

Trojan Funds (Ireland) plc

First Addendum dated 24 May, 2018 to the Prospectus dated 18 August, 2017 (the “First Addendum”)

This First Addendum forms part of and should be read in conjunction with the Prospectus of Trojan Funds (Ireland) plc (the “Company”) dated 18 August, 2017 together with any Supplement thereof (together the “Prospectus”). The Company is an umbrella type open-ended investment company with variable capital with segregated liability between its sub-funds authorised in Ireland as an undertaking for collective investment in transferable securities pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. Number 352 of 2011) as amended.

The Directors of the Company whose names appear in the section entitled “Directors” in the Prospectus, accept responsibility for the information contained in this First Addendum. 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.

This Addendum sets out details of amendments to the Prospectus. This document forms part of and should be read in conjunction with the Prospectus. Distribution of this First Addendum is not authorised unless accompanied by a copy of the Prospectus.

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this First Addendum.

1. Definitions

The following changes will be made to the Definitions section of the Prospectus:

- (a) A new definition of “GDPR” shall be included on page 13 of the Prospectus as follows:

““GDPR” means Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Legislation).”

2. Data Protection Information

The section entitled “Data Protection Information” on page 47 of the Prospectus shall be deleted in its entirety and replaced with the following section entitled “Data Protection Information”:

“Data Protection Information

Prospective investors should note that by completing the Application Form they will be providing information to the Company which may constitute personal data within the meaning of data protection legislation in Ireland or with effect from 25 May 2018, “personal data” within the meaning of the GDPR. The following is a short summary of the key issues arising from GDPR which relate to the interaction between the Company and its investors. Personal data will be

used by or on behalf of the Company on an ongoing basis for the purposes of investor identification including “know your client” checks, management and administration of your holding of Shares in the Company, statistical analysis, market research and to comply with any applicable legal and/or regulatory requirements. Where a Shareholder has provided consent, that Shareholder’s personal data may be processed for the purposes of informing that Shareholder (for example, by telephone, mail and email) about future sub-funds of the Company or other products and services available from the Investment Manager and of marketing campaigns and event invitations. In such circumstances, the Investment Manager may act as a data controller of personal data provided to the Company and all rights afforded to Shareholders as data subjects under the GDPR shall be exercisable by a Shareholder solely against the Investment Manager.

Such data may be disclosed and / or transferred to third parties including auditors, legal advisers, regulatory and/or tax authorities, government departments, delegates, advisers, technology providers and service providers of the Company and their or the Company’s duly authorised agents and any of their respective related, associated or affiliated companies wherever located (including to countries outside the EEA which may not have the same data protection laws as in Ireland) for the purposes specified.

Investors have a right to obtain a copy of their personal data kept by the Company, the right to rectify any inaccuracies in personal data held by the Company and in a number of circumstances a right to be forgotten and a right to restrict or object to processing. In certain limited circumstances a right to data portability may apply. Where a Shareholder gives consent to the processing of personal data, that Shareholder may withdraw this consent at any time.

How long the Company holds your personal data for will vary and will be determined by various criteria, including: (a) the purpose for which the Company is using it – it will be necessary to keep the data for as long as is necessary for the relevant purpose; and (b) legal obligations – law and/or regulation may set a minimum period for which the Company has to keep your personal data. For example, Irish legal and regulatory requirements require that information and documentation provided by you in relation to your investment in the Company is retained for at least six years after the period of investment has ended or the date on which a Shareholder has had its last transaction with the Company.

A copy of the Company’s data privacy statement is available upon request from the Administrator.”

3. Risk Factors

The following paragraph entitled “GDPR” shall be inserted in Appendix II of the Prospectus in the section of the Prospectus entitled “Risk Factors” and after the risk factor entitled “Cross-Liability for other Funds”.

“GDPR

Under the GDPR, data controllers are subject to additional obligations including, amongst others, accountability and transparency requirements whereby the data controller is responsible for, and must be able to demonstrate, compliance with the rules set down in the GDPR relating to data processing and must provide data subjects with detailed information regarding the processing of their personal data. Other obligations imposed on data controllers include enhanced data consent requirements and the obligation to report any personal data breach to the relevant supervisory authority without undue delay. Under the GDPR, data subjects are afforded additional rights, including the right to rectify inaccurate personal information, the right to have personal data held by a data controller erased in certain circumstances and the right to restrict or object to processing in a number of circumstances.

The implementation of GDPR may result in increased operational and compliance costs being borne directly or indirectly by the Company. Further there is a risk that the measures will not be implemented correctly by the Company or its service providers. If there are breaches of these measures by the Company or any of its service providers, the Company or its service providers could face significant fines and/or be required to compensate any data subject who has suffered material or non-material damage as a result. In addition the Company might suffer reputational damage which may have a material adverse effect on its operations and financial conditions.”

Dated: 24 May, 2018