Vanguard

Prospectus

Vanguard Investments Funds ICVC

(An open-ended investment company incorporated with limited liability and registered in England and Wales under registered number IC000758)

This document constitutes the Prospectus for Vanguard Investments Funds ICVC which has been prepared in accordance with the Collective Investment Schemes Sourcebook.

This Prospectus is dated and is valid as at 24 March 2025.

Copies of this Prospectus have been sent to the Financial Conduct Authority and the Depositary.

Important: if you are in any doubt about the contents of this prospectus you should consult your professional adviser.

Vanguard Investments UK, Limited, the authorised corporate director of the Company, is the person responsible for the information contained in this Prospectus. To the best of its knowledge and belief (having taken all reasonable care to ensure that such is the case), the information contained herein does not contain any untrue or misleading statement or omit any matters required by the Collective Investment Schemes Sourcebook to be included in it. Vanguard Investments UK, Limited accepts responsibility accordingly.

Vanguard Investments Funds ICVC

No person has been authorised by the Company to give any information or make any representations concerning the Company or in connection with the offering of Shares other than those contained in this Prospectus, and, if given or made, such information or representations must not be relied on as having been given or made by the Company. The delivery of this Prospectus (whether or not accompanied by any reports) or the issue of Shares shall not, under any circumstances, create any implication that the affairs of the Company have not changed since the date hereof.

The distribution of this Prospectus and the offering of Shares in certain jurisdictions may be restricted. Persons into whose possession this Prospectus comes, including intermediaries who offer, distribute or sell the Shares, are required by the Company to inform themselves about and to observe any such restrictions. This Prospectus does not constitute an offer or solicitation by anyone in any jurisdiction in which such an offer or solicitation is not authorised or to any person to whom it is unlawful to make such offer or solicitation.

The distribution of this Prospectus in certain jurisdictions may require that this Prospectus is translated into the official language of those countries. Should any inconsistency arise between the translated version and the English version, the English version shall prevail.

The Shares have not been and will not be registered under the U.S. Securities Act of 1933, as amended. Subject to certain exceptions, the Shares may not be offered or sold in the U.S. or offered or sold to U.S. Persons. The Company has not been and will not be registered under the U.S. Investment Company Act of 1940, as amended. The ACD has not been registered under the U.S. Investment Advisers Act of 1940.

Shares in the Company are not listed or dealt on any investment exchange.

For purposes of the General Data Protection Regulation 2016 as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the EUWA and the Data Protection Act 2018, the data controller in relation to any personal data supplied is the ACD.

The ACD is responsible for the personal data received on behalf of the Company. The ACD and its affiliates take their data protection and privacy responsibilities seriously. For full details on how we collect, use and share personal data in the course of our business activities, what legal rights you have to help manage your privacy, and how you can contact us for support, please follow the link to our privacy policy https://fund-docs.vanguard.com/uk-limited-privacy-policy.pdf.

The provisions of the Company's Instrument of Incorporation are binding on each of its Shareholders (who are taken to have notice of them).

This Prospectus has been issued and approved for the purpose of Section 21 of the Financial Services and Markets Act 2000 by the ACD.

This Prospectus is based on information, law and practice at the date hereof. The Company cannot be bound by an out of date prospectus when it has issued a new prospectus, and investors should check with the ACD that this is the most recently published prospectus.

The value of the Funds may go down as well as up, and investors may not get back the amount invested or any return on an investment. There can be no assurance that any Fund will achieve its investment objective. Potential investors should not treat the contents of this Prospectus as advice relating to legal, taxation, investment or any matters and are recommended to consult their own professional advisers concerning the acquisition, holding or disposal of Shares. The Company makes no representations or warranties in respect of suitability.

Contents

Terms Used in this Document

'ACD'	Vanguard Investments UK, Limited, the authorised corporate director of the Company;
'Accumulation Shares'	Shares (of whatever Class) in the Company as may be in issue from time to time in respect of which income allocated thereto is credited periodically to capital pursuant to the COLL Sourcebook net of any tax deducted or accounted for by the Company;
'Administrator and Registrar'	both SS&C Financial Services Europe Limited and SS&C Financial Services International Limited or such other person or persons to whom the ACD may delegate such functions from time to time;
'BACS'	Bankers' Automated Clearing Services;
'Business Day'	every day on which the London Stock Exchange is open for trading, provided, however, that if for any reason (in the sole determination of the ACD) the fair and accurate valuation of the relevant Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company is impeded, the ACD may decide that any Business Day shall not be construed as such;
'Class'	all of the Shares relating to a single Fund or a particular class or classes of Shares relating to a single Fund;
'COLL'	the appropriate chapter, section or rule in the COLL Sourcebook;
'COLL Sourcebook'	the rules contained in the Collective Investment Schemes Sourcebook, as amended from time to time, issued by the FCA as part of the FCA Handbook, which shall, for the avoidance of doubt, not include guidance or evidential requirements contained in the said sourcebook;
'Company'	Vanguard Investments Funds ICVC;
'Custodian'	State Street Bank and Trust Company or such other person to whom the Depositary may delegate the function of custody from time to time;
'Cut-Off Time'	the point on a Dealing Day prior to which a transaction must be received by the Administrator and Registrar in order to permit the transaction to receive that Dealing Day's Valuation Point for each Fund as set out in **Appendix 1**;
'Dealing Day'	any day that a Fund accepts subscription or redemption orders, or any such other day or days as may be determined by the ACD and notified to Shareholders in advance, details of which for each Fund are set out in **Appendix 1**;

'Depositary'	State Street Trustees Limited, the depositary of the Company, or such other entity as is appointed to act as Depositary;
'EEA'	the European Economic Area;
'EEA State'	a member state of the EEA;
'EEA UCITS Scheme'	a collective investment scheme established in accordance with the UCITS Directive in an EEA State;
'ESMA'	the European Securities and Markets Authority;
'EU'	the European Union;
'Euro' or '€'	the European euro, the lawful currency of the Economic and Monetary Union of the EU from time to time;
'EUWA'	the European Union (Withdrawal) Act 2018;
'Excess Return'	the difference between the performance of a passively managed Fund and the performance of the index tracked by the Fund over a stated period of time, as further described in the "Excess Return and Tracking Error" section of this Prospectus;
'FCA'	the Financial Conduct Authority or any successor body thereto;
'FCA Handbook'	the FCA Handbook of rules and guidance, as amended from time to time;
'FDI'	financial derivative instruments;
'FSMA'	the Financial Services and Markets Act 2000;
'Fund'	a sub-fund of the Company (being part of the scheme property which is pooled separately and to which specific assets and liabilities of the Company may be allocated), which is invested in accordance with the investment objective applicable to such sub-fund;
'HMRC'	HM Revenue & Customs;
'Income Shares'	Shares (of whatever Class) in the Company as may be in issue from time to time in respect of which income allocated thereto is distributed periodically to the holders thereof pursuant to the COLL Sourcebook net of any tax deducted or accounted for by the Company;
'Instrument of Incorporation'	the instrument of incorporation of the Company as amended from time to time;
'Investment Adviser'	the entity appointed to provide investment management services for each Fund, as further explained in the section with the heading "Investment Advisers" and as specified in Appendix 1 for each Fund;
'Member State'	a member state of the EU;

'Net Asset Value' or **'NAV'**	the value of the scheme property attributable to a Fund (or the Company) less the liabilities of the Fund (or the Company) as calculated in accordance with the Company's Instrument of Incorporation and the FCA Handbook;
'OEIC Regulations'	the Open-Ended Investment Companies Regulations 2001, as amended or re-enacted from time to time;
'OTC derivative'	an FDI dealt over-the-counter (off exchange);
'Register'	the register of Shareholders kept on behalf of the Company;
'Regulations'	the OEIC Regulations and the COLL Sourcebook;
'Relevant Institution'	a credit institution which is authorised in the EEA, the U.K., Switzerland, Canada, Japan, the United States, Jersey, Guernsey, the Isle of Man, Australia or New Zealand;
'Scheme Property'	the property of the Company or a Fund, as the context may require, required under the COLL Sourcebook to be given for safekeeping to the Depositary;
'SDRT'	U.K. Stamp Duty Reserve Tax;
'Share' or **'Shares'**	a share in the capital of the Company (including larger denomination and smaller denomination shares equivalent to one ten-thousandth of a larger denomination share);
'Shareholder'	a holder of registered Shares;
'Sterling', '£' or **'GBP'**	U.K. pounds sterling, the lawful currency of the U.K.;
'Tracking Error'	the volatility of the difference between the return of a passively managed Fund and the return of the index tracked by the Fund, as further described in the "Excess Return and Tracking Error" section of this Prospectus;
'UCITS Directive'	European Parliament and Council Directive No. 2009/65/EC of 13 July 2009 as amended, which applies to EEA UCITS Schemes;
'U.K.'	the United Kingdom;
'U.K. UCITS Rules'	the COLL Sourcebook and the Collective Investment Schemes (Amendment etc) (EU Exit) Regulations 2019 No.325;
'U.K. UCITS Scheme'	a UK UCITS as defined in the glossary of definitions in the FCA Handbook;
'U.S.'	the United States of America, its possessions and territories, including any state of the United States of America and the District of Columbia;

'U.S. Person'	any person falling within the definition of the term U.S. Person under Regulation S promulgated under the U.S. Securities Act of 1933, as amended;
'Valuation Point'	the point on a Dealing Day whether on a periodic basis or for a particular valuation, at which the ACD carries out a valuation of the Scheme Property for the Company or a Fund (as the case may be) for the purpose of determining the price at which Shares of a Class may be issued, cancelled, sold or redeemed, as set out for each Fund in **Appendix 1**;
'Vanguard Group of Companies'	the group of companies of which The Vanguard Group, Inc. is the ultimate parent.

Directory

Company's Head Office and Registered Office
4th Floor, The Walbrook Building
25 Walbrook
London EC4N 8AF
U.K.

Administrator and Registrar
SS&C Financial Services Europe Limited and
SS&C Financial Services International
Limited
St. Nicholas Lane
Basildon
Essex SS15 5FS
U.K.

Company's address for service of notices
P.O. Box 10315
Chelmsford CM99 2AT
U.K.

Auditor
PricewaterhouseCoopers LLP
7 More London Riverside
London SE1 2RT
U.K.

The Authorised Corporate Director
Vanguard Investments UK, Limited
4th Floor, The Walbrook Building
25 Walbrook
London EC4N 8AF
U.K.

Investment Advisers
Vanguard Asset Management Limited
4th Floor, The Walbrook Building
25 Walbrook
London EC4N 8AF
U.K.

Vanguard Global Advisers, LLC
P.O. Box 2600
Valley Forge, PA 19482
U.S.

The Depositary
State Street Trustees Limited
20 Churchill Place
London E14 5HJ
U.K.

Independent Sub-Investment Advisers:

Baillie Gifford Overseas Limited
Calton Square
1 Greenside Row
Edinburgh EH1 3AN
U.K.

Schroder Investment Management North
America Inc.
7 Bryant Park
New York, NY 10018
U.S.

Pzena Investment Management, LLC
320 Park Avenue
8th Floor
New York, NY 10022
U.S.

Wellington Management Company LLP
280 Congress Street
Boston, MA 02210
U.S.

The Company

General

Vanguard Investments Funds ICVC is an investment company with variable capital incorporated with limited liability and registered in England and Wales under number IC000758. The Company was authorised by the FCA (formerly the Financial Services Authority) on 16 June 2009 (FCA Product Reference Number: 500189). The Company is of unlimited duration.

Share capital

The maximum share capital of the Company is £500,000,000,000 and the minimum share capital is £1. Shares have no par value. Shareholders are not liable for the debts of the Company.

Shares in the Company may be marketed in countries other than the U.K., subject to the Regulations, and any regulatory constraints in those countries, if the ACD so decides.

Base currency

The base currency for the Company is Sterling or such other currency or currencies as shall be the lawful currency of the U.K.

Category of scheme

The Company is a U.K. UCITS Scheme.

Further information

Further general information concerning the Company, Shareholder meetings and voting rights, provisions relating to the winding up of the Company or a Fund and other matters is contained in Appendix 5.

Management and Administration

Authorised Corporate Director (ACD)

General

The Authorised Corporate Director (ACD) of the Company is a private limited company incorporated in England and Wales on 8 May 2001 with registered number 4212659. Its registered office address is 4th Floor, The Walbrook Building, 25 Walbrook, London EC4N 8AF.

