merger, supported in particular by the fact that AXA IM Paris would maintain a high degree of operational continuity in Luxembourg throughout and after the implementation of the Merger both at the entity level and at the staff members’ level, while keeping reporting and responsibilities towards the CSSF and investors. AXA IM Paris would indeed continue to leverage on its long-dated presence in Luxembourg, with the local Luxembourg teams continuing to be the main interlocutors of the CSSF, the local providers and be available to investors, if needed.

The costs incurred in connection with such restructuring will be borne by AXA IM Paris.

The Board has therefore decided to reflect the change of management company resulting from the Merger in the Prospectus and the Sub-Funds’ KIIDs or PRIIPs KIDs when available, anywhere relevant.

This change will have no material impact on your investment and does not entail any increase of fees. It will take effect on 28 February 2023.

2. Renaming of Sub-Funds

The Board has decided to rename the Sub-Funds listed below and as follows:

- “AXA World Funds - Framlington Europe Real Estate Securities” in “AXA World Funds – Europe Real Estate”;
 - “AXA World Funds – Framlington Europe Small Cap” in “AXA World Funds – Europe Small Cap”;
- (hereafter together referred to as the “**Renamed Sub-Funds**”);

The Board has decided to update as applicable the Prospectus and the KIIDs or PRIIPs KID when available to reflect the new names of the Renamed Sub-Funds.

3. Insertion of a specific disclosure in the Investment Objective and Strategy of AXA WF – ACT Clean Economy regarding the targeted investments market

The Board has decided to amend the “Investment Objective and Strategy” section of the following Sub-Fund in order to clarify (without actually amending the targeted investments market itself) the wording regarding the targeted investments market as set out in the table below:

Name of the sub-fund	Previous wording	New wording
AXA WF – ACT Clean Economy	The Sub-Fund invests in equities of worldwide companies in the clean economy that develop activities which allow the energy transition and resource optimization.	The Sub-Fund invests in equities of worldwide companies of any market capitalization.

4. Insertion of an Anti-Money Laundering clause

The Board has decided to add to the general part of the Prospectus the following wording regarding the Anti-Money Laundering clause and to remove the existing clause in order to capture the last developments related to anti-money laundering:

*“The SICAV, the Management Company and the registrar agent must comply with applicable international and Luxembourg laws and regulations regarding the prevention of money laundering and terrorist financing, including but not limited to the Luxembourg law of 12 November 2004 on the fight against money laundering and terrorist financing, as amended (the “**AML Law**”), and CSSF Regulation 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing, as amended (altogether the “**AML/CFT Rules**”). The AML/CFT Rules require the SICAV, on a risk sensitive basis, to establish and verify the identity of investors (as well as the identity of any intended beneficial owners of the shares if they are not the investors) and the origin of invested monies, source of funds and, as the case may be, source of wealth, and to monitor the business relationship on an ongoing basis. The identity of investors should be verified on the basis of documents, data or information obtained from a reliable and independent source. Investors shall provide the registrar agent with the information set out in the Application Form, depending on their type and category.*

The SICAV, the Management Company and the registrar agent are required to establish appropriate anti-money laundering controls and will require all documentation deemed necessary to establish and verify the identity and profile of a given investor, the nature and the intended purposes of the business relationship and the origin of subscription proceeds. The registrar agent (and, as the case may be, the Management Company) has the right to request additional information until it is reasonably satisfied it understands the identity and economic purpose of the investor in order to comply with the AML/CFT Rules and, in addition, confirmation may be requested to verify the ownership of any bank account from which or to which monies are being paid. Furthermore, any investor is required to notify the registrar agent prior to the occurrence of any change in the identity of any beneficial owner of Shares.

