

**AXIOM LUX**  
*Société d'Investissement à Capital Variable*  
Registered Office: 5 Allée Scheffer, L-2520 Luxembourg  
R.C.S Luxembourg B 196052  
(the « **Company** »)

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**NOTICE TO SHAREHOLDERS OF THE SUB-FUND**  
**AXIOM LUX – AXIOM EUROPEAN BANKS EQUITY**  
(the « **Sub-Fund** »)

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Luxembourg, 28 January 2025

Dear shareholder,

The board of directors of the Company (the “**Board**”) hereby informs you as a shareholder of the Sub-Fund that it has been decided to amend the pre-contractual disclosures for the financial products referred to in Article 8 and Article 9 of Regulation (EU) 2020/852 (“**SFDR**”) under SFDR annex of the Sub-Fund (“**SFDR Annex**”), as it is more specifically explained hereafter, with effect from 31 January 2025.

**I. Amendment to the minimum proportion of sustainable investments**

In 2021, the management company of the Company set a minimum threshold of 0%, due to pending clarifications of the definition of sustainable investments by the EU Commission.

The Board has decided to amend the SFDR Annex to modify the environmental and/or social characteristics in order to implement the minimum proportion of sustainable investments. This section of the SFDR Annex previously indicated that the Sub-Fund promoted environmental and/or social characteristics but did not make any sustainable investments.

It has been decided to amend the SFDR Annex to state that the Sub-Fund promotes environmental and/or social characteristics and while it does not have sustainable investment as its objective, it will have a minimum proportion of 60% of sustainable investments.

This proportion of sustainable investments will have an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

**II. Amendment to the sustainable objectives of the Sub-Fund**

The Board has decided to amend the SFDR Annex to adjust the engagement of sustainable investments that the Sub-Fund partially intends to make, aligning them with SFDR and the regulation (EU) 2020/852 of June 18, 2020 establishing a framework to facilitate sustainable investments (“**Taxonomy Regulation**”). This section of the SFDR Annex previously indicated that the Sub-Fund does not currently commit to investing in any sustainable investment within the meaning of the SFDR or the Taxonomy Regulation.

Further to the changes, the Sub-Fund now supports the climate mitigation objective. Positive contribution to climate mitigation is defined through the use of the Axiom Climate Readiness Score (ACRS), which is a proprietary methodology that scores the climate performance of insurers and banks, while the Do No Significant Harm principle is considered through the use of Principal Adverse Impact indicators. Good governance practices are assessed through an internal methodology further explained in the SFDR Annex.

### **III. Amendment to the asset allocation of the Sub-Fund**

The Board has decided to amend the SFDR Annex to clarify the proportion of investments (excluding non single-name derivatives, cash and cash equivalents) allocated to sustainable investments.

Further to the changes, the SFDR Annex now indicates that at least 90% of the Sub-Fund's investments are used to attain the environmental and/or social characteristics promoted by the Sub-Fund. 66,5% of these investments are in sustainable investments. 33,5% of the investments have other environmental and/or social characteristics.

These adjustments have no impact on the asset allocation, the risk profile, or the way the Sub-Fund is being managed.

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The revised prospectus will be dated 31 January 2025 and will be made available at the Company's registered office as well as on the management company's website: [www.axiom-ai.com](http://www.axiom-ai.com).

Should you have any questions regarding the content of this notice, please contact the Company at its registered office (5 Allée Scheffer, L-2520 Luxembourg, Grand Duchy of Luxembourg).

The Board