The ACD's ultimate parent company is The Vanguard Group, Inc., which is incorporated in Pennsylvania, U.S. The ACD is the sole director of the Company.

Share Capital

The ACD has an issued and fully paid-up share capital of £5,200,000.

Regulatory status

The ACD is authorised and regulated by the FCA.

Directors of the ACD

The directors of the ACD are:

- John Bendl
- Mike Craston
- Maureen Erasmus
- Paul Jakubowski
- Robyn Laidlaw
- Kim Petersen
- Daniel Waters

No director of the ACD is engaged in any business activity of significance to the Company's business that is not connected with the business of the ACD, its ultimate parent company or other affiliated companies.

Terms of Appointment

The ACD is responsible for managing and administering the Company's affairs pursuant to the terms of an ACD Agreement between the Company and the ACD dated 16 June 2009 (the "**ACD Agreement**"). Under the terms of the ACD Agreement, the ACD is to provide investment management services, administrative, accounting, consultancy, distribution, advisory, secretarial services and registrar services to the Company. The ACD may delegate all or some of its powers and duties, subject to conditions set out in the Regulations and FSMA, and has delegated certain administrative functions and the function of registrar to the Administrator and Registrar, the function of accounting to State Street Bank and Trust Company, and the function of investment management to the Investment Advisers.

The ACD may provide similar services for other clients.

The ACD Agreement provides that the ACD's appointment is terminable upon six months' written notice by either the ACD or the Company or, subject to the Regulations and FSMA, by the mutual written consent of both parties. The ACD Agreement also terminates automatically if the ACD is removed as a director of the Company by a resolution of shareholders of the Company. No termination of the ACD's appointment, on notice or otherwise, can take effect until the FCA has approved the change of the ACD as the authorised corporate director.

To the extent permitted by the Regulations and FSMA, the Company indemnifies the ACD in respect of liabilities incurred by the ACD by reason of the ACD's performance of its duties in accordance with the ACD Agreement, save where such liabilities arise as a direct consequence of the ACD's or, as the case may be, its directors', officers' or employees' negligence or wilful default in relation to the Company.

Details of the remuneration provisions under the ACD Agreement are summarised under the heading "ACD's Charges and Expenses" in the "Charges and Expenses" section of this Prospectus.

Other schemes managed/operated by the ACD

The ACD also serves as the authorised corporate director of Vanguard Investments Money Market Funds and Vanguard LifeStrategy Funds ICVC and as the authorised fund manager of Vanguard FTSE U.K. All Share Index Unit Trust and Vanguard FTSE 100 Index Unit Trust.

Remuneration Policies and Practices

Vanguard personnel providing services to the ACD are subject to the Vanguard European Remuneration Policy (the "**Remuneration Policy**"). The Remuneration Policy has been designed to ensure that Vanguard's European remuneration policies and practices are consistent with, and promote, sound and effective risk management, and are in line with the business strategy and objective of the Vanguard group of European companies ("**Vanguard Europe**") and the interests of the group and its stakeholders. The Remuneration Policy complies with the requirements of the UK IFPRU Remuneration Code and the U.K. UCITS Rules.

The Remuneration Policy provides for an appropriate balance of fixed salary; benefits, such as pension, life assurance and health insurance; and bonus arrangements, based on the overall business performance of the Vanguard Group, or individual, team, business unit and fund performance, together with certain qualitative criteria, such as compliance with policies and procedures.

Details of the Remuneration Policy are available through https://fund-docs.vanguard.com/ucits-v-remuneration-policy.pdf, which will be updated periodically to reflect changes to the Policy. A paper copy of these details may be obtained, free of charge on request, from the Head of Human Resources, Europe, Vanguard Asset Services, Limited, 4th Floor, The Walbrook Building, 25 Walbrook, London EC4N 8AF.

Investment Adviser

The ACD has appointed: (i) Vanguard Asset Management, Limited ("**VAM**"), based in London, United Kingdom; and (ii) Vanguard Global Advisers, LLC ("**VGA**"), based in Malvern, Pennsylvania, USA, as investment advisers to provide discretionary investment management and advisory services to the Company, in respect of the relevant Funds to which each of VAM and VGA has been appointed. Please refer to the sections headed **Fund Details** in **Appendix 1** for each Fund for further details on the relevant Investment Adviser that has been appointed in respect of such Fund. VAM and VGA are part of the Vanguard Group of Companies.

VGA is a private limited company incorporated in Pennsylvania, U.S. and is part of the Vanguard Group of Companies. VGA is registered with the U.S. Securities and Exchange Commission ("**SEC**") as an investment adviser under the U.S. Investment Advisers Act of 1940. The Investment Adviser currently provides investment management and advisory services to collective investment schemes domiciled in the U.K. and Ireland as well as non-U.S. separate account clients.

VAM is a private limited company incorporated under the laws of England and Wales and is part of the Vanguard Group of Companies. VAM is authorised and regulated by the FCA and currently provides investment management services to collective investment schemes domiciled in the U.K. and Ireland.

The Investment Advisers or the ACD may, from time to time, appoint other companies, including without limitation companies connected with the Vanguard Group of Companies, as sub-investment advisers with responsibility to provide investment management and advisory services with respect to any Fund. Details of sub-investment advisers will be disclosed in the Company's periodic reports. If a sub-investment adviser is not connected with the Vanguard Group of Companies, details will be provided in this Prospectus – see "Independent Sub-Investment Advisers" below.

Terms of Appointment

The ACD has entered into a separate investment advisory agreement with each Investment Adviser. These investment advisory agreements dated 1 January 2025, between the ACD and the Investment Adviser (each an "**Advisory Agreement**" together, the "**Advisory Agreements**"), provide that in the absence of the negligence, wilful default or fraud of or by the Investment Adviser (or any of its directors, officers, employees and agents) the Investment Adviser (and its directors, officers, employees and agents) shall not be liable to the ACD or the Company for any loss, liability, damage, cost or expense resulting from any act or omission of the Investment Adviser in connection with the performance of its services under the Advisory Agreement, except in the case of the Investment adviser's negligence, wilful default or fraud.

The Advisory Agreements provide that each Investment Adviser will have discretionary authority to manage the Scheme Property of each Fund they manage within the investment objectives, investment policy and any restrictions set out in the Instrument of Incorporation, this Prospectus, the OEIC Regulations, the COLL Sourcebook and FSMA. The Advisory Agreements may be terminated by the mutual written agreement of the parties or earlier upon the happening of certain specified events.

The Investment Advisers are entitled to a fee for their services, which is paid out of the annual management charge made by the ACD. The Investment Advisers have authority to delegate certain functions to sub-advisers. The relevant Investment Adviser will pay the fees of any Sub-Investment Adviser appointed by it.

Independent Sub-Investment Advisers

Some or all of the assets of the Company's "actively managed" Funds may be managed by one or more independent sub-investment advisers appointed by an Investment Adviser. Certain Funds may employ a multi-manager structure, involving two or more investment advisers which are each responsible for separately managing an assigned portion of the Fund's assets (subject to ongoing monitoring and supervision by the appointing Investment Adviser). In such cases, the appointing Investment Adviser designates a proportion of the relevant Fund's assets to be separately managed by the sub-investment advisers and may change the allocated proportions to be managed by such sub-investment advisers at any time. Any proportion of such Fund's assets not designated to a sub-investment adviser shall be managed by the Investment Adviser for the relevant Fund.

As at the date of this Prospectus, the sub-investment advisers appointed to the Funds are as listed below.

Baillie Gifford Overseas Limited ("**Baillie Gifford**") manages approximately half of the assets of each of (i) Vanguard Global Emerging Markets Fund; (ii) Vanguard Global Equity Fund and (iii) Vanguard Active U.K. Equity Fund. Baillie Gifford is an investment advisory firm founded in 1983, based in Edinburgh, Scotland. Baillie Gifford Overseas Limited is wholly owned by Baillie Gifford & Co., a Scottish investment firm founded in 1908. One of the largest independently owned investment management firms in the U.K., Baillie Gifford & Co. manages money primarily for institutional clients. As at 31 December 2024, Baillie Gifford & Co. managed approximately £217 billion in assets.

Pzena Investment Management, LLC ("**Pzena**") manages approximately half of the assets of Vanguard Global Emerging Markets Fund. It is a global investment management firm founded in 1995, based in New York, USA. Pzena focuses exclusively on a deep value investment approach. The members of the firm's executive committee and other employees collectively own a majority of the firm. As at 31 December 2024, Pzena managed approximately £53 billion in assets.

Schroder Investment Management North America Inc. ("**Schroders**") manages approximately half of the assets of Vanguard Active U.K. Equity Fund. Schroders is a global investment management firm that manages billions of assets on behalf of institutional and retail investors, financial institutions and high net worth clients from around the world, invested in a broad range of asset classes across equities, fixed income, multi-asset and alternatives. As at 30 December 2024, Schroders managed approximately £778.7 billion in assets.

Wellington Management Company LLP ("**Wellington Management**") manages approximately half of the assets of Vanguard Global Equity Fund, approximately two-thirds of the assets of Vanguard Global Equity Income Fund and all of the assets of the Vanguard Global Capital Stewards Equity Fund, Vanguard ActiveLife Climate Aware 40-50% Equity Fund, the Vanguard ActiveLife Climate Aware 60-70% Equity Fund and the Vanguard ActiveLife Climate Aware 80-90% Equity Fund. Wellington Management is a Delaware limited liability partnership with principal offices in Boston, USA. Wellington Management is a professional investment counselling firm which provides investment services to investment companies, employee benefit plans, endowments, foundations, and other institutions. Wellington Management and its predecessor organisations have provided investment advisory services for over 80 years. Wellington Management is owned by the partners of Wellington Management Group LLP, a Massachusetts limited liability partnership. As at 31 December 2024, Wellington Management and its investment advisory affiliates had investment management authority with respect to approximately £950 billion in client assets.

Baillie Gifford Overseas Limited is authorised and regulated by the FCA. The other named sub-investment advisers are all regulated by the Securities and Exchange Commission in the U.S.

Terms of Appointment

The Investment Adviser (VGA) has entered into agreements with the sub-investment advisers under which each sub-investment adviser has responsibility to manage, on a fully discretionary basis, all or a proportion of the assets of one or more Funds, in accordance with and subject to the objectives and restrictions set out in the particular agreement. Each sub-advisory agreement may be terminated by the Investment Adviser (VGA) immediately on giving notice and by the sub-investment adviser on the expiry of a period of notice, and otherwise upon the happening of certain specified events. Each sub-investment adviser is entitled to receive a fee in respect of its services, to be paid by the appointing Investment Adviser from the fee which it receives from the ACD (see the "Charges and Expenses" section).

The Administrator and Registrar

The ACD has appointed the Administrator and Registrar, with the responsibilities to act as registrar to the Company and to provide services to it including certain administration functions.

The registered office of the Administrator and Registrar is at St. Nicholas Lane, Basildon, Essex SS15 5FS. The Administrator and Registrar is an affiliated company of the Depositary.

The Register of Shareholders will be maintained by the Administrator and Registrar at the address of its registered office as noted above, and may be inspected at that address during normal business hours by any Shareholder or any Shareholder's duly authorised agent.

The Administrator and Registrar will receive a fee paid by the ACD out of its remuneration received from the Funds.

The Depositary

General

The Depositary is a private limited company incorporated in England and Wales on 24 October 1994 (registered no. 2982384). Its registered office is at 20 Churchill Place, London E14 5HJ. The ultimate holding company of the Depositary is State Street Corporation, which is incorporated in Massachusetts, U.S. The principal business activity of the Depositary is to provide trustee and depositary services to collective investment schemes. The Depositary is authorised and regulated by the FCA.

The Depositary provides its services under the terms of a depositary agreement between the Company and the Depositary dated 13 July 2016 as amended pursuant to an addendum agreement dated 23 April 2019 (the "**Depositary Agreement**"). The Depositary Agreement may be terminated by not less than 90 days' notice given by either the Company or the Depositary, provided that the Depositary may not retire voluntarily except on the appointment of a new depositary.

The Depositary will receive a fee paid by the ACD out of its remuneration received from the Funds.

