

## UK ADDENDUM TO PROSPECTUS

### PLATINUM WORLD PORTFOLIOS PLC (THE "COMPANY")

The Company is an open-ended investment company with variable capital organised under the laws of Ireland as a public limited company pursuant to the Companies Acts and the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 as amended or any amendment or replacements thereto for the time being in force (the "Regulations"). The Company was incorporated on 9 July 2014 under registration number 546481.

The Regulations give effect to Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009. As a result, the Company qualifies as a UCITS under Article 1, paragraph 2, points a) and b) of Directive 2009/65/EC and may therefore (subject to registration) be offered for sale in the United Kingdom and in other Member States in the European Union.

The Company is organised in the form of an umbrella fund with segregated liability between its sub-funds. The Articles of Association provide that the Company may offer separate classes of Shares, each representing interests in a sub-fund, with each sub-fund comprising a separate and distinct portfolio of investments. The Company has obtained the approval of the Central Bank of Ireland ("Central Bank") for the establishment of the following sub-funds: the Platinum World Portfolios - International Fund; the Platinum World Portfolios - Asia Fund; and the Platinum World Portfolios - Japan Fund (each a "Fund" and together the "Funds").

The authorisation of the Company by the Central Bank is not an endorsement or guarantee of the Company by the Central Bank nor is the Central Bank responsible for the contents of the Prospectus. In addition, the authorisation of the Company by the Central Bank does not constitute a warranty as to the performance of the Company or any Fund and the Central Bank shall not be liable for the performance or default of the Company or any Fund.

**Registered Office:**  
10 Earlsfort Terrace  
Dublin 2  
Ireland

**THIS IS A COUNTRY SUPPLEMENT FOR INVESTORS IN THE UNITED KINGDOM DATED 3 JULY 2018 ("COUNTRY SUPPLEMENT") TO THE PROSPECTUS OF THE COMPANY DATED 2 JULY 2018 (THE "PROSPECTUS").**

#### **INFORMATION FOR INVESTORS IN THE UNITED KINGDOM**

**This Country Supplement forms part of, and should be read in conjunction with, the Prospectus, and is authorised for distribution only when accompanied by the Prospectus.** This Country Supplement is issued with respect to the offering of Shares in the Funds offered by the Company in the United Kingdom. Unless otherwise defined, capitalised terms herein shall have the same meaning as set out in the Prospectus. If you are in any doubt about the contents of this Country Supplement you should consult your stockbroker,

bank manager, solicitor, accountant or other professional adviser authorised pursuant to the Financial Services and Markets Act 2000 (“FSMA”).

This Country Supplement constitutes neither an offer by the Company or by any other person to enter into an investment agreement with the recipient of this document nor an invitation to the recipient to respond to the document by making an offer to the Company, or to any other person, to enter into an investment agreement. Investors who have any doubt about or wish to discuss the suitability of an investment in the Shares and/or obtain further information on the Shares should contact an independent financial advisor. Nothing in this Country Supplement should be construed as investment advice.

The Company is categorised as a recognised collective investment scheme for the purposes of section 264 of the FSMA. The Company is authorised and regulated by the Financial Conduct Authority (the “FCA”), for the purposes of section 21 of the FSMA, and as a result Shares may be marketed to the general public in the United Kingdom.

Prospective investors should be aware that some or all of the rules made under the FSMA for the protection of retail clients will not apply to an investment in the Company and compensation under the Financial Services Compensation Scheme of the United Kingdom will not be available.

The Company will provide facilities, in relation to each of the Funds, in the United Kingdom at the offices of the facilities agent, Global Funds Registration Limited (“**UK Facilities Agent**”), 2nd Floor, Golden House, 30 Great Pulteney Street, London W1F 9NN where:

1. information can be obtained about the Company's most recently published net asset value per Share in the Funds;
2. a Shareholder may arrange for redemption of his or her Shares in any of the Fund(s) and obtain payment in relation to such redemption (any redemption requests received by the UK Facilities Agent will be forwarded to the Administrator for processing);
3. the following documents concerning the Company are available for inspection free of charge and for which copies in English can be obtained free of charge:
  - 3.1. the most recent Memorandum and Articles of Association of the Company;
  - 3.2. the most recent Prospectus, all supplements thereto in respect of the Company and this Country Supplement;
  - 3.3. the most recently issued key investor information documents relating to the Company and its Shares offered in the United Kingdom; and
  - 3.4. the most recently prepared annual and half-yearly (if applicable) reports relating to the Company;
4. a Shareholder of a bearer certificate (in the event that any bearer certificate is issued by the Company) may obtain free of charge the payment of dividends and details or copies of any notices which have been given or sent to Shareholders; and
5. any Shareholder or other person can submit a complaint about the operation of the Company for transmission to the Company.

