



## Supplementary Information Document

# MI Thornbridge Investment Funds

May 2025



# Introduction

## Guide to this document

This document is designed to be read alongside a relevant 2-page Key Investor Information Document ("KIID"). Together they summarise information about your investment in the Sub-funds, and provide answers to some important questions.

You should read these documents carefully to help you understand what you are buying, and keep them safe for future reference.

Please note that we will not accept your investment instructions unless you have confirmed that you have read the appropriate KIID. These are available at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).

You should also read the relevant Prospectus (the "Prospectus") before making an investment decision. Your rights and duties as well as your legal relationship with the Company are set out in the Prospectus. For a copy of the Prospectus, please write to Apex Fundrock Limited, MI Thornbridge Investment Funds, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY or call us on 0345 305 4216.

A copy of the Prospectus, and details of how you can contact us, are also available at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).

The KIID and the Prospectus are available in English. If you have any doubts about the contents of these documents, you should contact a professional adviser.

As we are not registered with the relevant authorities in the United States we cannot sell shares to people who are "US persons". For a definition of a US person, and for further information on this point, please see further details in the Prospectus or call us on 0345 305 4216.

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## YOUR INVESTMENT

### About MI Thornbridge Investment Funds ("the Company")

The Company is authorised by the Financial Conduct Authority ("FCA") and it is a UK UCITS scheme as defined in the FCA Glossary.

The Company is an umbrella Open-Ended Investment Company ("OEIC"), which means we can set up separate funds from time to time with the approval of the FCA. Funds are a way of combining your money with that of other investors to buy a wider range of investments. This can help to reduce risk by spreading your money over a wider range of investments and provide access to the services of a professional fund manager. Each fund is divided into shares, with the number of shares you hold representing your share of the fund. The value of a fund is directly related to the value of the assets in which it invests and the number of shares it issues.

The Company currently has one Fund as follows:

#### MI Thornbridge Global Opportunities Fund

##### What may the Fund invest in?

All funds have different aims and may therefore hold a different mix of investments to achieve that aim. In addition, funds have the (limited) ability to invest in other asset types and countries, subject to a fund's investment objectives and policy. Variations to a fund's investments may change over time due to investment opportunities and changes in market conditions.

The Fund will have their assets invested in accordance with the investment objectives and policies. A summary of these is shown below.

Full investment objectives and policies are set out in the Prospectus available at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).

#### MI Thornbridge Global Opportunities Fund

A Sub-fund of MI Thornbridge Investment Funds.

##### What is the Fund's investment objective and policy?

The Fund aims to provide capital and income growth.

The Fund invests in the shares of companies around

the world.

The Fund has the discretion to invest in a range of investments as described above with no need to adhere to a particular benchmark.

##### Who is the Fund aimed at?

The Fund is designed to meet a wide range of investment needs and different appetites for risk. A summary of the investment objectives and policies of the Fund can be found in the relevant Key Investor Information Documents ("KIIDs"). Further details of the Fund's investment objectives and policies can be found in the Prospectus.

The Fund is for retail and professional investors through all distribution channels with or without professional advice who have a basic knowledge of relevant financial products or no financial industry experience and are willing to accept that there is no capital guarantee with 100% of their capital at risk.

Investors and potential investors should note that neither the description of the typical investor profile as set out below nor any other information contained in this document constitutes investment advice and investors and potential investors should consult their own professional advisers concerning the acquisition, holding or disposal of shares in a Fund. Neither the Fund, the ACD nor the Investment Manager makes any statement or representation in relation to the suitability, appropriateness or otherwise of any transaction in shares in a Fund.

The typical investor profile for the Fund is set out below.

#### MI Thornbridge Global Opportunities Fund

The Fund is marketable to all eligible investors provided they can meet the minimum age and subscription levels. The Fund may be suitable for investors who see collective investment schemes as a convenient way of participating in investment markets. They may be suitable for investors wishing to seek to achieve defined investment objectives. Such investors must have experience with, or understand, products where the capital is at risk. Investors must be able to accept some risk to their capital, thus the Fund may be suitable for investors who are looking to set aside the capital for at

least 5 years. If you are uncertain whether these products are suitable for you, please contact a professional adviser.