Depositary's functions

Subject to the Regulations and the terms of the Instrument of Incorporation and the Depositary Agreement, the Depositary has been entrusted with the following main functions:

(i) ensuring that the sale, issue, repurchase, redemption and cancellation of Shares are carried out in accordance with applicable law, the Regulations, the Instrument of Incorporation and this Prospectus;

(ii) ensuring that the value of the Shares is calculated in accordance with applicable law, the Regulations, the Instrument of Incorporation and this Prospectus;

(iii) carrying out the instructions of the ACD unless they conflict with applicable law, the Regulations, the Instrument of Incorporation and this Prospectus.

(iv) ensuring that in transactions involving the assets of the Funds any consideration is remitted within the usual time limits;

(v) ensuring that the income of the Funds is applied in accordance with applicable law, the Regulations, the Instrument of Incorporation and this Prospectus;

(vi) monitoring the Funds' cash and cash flows; and

(vii) safekeeping of the Funds' assets, including the safekeeping of financial instruments to be held in custody and ownership verification and record keeping in relation to other assets.

In carrying out its duties the Depositary shall act honestly, fairly, professionally, independently and solely in the interests of the Company and its Shareholders.

Depositary's liability

In the event of a loss of a financial instrument held in custody, determined in accordance with the U.K. UCITS Rules, the Depositary shall return financial instruments of identical type or the corresponding amount to the ACD acting on behalf of the Company without undue delay.

The Depositary shall not be liable if it can prove that the loss of a financial instrument held in custody has arisen as a result of an external event beyond its reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary pursuant to the U.K. UCITS Rules.

In case of a loss of financial instruments held in custody, the Shareholders may invoke the liability of the Depositary directly or indirectly through the ACD provided that this does not lead to a duplication of redress or to unequal treatment of the Shareholders.

The Depositary is indemnified by the Company against all liabilities suffered or incurred by the Depositary by reason of the proper performance of the Depositary's duties under the terms of the Depositary Agreement save where any such liabilities arise as a result of the Depositary's negligence, fraud, bad faith, wilful default or recklessness of the Depositary or the loss of financial instruments held in custody.

The Depositary will be liable to the Company for all other losses suffered by the Company as a result of the negligent or intentional failure to properly fulfil its obligations pursuant to the U.K. UCITS Rules.

The Depositary shall not be liable for consequential or indirect or special damages or losses, arising out of or in connection with the performance or non-performance by the Depositary of its duties and obligations.

Delegation

The Depositary has full power to delegate the whole or any part of its safekeeping functions but its liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping. The Depositary's liability shall not be affected by any delegation of its safekeeping functions under the Depositary Agreement.

Information about the safekeeping functions which have been delegated and the identification of the relevant delegates and sub-delegates are contained in Appendix 6.

Conflicts of interest

The Depositary is part of an international group of companies and businesses ("**State Street**") that, in the ordinary course of their business, act simultaneously for a large number of clients, as well as for their own account, which may result in actual or potential conflicts. Conflicts of interest arise where the Depositary or its affiliates engage in activities under the Depositary Agreement or under separate contractual or other arrangements. Such activities may include:

(i) providing nominee, administration, registrar and transfer agency, research, agent stock lending, investment management, financial advice and/or other advisory services to the Company; and

(ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Company, either as principal and in the interests of itself, or for other clients.

The Depositary or its affiliates:

(i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and, except as required by law, the Depositary is not bound to disclose to the Company the nature or amount of any such profits or compensation, including any fee, charge, commission, revenue share, spread, mark-up, mark-down, interest, rebate, discount, or other benefit received in connection with any such activities or earned by the Depositary or any of its affiliates when acting in any other capacity;

(ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;

(iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Company;

(iv) may provide the same or similar services to other clients including competitors of the Company and the fee arrangements it has in place will vary; and

(v) may be granted creditors' rights by the Company, e.g., indemnification, which it may exercise in its own interest. In exercising such rights the Depositary or its affiliates may have the advantage of an increased knowledge about the affairs of the Company relative to third party creditors thus improving its ability to enforce and may exercise such rights in a way that may conflict with the Company's strategy.

The Company may use an affiliate of the Depositary to execute foreign exchange, spot or swap transactions for the account of the Company. In such instances, the affiliate shall be acting in a principal capacity and not as a broker, agent or fiduciary of the Company. The affiliate will seek to profit from these transactions and is entitled to retain and not disclose any profit to the Company.

The affiliate shall enter into such transactions on the terms and conditions agreed with the Company. The Depositary will not, except as required by law, disclose any profit made by such affiliates.

Where cash belonging to the Company is deposited with an affiliate being a bank, cash is not segregated from its own assets and a conflict arises in relation to the interest (if any) which the affiliate may pay or charge to such account and the fees or other benefits which it may derive from holding such cash as banker.

The ACD may also be a client or counterparty of the Depositary or its affiliates and a conflict may arise where the Depositary refuses to act if the ACD directs or otherwise instructs the Depositary to take certain actions that might be in direct conflict with the interests of the investors in a Fund.

The types and levels of risk that the Depositary is willing to accept may conflict with the Company's preferred investment policy and strategy.

Conflicts that may arise in the Depositary's use of sub-custodians include five broad categories:

(i) our global custodian and sub-custodians seek to make a profit as part of or in addition to their custody services. Examples include profit through the fees and other charges for the services, profit from deposit taking activities, revenue from sweeps and repo arrangements, foreign exchange transactions, contractual settlement, error correction (where consistent with applicable law) and commissions for sale of fractional shares;

(ii) the Depositary will typically only provide depositary services where global custody is delegated to an affiliate of the Depositary. Our global custodian in turn appoints a network of affiliated and non-affiliated sub-custodians. Multiple factors influence the determination of our global custodian to engage a particular sub-custodian or allocate assets to them, including their expertise and capabilities, financial condition, service platforms and commitment to the custody business as well as the negotiated fee structure (which may include terms that result in fee reductions or rebates to the global custodian), significant business relationships and competitive considerations;

(iii) sub-custodians, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests and the fee arrangements they have in place will vary;

(iv) sub-custodians, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depositary as their counterparty, which might create incentive for the Depositary to act in its self-interest, or other clients' interests to the detriment of clients; and

(v) sub-custodians may have creditors' rights against client assets and other rights that they have an interest in enforcing.

The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest to be properly identified, managed and monitored. Additionally, in the context of the Depositary's use of sub-custodians, the Depositary imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-custodians. The Depositary makes available frequent reporting on clients' activity and holdings, with the underlying sub-custodians subject to internal and external control audits. Finally, the Depositary segregates the Company's assets from the Depositary's proprietary assets and follows a Standard of Conduct that requires employees to act ethically, fairly and transparently with clients.

State Street has implemented a global policy laying down the standards required for identifying, assessing, recording and managing all conflicts of interest which may arise in the course of business. Each State Street business unit, including the Depositary, is responsible for establishing and maintaining a Conflicts of Interest Program for the purpose of identifying and managing organisational conflicts of interest that may arise within the business unit in connection with providing services to its clients or in delivering its functional responsibilities.

Up-to-date information on the Depositary, its duties, any conflicts that may arise, the safekeeping functions delegated by the Depositary, the list of delegates and sub-delegates in Appendix 6, and any conflicts of interest that may arise from such a delegation, will be made available to Shareholders on request.

The Auditor

The auditor of the Company is PricewaterhouseCoopers LLP.

General

The Company, the ACD and the Depositary must each comply with the relevant requirements of the COLL Sourcebook in a timely manner unless delay is lawful and also in the interests of the Company.

The ACD and the Depositary may retain the services of the other, or of third parties, to assist them in fulfilling their respective roles. However:

(i) the Depositary may not delegate oversight of the Company to the Company, the ACD or any associate of the Company or of the ACD, or custody or control of the Scheme Property to the Company or the ACD; and

(ii) any delegation of custody of the Scheme Property must be under arrangements which allow the custodian to release documents into the possession of a third party only with the Depositary's consent.

Where functions are performed by third parties, the ACD remains responsible for the management of the Scheme Property and, if the third party is an associate, any other functions which are within the role of the ACD.

Conflicts of interest

The COLL Sourcebook contains various requirements relating to transactions entered into between the Company and the ACD, the Depositary, the Investment Adviser or any associate of them which may involve a conflict of interest. These are designed to protect the interests of the Company. Certain transactions between the Company and the ACD, or an associate of the ACD, may be voidable at the insistence of the Company in certain circumstances.

The ACD, the Depositary, the Investment Adviser, the Administrator and Registrar, and other companies connected with them may, from time to time, act as manager, depositary / custodian, trustee, investment manager / adviser, administrator, registrar or distributor in relation to, or be otherwise involved in, other funds or collective investment schemes which follow similar investment objectives to those of the Funds of the Company. It is therefore possible that any of them may, in the course of their business, have potential conflicts of interest with the Company or a particular Fund. Each will at all times have regard in such event to its obligations under the Instrument of Incorporation, the COLL Sourcebook and the ACD Agreement (and any other relevant agreement by which it is bound in relation to the Company or any Fund), and, in particular, to its obligation to act in the best interests of the Company so far as is practicable, having regard to its obligations to other clients when undertaking any investment or otherwise where potential conflicts of interest may arise, and each will endeavour to ensure that any such conflicts are resolved fairly.

In selecting brokers to make purchases and sales of investments for the Company, the Investment Adviser (or any sub-investment adviser) will choose those brokers who provide best execution to the Company in accordance with applicable law. In determining what constitutes best execution, the Investment Adviser (or sub-investment adviser) will consider, amongst other things, the overall economic result of the Company (including the price of commission), the efficiency of the transaction, the broker's ability to effect the transaction if a large block is involved, the availability of the broker for difficult transactions in the future and the financial strength and stability of the broker. The brokers selected to make purchases and sales of investments for the Company will be required to comply with the Investment Adviser's execution policy. A copy of each Investment Adviser's execution policy is available on request.

The ACD, the Investment Adviser or any sub-investment adviser are prohibited from receiving any in-kind benefits, soft commission arrangements or other inducements from a broker, whether utilised in executing a transaction or otherwise (excluding any minor non-monetary benefits which are permitted in accordance with FCA Handbook and all applicable laws). In managing the assets of the Company, the Investment Adviser (or sub-investment adviser) may from time to time receive or utilise certain investment research and other investment related commentary, statistics, information or material (collectively "Research") provided by third parties. Direct charges for Research will be borne by the Investment Adviser out of its fees and will not, in any circumstances be allocated to the Company and/or the Funds.

At the time of launch, the Funds may have received initial (or "seed") investment from entities within the Vanguard Group of Companies. New Funds launched in the future may also receive similar seed investment. The Funds are permitted to receive such seed investment, and entities within the Vanguard Group of Companies are at liberty to provide it, notwithstanding any relevant restrictions on investment in the Funds by non-UK entities.

The Funds

General

The Company has been established as a U.K. UCITS Scheme and is structured as an umbrella company (under the OEIC Regulations), meaning that different Funds may be established from time to time by the ACD with the agreement of the Depositary and approval of the FCA. This Prospectus will be revised on the introduction of a new Fund or Class of Shares within a Fund.

The Funds are operated separately. Each Fund has a specific portfolio of assets to which the Fund's liabilities are attributable. The assets of each Fund are treated as separate from those of every other Fund and are managed in accordance with the investment objective and policy applicable to that Fund.

The following Funds have been established and are currently available:

- Vanguard FTSE U.K. Equity Income Index Fund (Launched 23 June 2009)
- Vanguard FTSE Developed World ex-U.K. Equity Index Fund (Launched 23 June 2009)
- Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund (Launched 23 June 2009)
- Vanguard U.S. Equity Index Fund (Launched 23 June 2009)
- Vanguard U.K. Inflation-Linked Gilt Index Fund (Launched 3 February 2011)
- Vanguard U.K. Long Duration Gilt Index Fund (Launched 3 February 2011)
- Vanguard Global Emerging Markets Fund (Launched 25 May 2016)
- Vanguard Global Equity Fund (Launched 25 May 2016)
- Vanguard Global Equity Income Fund (Launched 25 May 2016)
- Vanguard FTSE Global All Cap Index Fund (Launched 8 November 2016)
- Vanguard Active U.K. Equity Fund (Launched 15 October 2019)
- Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) (formerly "Vanguard ESG Developed World All Cap Equity Index Fund (UK)") (Launched on 9 June 2020)
- Vanguard ActiveLife Climate Aware 40-50% Equity Fund (formerly "Vanguard SustainableLife 40-50% Equity Fund") (Launched on 8 December 2021)
- Vanguard ActiveLife Climate Aware 60-70% Equity Fund (formerly "Vanguard SustainableLife 60-70% Equity Fund") (Launched 25 May 2016)
- Vanguard ActiveLife Climate Aware 80-90% Equity Fund (formerly "Vanguard SustainableLife 80-90% Equity Fund") (Launched on 8 December 2021)
- Vanguard Global Capital Stewards Equity Fund (formerly "Vanguard Global Sustainable Equity Fund") (Launched 8 December 2021)

Details of each Fund are set out in **Appendix 1**.

