

# ADDITIONAL INFORMATION FOR INVESTORS IN LUXEMBOURG

## COUNTRY SUPPLEMENT FOR BRANDES INVESTMENT FUNDS PLC (THE "FUND")

The following information is addressed to potential investors of the Fund in Luxembourg. This country supplement forms part of, and should be read in conjunction with, the most recent Prospectus for the Fund dated 1 April, 2020, as may be amended from time to time, (the "Prospectus") and specifies and completes the Prospectus as far as sales activities in Luxembourg are concerned.

The Directors of the Fund, whose names appear under the heading "Management and Administration" of the Prospectus, accept responsibility for the information contained in the Prospectus and this country supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case), such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

Unless otherwise specified in this country supplement, capitalised terms and expressions used hereinafter shall bear the same meaning as in the Prospectus.

### Public Distribution in Luxembourg

The Fund has notified the Luxembourg supervisory authority, the *Commission de Surveillance du Secteur Financier* (CSSF), of its intention to publicly distribute the Shares of the Fund listed below in Luxembourg (hereinafter referred to as the "Share Classes") in accordance with the requirements of the Luxembourg Law on Undertakings for Collective Investment dated 17 December 2010 Chapter 7, "UCITS situated in other Member States of the European Union which market their units in Luxembourg" (the "2010 Law"), and is authorised to do so since the end of the notification procedure.

Sub-Fund	Share Class	Denominated Currency	ISIN
Brandes European Value Fund	Euro Class A Shares	EUR	IE0031574647
Brandes European Value Fund	Euro Class A1 Shares	EUR	IE00BYXWTQ92
Brandes European Value Fund	Euro Class I Shares	EUR	IE0031574977
Brandes European Value Fund	Euro Class I1 Shares	EUR	IE00BYXWTT24
*Brandes European Value Fund	Euro Class S Shares	EUR	IE00BYWGL889
*Brandes European Value Fund	Euro Class X Shares	EUR	IE00BYXWTM54
Brandes European Value Fund	Sterling Class A Shares	GBP	IE0031574753
*Brandes European Value Fund	Sterling Class A1 Shares	GBP	IE00BYXWTR00
Brandes European Value Fund	Sterling Class I Shares	GBP	IE0031575057
Brandes European Value Fund	Sterling Class I1 Shares	GBP	IE00BYXWTN61
*Brandes European Value Fund	Sterling Class S Shares	GBP	IE00BYWGL996
*Brandes European Value Fund	Sterling Class X Shares	GBP	IE00BYXWV636
Brandes European Value Fund	US Dollar Class A Shares	USD	IE0031574530
*Brandes European Value Fund	US Dollar Class A1 Shares	USD	IE00BYWTYS81
*Brandes European Value Fund	US Dollar Class AH Shares	USD	IE00BYXWTS17
Brandes European Value Fund	US Dollar Class I Shares	USD	IE0031574860
*Brandes European Value Fund	US Dollar Class I1 Shares	USD	IE00BYWTTY98
*Brandes European Value Fund	US Dollar Class IH Shares	USD	IE00BYXWTP85
*Brandes European Value Fund	US Dollar Class S Shares	USD	IE00BYWGL772
*Brandes European Value Fund	US Dollar Class X Shares	USD	IE00BYXWTL48
Brandes Emerging Markets Value Fund	Euro Class A Shares	EUR	IE00B6RNXY80
Brandes Emerging Markets Value Fund	Euro Class I Shares	EUR	IE00B4P97428
*Brandes Emerging Markets Value Fund	Euro Class S Shares	EUR	IE00BYWGCLC22

