TT International Funds plc

Country Supplement

TT INTERNATIONAL FUNDS PLC (the "Company")

Additional Information for Investors in Austria

28 February 2020

This country supplement dated 28 February 2020 (the "Supplement") forms part of and should be read in conjunction with the prospectus of the Company dated 28 February 2020, as amended and supplemented from time to time (the "Prospectus").

Capitalised terms used in this Supplement, unless otherwise stated, shall have the same meanings as are given to them in the Prospectus.

Supervision and Registration
The Company is an open ended umbrella investment company with variable capital incorporated on 13 August 2001 under the laws of Ireland. The Company is structured as an open-ended umbrella fund, with segregated liability between sub-funds. The Company is authorised in Ireland and qualifies as a UCITS (Undertakings for Collective Investments in Transferable Securities) according to the Directive 2009/65/EC (as amended from time to time). The Company is supervised by the Central Bank of Ireland.

The following sub-funds of the Company are registered for marketing in Austria in accordance with sec. 140 (1) Austrian Investment Funds Act 2011 (*Investmentfondsgesetz*, "InvFG"):

- TT European Equity Fund
- TT UK Equity Fund
- TT Europe ex-UK Equity Fund
- TT Asia-Pacific Equity Fund
- TT Emerging Markets Equity Fund
- TT Euro Zone Equity Fund
- TT Global Equity Fund
- TT Emerging Markets Unconstrained Fund
- TT Asia Ex-Japan Equity Fund

Distribution
Shares of the Funds will be distributed through licensed banks and licensed investment firms.

The Austrian Information and Paying Agent

Raiffeisen Bank International AG, Am Stadtpark 9, 1030 Wien (the "Austrian Paying Agent"), has been appointed as information and paying agent in accordance with sec. 141 (1) InvFG 2011. Accordingly, Shares may be subscribed and redeemed through the Austrian Paying Agent.

The Prospectus, the Key Investor Information Documents ("KIIDs"), the Company's articles of association, and the most recently published periodic reports are available free of charge at the registered office of the Company as well as at the office of the Austrian Paying Agent.

The subscription and redemption prices of Shares may be obtained at the registered office of each of the Company, the Austrian Paying Agent and Northern Trust International Fund Administration Services (Ireland) Limited ("Administrator").

Publication
Pursuant to section 141 and 142 of the InvFG, the Company has to publish its annual report for the last financial year, its semi-annual report, the KIIDs (in German), the Prospectus, the subscription and redemption prices of the Shares as well as all other documents and information, which must be published in Ireland and/or Austria in accordance with the provisions provided for under section 136 para 4 of the InvFG.

Tax Representative

PwC, PricewaterhouseCoopers Wirtschaftsprüfung und Steuerberatung GmbH, Erdbergstraße 200, 1030 Wien has undertaken the function of the domestic tax representative.

Austrian Shareholders are hereby informed that the Austrian tax status of Shares in a Fund are stated as "Reporting Fund" or "Non-reporting Fund" in the OeKB-List which can be found at: www.profitweb.at.

Tax information

The following information provides a general overview of the tax treatment of Shares in a non-Austrian domiciled investment fund under Austrian tax law for investors that are tax resident in Austria. Special provisions, which may apply depending on the individual circumstances of the taxpayer, will not be discussed. Thus, the information contained in this Supplement must not be misunderstood as information on the specific tax treatment of the individual Shareholders of the non-Austrian investment fund. It is therefore strongly recommended that Shareholders who invest into a Fund, seek professional advice from a tax adviser or a tax lawyer regarding the tax treatment of share subscription (share acquisition), exchange of shares, share redemption as well as distributions and income related to such Shares.

The following text assumes that the non-Austrian investment fund generates income only from capital and neither qualifies as a non-Austrian Real Estate Investment Fund in the meaning of sec. 42 (1) Austrian Real Estate Investment Fund Act (*ImmoInvFG*) nor obtains proceeds that are considered as management or appreciation proceeds (*Bewirtschaftungs- und Aufwertungsgewinne*) within the meaning of sec. 14 (2)(1) and (2) ImmoInvFG.

