

NOMURA FUNDS IRELAND PLC (THE “FUND”)
INFORMATION TO THE INVESTORS OF THE FUND IN BELGIUM

This Country Supplement dated 12 November 2021 forms part of, and should be read in conjunction with the prospectus for the Fund dated 4 November 2021 as amended and supplemented from time to time (the “Prospectus”). All capitalised terms shall have the same meaning in this supplement as in the Prospectus, unless otherwise indicated.

The Fund is an open-ended investment company with variable capital established under the laws of Ireland. The Fund has been authorised by the Central Bank of Ireland as an undertaking for collective investment in transferable securities (“UCITS”) in accordance with the provisions of the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011. The Fund is an umbrella fund consisting of different sub-funds each of which constitutes a specific pool of assets and liabilities and pursues a separate investment policy (each a “Sub-Fund” and together the “Sub-Funds”). The Fund has segregated liability between each of its Sub-Funds.

Information relating to the fees and expenses payable by investors is set out in the section of the Prospectus entitled “Fees and Expenses”. The attention of prospective investors is drawn to the information relating to fees and expenses set out therein.

1. **Financial Agent**

ABN AMRO Bank N.V.
Roderveldlaan 5 bus 4
2600 Berchem
Belgium

The aforementioned bank has assumed the function of the Financial Agent in Belgium.

The Prospectus (and any Supplement attached thereto), the Key Investor Information Documents (KIIDs), the Memorandum and Articles of Association of the Company and the most recently published annual and semi-annual reports are available for inspection and obtainable free of charge during normal business hours at the offices of the Belgian Financial Agent. These documents are available in English except the KIID that is available in French. **Investors are invited to read the KIID before taking any investment decision.**

Requests for the subscription, redemption and switching of Shares may be submitted to the Belgian Financial Agent who will forward such requests to the Company. Upon their request, Shareholders in Belgium may receive redemption proceeds, dividend payments and any other payments through the Belgian Financial Agent.

2. **Publications**

The following documents are available to the public from the Financial Agent in Belgium:

- the Prospectus and Key Investor Information Document (in French and English) of the Company;
- the articles of incorporation of the Company (in English);
- the annual and semi-annual reports (in English).

The Prospectus will also be made available with all the Belgian distributors.

All information published in Ireland, the Company’s country of origin, will also be published on the following website: www.fundinfo.com. Such information may include the publication of the net asset value, convening notices for general meetings, notices on dividend payments, on liquidation, merger or split decisions and modalities and notices on the suspension of the calculation of the net asset value.

3. **Complaints**

Any investor wishing to make a complaint regarding any aspect of the Company or its operation may contact Michael Doyle at Bridge Consulting; michael.doyle@bridgeconsulting.ie. Belgian investors may also lodge any complaint relating to the operation of the Company with the Belgian Financial Agent. If the complaint is not resolved, Belgian investors may lodge a complaint with the Belgian Ombudsfm at:

<http://www.ombudsfm.be/fr/particuliers/introduire-une-plainte/>
<http://www.ombudsfm.be/nl/particulieren/klacht-indienen/>.

4. **Costs and charges applicable to the subscription, redemption and switching of Shares – Minimum subscription amount**

Entry charge: Maximum 5%, negotiable for the A (retail) share classes. All other share classes have 0% entry charge. This charge may vary from distributor to distributor. Investors are invited to enquire about the entry charge with their financial intermediary.

For the minimum subscription amount in relation to a Sub-Fund, reference is made to the minimum subscription for Shares as specified in the relevant Class Supplement for such Sub-Fund.

5. **Taxation**

The information below is a summary of the tax regime applicable to natural persons resident in Belgium. The tax regime may differ depending on the individual circumstances of each investor and may fluctuate. Please consult your tax advisor. Other categories of investors are invited to inform themselves about the tax regime applicable to their situation.

Natural persons who are Belgian residents for tax purposes, i.e., who are subject to the Belgian personal income tax and who hold the shares as a private investment, are in Belgium subject to the following tax treatment with respect to the shares. Other tax rules apply to resident individuals who do not hold the shares as a private investment.

5.1 Principle: exemption of capital gains

In principle, capital gains realised on the redemption or sale of the Shares or on the total or partial distribution of the assets of the Sub-Fund are not subject to any personal income tax if the investor acts within the framework of normal management of his private assets.