Investment objectives and policies of the Funds

The investment objective and policy of each Fund are set out in **Appendix 1**.

The assets of each Fund will be invested with the aim of achieving the investment objective and in accordance with the policy of that Fund. They must also be invested so as to comply with the investment and borrowing powers and restrictions set out in the COLL Sourcebook as they apply to a U.K. UCITS Scheme, the Instrument of Incorporation and this Prospectus.

As stated in **Appendix 1**, each Fund follows either an active or passive investment strategy in seeking to achieve its objective. "Active management" involves the making of specific investment decisions in order to achieve the objectives of the relevant Fund. "Passive management" takes the form of replicating or tracking an index in order to replicate its performance.

Where the investment policy of a Fund permits it to invest in shares, these may include equity related securities including warrants, depositary receipts and rights.

A summary of the investment and borrowing powers and restrictions applicable to the Funds is set out in **Appendix 3**. Details of eligible securities and derivatives markets for the Funds are also set out in **Appendix 3**.

Portfolio Investment Techniques

The Company may employ investment techniques and instruments relating to transferable securities and money market instruments for efficient portfolio management of the assets of any Fund, including hedging against market movements, currency exchange or interest rate risks under the conditions and within the limits stipulated by the COLL Sourcebook, as described in **Appendix 4**. Except as the COLL Sourcebook may permit and this Prospectus specify, a Fund may not be leveraged in excess of 100% of its Net Asset Value.

Profile of a typical investor in the Funds

Each Fund is available to a wide range of investors seeking access to a portfolio managed in accordance with a specific investment objective and policy. Investors should in particular read the Risk Factors and Performance section as set out in this Prospectus and, if they are in any doubt about making an investment, should consult their professional advisor concerning the acquisition, holding or disposal of any Shares.

Past Performance

The figures below refer to the past. Past performance is not a reliable indicator of future results. The price of Shares and the income from them can fall as well as rise and Shareholders may not get back the amount originally invested. Performance shown is from 1 January to 31 December of each year. Performance of each Share Class and each benchmark is shown in GBP.

Fund and Class	Share Class Launch date	2020	2021	2022	2023	2024
		Equity				
Vanguard FTSE U.K. Equity Income Fund						
Vanguard FTSE U.K. Equity Income Index Fund – GBP Income	23 June 2009	-15.70%	18.89%	7.67%	6.17%	12.63%
Vanguard FTSE U.K. Equity Income Index Fund – GBP Accumulation	23 June 2009	-15.64%	18.89%	7.69%	6.19%	12.66%
Vanguard FTSE U.K. Equity Income Index Fund – Institutional Plus Income	2 September 2014	-15.68%	18.92%	7.69%	6.19%	12.66%
Vanguard FTSE U.K. Equity Income Index Fund – Institutional Plus Accumulation	2 September 2014	-15.62%	18.93%	7.71%	6.20%	12.68%
Benchmark *FTSE U.K. Equity Income Index*		*-15.45%*	*19.26%*	*7.93%*	*6.44%*	*12.95%*
Vanguard FTSE Developed World ex-U.K. Equity Index Fund						
Vanguard FTSE Developed World ex-U.K. Equity Index Fund – GBP Income	23 June 2009	14.15%	22.27%	-8.28%	17.20%	20.35%
Vanguard FTSE Developed World ex-U.K. Equity Index Fund – GBP Accumulation	23 June 2009	14.15%	22.27%	-8.28%	17.22%	20.33%
Vanguard FTSE Developed World ex-U.K. Equity Index Fund – Institutional Plus Income	2 September 2014	14.22%	22.34%	-8.22%	17.27%	20.42%
Vanguard FTSE Developed World ex-U.K. Equity Index Fund – Institutional Plus Accumulation	2 September 2014	14.22%	22.34%	-8.22%	17.28%	20.40%
Benchmark *FTSE Developed ex-U.K. Index*		*14.27%*	*22.41%*	*-8.18%*	*17.29%*	*20.47%*
Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund						
Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund – GBP Income	23 June 2009	8.35%	17.06%	-7.88%	15.31%	2.30%
Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund – GBP Accumulation	23 June 2009	8.35%	17.06%	-7.88%	15.31%	2.30%
Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund – Institutional Plus Income	2 September 2014	8.39%	17.11%	-7.84%	15.36%	2.35%

Fund and Class	Share Class Launch date	2020	2021	2022	2023	2024
Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund – Institutional Plus Accumulation	2 September 2014	8.39%	17.10%	-7.84%	15.36%	2.35%
Benchmark *FTSE Developed Europe ex-U.K. Index*		*8.44%*	*17.22%*	*-7.81%*	*15.43%*	*2.46%*
Vanguard U.S. Equity Index Fund						
Vanguard U.S. Equity Index Fund – GBP Income	23 June 2009	16.65%	26.46%	-9.66%	18.61%	25.72%
Vanguard U.S. Equity Index Fund – GBP Accumulation	23 June 2009	16.64%	26.46%	-9.66%	18.61%	25.73%
Vanguard U.S. Equity Index Fund – Institutional Plus Income	2 September 2014	16.69%	26.51%	-9.63%	18.65%	25.77%
Vanguard U.S. Equity Index Fund – Institutional Plus Accumulation	2 September 2014	16.68%	26.51%	-9.63%	18.66%	25.77%
Benchmark *S&P Total Market Index*		*16.76%*	*26.57%*	*-9.61%*	*18.66%*	*25.83%*
Vanguard FTSE Global All Cap Index Fund						
Vanguard FTSE Global All Cap Index Fund – GBP Income	8 November 2016	12.50%	18.93%	-8.01%	14.72%	18.27%
Vanguard FTSE Global All Cap Index Fund – GBP Accumulation	8 November 2016	12.51%	18.95%	-8.01%	14.71%	18.27%
Vanguard FTSE Global All Cap Index Fund Institutional Plus GBP Inc[1]	11 June 2024	n/a	n/a	n/a	n/a	n/a
Vanguard FTSE Global All Cap Index Fund Institutional Plus GBP Acc[1]	11 June 2024	n/a	n/a	n/a	n/a	n/a
Benchmark *FTSE Global All Cap Index*		*12.89%*	*19.38%*	*-7.76%*	*15.00%*	*18.65%*
Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK)[2]						
Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) – GBP Income	9 June 2020	n/a	21.90%	-13.10%	19.17%	20.21%
Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) – GBP Accumulation	9 June 2020	n/a	21.89%	-13.10%	19.17%	20.21%
Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) – Institutional Plus Income	9 June 2020	n/a	21.97%	-13.04%	19.25%	20.30%

[1] Performance is not currently available as the Share Class does not have a complete 12 month (calendar year) period of performance since launch

[2] Until 26 November 2024, this Fund was called "Vanguard ESG Developed World All Cap Equity Index Fund (UK)".

Fund and Class	Share Class Launch date	2020	2021	2022	2023	2024
Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) – Institutional Plus Accumulation	1 September 2021	n/a	n/a	-13.04%	19.25%	20.29%
Benchmark *FTSE Developed All Cap Choice Index*		*n/a*	*22.13%*	*-12.99%*	*19.39%*	*20.43%*
Fixed Income						
Vanguard U.K. Inflation-Linked Gilt Index Fund						
Vanguard U.K. Inflation-Linked Gilt Index Fund – GBP Income	3 February 2011	11.25%	3.80%	-34.57%	0.62%	-8.70%
Vanguard U.K. Inflation-Linked Gilt Index Fund – GBP Accumulation	3 February 2011	11.25%	3.80%	-34.57%	0.62%	-8.70%
Vanguard U.K. Inflation-Linked Gilt Index Fund – Institutional Plus Income	2 September 2014	11.32%	3.86%	-34.53%	0.68%	-8.63%
Vanguard U.K. Inflation-Linked Gilt Index Fund – Institutional Plus Accumulation	2 September 2014	11.28%	3.87%	-34.53%	0.68%	-8.65%
Benchmark *Bloomberg U.K. Government Inflation-Linked Float Adjusted Bond Index*		*11.34%*	*3.91%*	*-34.45%*	*0.65%*	*-8.59%*
Vanguard U.K. Long Duration Gilt Index Fund						
Vanguard U.K. Long Duration Gilt Index Fund – GBP Income	3 February 2011	14.02%	-7.28%	-40.20%	1.50%	-10.63%
Vanguard U.K. Long Duration Gilt Index Fund – GBP Accumulation	3 February 2011	14.01%	-7.28%	-40.21%	1.50%	-10.63%
Vanguard U.K. Long Duration Gilt Index Fund – Institutional Plus Income	2 September 2014	14.06%	-7.24%	-40.19%	1.58%	-10.59%
Vanguard U.K. Long Duration Gilt Index Fund – Institutional Plus Accumulation	2 September 2014	14.06%	-7.24%	-40.19%	1.54%	-10.59%
Benchmark *Bloomberg U.K. Government 15+ Years Float Adjusted Bond Index*		*14.16%*	*-7.26%*	*-40.15%*	*1.54%*	*-10.58%*
Active						
Vanguard Global Equity Fund						
Vanguard Global Equity Fund – A GBP Income	25 May 2016	20.16%	13.99%	-7.59%	10.39%	12.44%
Vanguard Global Equity Fund – A GBP Accumulation	25 May 2016	20.17%	14.00%%	-7.60%	10.40%	12.43%
Benchmark *FTSE All World Index*		*12.71%*	*19.73%*	*-7.54%*	*15.39%*	*19.54%*
Vanguard Global Equity Income Fund						
Vanguard Global Equity Income Fund – A GBP Income	25 May 2016	-0.85%	21.35%	10.19%	5.39%	13.56%
Vanguard Global Equity Income Fund – A GBP Accumulation	25 May 2016	-0.84%	21.32%	10.19%	5.39%	13.57%

Fund and Class	Share Class Launch date	2020	2021	2022	2023	2024
Benchmark *FTSE Developed Index*		*12.82%*	*22.25%*	*-7.62%*	*16.92%*	*20.09%*
Vanguard Global Emerging Markets Fund						
Vanguard Global Emerging Markets Fund – A GBP Income	25 May 2016	13.01%	0.48%	-5.64%	5.96%	4.81%
Vanguard Global Emerging Markets Fund – A GBP Accumulation	25 May 2016	13.09%	0.46%	-5.60%	6.01%	4.80%
Benchmark *FTSE Emerging Index*		*11.69%*	*0.78%*	*-6.74%*	*2.65%*	*14.48%*
Vanguard Global Capital Stewards Equity Fund[3]						
Vanguard Global Capital Stewards Equity Fund – A GBP Accumulation	8 December 2021	n/a	n/a	0.45%	12.80%	15.44%
Vanguard Global Capital Stewards Equity Fund – A GBP Income	8 December 2021	n/a	n/a	0.45%	12.79%	15.44%
Benchmark *FTSE All-World Index*		*n/a*	*n/a*	*-7.54%*	*15.39%*	*19.54%*
Vanguard ActiveLife Climate Aware 40-50% Equity Fund[4]						
Vanguard ActiveLife Climate Aware 40-50% Equity Fund – A GBP Accumulation	8 December 2021	n/a	n/a	-5.43%	7.44%	6.09%
Vanguard ActiveLife Climate Aware 40-50% Equity Fund – A GBP Income	8 December 2021	n/a	n/a	-5.40%	7.43%	6.08%
Benchmark *Composite index[5]*		*n/a*	*n/a*	*-11.21%*	*11.66%*	*10.51%*
Vanguard ActiveLife Climate Aware 60-70% Equity Fund[6]						
Vanguard ActiveLife Climate Aware 60-70% Equity Fund – A GBP Income	25 May 2016	4.05%	13.79%	-1.42%	7.84%	7.53%
Vanguard ActiveLife Climate Aware 60-70% Equity Fund – A GBP Accumulation	25 May 2016	4.03%	13.81%	-1.43%	7.84%	7.53%
Benchmark *Composite index[7]*		*10.82%*	*13.58%*	*-10.02%*	*13.44%*	*13.89%*
Vanguard ActiveLife Climate Aware 80-90% Equity Fund[8]						
Vanguard ActiveLife Climate Aware 80-90% Equity Fund – A GBP Accumulation	8 December 2021	n/a	n/a	2.72%	8.30%	8.99%
Vanguard ActiveLife Climate Aware 80-90% Equity Fund – A GBP Income	8 December 2021	n/a	n/a	2.73%	8.33%	9.00%

[3] Until 26 November 2024, this Fund was called “Vanguard Global Sustainable Equity Fund”

[4] Until 26 November 2024, this Fund was called “Vanguard SustainableLife 40-50% Equity Fund”

[5] 45% FTSE Developed Net Tax Index, 44% Bloomberg Global Aggregate Credit Index, 5.5% Bloomberg Global Aggregate Treasury Index, and 5.5% Bloomberg Global Aggregate Securitized Index (together, the “Composite Index”).