## **ADDITIONAL TAX INFORMATION FOR INVESTORS IN THE UNITED KINGDOM**

This section sets out some aspects of the United Kingdom taxation regime relevant to the Company and some of the taxation implications of investment in the Company and the Funds for investors in the United Kingdom. It is intended as a general summary only, based on

current law and practice in force in the United Kingdom as of the date of this Country Supplement. The summary provided in this section is not exhaustive and such law and practice are subject to change. This summary should not be taken to constitute legal or tax advice.

**Prospective investors should consult their own professional advisors on the implications of making an investment in the Shares, the holding or disposing of Shares and the receipt of distributions with respect to such Shares under the laws of the countries in which they are liable to taxation.**

In addition, prospective investors' attention is drawn to certain taxation risks associated with investing in the Fund(s). Please see the "Taxation" section under section 10 of the Prospectus for additional information.

## **The Company**

The Directors intend that the affairs of the Company shall be managed and conducted so that it is not resident in the United Kingdom for United Kingdom taxation purposes. Accordingly, and provided that the Company does not carry on a trade in the United Kingdom through a permanent establishment situated therein for United Kingdom corporation tax purposes or through a branch or agency situated in the United Kingdom which would bring it within the charge to income tax, the Company will not be subject to United Kingdom corporation tax or income tax on income and capital gains arising to it. The Directors intend that the affairs of the Company will be conducted so that no such permanent establishment, branch or agency will arise insofar as this is within their control, but it cannot be guaranteed that the conditions necessary to prevent any such permanent establishment, branch or agency coming into being will at all times be satisfied.

Interest and other amounts received by the Company which have a United Kingdom source may be subject to withholding or other taxes in the United Kingdom.

The taxation of income and capital gains of the Company and of the Shareholders is subject to the fiscal laws and practices of Ireland, of the countries in which the Company invests and of the jurisdictions in which the Shareholders are resident or otherwise subject to tax. In relation to taxation outside of Ireland, the income and capital gains of the Company from its securities and assets may suffer withholding tax of the territory where such income and gains arise, which may not be reclaimable in those territories. The Company, in certain circumstances, may be able to benefit from applicable reduced rates of withholding tax provided in double taxation agreements between Ireland and such territories, but in other circumstances, may not be able to benefit from a reduced rate.

## **UK Reporting Status**

Shareholdings in the Company are likely to constitute interests in an "offshore fund" for the purposes of the UK Offshore Funds (Tax) Regulations 2009.

The UK Offshore Funds (Tax) Regulations 2009 provide that if a shareholder resident in the UK for taxation purposes holds an interest in an offshore fund and that offshore fund is a 'non-reporting fund', any gain accruing to that shareholder upon the sale or other disposal of that interest will be charged to UK tax as income and not as a capital gain. Alternatively, where a shareholder resident in the UK holds an interest in an offshore fund that has been a 'reporting fund' for all periods of account for which they hold their interest, any gain accruing upon sale or other disposal of the interest will be subject to tax as a capital gain rather than income; with relief for any accumulated or reinvested profits which have already been subject

to UK income tax or corporation tax on income (even where such profits are exempt from UK corporation tax).

Where an offshore fund may have been a non-reporting fund for part of the time during which the UK shareholder held their interest and a reporting fund for the remainder of that time, there are elections which can potentially be made by the shareholder in order to pro-rate any gain made upon disposal; the impact being that the portion of the gain made during the time when the offshore fund was a reporting fund would be taxed as a capital gain. Such elections have specified time limits in which they can be made. Shareholders should refer to their tax advisors for further information.

It should be noted that a “disposal” for UK tax purposes would generally include a switching of interest between sub-funds within the Company and might in some circumstances also include a switching of interests between classes in the same sub-fund of the Company.