Where subscriptions of shares are made indirectly through intermediaries investing on behalf of third parties, the SICAV, the Management Company and the registrar agent may be permitted to rely on the customer identification and verification measures performed by these intermediaries under the conditions described in Art. 3-3 of the AML Law. These conditions require in particular that the intermediaries apply customer due diligence and record-keeping requirements that are consistent with those laid down in the AML Law and are supervised by a competent supervisory authority in a manner consistent with these rules. Such intermediaries shall be required to provide the registrar agent with (i) information about the identity of the underlying investor(s), the persons acting on its behalf and the beneficial owners, (ii) relevant information on the source of funds, and (iii) at the request of the SICAV and/or the Management Company, provide copies of the customer due diligence documents as further specified in the relevant application subscription forms without delay, which can be used to verify the identity of the investor (and, if applicable, all beneficial owners).

The SICAV and the Management Company have entered into agreements with several distributors who may then enter into agreements with sub-distributors pursuant to which the distributors agree to act as or can appoint nominees for investors subscribing for shares through their facilities. In such capacity, distributors may effect subscriptions, conversions and redemptions of shares in the nominee name on behalf of individual investors and request the registration of such operations on the register of shareholders of the SICAV in such nominee name. In such circumstances, the nominee/distributor maintains its own records and provides the investor with individualised information as to its holdings of shares.

Failure to provide such information and documents deemed necessary for the SICAV, the Management Company and the registrar agent to comply with their obligations pursuant to the AML/CFT Rules, may result in delays in, or rejection of, any subscription or conversion application and/or delays in any redemption application or dividend payments. No liability for any interest, costs or compensation will be accepted. Similarly, when shares are issued, they cannot be redeemed or converted until full details of registration have been completed and appropriate documents on the business relationship have been obtained.

The Management Company performs a specific due diligence and regular monitoring and applies precautionary measures on both the liability and asset side of the balance sheet (i.e. including in the context of investments/divestments by the Sub-Funds), in accordance with articles 3(7) and 4(1) of the AML Law.

Pursuant to articles 3(7) and 4(1) of the AML Law, the SICAV is also required to apply precautionary measures regarding the assets of the Sub-Funds. The Management Company assesses, using a risk based approach, the extent to which the offering of the shares and services presents potential vulnerabilities to placement, layering or integration of criminal proceeds into the financial system.

Pursuant to the Luxembourg law of 19 December 2020 on the implementation of restrictive measures in financial matters, the application of international financial sanctions must be enforced by any Luxembourg natural or legal person, as well as any other natural or legal person operating in or from the Luxembourg territory. As a result, prior to the Sub-Funds investing in assets, the management company shall, as a minimum, ensure that the name of such assets or of the issuer is screened against the target financial sanctions lists."

5. Insertion of a specific disclosure in the remuneration policy of the Management Company

In light of the provisions the ESMA Q&A related to the application of the UCITS Directive (ESMA34-43-392), the Board has decided to update the "Remuneration Policy" sub-section of the "Management Company" section of the Prospectus to include the information with regard to the rebates granted by the Management Company. This update does not imply any change in the policy but is made only for transparency purposes.

6. Update of the "Notices and Publications" section

The Board has decided to update the "Notices and Publications" section in the general part of the Prospectus in order to include the possibility, unless otherwise required by applicable laws and regulations to notify shareholders by way of publication on the website, under exceptional circumstances.

7. Enhancement of disclosures on exposure to money market instruments, money market funds and bank deposits

In compliance with the CSSF FAQs on the law of 17 December 2010, the Board has decided to enhance the disclosures relating to the exposure to money market instruments, money market funds and bank deposits for transparency purposes, and to amend, where applicable, the relevant section of the sub-funds' supplements (without actually changing the investment strategy).

This change will have no material impact on the portfolio composition, the risk profile or the fees of the sub-funds.