In addition, the following two chapters on "Reporting Funds" (*Meldefonds*) assume that the non-Austrian investment fund has appointed an Austrian tax representative in the meaning of sec. 186 (2) (2) InvFG 2011 that meets the annual reporting obligation vis-à-vis the *Oesterreichische Kontrollbank AG (OeKB)* acting as reporting agency. Potential tax consequences if such reporting obligations are not fulfilled (i.e. lump-sum taxation) are outlined with in the last chapter on "Non-reporting Funds" (*Nicht-Meldefonds*).The tax treatment of income from a non-Austrian investment fund in particular depends on whether the Shares in the non-Austrian investment fund are held by an individual as a private or business asset or by a corporation. For other investors (such as Austrian private foundations or public bodies) special rules may apply which are not described in this tax information.

1. Reporting Funds (*Meldefonds*): Tax treatment of shares in a non-Austrian investment fund held by individuals

1.1 Distributed income from capital within the meaning of sec. 27 Austrian Income Tax Act (*EStG*), i.e. income from capital investments (e.g. dividends, interest income) (sec. 27 (2) EStG), capital gains from capital investments (sec. 27 (3) EStG) and income from derivatives (sec. 27 (4) EStG), after deduction of related expenses of the investment fund, is considered taxable income of the investor. If pro rata temporis interest within the meaning of sec. 27 (2) (2) EStG is

treated as separately accrued in the financial accounting of the investment fund, such interest income is for tax purposes also considered income from capital investments within the meaning of sec. 27 (2) EStG. Other income distributed within the meaning of the EStG is, after deduction of related expenses of the investment fund, also considered taxable income of the investor pursuant to sec. 186 (5) InvFG. In case of a distribution of income by the non-Austrian investment fund, the proceeds of the investment fund are considered distributed in the following sequence: (1) the current income realized in previous years within the meaning of sec. 27 EStG (income from capital), (2) other income within the meaning of the EStG and (3) proceeds not qualifying as income within the meaning of the EStG. An aggregate loss after deduction of expenses may be set off against other income within the meaning of sec. 27 EStG (income from capital) of the non-Austrian investment fund. If such a set-off of losses is not possible within the same business year, the losses may be set off against income of the non-Austrian investment fund in the following business years, primarily with losses from capital investments (sec. 27 (3) EStG) and income from derivatives (sec. 27 (4) EStG). Unutilized loss carry-forwards from business years of the investment fund prior to 1 January 2013, can bet set-off in later business years against capital gains from capital investments (sec. 27 (3) EStG) or income from derivatives (sec. 27 (4) EStG), however only 25 per cent of such losses may be offset if the shares of the non-Austrian investment fund are not held as business assets. For business years of the investment fund beginning as from the calendar year 2013, the breakdown of deemed distributed proceeds (*ausschüttungsgleiche Erträge*; sec. 186 (2) (2) InvFG) has to provide for the total amount of such loss carry-forwards not yet set off.

1.2 Actual distributions are taxed at the time the distribution is made to the investor. If the distribution of income from capital (excluding dividends from shareholdings in Austrian corporations) is paid to the investor by an Austrian paying agent (*auszahlende Stelle*), that paying agent has to withhold 27.5 per cent capital yields tax (*Kapitalertragsteuer*). The capital yields tax finally discharges any income tax liability in respect of such income from capital to the extent the shares in the non-Austrian investment fund are held by an individual investor as business assets (except for income from realized capital gains and derivatives) or as private assets. Distributions of income from capital that were not subject to Austrian capital yields tax (e.g. if paid to the Austrian investor by a non-Austrian paying agent) have to be included in the investor's annual tax return and are subject to the general provisions (in general the special income tax rate of 27.5 per cent), unless a Liechtenstein paying agent has withheld final withholding tax in the same amount under the Liechtenstein withholding tax act implementing the bilateral withholding tax agreement with Liechtenstein (in force since 1 January 2014, revised as per 1 January 2017) which final withholding tax discharges the investor's Austrian income tax liability. Since 1 January 2017 this is only possible in very limited cases for tax transparent asset structures (*steuerlich transparente Vermögensstrukturen*) existing on 31 December 2016. The deduction of expenses connected to the generation of such income is not allowed. The investor may opt for income taxation under the general (progressive) income tax tariff of up to 55% (*Antragsveranlagung*) in which case the capital yields tax may be credited against the investor's income tax liability.

1.3 Non-Austrian (withholding) taxes that have been levied on items of income distributed by the non-Austrian investment fund may be reclaimed by the investor or credited against the investor's Austrian tax liability subject to the respectively applicable Double Taxation Convention. To the extent the non-Austrian investment fund’s distributions consist of dividends from non-Austrian corporations, the withholding tax may be credited against Austrian capital yields tax by the Austrian paying agent at source, subject to a limit of 15 per cent of the gross amount of the respective dividend according and subject to the *Auslands-KESt Verordnung*.