*Brandes Emerging Markets Value Fund	Euro Class X Shares	EUR	IE00BYXWTY76
*Brandes Emerging Markets Value Fund	Sterling Class A Shares	GBP	IE00B6S5CV37
*Brandes Emerging Markets Value Fund	Sterling Class I Shares	GBP	IE00B63F0G99
*Brandes Emerging Markets Value Fund	Sterling Class II Shares	GBP	IE00B6TS4266
*Brandes Emerging Markets Value Fund	Sterling Class S Shares	GBP	IE00BYWGLD39
*Brandes Emerging Markets Value Fund	Sterling Class X Shares	GBP	IE00BYXWTZ83
Brandes Emerging Markets Value Fund	US Dollar Class A Shares	USD	IE00B6TRNJ36
*Brandes Emerging Markets Value Fund	US Dollar Class A1 Shares	USD	IE00BYWTYQ67
Brandes Emerging Markets Value Fund	US Dollar Class I Shares	USD	IE00B6SMR972
*Brandes Emerging Markets Value Fund	US Dollar Class II Shares	USD	IE00BYWTYR74
*Brandes Emerging Markets Value Fund	US Dollar Class S Shares	USD	IE00BYWGLB15
*Brandes Emerging Markets Value Fund	US Dollar Class X Shares	USD	IE00BYXWTX69
Brandes Global Value Fund	Euro Class A Shares	EUR	IE0031573904
Brandes Global Value Fund	Euro Class I Shares	EUR	IE0031574209
*Brandes Global Value Fund	Euro Class S Shares	EUR	IE00BYWGLG69
*Brandes Global Value Fund	Euro Class X Shares	EUR	IE00BYXWTJ26
Brandes Global Value Fund	Sterling Class A Shares	GBP	IE0031574084
Brandes Global Value Fund	Sterling Class A1 Shares	GBP	IE00B1SHJL36
Brandes Global Value Fund	Sterling Class I Shares	GBP	IE0031574423
Brandes Global Value Fund	Sterling Class II Shares	GBP	IE00B1SHJJ14
*Brandes Global Value Fund	Sterling Class S Shares	GBP	IE00BYWGLH76
*Brandes Global Value Fund	Sterling Class X Shares	GBP	IE00BYXWTK31
Brandes Global Value Fund	US Dollar Class A Shares	USD	IE0031573896
*Brandes Global Value Fund	US Dollar Class A1 Shares	USD	IE00BYWTYL13
Brandes Global Value Fund	US Dollar Class I Shares	USD	IE0031574191
*Brandes Global Value Fund	US Dollar Class II Shares	USD	IE00BYWTYM20
*Brandes Global Value Fund	US Dollar Class S Shares	USD	IE00BYWGLF52
*Brandes Global Value Fund	US Dollar Class X Shares	USD	IE00BYXWTH02
Brandes U.S. Value Fund	Euro Class A Shares	EUR	IE0031575271
Brandes U.S. Value Fund	Euro Class I Shares	EUR	IE0031575503
*Brandes U.S. Value Fund	Euro Class S Shares	EUR	IE00BYWGLK06
*Brandes U.S. Value Fund	Euro Class X Shares	EUR	IE00BYXWTW52
Brandes U.S. Value Fund	Sterling Class A Shares	GBP	IE0031575388
*Brandes U.S. Value Fund	Sterling Class A1 Shares	GBP	IE00B1SHJR97
*Brandes U.S. Value Fund	Sterling Class I Shares	GBP	IE0031575610
*Brandes U.S. Value Fund	Sterling Class II Shares	GBP	IE00B1SHJN59
*Brandes U.S. Value Fund	Sterling Class S Shares	GBP	IE00BYWGLL13
*Brandes U.S. Value Fund	Sterling Class X Shares	GBP	IE00BYXWV743
Brandes U.S. Value Fund	US Dollar Class A Shares	USD	IE0031575164
*Brandes U.S. Value Fund	US Dollar Class A1 Shares	USD	IE00BYWTYN37
Brandes U.S. Value Fund	US Dollar Class I Shares	USD	IE0031575495
*Brandes U.S. Value Fund	US Dollar Class II Shares	USD	IE00BYWTYP50
*Brandes U.S. Value Fund	US Dollar Class S Shares	USD	IE00BYWGLJ90
*Brandes U.S. Value Fund	US Dollar Class X Shares	USD	IE00BYXWTV46

\*Share Classes not currently launched

Pursuant to a Paying Agency Agreement dated 1 October 2008 as amended, the Manager has appointed Société Générale Bank & Trust, having its principal place of business at 11, Avenue Emile Reuter, L-2420 Luxembourg, (the "Luxembourg Paying Agent") as paying and information agent in Luxembourg (the "Paying Agency Agreement").

In addition to the common redemption procedure, Shareholders resident in Luxembourg may alternatively redeem their Shares through the Luxembourg Paying Agent. The Luxembourg Paying Agent will transfer the redemption proceeds to the account indicated by the Shareholder. Upon the request of the Shareholder, the redemption proceeds will also be paid by the Luxembourg Paying Agent in cash. Shareholders resident in Luxembourg may also forward switching requests to the Luxembourg Paying Agent.

Shareholders resident in Luxembourg may also arrange to have all other payments (e.g. dividends), which are to be made by the Fund for their benefit paid through the Luxembourg Paying Agent. In this case the Luxembourg Paying Agent will transfer such payments to an account indicated by the Shareholder or make payments to him in cash. All of the aforementioned payments and transfers will be made subject to any withholding tax or other deductions, which may apply.