MI Thornbridge Global Opportunities Fund may be suitable for those investors wanting to achieve long-term capital growth and a reasonable level of income from a portfolio of equities and fixed interest stocks quoted in global markets.

## INVESTING

### How do I invest?

You can buy shares directly from us or through a professional adviser or other intermediary or investment platform. Application forms for buying shares can be obtained by calling us on 0345 305 4216, or via our website at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/). If you have received advice from a FCA authorised intermediary, you will need to agree with them what charge you are paying for their service to you. This can be arranged directly between you and your intermediary.

If investing directly with us or through an intermediary, when we receive your completed application form and payment, we will invest in the Fund. If we receive your application before 12 noon UK time, we will invest in the Fund on the same business day. If we receive your application after 12 noon UK time, we will invest in the Fund on the following business day.

We will send you or your financial adviser (or both) a confirmation following the investment. You will also be given an account number to use when you contact us.

If you invest through an investment platform, you should contact the platform to invest in the Fund.

You may also telephone the dealing team to invest in the Fund on 0345 305 4216 between 8.30 a.m. to 4.30 p.m. UK time.

### What happens if I change my mind?

If you received advice from a financial adviser, and subsequently invested, you will receive a notice informing you of your right to change your mind and instructions on how to cancel. You will then have 14 days to cancel your investment. If you decide to proceed with your cancellation, we will return your investment money. Please note that if the value of your underlying investment has changed from the time your money was originally invested in the Fund, you may not receive your full money back.

### How do I sell shares?

If you invest directly with us or through an

intermediary, you can sell your shares by writing to us or calling 0345 305 4216. We will then send you a confirmation together with a renunciation form, which you will need to complete and return to us. We will sell your shares at the 12 noon UK time valuation point after we receive your instructions. Once we have received all the required documents to settle the deal, we will forward the proceeds of the sale to your designated bank account, normally within four business days. Investors are entitled to redeem their shares on any dealing day subject to certain conditions in the Prospectus and Regulations.

If you invest through an investment platform, you should contact the platform to sell your holding.

### Contract notes to an intermediary

Where an intermediary has placed a transaction on an investor's behalf, all copies of contract notes will normally be sent to the intermediary. It is the responsibility of the intermediary to ensure that its client receives a copy of the contract note.

Where an investor has the right to cancel the transaction (typically where investment advice has been received by the investor from a regulated intermediary prior to investment), one copy of the contract note is sent to the investor along with the Cancellation Notice. A further copy is sent directly to the intermediary.

### Can I Convert my shares for another share class in the same Fund?

Subject to any restrictions on the eligibility of investors for a particular share class, an investor may at any time convert all or some of their shares ("Original Shares") of one class in a Fund for shares in another class ("New Shares") in the same Fund.

There is no charge for converting between share classes.

### Can I Switch between the different Funds?

Subject to any restrictions on the eligibility of investors for a particular share class, an investor may at any time switch all or some of their shares ("Original Shares") for shares of another Fund ("New Shares") in the Company.

The ACD may at its discretion make a charge on the switching of shares between Funds. Any such charge on Switching does not constitute a separate charge payable by a Shareholder, but is rather the application of any redemption charge on the Original Shares and any initial charge on the New Shares, subject to certain waivers.

There is currently no charge for switching or conversions of shares in one class of a Fund for shares in another class of the same Fund.

Please note that under UK tax law a switch of shares in one Fund for shares in any other Fund is treated as a redemption of the Original Shares and a purchase of New Shares and will, for persons subject to taxation, be a realisation of the Original Shares for the purposes of capital gains taxation, which may give rise to a liability to tax, depending upon the investor's circumstances.

An investor who switches shares in one Fund for shares in any other Fund (or who switches between classes of shares) will not be given a right by law to withdraw from or cancel the transaction.

