

ADDENDUM TO THE PROSPECTUS

ASPECT UCITS FUNDS PLC

24 February 2021

This Addendum is supplemental to, forms part of and should be read in conjunction with, the prospectus for Aspect UCITS Funds plc (the “**Company**”) dated 1 December 2020 (the “**Prospectus**”).

Distribution of this Addendum is not authorised unless accompanied by a copy of the Prospectus and the reports referred to therein which together form the Prospectus for the issue of Shares in the Company.

The Directors of the Company whose names appear on page xii of the Prospectus accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors of the Company (who have taken all reasonable care to ensure that such is the case) the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of such information and the Directors of the Company accept responsibility accordingly.

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this Addendum. For the purposes of interpretation, in the event of any conflict between this Addendum and the Prospectus, any such conflict shall be resolved in favour of this Addendum.

EU Sustainable Finance Disclosure Regulation

While the Investment Manager is not itself generally subject to 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 (“**SFDR**”), the Company falls within its scope and so some limited disclosures under the SFDR must be made in respect of the Company and the following sections are intended to satisfy such requirements.

Sustainability Risks

The SFDR requires the Investment Manager to determine, on a product-by-product basis, whether sustainability risks are relevant to the Investment Manager’s in-scope financial products, including the Funds. For the purposes of SFDR, “sustainability risk” means an environmental, social or governance (“**ESG**”) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

The Investment Manager has determined that sustainability risks are not relevant to the Funds on the basis that in light of the investment strategy of the Funds, and in particular in light of the quantitative, systematic strategy employed by the Investment Manager on behalf of the Funds, the Investment Manager considers that ESG events or conditions are unlikely to cause a material negative effect on the returns of the Funds.

Consequently, the Investment Manager does not currently integrate sustainability risks into its investment decision making for the Funds, and the Investment Manager has not assessed the likely impacts of sustainability risks on the returns of the Funds.

The Investment Manager will keep its assessment that sustainability risks are not relevant to the Funds under regular review.

Principal adverse impacts

The SFDR requires an in-scope firm to make a “comply or explain” decision whether to consider the principal adverse impacts (“**PAIs**”) of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR. The Investment Manager has opted not to comply with that regime (both generally and in relation to the Funds). Accordingly, the Investment Manager does not consider the principal adverse impacts of its investment decisions on sustainability factors (either generally or in relation to the Funds).

The Investment Manager evaluated the requirements of the PAI regime in Article 4 SFDR, and in the draft Regulatory Technical Standards which were published in April 2020 (the “**PAI regime**”). Taking account of the nature of the Investment Manager’s activities and the types of products the Investment Manager makes available, the Investment Manager considers that it would be disproportionate to comply with the specific PAI regime of the SFDR.

In addition, the Investment Manager considers that its primary investment strategies do not support adoption of the PAI regime within SFDR. The Investment Manager’s products (including the Funds) involve quantitative, systematic portfolio management strategies where it is not possible to conduct detailed diligence on the principal adverse impacts of the Investment Manager’s investment decisions on sustainability factors.

The Investment Manager will keep its decision not to comply with the PAI regime under regular review.

Other disclosures

The Investment Manager notes that the Funds do not promote environmental or social characteristics (Article 8 SFDR) and the Funds do not have sustainable investments as their objective (Article 9 SFDR). The investments underlying the Funds do not take into account the EU criteria for environmentally sustainable investments.

Responsible Investment Policy

The Investment Manager has been a signatory to the UN Principles for Responsible Investment (the “**PRI**”) since February 2019. Accordingly, the Investment Manager has implemented a responsible investment policy, which can be accessed here: <https://www.aspectcapital.com/responsibility/>.

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