5.2 Withholding Tax

In the case that the by-laws of the Sub-Fund do not provide for the distribution of the net gain (income is reinvested), the shares qualify as accumulation shares and no dividends or other income will be distributed. No Belgian withholding tax is due on the capital gains generated by the sale or redemption of Shares except if the Sub-Fund is investing more than 10% in interest bearing assets (25% for Shares purchased prior to 1 January 2018). In that case a 30% withholding tax is due. The income is taxed to the extent it derives, directly or indirectly (in the form of interests, capital gains or capital losses) from the income or return on investments in interest bearing assets.

Any losses sustained upon sale or redemption of the Shares will not be deductible.

In the case that the by-laws of the Sub-Fund do provide for the distribution of dividends or other income that is distributed, it will in principle be subject to a Belgian withholding of 30 % when it is distributed by a financial institution or an intermediary established in Belgium.

Any withholding tax applicable will be calculated after deduction of any non-Belgian withholding taxes and will be levied before any income or proceeds are paid when distributed by a Belgian financial intermediary.

5.3. Personal Income Tax (Belgian individuals)

The Belgian withholding tax constitutes the final income tax for Belgian resident individuals. Regarding accumulation shares this implies that they do not have to declare the capital gain obtained on the shares in their personal income tax return, provided withholding tax, if applicable, was effectively levied on these payments.

They may nevertheless elect to declare income or proceeds in respect of the shares in their personal income tax return. If income or proceeds are paid outside Belgium without the intervention of a Belgian financial intermediary, the income/proceeds received (after deduction of any non-Belgian withholding tax) has to be declared in the personal income tax return.

The amount which is declared in the annual personal income tax return will in principle be taxed at a flat rate of 30% (or at the progressive personal tax rate taking into account the taxpayer's other declared income, whichever is more beneficial).

In the case that distribution shares are held on a foreign bank account, and no withholding tax was levied, the Belgian individual resident must declare the income in its yearly income tax return. The income will then in principle be taxed at the same rate of 30 % (or at the progressive personal tax rate taking into account the taxpayer's other declared income, whichever is more beneficial).

If the income/proceeds payment is declared, any withholding tax retained may be credited.

5.4 Stock Exchange Transactions Tax

The tax on stock exchange transactions is charged in particular on redemptions and conversions of accumulation shares when they are concluded or executed by Belgian residents.

The sale or redemption of capitalization shares is subject to a tax on stock exchange transactions of 1,32% (with a maximum of 4.000 EUR per transaction). This tax also applies in case of sale on a secondary market.

Distribution shares are not subject to the tax on stock exchange transaction, except in case of sale on a secondary market. In that case, the rate of the tax is 0,12%, with a cap at EUR 1300 per transaction.

For transactions entered or performed in Belgium, the tax is payable by the intermediary established in Belgium. If the shares are held on a foreign bank account, the tax is payable by the Belgian resident, unless he can demonstrate that the tax was paid by a third party (e.g. the foreign bank).

5.5 Subscription tax on securities account

A law dated 17 February 2021 has introduced a new subscription tax on securities accounts named Yearly Tax on Securities Accounts ("YTSA"). The new YTSA has entered into force on the 26th of February 2021, with exception of certain anti-abuse provisions that have effect per 30 October 2020.

The YTSA will take the form of an annual levy of 0.15% on taxable financial instruments held on a securities account with an average value of EUR 1.000.000 or more during the reference period. Moreover, the YTSA is limited to 10% of the difference between the average value and the threshold of €1.000.000, in order to avoid that the payment of the YTSA due results in the lowering of the value of the securities account below the threshold.

In principle, the reference period starts on 1 October and ends on 30 September of the following year. The reference period can be shorter when a securities account is closed or when the account holder moves from Belgium to a State with which Belgium concluded a double tax treaty that allocates the right to tax wealth to the jurisdiction of residence. The threshold is assessed on the average value of the assets in the securities account at 4 different reference points within the reference period (31 December, 31 March, 30 June and 30 September).

The threshold is assessed per securities account and not per account holder. The YTSA applies to securities accounts held worldwide by Belgian residents and Belgian establishments (corporates and individuals). It also applies to securities accounts held by non-residents with Belgian financial intermediaries (but not with their foreign establishments), unless the application of the YTSA is prevented by the applicable Double Tax Treaty (e.g. allocates the right to tax wealth to the jurisdiction of residence).

The financial intermediary holding the securities account will in principle withhold the tax and submit the tax return. In all other circumstances, the account holder must submit the YTSA return and pay the YTSA. If there is more than one account holder, every account holder is jointly and severally liable. Every account holder can submit the tax return on behalf of all account holders.