### **How do you calculate the value of the shares and where can I find out my shares' value?**

The value of your shares is linked directly to the value of the investments held in the Fund. We calculate the share price at 12 noon UK time on each business day, which is the Fund's valuation point.

The Fund only has one price at which shares can be bought and sold. Any charges we place on buying and selling will be in addition to this figure.

The previous day's dealing price of shares in the Fund's share classes are available at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/). The prices of shares can also be obtained by calling us on 0345 305 4216 between 8.30 a.m. to 4.30 p.m. UK time.

As the Fund deals on a forward pricing basis, the prices that appear in these sources will not be the same as those at which investors can currently deal.

## WHAT LIMITS APPLY TO INVESTING IN THE FUND?

The limits that apply to investment in the Fund's share classes are as follows:

### MI Thornbridge Global Opportunities Fund

Share Class	Minimum Initial Investment*	Minimum Subsequent Investment	Minimum Holding*	Minimum Redemption	Regular Savings Plan	Regular Withdrawal Facility
Class B Accumulation USD	US\$1,000	N/A (provided minimum holding is maintained)	US\$1,000	N/A (provided minimum holding is maintained)	Yes, monthly investments are to be made via a standing order	No
Class C Income and Accumulation GBP & USD†	£100,000 US\$100,000	N/A (provided minimum holding is maintained)	£100,000 US\$100,000	N/A (provided minimum holding is maintained)	Yes, monthly investments are to be made via a standing order	No
Class D Accumulation USD	US\$50,000,000	N/A (provided minimum holding is maintained)	US\$50,000,000	N/A (provided minimum holding is maintained)	No	No

\*The ACD may waive the minimum levels at its discretion.

†Class C USD Shares are only available as Accumulation Shares.

### Accumulation and Distribution Dates

Fund	Final Accounting Date	Interim Accounting Date	Ex-dividend Dates	Income Distribution/ Accumulation Dates
<b>MI Thornbridge Global Opportunities Fund</b>	30 June	31 December	(Final): 1 July (Interim): 1 January	(Final): 31 August (Interim): Last day of February

The Company offers both income and accumulation shares. Income will be accumulated in the price of Accumulation shares and the share price will be increased to reflect this.

Holders of Accumulation shares will be sent an Accumulation Statement giving details of the amount accumulated during the relevant period.

Income will be distributed to holders of Income shares who will receive a Tax Voucher giving details of the amount distributed during the relevant period.



## CHARGES AND EXPENSES

### What are the charges involved in investing?

This section gives details of relevant charges and expenses and the effect they may have on your investment. Full details of each of the charges, how they are calculated and when they are paid are set out in the Prospectus.

		Fund	Share Class	Charge
When I buy shares	<b>Initial Charge (may also be called Entry Charge)</b> There is no initial charge applicable when you invest in shares of the Fund.	MI Thornbridge Global Opportunities Fund	N/A	N/A
During my investment	<b>Annual Management Charge</b>  There is a charge for managing the Fund, which is usually a percentage of the value of the Fund.  (Paid out of the Fund)		Class B	Fixed component (investment management fees 1.00% Variable component (administration feed) 0.06% - 0.16%*
			Class C	Fixed component (investment management fees 0.75% Variable component (administration feed) 0.06% - 0.16%*
			Class D	Fixed component (investment management fees 0.00% Variable component (administration feed) 0.06% - 0.16%*

If I want to Switch or Convert my shares	<b>Switching and Conversion charges</b> We do not charge for Switching or Converting your shares from one Fund into another.		N/A	N/A
If I want to sell my shares	<b>Exit charge</b> We do not charge when you sell your shares.		N/A	N/A

\* The variable component is calculated on the value of the assets of the Fund as follows: 0.16% per annum on the first £50 million; 0.12% per annum on the next £50 million; 0.08% per annum on the next £100 million; 0.06% per annum thereafter. The variable component is subject to a minimum fee of £43,500 per annum.

In the event that distributions are made more frequently than as stated above, a fee of £1,000 will be levied in respect of each additional distribution made.

In the event that additional share classes are launched, a fee of £7,500 per annum will be levied in respect of each additional share class.