The Manager has also appointed the Luxembourg Paying Agent as information agent. Shareholders resident in Luxembourg may obtain the Prospectus, the Memorandum and Articles of Association and any subsequent documentation amending same and the most recent annual report and, if subsequently published, the semi-annual report from the Luxembourg Paying Agent at no cost and can also enquire there about the issue and redemption prices of the Fund's Shares. The material contracts mentioned in the Prospectus under the heading "General Information – Material Contracts" and the Paying Agency Agreement may also be inspected at the Luxembourg Paying Agent's office.

The Luxembourg Paying Agent will be paid out of the assets of the Fund fees and expenses which will be charged at normal commercial rates.

#### **Distributors**

Among others, Allfunds International, S.A., whose registered office is at 30, Boulevard Royal, L-2449 Luxembourg, has been appointed as Distributor of the Shares in the Sub-Funds.

#### **Luxembourg Taxation**

The following information is of a general nature only and is based on the Fund's understanding of certain aspects of the laws and practice in force in Luxembourg as of the date of this country supplement. It does not purport to be a comprehensive description of all of the tax considerations that might be relevant to an investment decision. It is included herein solely for preliminary information purposes. It is not intended to be, nor should it be construed to be, legal or tax advice. It is a description of the essential material Luxembourg tax consequences with respect to the Shares and may not include tax considerations that arise from rules of general application or that are generally assumed to be known to Shareholders. This summary is based on the laws in force in Luxembourg on the date of this country supplement and is subject to any change in law that may take effect after such date. Prospective Shareholders should consult their professional advisors with respect to particular circumstances, the effects of state, local or foreign laws to which they may be subject and as to their tax position.

Please be aware that the residence concept used under the respective headings below applies for Luxembourg income tax assessment purposes only. Any reference in the present section to a tax, duty, levy impost or other charge or withholding of a similar nature refers to Luxembourg tax law and/or concepts only. Also, please note that a reference to Luxembourg income tax encompasses corporate income tax (*impôt sur le revenu des collectivités*), municipal business tax (*impôt commercial communal*), a solidarity surcharge (*contribution au fonds pour l'emploi*) as well as personal income tax (*impôt sur le revenu*). Corporate taxpayers may further be subject to net worth tax (*impôt sur la fortune*), as well as other duties, levies or taxes. Corporate income tax, municipal business tax, as well as the solidarity surcharge invariably apply to most corporate taxpayers resident of Luxembourg for tax purposes. Individual taxpayers are generally subject to personal income tax and to the solidarity surcharge. Under certain circumstances, where an individual taxpayer acts in the course of the management of a professional or business undertaking, municipal business tax may apply as well.

#### **Luxembourg Taxation of Shareholders**

##### **Luxembourg tax residency of the Shareholders**

A Shareholder will not become resident, nor be deemed to be resident, in Luxembourg, by reason only of the holding of the Shares, or the execution, performance, delivery and / or enforcement of the Shares.

##### **Luxembourg Residents Shareholders**

##### **Luxembourg Resident Individuals**

Dividends and other payments derived from the Shares by a resident individual Shareholder, who acts in the course of the management of either his/her private wealth or his/her professional/business activity, are subject to income tax at ordinary progressive rates.

Capital gains realised upon the disposal of the Shares by a resident individual Shareholder, who acts in the course of the management of his/her private wealth, are not subject to income tax, unless said capital gains qualify either as speculative gains or as gains on a substantial participation. Capital gains are deemed to be speculative and are

thus subject to income tax at ordinary rates if the Shares are disposed of within six (6) months after their acquisition or if their disposal precedes their acquisition. A participation is deemed to be substantial where a resident individual Shareholder holds or has held, either alone or together with his spouse or partner and/or minor children, directly or indirectly at any time within the five (5) years preceding the disposal, more than ten percent (10%) of the share capital of the company whose shares are being disposed of. A Shareholder is also deemed to alienate a substantial participation if he acquired free of charge, within the five (5) years preceding the transfer, a participation that was constituting a substantial participation in the hands of the alienator (or the alienators in case of successive transfers free of charge within the same five-year period). Capital gains realised on a substantial participation more than six (6) months after the acquisition thereof are taxed according to the half-global rate method (i.e. the average rate applicable to the total income is calculated according to progressive income tax rates and half of the average rate is applied to the capital gains realised on the substantial participation). A disposal may include a sale, an exchange, a contribution or any other kind of alienation of the participation.

Capital gains realised on the disposal of the Shares by a resident individual Shareholder, who acts in the course of the management of his/her professional/business activity, are subject to income tax at ordinary rates. Taxable gains are determined as being the difference between the price for which the Shares have been disposed of and the lower of their cost or book value.