1.4 In the case of a non-distributing non-Austrian investment fund or if not all income of the non-Austrian investment fund is actually distributed, all undistributed income from the non-Austrian investment fund is deemed distributed to its investors pro-rata with their respective shareholding in the non-Austrian investment fund at the following point in time:

- if the investment fund distributes capital yields tax to be withheld in Austria pursuant to

sec 58 (2) InvFG within four months after the end of the business year, at the time of such distribution;

- otherwise at the time the *Oesterreichische Kontrollbank* publishes the information relevant for the income tax treatment due to a timely notification by the investment fund's tax representative; and

- in all other cases (i.e. in case of a non-reporting funds; in this respect, see below) on 31 December of the respective calender year.

The "Equivalent to a Distribution" (*ausschüttungsgleiche Erträge)* comprises all income of capital investments within the meaning of sec. 27 (2) EStG and 60 per cent of the positive net total amount of capital gains from capital investments (sec. 27 (3) EStG) and 60 per cent of income from derivatives (sec. 27 (4) EStG) – after deduction of expenses connected to the generation of such income. If the share in a non-Austrian investment fund is held as a business asset, 100 per cent of the positive net total amount of capital gains (sec. 27 (3) EStG) and income from derivatives (sec. 27 (4) EStG) – after deduction of expenses connected to the generation of such income – is deemed distributed. The Equivalent to a Distribution is generally subject to the 27.5 per cent capital yields tax or subject to the special income tax rate of 27.5 per cent. The investor may opt for taxation under the general (progressive) income tax tariff of up to 55%. To the extent capital yields tax has been withheld on distributed tax exempt capital gains, capital yields tax may be credited to the investor's other income tax liability or refunded upon application. Subsequent actual distributions of an Equivalent to a Distribution are tax exempt.

1.5 The calculation and the amount of capital yields tax on actual distributions and the composition of the Equivalent to a Distribution has to be reported to the *OeKB* acting as reporting agency pursuant sec. 186 (2) (2) InvFG 2011 (Reporting Fund, *Meldefonds*). The capital yields tax must be withheld based on such reporting.

1.6 Capital gains resulting from the sale of a share in the non-Austrian investment fund acquired after 31 December 2010 are taxable income. The redemption of a share in a non-Austrian investment fund and, if applicable, withdrawals (*Entnahmen*) and other transfers of the shares in a non-Austrian investment fund from the securities account will be treated as disposals (sales) for tax purposes, unless the criteria of one of the exemptions specified in sec. 27 (6)(2) EStG are fulfilled. Equivalents to a Distribution increase the investor's acquisition cost of the shares in the non-Austrian investment fund. Actually distributed tax free distributions and distributions (e.g. proceeds that were previously taxed as equivalents to a distribution from income within the meaning of sec. 27 EStG but are actually distributed later) as well as distributions not being considered as income within the meaning of the EStG, reduce the acquisition costs of the share in the non-Austrian investment fund at the level of the selling investor. Capital gains resulting from the sale of a share in a non-Austrian investment fund realised by a private or a business investor are subject to the 27.5 per cent capital yields tax or the special income tax rate of 27.5 per cent. The investor may opt for income taxation under the general (progressive) income tax tariff of up to 55%. In such case, losses from capital gains resulting from the sale of a share in the non-Austrian investment fund may only be set off against other income subject to 27.5 per cent capital yields tax (with the exception of interest on cash deposits and saving accounts with Austrian banks, benefits paid by an Austrian foundation as well as payments to (typical) silent partners.

1.7 The inheritance or donation of a share in a non-Austrian investment fund is not subject to an inheritance or gift tax in Austria, but reporting obligations may apply vis-à-vis the Austrian tax authorities in case of a gift.