## **Fees detailed in the KIID**

The Entry charges and the Ongoing Charges Figure (the OCF) apply to all Classes of Income Shares and Accumulation Shares and are displayed in the KIID (available separately at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/)). The OCF includes the Investment Management Fee rate detailed as above, as well as additional expenses paid by a Fund. Further details concerning fees and any additional expenses paid by a Fund can be found in the Prospectus.

## **How will charges and expenses affect my investment?**

Shares in a Fund are purchased and sold at the Fund's share price based on Net Asset Value. The initial charge paid as detailed above is deducted from an investor's subscription monies before shares are purchased.

The Fund's fees and expenses are deducted from the Fund's income account with the exception of the Annual Management Charge and Portfolio transactions (SDRT, broker's commission). This may have the effect of reducing the amount of income available for distribution. However, where the amount of income received by the Fund is insufficient to meet all of the fees and expenses, some or all of such charges and expenses may be charged against capital instead. Any charges made against capital may have the effect of constraining capital growth.

## **Do you apply a dilution levy?**

The actual cost of purchasing, selling or switching underlying investments in a Fund may deviate from the mid-market value used in calculating its share price due to dealing charges, taxes and any spread between buying and selling prices of a Fund's underlying investments. These costs could have an adverse effect on the value of a Fund, known as "dilution". In order to mitigate the effect of dilution, and in order to protect the interests of existing/continuing shareholders, the ACD has the power to charge a "dilution levy" on the purchase and/or redemption or switching of shares in a Fund.

The intention of a dilution levy is to mitigate, as much as possible, the dilutive effect caused by purchases and redemptions.

Where charged, the dilution levy will be shown separately as an addition to the cost of shares when they are issued by the ACD, or as a deduction when they are redeemed by the ACD.

The ACD has no entitlement to the dilution levy, which will either be paid into the relevant Fund, in the case of an issue of shares or retained in the Fund, in the case of redemption of shares.

It is not possible to predict accurately whether dilution will occur at any point in time. The need to charge a dilution levy will depend on the volume of net purchases or redemptions, or in relation to any large deals as described below. The ACD may charge a discretionary dilution levy on any sale or redemption of shares if, in its opinion, the existing shareholders (for sales) or continuing shareholders (for redemptions) might otherwise materially be adversely affected. A dilution levy must be imposed only in a manner, that so far as practicable, is fair to all shareholders or potential shareholders. In particular, the dilution levy may be charged in the following circumstances:

where a Fund is in continual decline, in terms of net asset value, as a result of poor market conditions or continual net redemptions;

where a Fund experiences a large level of net purchases on any dealing day (i.e. purchases less redemptions) or a large level of net redemptions on any dealing day (i.e. redemptions less purchases) relative to its size;

on "large deals". For these purposes, a large deal is defined as a single purchase or a redemption exceeding 5% of the net asset value of a Fund);

in any other case where the ACD is of the opinion that the interests of existing/continuing shareholders and potential shareholders require the imposition of a dilution levy.

It is envisaged, based on future projections that a dilution levy will be applied from time to time and a

typical dilution levy, may be up to 0.75% but for the avoidance of doubt, may be higher in practice.

## TAX INFORMATION

Tax affects both your personal position and that of the Fund. The tax position may change in the future. If you are unsure about your tax position, you should obtain advice from a professional adviser.

The information below is a general guide based on current UK law and HM Revenue and Customs ("HMRC") practice, which are subject to change. It summarises the tax position of the Fund and of investors who are resident in the UK and hold shares as investments. Prospective investors who are in any doubt as to their tax position, or who may be subject to tax in a jurisdiction other than the UK, are advised to take professional advice.

### **Does the Fund pay tax?**

The Fund does not pay capital gains tax but does pay corporation tax on interest and some other income at a rate that is equal to the basic rate of income tax.

### **What is my tax position if I invest in the Fund through an ISA?**

When you invest through an ISA, there is no personal income tax or capital gains tax to be paid on income or gains in your ISA investment.

