

FUNDSMITH EQUITY FUND Sicav (THE "SICAV")

IRISH COUNTRY SUPPLEMENT

This Country Supplement, dated 2 April 2019, forms part of, and should be read in the context of, and in conjunction with, the prospectus for the SICAV dated 29 March 2019 (hereinafter referred to as the "Prospectus").

The Directors of the SICAV, whose names appear in the Directory section of the Prospectus, accept responsibility for the information contained in 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) the information contained in this document does not contain any untrue or misleading statement or omit any matters required to be included in it. The Directors accepts responsibility accordingly.

All capitalised terms herein contained shall have the same meaning in this document as in the Prospectus, unless otherwise indicated.

The Directors wish to inform Shareholders and prospective investors in the SICAV of the following:

ADDITIONAL INFORMATION FOR INVESTORS IN IRELAND

The SICAV is an investment company incorporated under the laws of Grand Duchy of Luxembourg as a société d'investissement à capital variable ("**SICAV**") in accordance with the provisions of Part I of the UCI Law and qualifies as a UCITS. The SICAV was incorporated for an unlimited period on 28 October 2011 Sicavand has its registered office in Luxembourg.

The Central Bank of Ireland (the "**Central Bank**") has not approved and takes no responsibility for the contents of the Prospectus or for the financial soundness of the SICAV or for the correctness of any statements made or expressed in the Prospectus.

TAXATION OF THE SICAV IN IRELAND

The Directors of the SICAV intend to conduct the affairs of the SICAV so that it does not become resident in Ireland for taxation purposes. Accordingly, provided the SICAV does not exercise a trade within Ireland or carry on a trade in Ireland through a branch or agency, the SICAV will not be subject to Irish tax on its income and gains other than on certain Irish source income and gains.

TAXATION OF SHAREHOLDERS IN IRELAND

Subject to personal circumstances, Shareholders resident in Ireland for taxation purposes will be liable to Irish income tax or corporation tax in respect of any income distributions of the SICAV (whether distributed or reinvested in new Shares).

ANTI-AVOIDANCE

The attention of individuals resident or ordinarily resident in Ireland for tax purposes is drawn to Chapter 1 of Part 33 of the Taxes Consolidation Act, 1997, as amended (the "TCA"), which may render them liable to income tax in respect of undistributed income or profits of the SICAV. These provisions are aimed at preventing the avoidance of income tax by individuals through a transaction resulting in the transfer of assets or income to persons (including companies) resident or domiciled abroad and may render them liable to income or corporation tax in respect of undistributed income or profits of the SICAV on an annual basis.

The attention of persons resident or ordinarily resident in Ireland (and who, if they are individuals, are domiciled in Ireland) is drawn to the fact that the provisions of Chapter 4 (Section 590) of Part 19 of the TCA could be material to any person who holds 5% or more of the Shares in the SICAV if, at the same time, the SICAV is controlled in such a manner as to render it a company that would, were it to have been resident in Ireland, be a "close" company for Irish taxation purposes. These provisions could, if applied, result in a person being treated, for the purposes of the Irish taxation of chargeable gains, as if part of any gain accruing to the SICAV (such as on a disposal of its investments that constitute a chargeable gain for those purposes) had accrued to that person directly; that part being equal to the proportion of the assets of the SICAV to which that person would be entitled to on the winding up of the SICAV at the time when the chargeable gain accrued to the SICAV.

TAXATION

The rates outlined below assume certain details relating to the acquisition of, disposal of and the receipt of income from such investments are included in the tax return(s) made on time by the investor.

The Shares of the SICAV will constitute a "material interest" in an offshore fund located in a qualifying location for the purposes of Chapter 4 (Sections 747B to 747FA) of Part 27 of the TCA. This Chapter provides that if an investor resident or ordinarily resident in Ireland for taxation purposes holds a "material interest" in an offshore fund and that fund is located in a "qualifying location" (including a member state of the European Community, a member state of the European Economic Area or a member of the OECD with which Ireland has a double taxation treaty) then, dividends paid by the fund to such investor that is not a company will be charged to tax at a rate of 41% and any gain (calculated without the benefit of indexation relief) accruing to the investor upon the sale or on the disposal of the interest will also be charged to tax at 41%. Dividends paid by the SICAV to an investor that is a company that is resident in Ireland will be taxed at 25% and any gain (calculated without the benefit of indexation relief) accruing to such investor upon the sale or on the disposal of their interest in the SICAV will also be taxed at 25%.