[6] Until 26 November 2024, this Fund was called the “Vanguard SustainableLife 60-70% Equity Fund”

[7] 65% FTSE Developed Net Tax Index, 28% Bloomberg Global Aggregate Credit Index, 3.5% Bloomberg Global Aggregate Treasury Index and 3.5% Bloomberg Global Aggregate Securitized Index (together, the “Composite Index”).

[8] Until 26 November 2024, this Fund was called the “Vanguard SustainableLife 80-90% Equity Fund”

Fund and Class	Share Class Launch date	2020	2021	2022	2023	2024
Benchmark *Composite index*[9]		*n/a*	*n/a*	*-8.52%*	*15.52%*	*17.44%*
Vanguard Active U.K. Equity Fund						
Vanguard Active U.K. Equity Fund – A GBP Income	15 October 2019	-1.64%	7.87%	-14.37%	6.65%	8.47%
Vanguard Active U.K. Equity Fund – A GBP Accumulation	15 October 2019	-1.62%	7.87%	-14.37%	6.67%	8.47%
Benchmark *FTSE All-Share Index*		*-9.82%*	*18.32%*	*0.34%*	*7.92%*	*9.47%*

Source: The Vanguard Group Inc. Performance calculations are based on NAV-to-NAV prices with net income reinvested.

Notes: Past performance is shown for complete 12 month (calendar year) periods only.

[9] 85% FTSE Developed Net Tax Index, 12% Bloomberg Global Aggregate Credit Index, 1.5% Bloomberg Global Aggregate Treasury Index, and 1.5% Bloomberg Global Aggregate Securitized Index (together, the “Composite Index”).

Benchmarks Regulation

Regulation (EU) 2016/1011 (the "**Benchmarks Regulation**") came into full effect on 1 January 2018. In respect of the Funds, the Benchmarks Regulation prohibits the use of indices provided by benchmark administrators, other than in accordance with the Benchmarks Regulation. The Benchmarks Regulation, which is part of U.K. law by virtue of the EUWA, introduced a requirement for all benchmark administrators providing indices in the EU or the U.K. to be authorised or registered on a public register maintained by ESMA for those provided in the EU (or the FCA for those provided in the U.K.). The benchmark administrators providing the indices used by the Funds have obtained authorisation in respect of those indices used by the Funds. The ACD maintains a robust written plan setting out the actions that it would take in the event that a benchmark materially changes or ceases to be provided.

Additional information about index tracking (passively managed) Funds

Index tracking

Where set out in the investment objective of a Fund, the performance of a Fund will normally be measured against an index, which will be tracked as set out in **Appendix 1**.

Index rebalancing and costs

Index providers periodically publish new constituents, reflecting changes in the securities which are included in an index depending on the relevant index rules. This process is called "rebalancing". The rebalancing frequency of the index relevant to each passively managed Fund is set out in **Appendix 1**.

When the constituents of an index change, the Fund being managed against the index will typically (to the extent that it is possible and practicable to do so) seek to realign its exposure so that it more closely reflects that of the index and thereby reduce Excess Return and Tracking Error (explained below).

To realign the exposures in a Fund, securities must be bought and sold. This rebalancing will incur costs which are not reflected in the theoretical calculation of the index return and, consequently, may impact on the Fund's ability to provide returns consistent with those of the relevant index. Such costs can be direct or indirect and include (but are not limited to): transaction costs (such as brokerage fees), custody fees, exchange costs and commissions (including foreign exchange spreads), and stamp duty.

Excess Return and Tracking Error

Excess Return

Excess Return is the difference between the performance of a passively managed Fund and the performance of the index tracked by the Fund over a stated period of time. Excess Return can be either positive (where the Fund outperforms the relevant index) or negative (where the Fund underperforms the relevant index). It is calculated as the Fund's total return less the index's total return. Because a Fund's total return includes fund expenses, Excess Return will usually be negative.

An index's return is theoretical – it is reflective of the increase or decrease in the value of the securities within that index. However, an index provider does not actually buy and sell these securities when calculating an index's performance. This means that an index's performance does not take into account the costs of buying and selling securities, such as brokerage fees, commissions, stamp duty, custody fees, regulatory fees, exchange fees, and spreads. A Fund incurs all of these expenses in tracking an index, and these expenses will have a negative impact on the Fund's performance relative to the index.

In addition, an index's performance will not always take into account the exact same costs related to withholding tax payable on income derived from the component securities (i.e., dividends or coupon payments). This can either have a positive or negative impact on the performance of a Fund against the relevant index. Index performance also does not take into account capital gains tax arising from selling securities, which may have a negative impact on the performance of a Fund against the relevant index.

A Fund may also engage in stock lending. The net income from this lending is paid back into the Fund, and this will have a positive impact on the performance of the Fund relative to the relevant index.

Excess Return can also occur when a Fund's index tracking strategy involves a representative sampling process rather than full replication. For more information on this and other causes of Excess Return, please refer to "Index-related risks" in the Risk Factors section of this Prospectus.

Tracking Error

Tracking Error is the volatility of the difference between the return of a passively managed Fund and the return of the index tracked by the Fund. Tracking Error indicates the consistency of a Fund's Excess Return during the same stated period of time. It is the annualised standard deviation of Excess Return data points for the given time period.

Tracking Error can be expressed in two different ways:

(a) ex-post (or realised / actual) Tracking Error – which is the Tracking Error of a Fund calculated using historical data; or
(b) ex-ante (or anticipated) Tracking Error – which is the expected Tracking Error of a Fund looking forward into the future.

The estimated Tracking Error of each Fund is set out in **Appendix 1**.

Sustainable Finance

Sustainability Risk

Sustainability risks are environmental, social, or governance events or conditions that, if they occur, could cause actual or potential material negative impacts on the value of a Fund's assets. For further details in respect of sustainability risks and the impact of same on the returns of the Funds please see "Sustainability Risk" in the "Risk Factors" section.

Sustainability risk is considered as a component part of the overall investment risk management processes for each category of financial product, and is one of many risks which will be assessed as to whether it is material, depending on the specific investment opportunity.

Unless specifically stated or referenced within a particular Fund's investment objective or policy, sustainability risks are generally not a material part of the investment decision process for the Funds. See table below for further details.

Table summarising how sustainability risks are integrated by investment style:

Investment Strategy	**Asset Type**	**Are sustainability risks integrated in investment decision making?**
Index tracking (passive) funds	Equity	No. These Funds have a primary investment objective to track the performance of their relevant Index and do not consider

Investment Strategy	Asset Type	Are sustainability risks integrated in investment decision making?
		any explicit sustainability characteristics (including sustainability risks) in the selection of portfolio holdings.
	Fixed Income	No. These Funds have a primary investment objective to track the performance of their relevant Index and do not consider any explicit sustainability characteristics (including sustainability risks) in the selection of portfolio holdings.
	ESG Screened	These Funds screen out certain companies that the Index provider determines to be engaged or involved in specific parts of the supply chain for, and/or derive revenue (above a threshold specified by the Index provider) from, certain activities that conflict with investor preferences by limiting exposure to certain industries or business activities, and thereby reducing the products exposure to certain industries/sectors as reflected in the relevant Index methodology. Otherwise, there is no further explicit management of sustainability risks within the investment process.
Actively managed funds	Externally managed funds (other than those mentioned below)	No. The investment management of sustainability risks for any particular Fund that has delegated to the relevant third-party Sub-Investment Adviser and is reviewed by the Oversight & Manager Search team. As these Funds are managed to their specific investment objective, they are not expected to consider any explicit sustainability characteristics (including sustainability risks) in the selection of portfolio holdings.
	Externally managed funds (ActiveLife range and Global Capital Stewards Fund)	Yes. The management of sustainability risk for these mandates are delegated to a third-party Sub-Investment Adviser. The sustainability approach or sustainability characteristics (as applicable) is reviewed by the Oversight & Manager Search team. As these products have specific sustainability approaches or sustainability characteristics (as applicable), they are expected to consider sustainability characteristics (including sustainability risks) in the selection of portfolio holdings as further described in Appendix 1.

A summary of the ACD's Investment Sustainability Risk Policy is available from the ACD upon request.

Shares

Classes of Shares

Different Classes of Shares may be issued in respect of each Fund. Classes may be distinguished by their different characteristics, including, without limitation, criteria for subscription, currency of denomination, allocation of costs, liabilities, gains and losses and charges. The Classes currently available in each Fund and their characteristics are set out in **Appendix 1**.

Institutional Plus Class Shares are available only to discretionary investment managers and other institutional investors to whom the ACD agrees to sell such Shares. They are not available to platforms and other non-discretionary investors who actively market and distribute Shares (or whom the ACD believes intend to do so).

Further Classes of Shares may be established from time to time by the ACD in accordance with the Regulations, subject to the agreement of the Depositary and in accordance with the Instrument of Incorporation. On the introduction of any new Fund or Class, a revised Prospectus will be prepared, setting out the details of each Fund or Class.

Denomination

The currency in which each new Class of Shares will be denominated will be determined at the date of creation and set out in the Prospectus issued in respect of the new Class of Shares.

Shares will be issued in larger and smaller denominations. There are 10,000 smaller denomination Shares to each larger denomination Share. Smaller denomination Shares represent what might, in other terms, be called fractions of a larger Share and have proportionate rights.

Shares have no par value and, within each Class in each Fund subject to their denomination, are entitled to participate equally in the profits arising in respect of, and in the proceeds of, the liquidation of the Company or termination of the relevant Fund. Shares do not carry preferential or pre-emptive rights to acquire further Shares.

Allocation

The net proceeds from subscriptions to a Fund will be invested in the specific portfolio of assets constituting that Fund. The Company will maintain for each current Fund a separate pool of assets, each invested for the exclusive benefit of the relevant Fund. Each Fund will be charged with the liabilities, costs, charges and expenses of the Company attributable to that Fund, and within the Funds charges will be allocated between Classes in accordance with the terms of issue of those Classes.

To the extent that any Scheme Property, any assets to be received as part of the Scheme Property, or any liabilities, costs, charges or expenses of the Company are not attributable to one Fund only, the ACD will allocate such Scheme Property, assets, liabilities, costs, charges or expenses between Funds in a manner which it considers to be fair to all Shareholders of the Company.

Where a Fund has different Classes, each Class may attract different charges and so monies may be deducted from the Scheme Property attributable to such Classes in unequal proportions. In these circumstances, the proportionate interests of the Classes within a Fund will be adjusted accordingly.

Income and Accumulation Shares

The Company may issue Income Shares and Accumulation Shares in respect of each Fund.

Holders of Income Shares are entitled to be paid the distributable income attributed to such Shares on any relevant interim and annual allocation dates.

Holders of Accumulation Shares are not entitled to be paid the income attributed to such Accumulation Shares, but that income is automatically transferred to (and retained as part of) the capital assets of the relevant Fund on the relevant interim and/or annual accounting dates. This is reflected in the price of an Accumulation Share.

Further details relating to distributions and allocations of income in respect of Shares of each Fund are set out under the “Income” section of this Prospectus.