The value of any tax advantages will depend on your individual circumstances.

### **What is my tax position if I invest into the Fund directly?**

You may have to pay UK capital gains tax if you sell shares or switch between funds.

All income paid to investors from their investments is treated by HMRC as income (whether we pay the money into your bank account or you choose to allow it to accumulate in a fund). As a direct investor, you will therefore have to pay income tax on any investment income you receive. We pay or accumulate the net amount of your investment income gross and, for the 2025/2026 tax year, individual UK resident holders have an annual tax free allowance to dividend income of £500 per annum. For dividend income received above £500, the current tiers and rates of tax

(subject to change) are as follows and will be based upon an individual's level of income:

Basic Rate Taxpayers – 8.75% (basic rate)

Higher Rate Taxpayers – 33.75%

Additional Rate Taxpayers – 39.35%

Individuals should note that if the receipt of dividend income takes them from one band/tier of UK personal taxation to another, the tax due on the excess dividend income over the annual allowance will be at the rates applicable to the new band/tier.

Corporate Shareholders who receive dividend distributions may have to divide them into two (in which case the division will be indicated on the tax voucher). Any part representing dividends received from a company will be treated as dividend income (that is, franked investment income) and no further tax will be due on it. The remainder will be received as an annual payment after deduction of income tax at the basic rate, and Corporate Shareholders may, depending on their circumstances, be liable to tax on the grossed up amount, with the benefit of the 20% income tax credit attached or to reclaim part of the tax credit as shown on the tax voucher.

Dividend distributions will be made gross to shareholders who are not UK resident. Non-resident shareholders who are individuals are not liable to UK income tax on the dividend distribution. Non-UK resident shareholders are recommended to seek professional advice as to the tax consequences of receiving a dividend distribution under the law of the jurisdiction of their residence.

Non-resident trusts may be chargeable to UK income tax on distributions made by a Fund and are recommended to seek professional advice.

## CLIENT MONEY

In certain circumstances (including in relation to the purchase and redemption of shares), money in respect of shares will be transferred to a client money bank account with an Approved Bank that the ACD may from time to time select until such transactions can be completed. Money transferred to a client money account will be held in accordance with the FCA Client Money Rules relating to the holding of client money.

The purpose of utilising client money accounts is to protect shareholders should the ACD become insolvent during such a period. All client money bank accounts are non-interest bearing and therefore no interest is due or payable to the shareholders where client money balances are held.

Client money may be held with an Approved Bank outside the UK. In such case, the relevant accounts will be subject to the laws of that state and the client money may be treated in a different manner from that which would apply if the client money were held by a party located in the UK.

Where client money is deposited into an account with an Approved Bank, the Approved Bank may have a security interest or lien over, or right of set-off in relation to such money, to the extent the ACD is permitted to grant such rights by the Client Money Rules.

The ACD may hold client money in an omnibus account which means that shareholder's money may be held in the same account as that of other shareholders. In an insolvency event shareholders would not have a claim against a specific amount in a specific account. Shareholders would claim against the client money pool in general. Pooled property in omnibus accounts held by the ACD may be used for the account of any of the relevant shareholders.

The ACD will not be responsible for any loss or damages suffered by shareholders because of any error or action taken or not taken by any third parties holding client money in accordance with the Client Money Rules, unless the loss arises because the ACD has been negligent or acted fraudulently or in bad faith.

However, if the Approved Bank or Banks cannot repay all the persons to whom it owes money, any shortfall may have to be shared proportionally between all its creditors including shareholders.

### Transfer of business

Except in respect of de minimis sums transferred in accordance with the Client Money Rules (where shareholder consent is not required), shareholders agree that the ACD may transfer to another person, as part of a transfer of business to that person, client money balances, provided that:

- a) the sums transferred will be held for the relevant shareholder by the person to whom they are transferred in accordance with the Client Money Rules; or
- b) if not held in accordance with (a), the ACD will exercise all due skill, care and diligence in assessing whether the person to whom the client money is transferred will apply adequate measure to protect these sums.