In broad terms, a ‘reporting fund’ is an offshore fund that meets certain upfront and annual reporting requirements to HM Revenue & Customs (“HMRC”) and its shareholders.

The Directors have applied to HMRC for Class A, Class B, Class G and Class H of each of the Funds (“Reporting Classes”) to be granted “reporting fund” status and have obtained “reporting fund” status for each of the Reporting Classes. However, there can be no guarantee that “reporting fund” status will be maintained for each Reporting Class. HMRC publishes on its website a list of all offshore funds that have been granted reporting fund status (currently at [www.gov.uk/government/publications/offshore-funds-list-of-reporting-funds](http://www.gov.uk/government/publications/offshore-funds-list-of-reporting-funds)).

The Directors further intend to manage the affairs of the Reporting Classes so that the relevant upfront and annual costs and reporting duties are met and continue to be met on an on-going basis. Such annual duties will include calculating and reporting the income returns of the Reporting Classes for each reporting period (as defined for UK tax purposes) on a per-Share basis to all relevant Shareholders (as defined for these purposes). UK Shareholders which hold their interests at the end of the reporting period to which the reported income relates, will be subject to income tax or corporation tax on the higher of any cash distribution paid and the full reported amount. The reported income will be deemed to arise to UK Shareholders six months following the end of the relevant reporting period.

Reporting fund status for the Reporting Classes will remain in place permanently so long as the annual requirements are undertaken. Should Shareholders wish further information on the implications of the relevant Share Classes holding such status, they should seek professional advice. Although it is the Directors’ current intention to maintain “reporting fund” status in respect of the Reporting Classes, Shareholders are advised that the Directors do not accept any liability for such status not being maintained.

UK Shareholders holding Shares in a Reporting Class at the end of each reporting period (as defined for UK tax purposes) will potentially be subject to UK income tax or corporation tax on their share of the relevant Class’s reported income, to the extent that this amount exceeds dividends received. Both dividends and reported income will be treated as dividends received from a foreign corporation, subject to any re-characterisation as interest, as described below.

In accordance with Regulation 90 of the UK Offshore Funds (Tax) Regulations 2009, the Reporting Classes’ reportable income information will be made available on the Company’s website at [www.platinumworldportfolios.ie](http://www.platinumworldportfolios.ie) within six months of the end of the reporting period (e.g. by 31 December 2017 for 30 June 2017 period end). Shareholders may, if they so require, request a hard copy of the Reporting Classes’ reportable income information for any given reporting period. Such requests must be made in writing to the Administrator or the UK

Facilities Agent. Each such request must be received within three months of the end of the reporting period. Unless the Administrator is notified to the contrary in the manner described above, it is understood that Shareholders do not require the reportable income information be sent to them other than by making it available on the Company's website at [www.platinumworldportfolios.ie](http://www.platinumworldportfolios.ie).

## Shareholders

Individual Shareholders resident in the United Kingdom may be taxed on capital gains at a flat rate of 10% (or 20% for higher or additional rate tax payers). A gain on disposal of Shares, together with other chargeable gains less allowable losses in a tax year, is subject to tax to the extent that it exceeds the annual exempt amount, which for the tax year 2017/2018 is £11,300.

Corporate Shareholders are not eligible for the annual exempt amount but indexation allowance may be available to reduce the amount of any taxable gain.

Special rules exist for Shareholders who are UK resident life assurance companies. Such Shareholders should seek their own professional advice.

The attention of UK resident corporate Shareholders is drawn to Chapter 3 of Part 6 of the Corporation Tax Act 2009, whereby interests of UK companies in offshore funds may be deemed to constitute a loan relationship; with the consequence that all profits and losses on such relevant interests are chargeable to UK corporation tax in accordance with a fair value basis of accounting. These provisions apply where the market value of relevant underlying interest bearing securities and other qualifying investments of the offshore fund (broadly investments which yield a return directly or indirectly in the form of interest) are at any time during the relevant accounting period of the UK resident corporate Shareholder more than 60% of the market value of all the investments of the offshore fund.

When UK resident individuals receive dividends (including reported income) from the Funds, they will, subject to their personal circumstances, be liable to UK income tax. An annual tax free dividend allowance of £5,000 is available to UK resident shareholders. Dividends in excess of £5,000 are taxable at 7.5% (for basic rate tax payers); 32.5% (for higher rate tax payers); and 38.1% (for additional rate tax payers). In Budget 2017, it was proposed that the annual tax free dividend allowance should reduce to £2,000 with effect from 6<sup>th</sup> April 2018.

