

## **BlackRock Funds I ICAV**

(an Irish collective asset-management vehicle constituted as an umbrella fund with segregated liability between sub-funds and authorised by the Central Bank of Ireland pursuant to the Irish Collective Asset-management Vehicles Act 2015 and the UCITS Regulations)

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### **Country Supplement for investors residing in Denmark to the Prospectus dated 10 November 2023, as amended and supplemented from time to time**

THIS COUNTRY SUPPLEMENT IS INTENDED FOR DANISH INVESTORS THAT SUBSCRIBE FOR SHARES IN DENMARK AND FORMS AN INTEGRAL PART OF THE PROSPECTUS OF 10 NOVEMBER 2023, AS AMENDED AND SUPPLEMENTED FROM TIME TO TIME (THE "PROSPECTUS").

**THE PROSPECTUS AND ANY KEY INVESTOR INFORMATION DOCUMENT MAY ONLY BE DISTRIBUTED IN DENMARK TOGETHER WITH THIS COUNTRY SUPPLEMENT.**

**THIS COUNTRY SUPPLEMENT FORMS PART OF AND SHOULD BE READ IN CONJUNCTION WITH THE GENERAL DESCRIPTION OF THE ICAV CONTAINED IN THE PROSPECTUS OF THE ICAV. IN PARTICULAR, DANISH INVESTORS SHOULD REFER TO THE SECTION HEADED "FEES AND EXPENSES" IN THE PROSPECTUS.**

This Country Supplement is dated 10 November 2023.

## **1 Danish representative**

BlackRock Asset Management Ireland Limited as manager of BlackRock Funds I ICAV (the "ICAV") has appointed the following company as the Danish representative for the ICAV in accordance with Section 5(1) of the Danish Executive Order on Foreign UCITS' Marketing in Denmark (Executive Order no. 786 of 17 June 2014; the "Executive Order"):

BlackRock Copenhagen Branch, filial af BlackRock Investment Management (UK), Limited, England with registered address at Harbour House, Sundkrogsgade 21, DK-2100 Copenhagen, Denmark.

## **2 Taxation regulation applicable to Danish investors**

### **2.1 General**

The following statements are by way of a general guide to potential investors and Shareholders only and do not constitute legal or taxation advice. Shareholders and potential investors are therefore advised to consult their professional advisers concerning possible taxation or other consequences of purchasing, holding, selling or otherwise disposing of the Shares under the laws of their country of incorporation, establishment, citizenship, residence or domicile.

Shareholders and potential investors should note that the following statements on taxation are based on advice received by the Directors regarding the law and practice in force in the relevant jurisdiction at the date of this Country Supplement and are not exhaustive. As is the case with any investment, there can be no guarantee that the tax position or proposed tax position prevailing at the time an investment is made in the ICAV will endure indefinitely.

### **2.2 Taxation of Danish Investors**

The ICAV is an umbrella fund with segregated liability between sub-funds. As such, it will more likely than not be considered a separately taxable entity as opposed to a tax transparent entity for Danish tax purposes. However, the assessment of whether a non-Danish investment fund is considered a tax transparent entity or not is based on a case-by-case assessment taking all specific characteristics of the

fund into consideration. No rulings concerning this particular type of fund have been issued publicly by the Danish tax authorities. Assuming the ICAV is considered a separately taxable entity for Danish tax purposes, the tax consequences for Danish investors will be as follows:

Gains and losses on the Shares are assumed to be comprised by the provisions of Section 19 a of the Danish Capital Gains Tax Act (Consolidation Act No. 1148 of 29 August 2016, as amended), which means that investors are taxed in accordance with the mark-to-market principle. This means that an investor is subject to current taxation of both realised and unrealised gains and losses.

Individuals must pay tax on gains, losses and dividends on the Shares as capital income. Capital income is taxed at a rate between 37.7% and 42% (2019) depending on the individual investor's situation whereas negative capital income (on an annual net basis) is deductible at a rate between approximately 25.6% and 33.6% (2019) again depending on the individual investor's situation and assuming the Danish tax authorities have been informed about the purchase of the Shares. If the investor is a professional trader, the investor must pay tax on gains and deduct losses as personal income.

For completeness it is noted that the rules on taxation of Danish individual investors will change with effect from the 2020 income year to the effect that gains, losses and dividends will be considered as either capital income *or* share income depending on inter alia the characteristics of the Shares in each given income year.

In case of pension funds, the taxation will be in accordance with the Danish Act on Taxation of Pension Yields (Consolidation Act No. 1126 of 10 October 2014, as amended), which means that the yields and dividends from shares are taxed in accordance with the mark-to-market principle at an annual tax rate of 15.3%.

As for corporate investors, including banks, capital gains/losses are also taxed in accordance with the mark-to-market principle, but the general provisions of the Danish Capital Gains Tax Act do not apply. As a consequence, capital gains/losses and dividends will be fully included in the investor's taxable corporate income and is taxable by 22%.

### **3 Documents which are generally available**

Copies of the following documents may be obtained free of charge from the Manager, BlackRock Asset Management Ireland Limited, at the address J.P.Morgan House, International Financial Services Centre, Dublin 1, Ireland, and from the Danish representative, BlackRock Copenhagen Branch, filial af BlackRock Investment Management (UK), Limited, England:

- (a) Instrument of Incorporation;
- (b) the Prospectus, any Supplement and any KIIDs;
- (b) the annual and semi-annual reports of the ICAV.

These documents will also be made available to Danish investors at the following website: <https://www.blackrock.com/dk>

### **4 Cessation of marketing in Denmark**

If the ICAV ceases marketing in Denmark any investors trading at primary market level will be notified by the ICAV in writing and informed about the termination. The redemption procedures will continue unchanged, in case the ICAV ceases marketing in Denmark.

### **5 Measures implemented to secure Danish investors' rights**

BlackRock Copenhagen Branch, filial af BlackRock Investment Management (UK), Limited, England has been appointed as the Danish representative for the ICAV in accordance with Section 5(1) of the Executive Order in order to secure the Danish investors' rights to receive dividends and redeem shares.

### **6 Danish rules on risk-labelling of investment products**

The Danish FSA has introduced rules on risk labelling for investment products pursuant to which various categories of investment products have been assigned a risk label. The shares of the sub-funds of the ICAV have the yellow risk label pursuant to the Danish FSA's rules on risk labelling. The risk labelling is based on the possibility of losing the invested amount based on the product type and not the actual likelihood of this happening.

The risk labelling system is based on the colours of a traffic light.

Green: Investment products labelled green refer to those where the risk of losing the invested amount is considered very limited and where the product type is not difficult to understand. Examples include Danish government bonds, EU government bonds and Danish mortgage bonds.

Yellow: Investment products labelled yellow refer to those where there is considered to be a risk of losing the entire or a part of the invested amount and where the product type is not difficult to understand. Examples include listed shares, corporate bonds and shares of non-structured UCITS funds.

Red: Investment products labelled red refer to those where there is considered to be a risk of losing more than the invested amount or the product type is difficult to understand. Examples include unlisted shares, options, futures, swaps and structured bonds.