For the purpose of this paragraph, de minimis shall mean £25 for retail investors and £100 for all other investors.

### Unclaimed balances

In certain circumstances, if the ACD has lost touch with a shareholder and there has been no movement on the account (notwithstanding any payments or receipts of charges, interest or similar items), the ACD will be permitted to pay the shareholder's client money balance to charity after six years. At this point, the ACD shall cease to treat such money as client money. The ACD will not do so until reasonable efforts have been made to contact the shareholder in accordance with the Client Money Rules. The shareholder will still be entitled to recover this money from the ACD at a later date irrespective of whether the ACD has paid the money to charity.

## GENERAL INFORMATION

### What other information can I access?

The annual long report relating to the Company (including accounts) will normally be made available within four months of the annual accounting period ending 30 June. The half-yearly (interim) long report relating to the Company (including accounts) will normally be made available within two months of the interim accounting period ending 31 December. These reports are available on the ACD's website at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).

The annual and interim reports are also available to any person, free of charge, upon request via telephone or in writing to the ACD.

### Best Execution

Our best execution policy sets out the basis upon which we will effect transactions and place orders in relation to the Company whilst complying with our regulatory obligations to obtain the best possible result for the Company. Details of the best execution policy are available from the ACD upon request.

### Voting Strategy

The Fund's property may be associated with voting rights. We have a strategy which determines when and how to vote for the benefit of each Fund. A summary of this strategy is available from the ACD on request by telephoning 0345 305 4216. You can also obtain details of the actions taken while following the strategy of the Fund.

### The Company's report and accounts and the Prospectus

Copies of the Prospectus and the latest annual and half-yearly long reports may be obtained free of charge, either before or after you invest, from the ACD's address quoted in the Directory on page 14. The Prospectus and the latest annual and half-yearly reports can also be downloaded from our website directly at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).

### Cancellation

If an investor has not had a face-to-face discussion with a representative of the company through which they are making this investment, which could, for example, be the ACD or a company providing financial

advice, then the investor is entering into this transaction 'at a distance'.

Where the investor is entering into a transaction 'at a distance', an investor does not have the right to cancel their application to invest in a Fund if the application has been made directly by the investor or if the investor did not meet their adviser or agent face-to-face. However, the ACD may, at its discretion, extend cancellation rights to such an investor but is under no obligation to do so.

If an investor has received face-to-face advice on their investment, they will have a right to change their mind. The investor will be able to exercise the right to cancel within 14 days of receipt of the cancellation notice from the ACD and they will receive a refund of the amount invested either in full or less a deduction to reflect any fall in the Fund's price in the intervening period.

### Telephone calls and electronic communications

Telephone calls and electronic communications will be recorded. The ACD will keep a copy of telephone calls and electronic communications. A copy of the record is available from the ACD on request. The records will be kept for up to five years and where requested by the FCA, for up to seven years.

### UK Money Laundering Regulations

In order to comply with the identification requirements of the UK Money Laundering Regulations, we may need to ask you to provide proof of your identity and address when buying or selling shares or to perform independent electronic searches of third-party databases.

### How do I complain?

To obtain a copy of the Complaints Procedure or to make a complaint concerning the operation or marketing of the Company, please write to the Head of Compliance of the ACD at Apex Fundrock Limited, MI Thornbridge Investment Funds, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY or by calling the ACD on 0345 305 4216 during the ACD's normal business hours.

If a complaint is not resolved to your satisfaction and you subsequently wish to take the matter further, you may refer it direct to the Financial Ombudsman Service at Exchange Tower, Harbour Exchange Square, London



E14 9SR (see also [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)).

### **Am I covered by a compensation scheme?**

You are covered by the Financial Services Compensation Scheme. You may be entitled to compensation from this scheme if we cannot meet our obligations. This depends on the type of business and circumstances of the claim. Most types of investment business are covered up to £85,000.

Further information is available from the Financial Services Compensation Scheme, [www.fscs.org.uk](http://www.fscs.org.uk).