The Finance Act, 2006 introduced an automatic exit tax for certain Shareholders resident or ordinarily resident in Ireland in respect of Shares held in the SICAV for a period of 8 years. Such Shareholders (both companies and individuals) will be deemed to have disposed of their Shares ("deemed disposal") at the expiration of the 8 year period and will be charged to tax at the rate of 41% (25% in the case of a company) on any deemed gain (calculated without the benefit of indexation relief) accruing to the Shareholder based on the increased value (if any) of the Shares since purchase or since the previous exit tax applied, whichever is later. For the purposes of calculating a gain or loss on any subsequent sale or disposal (actual or otherwise) of those Shares, the base value that the Shares will take, should be the market value applicable to those Shares at the time of the previous deemed disposal.

In addition the Finance Act 2007 introduced provisions regarding the taxation of Irish resident individuals or ordinarily resident in Ireland individuals who hold shares in offshore funds. These provisions introduced the concept of a personal portfolio investment undertaking ("**PPIU**"). Essentially, an offshore fund will be considered a PPIU in relation to a specific investor where that investor can influence the selection of some or all of the property held by the offshore fund. Depending on an individual's circumstances, an offshore fund may be considered a PPIU in relation to some, none or all individual investors i.e. it will only be a PPIU in respect of those individuals who can "influence" selection. Any gain arising on a chargeable event in relation to an offshore fund (located in a qualifying location) which is a PPIU in respect of an individual that gave rise to the chargeable event and occurs on or after 20 February 2007, will be taxed at the rate of 60% (80% where the income represented by the payment is not correctly included in the individual's tax return). Specific exemptions apply where the property invested in has been widely marketed and made available to the public or for non-property investments entered into by the offshore fund. Further restrictions may be required in the case of investments in land or unquoted shares deriving their value from land.

For the purposes of Irish taxation a conversion of Shares in the SICAV from one Class of Shares to another Class of Shares should not constitute a disposal. The replacement Shares shall be treated as if they had been acquired at the same time for the same amount as the holding of Shares to which they relate. There are special rules relating to situations where additional consideration is paid in respect of the conversion of shares, or if a shareholder receives consideration other than the replacement shares in a fund and special rules may also apply when a fund operates equalisation arrangements (these rules are outside the scope of this note).

Attention is drawn to the fact that the above rules may not be relevant to particular types of Shareholders (such as financial institutions), which may be subject to special rules. Investors should seek their own professional advice as to the tax consequences before investing in Shares in the SICAV. Taxation law and practice, and the levels of taxation may change from time to time.

Further information about the SICAV and the relevant dealing procedures may be obtained from the Facilities Agent.

FACILITIES AGENT

The Facilities Agent for the SICAV in Ireland is Zeidler Legal Process Outsourcing Limited, 5 Lower Mount Street, Dublin 2, Ireland, (the “**Facilities Agent**”). The Facilities Agent will provide the following services in connection with marketing the Shares of the SICAV in Ireland:

1. The following documents relating to the SICAV will be available for inspection, without charge, during regular business hours at the offices of the Facilities Agent:
 - (i) the Prospectus;
 - (ii) the KIIDs;
 - (ii) the latest annual and semi-annual reports of the SICAV; and
 - (iii) the Articles (and any amending documents).

2. The Facilities Agent will carry out the following tasks:
 - (i) It will provide information on how a redemption request can be made and how redemption proceeds will be paid.
 - (ii) It will provide the Central Bank with written confirmation that it will act as the Irish facilities agent in respect of the SICAV. It will provide investors with documentation constituting the SICAV, including the prospectus, the annual and semi-annual report.
 - (iii) It will forward complaints received to the Head Office and/or the Complaints Handling Officer of the SICAV.

Further information about the SICAV and the relevant dealing procedures may be obtained from the Facilities Agent.

The name of the SICAV and the name and address of the Facilities Agent will be placed by the Central Bank of Ireland on a list of collective investment schemes marketing in Ireland which will be made available to the public on request.

Dated: 2 April 2019