#### **Luxembourg Resident Companies**

A Luxembourg resident company (*société de capitaux*) must include any profits derived, as well as any gain realised on the sale, disposal or redemption of Shares, in its taxable profits for Luxembourg income tax assessment purposes.

#### **Luxembourg Residents Benefiting From a Special Tax Regime**

Shareholders which are Luxembourg resident companies benefiting from a special tax regime, such as (i) undertakings for collective investment subject to the amended 2010, (ii) specialised investment funds subject to the amended law of 13 February 2007, (iii) family wealth management companies governed by the amended law of 11 May 2007 and (iv) reserved alternative investment fund vehicles treated as specialised investment funds for Luxembourg tax purposes and subject to the law of 23 July 2016, are income tax exempt entities in Luxembourg, and are thus not subject to any Luxembourg income tax.

#### **Luxembourg Non-Resident Shareholders**

A non-resident Shareholder, who has neither a permanent establishment nor a permanent representative in Luxembourg to which or whom the Shares are attributable, is generally not liable to any Luxembourg income tax on income received and capital gains realised upon the sale, disposal or redemption of the Shares.

A non-resident Shareholder which has a permanent establishment or a permanent representative in Luxembourg to which or whom the Shares are attributable, must include any income received, as well as any gain realised on the sale, disposal or redemption of Shares, in its taxable income for Luxembourg tax assessment purposes. The same inclusion applies to an individual, acting in the course of the management of a professional or business undertaking, who has a permanent establishment or a permanent representative in Luxembourg, to which or whom the Shares are attributable. Taxable gains are determined as being the difference between the sale, repurchase or redemption price and the lower of the cost or book value of the Shares sold or redeemed.

#### **Withholding Tax**

Under current Luxembourg tax law, there is no withholding tax on any distribution, redemption or payment made by the Fund to its Shareholders under the Shares.

#### **Net Wealth Tax**

Luxembourg resident Shareholders and non-resident Shareholders who have a permanent establishment or a permanent representative in Luxembourg to which or whom the Shares are attributable, are subject to Luxembourg net wealth tax on such Shares, except if the Shareholder is (i) a resident or non-resident individual taxpayer, (ii) an undertaking for collective investment subject to the 2010 Law, (iii) a securitisation company governed by the amended law of 22 March 2004 on securitisation, (iv) a company governed by the amended law of 15 June 2004 on venture capital vehicles, (v) a specialised investment fund governed by the amended law of 13 February 2007, (vi) a family wealth management company governed by the amended law of 11 May 2007, (vii) a professional pension institution governed by the amended law of 13 July 2005, or (viii) a reserved alternative investment fund vehicle governed by the law of 23 July 2016.

However, (i) a Luxembourg resident securitisation company governed by the amended law of 22 March 2004 on securitisation, (ii) a professional pension institution governed by the amended law of 13 July 2005, (iii) a reserved alternative investment fund vehicle (opting for the treatment as a venture capital vehicle for Luxembourg tax purposes) governed by the law of 23 July 2016, and (iv) a Luxembourg resident company governed by the amended law of 15 June 2004 on venture capital vehicles remain subject to the minimum net wealth tax ("MNWT").

As from 1 January 2016, MNWT is levied on companies having their statutory seat or central administration in Luxembourg. For entities for which the sum of fixed financial assets, transferable securities and cash at bank exceeds 90% of their total balance sheet and EUR 350,000, the MNWT is set at EUR 4,815. For all other companies having their statutory seat or central administration in Luxembourg which do not fall within the scope of the EUR 4,815 MNWT, the MNWT ranges from EUR 535 to EUR 32,100, depending on their total balance sheet.

#### **Other Taxes**

There is no Luxembourg registration tax, stamp duty or other similar tax or duty payable by the Shareholders in Luxembourg by reason only of the issuance or transfer of the Shares.

Under Luxembourg tax law, where an individual Shareholder is a resident of Luxembourg for tax purposes at the time of his/her death, the Shares are included in his or her taxable base for inheritance tax purposes. On the contrary, no inheritance tax is levied on the transfer of the Shares upon death of a Shareholder in cases where the deceased was not a resident of Luxembourg for inheritance purposes at the time of his death.

Gift tax may be due on a gift or donation of the Shares, if the gift is recorded in a Luxembourg notarial deed or otherwise registered in Luxembourg.

**Publication of the Net Asset Value**

The Net Asset Value Per Share shall be published on the Business Day immediately succeeding each Dealing Day on the internet address [www.brandes.com/UCITS](http://www.brandes.com/UCITS).

**Dated: 1 April 2020**