8. Miscellaneous

The Board finally decided to implement a limited number of other clerical changes, amendments, clarifications, corrections, adjustments and/or updates, including reference update and adjustment of defined terms, including the following:

- Update of the Prospectus regarding (i) the table of contents and (ii) the table which indicates the ESG classification for each concerned Sub-Fund;
- Update of the section "Terms with specific meanings" in order to add the definition of the Key Performance Indicators (KPI) and the definition of a Financial Product;
- Update of the "Risk" section in the general part of the Prospectus in order to add the reference to the recall risk in the "Absolute return strategies risk" and "Synthetic short position risk" sub-sections for transparency purposes as follows: *"Taking synthetic short positions involves as well recall risk, since lenders may recall borrowed securities at any time"*;

- Update of the “General Investment Rules for UCITS” section in order to (i) clarify the relevant requirements for term deposits and for cash and (ii) update the description of covered bonds in which a sub-fund may invest up to 25% in any one issuer.

* *

With the exception of the restructuring and replacement of the Management Company, the Prospectus, taking into account the changes mentioned in this letter, will take effect take effect on 1 January 2023.

Yours faithfully,

The Board of Directors
AXA World Funds

ANNEXES:

Annex 1 – List of the classification of 3 main ESG categories

Annex 2 – Sub-Funds’ supplements main updates following the implementation of SFDR level II

Annex 3 - Specific information relating to AMF significantly engaging & SRI labeled Sub-Funds (applicable to article 8 or 9) to be inserted in the SFDR Annex

ANNEXE 1
List of the classification of 3 main ESG categories

Article 8 Products which are in the “Significantly Engaging Approach” of the AMF				
Labellized with Minimum of Sustainable Investment > 10%	Labellized with Minimum of Sustainable Investment > 50%	Article 8 with no minimum of Sustainable Investment & no label	Article 8 with Minimum of Sustainable Investment > 10% & no label	Article 8 Minimum of Sustainable Investment > 50% & no label
AXA WF – Framlington Europe Small Cap (to be renamed AXA WF – Europe Small Cap)	N/A	N/A	N/A	N/A
AXA WF – Optimal Income				

Other Article 8 Products (“Non-RI” or “Non-Significantly Engaging”)	
Other Article 8 funds with no minimum of Sustainable Investment	Other Article 8 funds with minimum of Sustainable Investment > 10%
AXA WF – US High Yield Bonds	AXA World Funds - Framlington Europe Real Estate Securities (to be renamed AXA WF – Europe Real Estate)
	AXA WF - Framlington Emerging Markets

Article 9 Products with a sustainable investment objective		
Name of the fund	Approach	Label
AXA WF – ACT Clean Economy	Impact funds focusing on SDG alignment and/or green, social or sustainability bonds	Label ISR

ANNEX 2

Sub-Funds' supplements main updates following the implementation of SFDR level II:

I. Article 8 significantly engaging

	Article 8 significantly engaging	
Objective	To seek <i>[financial objective]</i> and to apply an ESG approach.	
Strategy	<p><i>[Deletion of all ESG information, replaced by the following paragraphs:]</i></p> <p>The Sub-Fund promotes environmental and/or social characteristics by investing in securities that have implemented good practices in terms of managing their environmental, governance and social ("ESG") practices.</p> <p>More information about the promotion of environmental and social characteristics is available in the relative SFDR Annex of the Sub-Fund.</p>	

II. Other Article 8 (non RI or not significantly engaging)

Objective	<i>No change (no reference to ESG)</i>
Strategy	<p><i>[No change to financial strategy. Insertion of the following paragraphs:]</i></p> <p>The Sub-Fund promotes environmental and/or social characteristics.</p> <p>More information about the promotion of environmental and social characteristics is available in the relative SFDR Annex of the Sub-Fund.</p>

III. Article 9 focusing on Sustainable transitional assets / Impact funds with SDG alignment and/or green, social or sustainability bonds

[Deletion of all ESG information, replaced by the following paragraphs:]

	Funds focusing on sustainable transitional assets	Impact funds focusing on SDG alignment and/or green, social or sustainability bonds	
Objective	N/A	To seek <i>[financial objective]</i> , and a sustainable investment objective to advance the United Nations Sustainable Development Goals (SDGs) by investing into companies whose business models and/or operational practices are aligned with targets defined by one or more SDGs and that create financial and societal value and by applying an impact approach.	