2. Reporting Funds (*Meldefonds*): Tax treatment of shares in a non-Austrian investment fund held by a corporation

2.1 If the investor is a corporate entity, distributions of income within the meaning of the EStG by a non-Austrian investment fund are subject to corporate income tax at a rate of 25 per cent. Corporate holders are equally subject to capital yields tax of 27.5 percent. In case of corporations within the meaning of sec. 1 (1) Corporate Income Tax Act (*KStG*) receiving income from the investment fund, the Austrian paying agent shall be entitled to withhold capital yields tax at a rate of only 25 percent (regardless of the fact that the capital yields tax rate on such income was raised to 27.5 percent on 1 January 2016). Capital yields tax withheld on the distribution does not discharge the corporate income tax liability but is creditable against the corporate income tax liability. Corporate investors may file an exemption declaration (*Befreiungserklärung*) allowing the Austrian depository to abstain from levying the capital yields tax pursuant to sec. 94 (5) EStG. Non-Austrian (withholding) taxes that have been levied on items of income distributed by the non-Austrian investment fund may be reclaimed by the investor or credited against the investor's Austrian tax liability subject to the respectively applicable Double Taxation Convention (or against capital yields tax pursuant to the *Auslands-KESt Verordnung*). To the extent Austrian dividends received by the non-Austrian investment fund are distributed to a corporate entity the distribution may be exempt from corporate income tax pursuant to sec. 10 *KStG*. This exemption may equally apply to non-Austrian dividends, if the respective prerequisites of sec. 10 KStG are fulfilled. Foreign withholding taxes on tax-free dividends may not be credited.

2.2 Income not distributed by the non-Austrian investment fund has to be accounted for at the balance sheet date of the corporate entity on an accrual basis and is subject to corporate income tax. In this context it is considered sufficient if the not yet distributed income of the non-Austrian investment fund (as accounted for at the end of the business year of the non-Austrian investment fund) are accounted for as business profits. In the case of a non-distributing non-Austrian investment fund or if not all income of the non-Austrian investment fund is actually distributed, all income of the non-Austrian investment fund is deemed to be distributed to its shareholders pro-rata their respective shareholding in the non-Austrian investment fund at the point in time described in para 1.4 above. The Equivalent to a Distribution comprises all income from capital investments within the meaning of sec. 27 (2) EStG and the positive net total amount of capital gains from capital investments (sec. 27 (3) EStG) and income from derivatives (sec. 27 (4) EStG), after deduction of expenses connected to the generation of such income. To the extent the Equivalent to a Distribution (and other distributions) has already been accounted for by the corporation as a profit at the balance sheet date such income is not taxable. If levied, capital yields tax may be credited against the corporate income tax liability or refunded.

2.3 A share in a non-Austrian investment fund is a separate asset, which may depreciate for tax purposes if the value falls below the acquisition cost. Capital gains resulting from the sale of a share in a non-Austrian investment fund are taxable income of corporate investors. The redemption of a share in a non-Austrian investment fund is treated as a sale for tax purposes. Equivalent to a Distribution increase the investor's acquisitions cost of the shares in the non-Austrian investment fund. Actually distributed tax free distributions (e.g. proceeds that were previously taxed as equivalents to a distribution from income within the meaning of sec. 27 EStG but are actually distributed later) as well as distributions not being considered income within the EStG reduce the acquisition costs of the share in the non-Austrian investment fund at the level of the investor. Realized capital losses are generally deductible.

3. Non-reporting Funds (*Nicht-Meldefonds*): Tax treatment of shares in a non-Austrian investment fund

3.1. If the reporting obligations pursuant to sec. 186 (2) (2) InvFG 2011 are not fulfilled, the non-Austrian investment fund will be qualified as Non-Reporting Fund (*Nicht-Meldefonds*). As a consequence, actual distributions will be fully subject to tax and the Equivalent to a Distribution will be subject to lump-sum taxation based on the higher of (i) 90% of the difference of the redemption price on the first and the last day of a calendar year and (ii) 10%

of the redemption price on the last day of the calendar year. Such income is attributed to the investor on 31 December of the respective calendar year.

3.2. In order to avoid such lump-sum taxation, the investor may prove the composition of the Equivalent to a Distribution or the tax exemption of actual distributions by providing adequate documentary proof. If capital yields tax was deducted, such proof has to be provided to the paying agent, who is obliged to charge or refund the capital yields tax and to correct the acquisition cost in accordance with sec. 186 (3) InvFG 2011. In case a certification (on the compensation of losses) within the meaning of sec. 96 (4) EStG was issued, such refund of capital yields tax and correction of acquisition cost may only be carried out if the paying agent is instructed by the investor to forward a corrected certificate to the responsible tax office.

This information is based on Austrian tax law as in force in December 2017 and as applied by the Austrian Administrative Court and fiscal authorities. Either may be amended or altered by subsequent legislation, court decisions, rulings or practice of Austrian fiscal authorities even retroactively.