Switching

Shareholders are entitled (subject to certain restrictions) to convert or switch all or part of their Shares in a Class or a Fund for Shares of another Class within the same Fund or for Shares of the same or another Class within a different Fund of the Company. Details of this facility and the restrictions are set out under the “Converting and Switching Shares” section of this Prospectus.

Register of Shareholders

All Classes of Shares are in registered, uncertificated form. Certificates will not be issued to Shareholders.

The Administrator and Registrar has established and maintains the Register for each Fund, which is available for inspection by Shareholders at its office at St. Nicholas Lane, Basildon, Essex SS15 5FS. The Register shall be prima facie evidence as to the persons respectively entitled to the Shares entered in the Register. No notice of any trust – express, implied or constructive – shall be entered on the Register in respect of any Share and the ACD and the Administrator and Registrar shall not be bound by any such notice.

Dealing

General

Requests to deal in Shares may be made by:

(i) "per se professional clients" and "eligible counterparties" directly at the dealing office of the Administrator and Registrar, which is normally open from 9.00 a.m. to 5.00 p.m.[10] (London time) on each Dealing Day in respect of a Fund; or

(ii) all investors, including "retail investors", via a range of third party intermediaries including platform providers and through Vanguard's direct personal investing platform.

When dealing via the Administrator and Registrar, requests to deal in Shares may be made by telephone, by fax or by post on each Dealing Day (at the ACD's discretion) directly to the office of the Administrator and Registrar (telephone: 0800 408 2065 or such other number as published from time to time; fax number 0844 620 0002 or such other number as published from time to time; postal address Vanguard Investments UK, Limited, P.O. Box 10315, Chelmsford, CM99 2AT, or such other address as published from time to time). Telephone calls may be recorded.

All requests to deal in Shares received on a Dealing Day after a Fund's Cut-Off Time will be treated as having been received on the next Dealing Day. The ACD has made arrangements for the purchase and redemption of shares via third party intermediaries, including via on-line platform providers and the Vanguard personal investor platform, and the dealing procedures of the relevant platform provider should be referred to by any investor who wishes to purchase Shares via these routes.

Shares may also be purchased or redeemed on-line or through other communication media.

The ACD may also, at its discretion, introduce further methods of dealing in Shares in the future.

For the purposes of this section, "retail investors", "per se professional client" and "eligible counterparty" are as defined in the FCA Handbook.

Money Laundering Prevention

As a result of legislation in force in the U.K. to prevent money laundering, the ACD is responsible for compliance with anti money laundering regulations. In order to implement these regulations, investors may be asked to provide proof of identity when buying, converting, switching or redeeming Shares. In certain circumstances it may be necessary for the ACD to re-verify an investor's identity and request additional information for this purpose. The ACD may also choose to obtain information on any applicant for Shares and investor from a credit reference agency. Until satisfactory proof of identity is provided, the ACD reserves the right to refuse to issue Shares, pay the proceeds of a redemption of Shares or pay income on Shares to the investor. The ACD will not be liable for any Share price movements or loss of opportunity during any delays while money laundering checks are carried out. If additional administration is required to complete the registration of an investment as a result of anti-money laundering or fraud protection checks and procedures, the ACD reserves the right to make an administration charge in connection therewith.

Minimum holdings

The minimum holdings for each Fund are set out in **Appendix 1**. The ACD has the right to waive these limits. In the event that the minimum holdings are not maintained, the ACD reserves the further right to redeem the relevant shareholding in any Class of Shares.

[10] The Administrator and Registrar may vary these times at its discretion.

Further, if following a redemption, switch or transfer, a holding in any Class of Shares should fall below the minimum holding for that Class, as set out in **Appendix 1**, the ACD has the discretion to effect a redemption of that Shareholder's entire holding in that Class of Shares. Failure of the ACD to do so immediately after such redemption, switch or transfer does not remove this right.

Buying Shares

Procedure

"Per se professional clients" and "eligible counterparties" may purchase Shares directly from the Administrator and Registrar. Application forms may be obtained from the Administrator and Registrar. Other categories of investor may engage with the Administrator and Registrar through a professional adviser or other intermediary. Applicable tax regulations require the ACD to collect information about each investor's tax residency. Application forms for Shares request this information. In certain circumstances (including if the ACD does not receive a valid self-certification from an investor), the ACD may be obliged to share information on the investor's account with HMRC. If an investor has any questions about their tax residency, they should contact a tax adviser. Should any information provided change in the future, investors are requested to advise the ACD promptly of the changes.

Valid applications to purchase Shares of a Fund will be processed at a purchase price calculated with reference to the next Valuation Point for that Fund following receipt of the application, except in the case where dealing in a Fund has been suspended as set out below. For the avoidance of doubt, all valid applications received before a Fund's Cut-Off Time on a Dealing Day will receive that Dealing Day's Valuation Point. All valid applications received after a Fund's Cut-Off Time on a Dealing Day will receive the next Dealing Day's Valuation Point.

The ACD reserves the right to limit the issue of Shares in any Fund or Class where the liquidity within the Fund or Class is deemed to be detrimental to its performance by closing the Fund or Class to new subscriptions, conversions or switches into it, either from existing Shareholders or new applicants or both. An example of the circumstances in which this may occur could be where the ACD determines that it would be prudent to limit the capacity of the size of a Fund the investment objective of which is aimed at a particular market or sector.

Settlement

Settlement of purchase monies is due within two Business Days following the relevant Valuation Point. An order for the purchase of Shares will only be deemed to have been accepted by the Administrator and Registrar once the Administrator and Registrar is in receipt of cleared funds for the application. If full settlement of purchase monies is not made within a reasonable period, then the ACD reserves the right to make an administration charge and/or cancel any Shares sold/issued in respect of the application and recover any shortfall. Purchase monies must be received by telegraphic transfer or BACS transfer. The applicant shall bear all bank costs or other costs associated which are levied on such transfer. The ACD reserves the right to accept other forms of payment in its discretion; however, please note that no cheques will be accepted, subject to the ultimate discretion of the ACD.

Acceptance of applications

A purchase of Shares in writing or by telephone or any other communication media made available is a legally binding contract.

Once made, applications to purchase are, except in the case where cancellation rights are applied, irrevocable on the part of the applicant for Shares, subject to the complete discretion of the ACD to permit an applicant to withdraw or amend any application after it has been submitted but before the Fund's Valuation Point has been reached.

The ACD has the right to reject, on reasonable grounds but without providing an explanation and at any time before the Valuation Point, any application for Shares in whole or in part. In this event, the ACD will return any money sent, or the balance of such monies without interest. Such rejection is at the risk of the applicant as is the return of any monies. The ACD may scale back applications by investors to purchase Shares on the relevant Dealing Day on such basis as it may deem appropriate and may reject any application for Shares in whole or in part to give effect to such a scale back. In such event the ACD will return any money sent, or the balance of such monies, at the risk of the applicant and without interest.

The ACD, at its discretion, also has the right to cancel a purchase deal if settlement is overdue. Any loss arising on such cancellation shall be the liability of the applicant and the ACD reserves the right to pursue the applicant for any shortfall owing to a Fund or the ACD together with interest (equivalent to the ACD's cost of borrowing) thereon. Alternatively, at the ACD's discretion, interest may be charged (at the ACD's cost of borrowing) if settlement is overdue.

Any subscription monies remaining after a whole number of Shares has been issued will not be returned to the applicant and will instead be used to purchase fractions of whole Shares (known as smaller denomination Shares). A smaller denomination Share is equivalent to one -ten thousandth of a whole Share (or to four decimal places).

Documents the Applicant will receive

A confirmation giving details of the price and number of Shares purchased will be issued, normally no later than the end of the Business Day following the Valuation Point for the relevant Fund (making reference to the determination of the price and, where appropriate, a notice of the applicant's right to cancel).

Registration of Shares can only be completed by the Administrator and Registrar upon receipt of any required registration details and receipt of all purchase monies. These details may be supplied separately in writing to the Administrator and Registrar or by returning to the Administrator and Registrar the properly completed application form and copy of the confirmation.

Share certificates will not be issued in respect of Shares. Ownership of Shares will be evidenced by an entry on the Register. Tax vouchers in respect of periodic distributions (or accumulations) of income on Shares will show the number of Shares held by the recipient.

Minimum subscriptions

The minimum initial subscription levels for each Class of Shares in a Fund are set out in **Appendix 1**. The ACD may, at its sole discretion, accept subscriptions lower than the minimum amount(s).

Cancellations

Applicants who have received advice from their financial advisers may have the right to cancel their application to buy Shares at any time during the 14 calendar days after the date on which they receive a cancellation notice from the Administrator and Registrar. If an applicant decides to cancel the contract and the value of the investment has fallen from the time of the Valuation Point to the time when after the Administrator and Registrar receives the completed cancellation notice, the applicant may not receive a full refund as an amount equal to any fall in value will be deducted from the sum originally invested. No interest will be paid on refunds due to cancellations.

Market timing and frequent trading

Each of the Funds of the Company is designed and managed to support longer-term investment and active trading in Fund Shares is discouraged. Short-term or frequent trading into and out of a Fund as well as market timing may harm performance by disrupting fund management and by increasing expenses. The ACD may, at its discretion, refuse to accept applications for purchase of, or requests for switching of, Shares, especially where transactions are deemed disruptive, particularly from possible frequent traders or market timers.

In general, market timing refers to the investment behaviour of a person or group of persons buying, selling or switching investments in anticipation of making a profit on the basis of predetermined market indicators. Market timing may also be characterised by transactions that seem to follow a timing pattern. Frequent trading is characterised by transactions in and out of funds, occurring on a frequent basis.

Market timing can include elements of frequent trading and vice-versa. Both behaviours will tend to include frequent purchases and redemptions of Shares with a view to profiting from anticipated changes in market prices between Valuation Points or arbitraging on the basis of market price changes subsequent to those that are used in a Fund's valuation.

Such market timing and frequent trading activities are disruptive to fund management, may lead to additional dealing charges – which cause losses/dilution to a Fund – and may be detrimental to performance and to the interests of long-term Shareholders. Accordingly, the ACD may in its absolute discretion and without providing any reason, reject any application for subscription or switching of Shares from applicants that it considers to be associated with market timing activities.

The ACD may also combine Shares which are under common ownership or control for the purposes of determining whether the activities of Shareholders can be deemed to involve market timing or frequent trading.

Issue of Shares in exchange for in specie assets

The ACD may, at its discretion, arrange for the Company to issue Shares in respect of a Fund in exchange for in specie assets (that is, for securities rather than for cash). Such in specie assets must be in a form in which the relevant Fund may invest in accordance with its particular investment objectives and policies as set out in **Appendix 1**.

No Shares may be issued in exchange for such in specie assets unless the Depositary has taken reasonable care to ensure that the Company's acquiring of the assets concerned would not be likely to result in any material prejudice to the interests of Shareholders.

The ACD will ensure that the beneficial interest in the assets is transferred to the Company with effect from the issue of the Shares. The ACD reserves the right to pass all costs associated with the transfer of such assets, including without limitation any applicable SDRT, directly onto the Shareholder contributing such assets in exchange for Shares.

Redeeming Shares

Procedure

Every Shareholder is entitled on any Dealing Day to redeem its Shares.

Valid instructions to the Administrator and Registrar to redeem Shares in a Fund will be processed at a redemption price calculated with reference to the next Valuation Point for that Fund following receipt of the instruction, except in the case where dealing in a Fund has been suspended as set out under the "Suspension of Dealings" section of this Prospectus. For the avoidance of doubt, all redemption instructions received before a Fund's Cut-Off Time on a Dealing Day will receive that Dealing Day's Valuation Point. All redemption instructions received after a Fund's Cut-Off Time on a Dealing Day will receive the next Dealing Day's Valuation Point. Currently, transfers of title to Shares may not be effected on the authority of an electronic communication.

A redemption instruction to the Administrator and Registrar made in writing or by telephone or any other communication media made available is a legally binding contract and is irrevocable on the part of the redeeming Shareholder, subject to the complete discretion of the ACD to permit an applicant to withdraw or amend any application after it has been submitted but before the Fund's Valuation Point has been reached. However, an instruction to the Administrator and Registrar to redeem Shares, although irrevocable, may not be settled by either the Company or the Administrator and Registrar if the redemption represents Shares where the money due on the earlier purchase of those Shares has not yet been received or if insufficient documentation or anti-money laundering information has been received by the ACD.