Strategy		<p><i>[Financial strategy description]</i></p> <p>The Sub-Fund may invest up to 10% of net assets in UCITS and/or UCIs <u>that classify as Article 9 SFDR products (excluding money market funds).</u></p> <p><u>The Sub-Fund aims to support on the long run the SDGs established by the United Nations with a focus on [list of themes or of SDGs]</u></p> <p><i>[For Sub-Funds investing in equities:]</i> The Sub-Fund applies AXA IM's Impact approach for listed assets available on https://www.axa-im.com/responsible-investing/impact-investing/listed-assets</p> <p><i>[For Sub-Funds investing in green, social or sustainability bonds:]</i> The Sub-Fund adopts an impact investing approach that <u>aims to support on the long run the Sustainable Development Goals (SDGs) established by the United Nations with a focus on the environmental themes (green buildings, low carbon transport, smart energy solutions, sustainable ecosystem etc.) or social themes (food security, access to healthcare, employment generation, socioeconomic advancement and empowerment, access to education and inclusion through access to affordable housing, financial services and basic infrastructure etc).</u></p>	
			<p>More information about sustainable investment is available in the relative SFDR Annex of the Sub-Fund.</p>

ANNEX 3
Specific information relating to AMF significantly engaging & SRI labeled sub-funds
(applicable to article 8 or 9) to be inserted in the SFDR Annex

I. Selectivity approach	
Following a 20% investment universe reduction approach (Best-in-class or Best-in-Universe):	Applying an ESG scoring Upgrade Approach
<p>[The Financial Product applies a [<i>SRI Approach=Best-in-Universe</i>] selectivity approach on its investment universe that is bindingly applied at all times. This ESG selection approach consists in giving a priority to the issuers best rated from a non-financial viewpoint, irrespective of their sector of activity, and accepting sector biases, because the sectors which are considered more virtuous on the whole will be more heavily represented. The selectivity approach reduces the investment universe at least by 20% based on a combination of AXA IM's Sectorial Exclusion and ESG Standards policies and their [<i>SRI criteria</i>] to the exception of cash held on an ancillary basis and Solidarity Assets.</p> <p>OR</p> <p>The Financial Product applies a [<i>SRI Approach=Best-in-Class</i>] selectivity approach on its investment universe that is bindingly applied at all times. This ESG selection approach consists in giving priority to the companies best rated from a non-financial viewpoint within their sector of activity, without favouring or excluding one sector relative to the stock market index or customized universe used as a basis for starting. The selectivity approach reduces the investment universe at least by 20% based on a combination of AXA IM's Sectorial Exclusion and ESG Standards policies and their [<i>SRI criteria</i>] to the exception of cash held on an ancillary basis and Solidarity Assets]</p> <p>The Financial Product can invest up to 10% of its net assets, excluding bonds and other debt securities issued by public issuers, cash held on an ancillary basis and Solidarity Assets, in securities outside the investment universe, as defined above, and on the condition that the issuer is eligible based on the selectivity criteria.</p>	N/A
II. Key Performance Indicators (KPIs) (without being awarded with the Label SRI, some funds may have committed to outperform on 2 ESG KPIs voluntarily, in addition to the above selectivity approach)	
KPI outperformance	
The Sub-Fund always aims at outperforming the benchmark (or investment universe) on the following extra financial key performance indicators: [<i>Label ISR KPI 1</i>] and [<i>Label ISR KPI 2</i>].	
KPI coverage	
The following minimum coverage rates apply within the Financial Product (expressed as of at least % of the net assets, excluding bonds and other debt securities issued by public issuers, cash held on an ancillary basis and Solidarity Assets): (ii) 90% for the [<i>Label ISR KPI 1</i>] and iii) 70% for the [<i>Label ISR KPI 2</i>].	
III. ESG Coverage	
(already applicable to all sub-funds having a significantly engaging approach)	
The ESG analysis coverage rate within the portfolio is 90% of the net assets, except for bonds and other debt securities issued by public issuers, cash held on an ancillary basis and Solidarity Assets	