Where the relevant Fund's assets are more than 60% invested in "qualifying investments" (generally those which yield a return in the form of interest), any distribution will be treated as interest in the hands of a UK resident individual Shareholder. This means that the relevant tax rates will be those applying to interest. A personal savings allowance of £1,000 is available for basic rate tax payers and £500 for higher rate tax payers.

For UK corporate Shareholders, distributions received from the relevant Fund (including reported income) will be treated as overseas dividends except where the Fund's assets are more than 60% invested in "qualifying investments" (generally those which yield a return in the form of interest), in which case the distribution received will be treated as an interest receipt.

When UK resident corporate shareholders, which are within the charge to UK corporation tax, receive dividends from the relevant Fund and the rules regarding recharacterisation of dividends as interest set out in the preceding paragraph do not apply, the dividend is likely to fall within one of a number of exemptions from UK corporation tax. In addition, dividend distributions to non-UK companies carrying on a trade in the UK through a permanent establishment in the UK should also fall within an exemption from UK corporation tax on

dividends to the extent that the Shares held by that company are used by, or held for, that permanent establishment. Reported income in respect of a Reporting Class will be treated the same way as a dividend distribution for these purposes.

UK resident individual Shareholders who are not domiciled in the UK and who, where relevant, elect for the remittance basis of taxation for the tax year in which such dividend or other distribution is received may be subject to UK income tax on such dividends or distributions on the remittance basis.

The attention of individual Shareholders resident in the UK is drawn to the provisions of Chapter 2 of Part 13 of the Income Taxes Act 2007. These provisions are aimed at preventing the avoidance of UK income tax by individuals through transactions resulting in the transfer of assets or income to persons (including companies) resident or domiciled outside the UK, and may render them liable to income tax in respect of undistributed income of the Funds on an annual basis. The legislation is not directed towards the taxation of capital gains.

Shareholders should be aware that if persons who are resident in the UK (or certain persons connected with residents of the UK) have the power to secure that the affairs of the Funds are conducted in accordance with their wishes, the Funds may constitute a “controlled foreign company” for the purposes of Part 9A of the Taxation (International and Other Provisions) Act 2010. If the Funds were to fall to be treated as a controlled foreign company, any company that either alone or together with connected or associated persons is deemed to be entitled to 25% or more of the Funds’ profits, could be taxed on its share of the Funds’ profits unless one of a number of available exemptions is met. UK resident companies entitled to 25% or more of the chargeable profits of the Funds should take their own specific professional advice.

The attention of Shareholders resident in the UK (and who, if individuals, are also domiciled in the UK for those purposes) is drawn to the provisions of Section 13 of Taxation of Chargeable Gains Act 1992. Under these provisions, where a chargeable gain accrues to a company that is not resident in the UK, but which would be a close company if it were resident in the UK, a person may be treated as though a proportional part of that chargeable gain, calculated by reference to their interest in the company, has accrued to them. No liability under Section 13 can be incurred by such a person, however, where such a proportion does not exceed 25% of the gain.

Any individual Shareholder domiciled or deemed to be domiciled in the UK for UK tax purposes may be liable to UK inheritance tax on their Shares in the event of death or on making certain categories of lifetime transfer.

### **Stamp Duty and Stamp Duty Reserve Tax**

As the Company is not incorporated in the UK and the register of Shareholders will be kept outside the UK, no liability to UK stamp duty or stamp duty reserve tax will arise by reason of the transfer of, subscription for or redemption of Shares.

The Funds may be liable to transfer taxes in the UK on acquisitions and disposals of investments. In the UK, stamp duty or stamp duty reserve tax at a rate of 0.5%, rounded-up to the nearest £5 (in the case of stamp duty), will be payable by the Funds on the acquisition of shares in companies that are either incorporated in the UK or that maintain a share register there.

Shareholders should note that other aspects of UK taxation legislation may also be relevant to their investment in the Funds.

The above comments are intended only as a guide to the general UK stamp duty and stamp duty reserve tax position and do not relate to persons such as market makers, brokers, dealers, intermediaries or persons connected with depository arrangements or clearance services, to whom special rules may apply.