The amount to be paid as the proceeds of a redemption of Shares shall not be less than the price of Shares of the relevant Class less:

(i) any redemption charge permitted; and

(ii) any SDRT permitted to be retained by the ACD (and not otherwise already paid by the Shareholder).

The ACD reserves the right to make a charge for redemptions and details of any such applicable charge against the relevant Fund and Class are set out in **Appendix 1**.

Documents a redeeming Shareholder will receive

A confirmation giving details of the price and number of Shares redeemed will be sent to the redeeming Shareholder (or the first named Shareholder, in the case of joint Shareholders) together with (if sufficient written instructions have not already been given) a form of renunciation for completion and execution by the Shareholder (or, in the case of a joint holding, by all the joint Shareholders) no later than the end of the Business Day following the later of the request to redeem Shares or the Valuation Point of the relevant Fund by reference to which the price of the redeemed Shares is determined.

Settlement

Payment of redemption proceeds will normally be made by telegraphic transfer or BACS transfer in accordance with any instruction received (the ACD may recover any bank charge levied on such transfers), or, at the ACD's discretion, by cheque to the first named Shareholder (at their risk).

Such payment will be made within two Business Days of the later of:

(i) receipt by the Administrator and Registrar of the form of renunciation (or other sufficient written instructions) duly signed and completed by all the relevant Shareholders together with any other documentation and appropriate evidence of title, and any required anti-money laundering related documentation; or

(ii) the Valuation Point of the relevant Fund at which the price for the redemption was determined.

Deferred redemption

In times of high redemption, to protect the interests of continuing Shareholders, the ACD may defer all redemptions at any Valuation Point to the next Valuation Point where requested redemptions exceed 10% of the Fund’s value. This will allow the ACD to match the sale of the Scheme Property to the level of redemptions. At the next such Valuation Point all deals relating to the earlier Valuation Point will be completed before those relating to a later Valuation Point are considered.

In specie cancellation

In the event that a Shareholder requests the redemption or cancellation of Shares that the ACD considers substantial in relation to the total size of the Fund concerned, the ACD may, at its discretion, elect to satisfy the redemption request by the transfer of an appropriate amount of the Scheme Property in specie to the Shareholder instead of paying the price of the Shares in cash.

A deal involving Shares representing 3% or more in value of a Fund will normally be considered substantial.

Before the proceeds of cancellation of the Shares become payable, the ACD will give written notice to the Shareholder that the Scheme Property will be transferred to that Shareholder.

The ACD, in consultation with the Depositary, will select the Scheme Property to be transferred. They must ensure that the selection is made with a view to achieving no greater advantage or disadvantage to the redeeming Shareholder than to continuing Shareholders. Where a redemption request is received that is not substantial in relation to the total size of the Fund concerned, the ACD may, in its discretion after consultation with the Depositary, agree to an in specie cancellation with the relevant Shareholder in accordance with the provisions set out above.

In the event of an in-specie cancellation, the ACD reserves the right to pass all costs associated with the transfer of such assets, including without limitation any applicable SDRT, directly onto the redeeming Shareholder.

Converting and Switching Shares

Subject to any instructions on eligibility of investors in a particular Share Class, Shareholders are entitled to convert or switch some or all of their Shares of one Class ("**Original Shares**") for Shares of another Class within the same Fund or for Shares of any Class within a different Fund ("**New Shares**"). A switch involves the redemption of the Original Shares and the purchase of the New Shares.

The number of New Shares issued will be determined by reference to the respective purchase prices of New Shares and redemption prices of Original Shares established with reference to the Valuation Point applicable when the Original Shares are redeemed and the New Shares are issued.

Subject to any restrictions on eligibility of investors in a particular Share Class:

– instructions for converting Shares may be given by telephoning the Administrator and Registrar's Dealing Department on telephone number 0800 408 2065 or in writing to the Administrator and Registrar on fax number 0844 620 0002;

– instructions for switching Shares may be given by "per se professional clients" and "eligible counterparties" by telephoning the Administrator and Registrar's Dealing Department on telephone number 0800 408 2065 or in writing to the Administrator and Registrar on fax number 0844 620 0002;

– other categories of investor (including "retail investors") may effect a switch (or conversion) of Shares by engaging with the Administrator and Registrar through a professional adviser or other intermediary.

If a conversion or switch would result in the Shareholder holding a number of Original Shares or New Shares of a value which is less than the minimum holding in the Fund concerned, the ACD may, if it thinks fit, exchange the whole of the Shareholder's holding of Original Shares to New Shares or refuse to effect any conversion or switch of the Original Shares. No conversion or switch will be made during any period when the right of Shareholders to require the redemption of their Shares is suspended. The general provisions on procedures relating to redemption will apply equally to a conversion or switch. Written instructions must be received by the Administrator and Registrar before the Cut-Off Time of the relevant Fund on a Dealing Day in the Fund or Funds concerned to be dealt with at the prices at the Valuation Point of the relevant Fund on that Dealing Day. Conversion and switching requests received after a Cut-Off Time will be held over until the next Dealing Day in the relevant Fund or Funds.

The Administrator and Registrar may adjust the number of New Shares to be issued to reflect the application of any charge on switching together with any other charges or levies in respect of the application for the New Shares or redemption of the Original Shares as may be permitted pursuant to the COLL Sourcebook.

Shareholders subject to U.K. tax should note that a conversion or switch of Shares within the same Fund will generally not be treated as a disposal for the purposes of capital gains taxation. Switches of Shares between different Funds may be treated as a disposal for purposes of capital gains taxation and so may give rise to a capital gains tax liability.

Cancellation rights will not be given on conversions or switches. Shareholders who convert or switch Shares of one Class for Shares of any other Class, or switch Shares of one Fund for shares of any other Fund, will not be given a right by law to withdraw from or cancel the transaction.

For the purposes of this section, "retail investors", "per se professional client" and "eligible counterparty" are as defined in the FCA Handbook.

Suspension of Dealing in Shares

The ACD may, with the prior agreement of the Depositary or must, if the Depositary so requires, at any time temporarily suspend the purchase, cancellation, redemption, conversion and switching of Shares in any or all of the Funds if the ACD or the Depositary, as appropriate, is of the opinion that due to exceptional circumstances there is a good and sufficient reason to do so having regard to the interests of all Shareholders in the Company and/or the relevant Fund.

If the redemption of Shares is suspended, the obligations contained in Chapter 6 of the COLL Sourcebook relating to the creation, cancellation, issue and redemption of Shares will cease to apply and the obligations relating to the valuation of Shares will be complied with only to the extent practicable in light of the suspension.

Appropriate notification of suspension will be given to Shareholders as soon as practicable after suspension commences. This notification will draw Shareholders' particular attention to the exceptional circumstance which resulted in the suspension and tell them how to obtain further information on the suspension, which will be published on the ACD's website or by other general means and will include sufficient details to keep Shareholders appropriately informed about the suspension including, if known, its likely duration. In accordance with the COLL Sourcebook, the FCA will also be immediately informed of the suspension and the reasons for it.

The ACD and the Depositary will review the suspension at least every 28 days and will inform the FCA of the results. The suspension will continue only for as long as it is justified having regard to the interests of the Shareholders and will cease as soon as practicable after the exceptional circumstances which resulted in the suspension have ceased.

Recalculation of Share prices will commence at the next relevant Valuation Point immediately after the period of suspension ends.

Governing Law

All deals in Shares are governed by English law.

ACD Dealing as Principal

The ACD will, on the completion of the valuation of each Fund, advise the Depositary of the price of Shares of that Fund. This is the price which the ACD has to pay to the Depositary for the issue of Shares and which the ACD will receive from the Depositary upon the cancellation of Shares. The ACD deals as principal in these Shares and may hold Shares for its own account. However, Shares will generally only be held by the ACD to facilitate Share orders. Any profits or losses arising from such transactions shall accrue to the ACD and not to the Fund. The ACD is under no obligation to account to the Depositary or to Shareholders for any profit it makes on the issue or re-issue of Shares or cancellation of Shares which it has redeemed.

Restrictions and Compulsory Transfer and Redemption of Shares

General

The ACD may from time to time impose such restrictions as it may think necessary to ensure that no Shares are acquired or held by any person in breach of the law or governmental regulation (or any interpretation of a law or regulation by a competent authority) of any country or territory or otherwise contrary to any provision of this Prospectus. In connection with this, the ACD may reject in its discretion any application for the purchase, redemption, conversion or switching of Shares.

In particular, the ACD may impose such restrictions in respect of "Non-Qualified Persons", defined as any person to whom a transfer of Shares (legally or beneficially) or by whom a holding or acquisition of Shares (legally or beneficially) would or, in the opinion of the ACD, might:

(i) be in or constitute a breach of any law (or regulation by a competent authority) of any country or territory, or of any provision of this Prospectus, by virtue of which the person in question is not qualified or permitted to hold such Shares; or

(ii) require the Company to be registered under any law or regulation whether as an investment fund or otherwise, or cause the Company to be required to apply for registration, or comply with any registration requirements in respect of any of its Shares, whether in the U.S. or any other jurisdiction; or

(iii) cause the Company or its Shareholders some legal, regulatory, taxation, pecuniary or material administrative disadvantage or other adverse consequence which the Company or its Shareholders might not otherwise have incurred or suffered, which shall include, without limitation, subjecting the Company to any reporting or withholding obligation or liability under Sections 1471-1474 of the U.S. Internal Revenue Code of 1986, as amended (the "Code"); or

(iv) result in the Company having more than 80 beneficial owners of its Shares (whether directly or by attribution pursuant to Section 3(c)(1)(A) of the U.S. Investment Company Act of 1940) who are U.S. Persons; or

subject to (i) through (iv) above, result in any direct or indirect beneficial interest in any Shares held by any U.S. Taxpayer (as defined below) other than (1) a "specified United States person" (as defined in Section 1473(3) of the Code) and (2) such other persons whose direct or indirect ownership of Shares shall not, as determined by the ACD, subject the Company to any reporting or withholding obligation or liability under Sections 1471-1474 of the Code.

For these purposes, a "U.S. Taxpayer" includes: (i) a U.S. citizen or resident alien of the United States (as defined for U.S. federal income tax purposes); (ii) any entity treated as a partnership or corporation for U.S. federal tax purposes that is created or organised in, or under the laws of, the United States or any state thereof (including the District of Columbia); (iii) any other partnership that is treated as a U.S. Taxpayer under U.S. Treasury Department regulations; (iv) any estate, the income of which is subject to U.S. income taxation regardless of source; and (v) any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers.

If it comes to the notice of the ACD that any Shares are or may be owned or held legally or beneficially by a Non-Qualified Person ("affected Shares") the ACD may give notice to the registered holder(s) of the affected Shares requiring either the transfer of such Shares to a person who is not a Non-Qualified Person or a request in writing for the redemption or cancellation of such Shares in accordance with the COLL Sourcebook. If any person upon whom such a notice is served does not, within 30 days after the date of such notice, transfer the affected Shares to a person who is not a Non-Qualified Person or establish to the satisfaction of the ACD (whose judgement is final and binding) that he and the beneficial owner are not Non-Qualified Persons, he shall be deemed upon the expiration of that 30-day period to have given a request in writing for the redemption or cancellation (at the discretion of the ACD) of all the affected Shares pursuant to the COLL Sourcebook.

A person who becomes aware that he has acquired or holds affected Shares as described above shall forthwith, unless he has already received a notice from the ACD as above, either transfer the affected Shares to a person qualified to own them or give a request in writing for the redemption or cancellation of such Shares pursuant to the COLL Sourcebook.

The Company may refuse to register a transfer of Shares.

U.S. Persons

The Shares have not been and will not be registered under the U.S. Securities Act of 1933 as amended ("Securities Act") and, subject to certain exceptions, may not be offered or sold in the U.S. or offered or sold to U.S. Persons. The Company has not been and will not be registered under the U.S. Investment Company Act of 1940, as amended. The ACD has not been and will not be registered under the U.S. Investment Advisers Act of 1940.

Valuation

Valuation

The price of a Share is calculated by reference to the Net Asset Value of the Fund to which it relates and the basis of calculation of Net Asset Value is summarised in Appendix 2.

The ACD will carry out a valuation of each Fund with the frequency and at the Valuation Points detailed in **Appendix 1**.