### **Data Protection: How your personal data is used**

By completing and submitting an application form to invest in the Fund, you will be giving your consent to the processing of your personal data (including any anti-money laundering verification check), by us for the administration of services in connection with your investment on a contractual basis.

Additionally, we may be requested to share your personal data with our regulator, the Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject.

If you have used an intermediary to submit the application form we may also share information about your investment with them, to help them to continue to provide their services to you, unless you request us not to.

The way in which we may use personal information of individuals ("personal data") is governed by the "Data Protection Requirements" which means all applicable data protection laws and regulations including, without limitation, (a) the General Data Protection Regulation (EU) 2016/679 ("GDPR"), (b) UK GDPR (as that term is defined by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019) and the Data Protection Act 2018, and (c) any legislation that Supplements or replaces the foregoing in the United Kingdom.

If we or our service providers need to share your personal data with a recipient outside the European Economic Area "EEA" or the United Kingdom "UK", we will ensure that appropriate safeguards are in place including: model clauses that have been approved by the European Commission or the Secretary of State; a

code of conduct or other certified mechanisms such as binding contractual rules. ("Safeguards").

We make every effort to maintain the registration of your holdings accurately. However, if you feel that we have incorrectly recorded any of your personal data, you may request its correction. You have the right to request copies of your personal data stored by us and can do so by using our contact details below.

Your data will be stored and processed securely for the period of your contract with us and for a minimum of seven years after our relationship ceases, for regulatory and legislation purposes only.

We are registered with the Information Commissioner's Office as a Data Controller and Data Processor for this purpose. Further information on how we manage your personal data can be found within our privacy policy which can be found on our website at [www.apexgroup.com/privacy-policy/](http://www.apexgroup.com/privacy-policy/).

Should you wish to make a complaint or request further information on how we collect and process your personal data please contact us at: Data Protection Officer, Apex Fundrock Limited, Hamilton Centre, Rodney Way, Chelmsford Essex, CM1 3BY or email us at: [DPO@apexfs.com](mailto:DPO@apexfs.com)

Alternatively, if you have any concerns or complaints as to how we have handled your personal data, you may lodge a complaint to the Information Commissioner's Office through their website which can be found at: [ico.org.uk/make-a-complaint/data-protection-complaints/](http://ico.org.uk/make-a-complaint/data-protection-complaints/)



## DIRECTORY

### The Company and its Head Office

MI Thornbridge Investment Funds, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY.

Authorised and regulated by the Financial Conduct Authority.

Telephone: 0345 305 4216

### Sponsor

Thornbridge Investment Management LLP, 13 Austin Friars, London EC2N 2HE.

Authorised and regulated by the Financial Conduct Authority.

### Authorised Corporate Director ("ACD")

Apex Fundrock Limited, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY.

Authorised and regulated by the Financial Conduct Authority.

Apex Fundrock Limited is a subsidiary of Apex Group Ltd.

### Investment Manager

Thornbridge Investment Management LLP, 13 Austin Friars, London EC2N 2HE.

Authorised and regulated by the Financial Conduct Authority.

### Depository

Northern Trust Investor Services Limited, 50 Bank Street, Canary Wharf, London E14 5NT.

Authorised and regulated by the Financial Conduct Authority.

### Registrar and Administrator

Apex Fundrock Limited, Hamilton Centre, Rodney Way, Chelmsford, Essex CM1 3BY.

### Auditor

Grant Thornton UK LLP, 30 Finsbury Square, London EC2A 1AG.

Authorised and regulated by the Financial Conduct Authority.

### Competent Authority

The Company is authorised and regulated by the Financial Conduct Authority. They can be contacted at 12 Endeavour Square, London E20 1JN or by calling 0800 111 6768 (freephone) or 0300 500 8082 from the UK or +44 207 066 1000 from outside the UK. Website [www.fca.org.uk](http://www.fca.org.uk).

## INVESTOR TERMS AND CONDITIONS

A copy of the Investor Terms and Conditions are available at [www.fundrock.com/mi-funds/thornbridge-investment-management-llp/](http://www.fundrock.com/mi-funds/thornbridge-investment-management-llp/).