The ACD reserves the right, subject to prior approval from the Depositary, to:

(i) value the property of all or any of the Funds at an alternative time on any day; and

(ii) suspend valuation of the property of a Fund at any time when the buying, selling, converting and switching of Shares is suspended.

Fair value pricing policy

Where the ACD, or its appointed investment adviser, considers that no reliable price exists for a share in a collective investment scheme or for a security or investment at a Valuation Point, the ACD, or its appointed investment adviser, may value an investment at a price that in its opinion reflects a fair and reasonable price for that investment (the fair value price). The circumstances which may prompt the ACD, or its appointed investment adviser, to apply fair value prices may include, but are not limited to, no recent transaction in the relevant security, the occurrence of a market closure or suspension including by way of a national or declared holiday, the suspension of dealings in securities (including in a collective investment scheme) or the occurrence of a significant event since the most recent market closure or the valuation point at which one or more of the underlying funds or investments is valued.

The ACD, or its appointed investment adviser, may adjust values for individual securities, sectors, geographic areas or units in collective investment schemes. Adjustment for sectors, geographic areas or units in collective investment schemes will be based upon the percentage movement in a benchmark index or composite index or part thereof, one or more exchange traded funds or such other publicly available comparator which the ACD, or its appointed investment adviser, believes is correlated to part or the whole of a relevant Fund's value. The ACD, or its appointed investment adviser, will determine the threshold at which any adjustment will be applied.

Special valuations

The ACD, or its appointed investment adviser, may carry out an additional valuation of the property of a Fund at any time during a Dealing Day if it considers it desirable to do so and may carry out special valuations in certain circumstances (which the ACD, or its appointed investment adviser, may treat as not creating a Valuation Point for dealing purposes), including, without limitation, the following:

(i) where necessary for the purposes of effecting a scheme of reconstruction or amalgamation; or

(ii) on the day on which the annual or half-yearly accounting period ends.

Share Prices

Pricing basis

The Company deals on a forward-pricing basis at Share prices which are calculated with reference to the next Valuation Point determined for the Scheme Property after the purchase, redemption, conversion or switch of Shares is agreed.

Shares are priced on a single, mid-market basis in accordance with the FCA Handbook.

Calculation of Share prices

There will only be a single price for any Share as determined from time to time by reference to a particular Valuation Point.

The price of Shares of a relevant Class is calculated by reference to the Net Asset Value of the Fund to which it relates, as adjusted by any dilution adjustment (further details of which are set out in the "Dilution Adjustment" section below). In addition, as set out in Appendix 1, for purchases, there may be a preliminary charge and for redemptions, there may be a redemption charge.

Publication of prices

Daily prices for each Fund of the Company will be published on https://www.vanguard.co.uk/uk-fund-directory and may be published on www.ft.com, and/or on such other websites and publications as may be determined by the ACD from time to time.

Shareholders can obtain up-to-date Fund prices free of charge by telephoning the Administrator and Registrar at 0800 408 2065 or by fax on 0844 620 0002.

As the ACD deals on a forward-pricing basis, the price that appears in these sources will not necessarily be the same as the one at which investors can currently deal. The ACD may also, at its sole discretion, decide to publish certain Share prices on other third-party websites or publications but the ACD does not accept responsibility for the accuracy of the prices published in, or for the non-publication of prices by, these sources for reasons beyond the control of the ACD.

Dilution Adjustment

The actual cost of purchasing Shares in a Fund may be higher or lower than the mid-market value used in calculating the Share price. These costs may include dealing costs such as brokerage charges, commissions and transfer taxes (including SDRT (as applicable)), and the effects of dealing at prices other than the mid-market price. When investors purchase and redeem Shares, such charges and the dealing spread can have a materially disadvantageous effect on a Shareholder's interest in a Fund, known as "dilution". In order to mitigate the effect of dilution, the ACD may determine, at its discretion, to make a dilution adjustment in calculating the dealing price of Shares of a Fund (a policy called "swing pricing").

When applying a dilution adjustment, the ACD will calculate the Net Asset Value for the relevant Fund, and then adjust or "swing" the Net Asset Value with reference to the rate of the applicable dilution adjustment. These swings are intended to protect non-dealing Shareholders in the Funds from the impact of transaction charges and dealing spreads (as described above) triggered by dealing investors. The ACD will not benefit from the operation of its swing pricing policy and a dilution adjustment will only be applied for the purpose of reducing dilution in the interests of all Shareholders and potential Shareholders in the Fund.

As dilution is directly related to the inflows and outflows of monies in a Fund, it is not possible to predict accurately whether dilution will occur at any point in time, or to predict accurately how frequently the ACD will make a dilution adjustment to the dealing price of Shares. However, the ACD's current policy is that it will normally make a dilution adjustment when there are net purchases or net redemptions of Shares on a Dealing Day that exceed a pre-determined level (the "**Swing Threshold**") and if, in its opinion, Shareholders may otherwise be materially adversely affected. In respect of the Vanguard FTSE U.K. Equity Income Index Fund, the Vanguard Active U.K. Equity Fund, the Vanguard Global Equity Fund and the Vanguard Global Equity Income Fund, the ACD currently anticipates that a dilution adjustment will regularly be applied when the Funds experience cash flows. For the Vanguard FTSE Global All Cap Index Fund, the ACD currently anticipates that a dilution adjustment will be applied periodically when the Fund experiences cash flows. In respect of the Vanguard U.K. Inflation-Linked Gilt Index Fund, the Vanguard U.K. Long Duration Gilt Index Fund, the Vanguard Global Emerging Markets Fund, the Vanguard FTSE Developed World ex-U.K. Equity Index Fund, the Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund, the Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK), the Vanguard Global Capital Stewards Equity Fund, the Vanguard ActiveLife Climate Aware 40-50% Equity Fund, the Vanguard ActiveLife Climate Aware 60-70% Equity Fund and the Vanguard ActiveLife Climate Aware 80-90% Equity Fund, the ACD currently anticipates that a dilution adjustment will only be applied when the Funds experience significant cash flows. For the Vanguard U.S. Equity Index Fund, the ACD currently anticipates that a dilution adjustment will only be applied when the Fund experiences very large cash flows or in the event of exceptional market activity.

The direction in which the Net Asset Value is swung will depend on whether there are net purchases or net redemptions in the Fund on the relevant Dealing Day. For example, if the relevant Fund is experiencing net inflows (i.e., the aggregate number of Shares purchased exceeds the number of Shares redeemed), and the Swing Threshold has been reached, its Net Asset Value may be swung upwards as the dilution adjustment would increase the price of Shares above their Net Asset Value per Share. Conversely, where the aggregate number of Shares redeemed in the Fund exceeds the number of Shares purchased (net redemptions), and the Swing Threshold has been reached, the Net Asset Value may be swung downwards as the dilution adjustment would reduce the price of Shares to below their Net Asset Value per Share. Where the Swing Threshold has been reached on a Dealing Day, the adjusted dealing price of Shares of the Fund will be applicable to all transactions on that Dealing Day. In specie transfers will not be taken into account when determining any dilution adjustment, and any incoming portfolio will be valued on the same basis as the relevant Fund is priced.

As the estimated costs of buying and selling the underlying investments of a Fund can vary with market conditions, the amount of the dilution adjustment can vary over time and may vary from Fund to Fund. Based on historical data, the ACD does not anticipate that the dilution adjustment will exceed 2% of the Net Asset Value of any Fund; however, the ACD reserves the right to adjust this figure at any time in the event of exceptional market conditions or in any case where it is of the opinion that the interests of Shareholders require the imposition of a higher level of adjustment.

Even where the Swing Threshold has been met, the ACD may in its discretion decide not to make a dilution adjustment if it considers that the benefits to Shareholders of not making one outweigh the detriments. Where a Fund is experiencing net purchases or net redemptions of Shares and a dilution adjustment is not applied, there may be an adverse impact on the Shareholders of the Fund.

The Swing Threshold and the ACD’s policy to swing the dealing price will be reviewed regularly and may change. The ACD’s decision as to whether or not to make a dilution adjustment at any time, and as to the level of adjustment made either in particular circumstances or generally, will not prevent it from making a different decision in similar circumstances at a later time.

In the event that a dilution adjustment is applied to the Net Asset Value on any particular Dealing Day in accordance with the criteria outlined above, the Net Asset Value per Share of each class of Shares, prior to the application of the dilution adjustment, will be available to Shareholders on request.

SDRT provision

The Funds will generally owe SDRT on purchases of U.K. stocks.

The cost of SDRT may be met directly from the Scheme Property or recovered from Shareholders on the purchase or redemption of Shares in a Fund.

The ACD’s current policy is that all SDRT charges are paid directly from the Fund’s Scheme Property at the applicable rate (currently 0.5%). Where a charge to SDRT arises as a result of subscriptions and redemptions in the Funds, this is currently included in the dilution adjustment calculation, as set out above. However, the ACD reserves the right to recover any such SDRT charge directly from investors on the purchase or redemption of Shares.

Risk Factors

Investment in any Fund involves a degree of risk. While there are some risks that may be common to a number or all of the Funds, there may also be specific risk considerations that apply to particular Funds. Investors should consider the following risk factors before investing in any Fund. Risk factors apply directly to each Fund in connection with investments it holds or strategies it undertakes and, indirectly, through any collective investment schemes in which each Fund may invest. The value of Shares may go down as well as up, and investors may not get back the amount invested or any return on an investment. There can be no assurance that any Fund will achieve its investment objective. Upon request by any Shareholder, information relating to risk management methods employed for any Fund, including the quantitative limits that are applied and any recent developments in the risk and yield characteristics of the main categories of investments, may be provided to such Shareholder.

Past performance

Past performance does not necessarily indicate future performance. It can in no way provide a guarantee of future returns.

For Funds which are newly established, historical performance may not be available.

Stock market risk

The investments of a Fund are subject to normal market fluctuations and the risks inherent in investment in international securities markets, and there can be no assurances that appreciation will occur. Funds that invest in stocks are subject to stock market risk, which is the chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

Investment style risk

Funds are subject to investment style risk, which is the chance that returns from the types of stocks in which a Fund invests will trail returns from the overall stock market. Specific types of stocks tend to go through cycles of doing better or worse than the stock market in general. These periods have, in the past, lasted for as long as several years, and there can be no assurances that appreciation will occur.

Index-related risks

Funds that track an index as part of their investment objective are subject to the following risks:

- **Sampling risk** – As it may be inefficient or impracticable to hold all of the component securities of the index tracked by a passively-managed Fund and to reflect exactly their proportionate index weightings (an indexing strategy called “full replication”), certain Funds instead use an index “sampling” process of selecting securities, either as the primary investment strategy or occasionally when full replication is not practicable. Where this limited replication strategy is employed, the Fund holds a representative sample of securities which approximates the full index in terms of key risk factors and other characteristics. These factors include price/earnings ratio, industry weights, country weights, market capitalisation, dividend yield, and other financial characteristics of stocks. While a sampling Fund keeps currency, country, industry sector and sub-sector exposure within tight boundaries compared with that of its index, there is the risk that the securities selected for the Fund, in the aggregate, will not provide investment performance matching that of the relevant index.

- **Tracking risk** – A passively-managed Fund is not expected to track or replicate the performance of its respective index at all times with perfect accuracy. Each Fund is, however, expected to provide investment results which, before expenses, generally correspond to the price and yield performance of its respective index. Although the

Investment Adviser will regularly monitor the level of correspondence of the performance of a Fund with the performance of the relevant index (i.e., the "tracking accuracy"), there can be no assurance that any Fund will achieve any particular level of tracking accuracy. The annual and semi-annual reports of the Company will disclose the level of tracking accuracy for each Fund over the relevant periods. The annual report of the Company will also provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period.

The following factors may adversely affect the tracking by a Fund of its respective index:

(a) a Fund must pay various expenses, while an index does not reflect any expenses;

(b) a Fund must comply with regulatory constraints, such as the Investment and Borrowing Restrictions (as set out in Appendix 3), that do not affect the calculation of its respective index;

(c) the existence of uninvested assets in the Fund (including cash and deferred expenses);

(d) the timing difference between when an index reflects the event of dividends and when a Fund reflects the event of dividends;

(e) the temporary unavailability of certain securities comprising an index;

(f) the presence of small, illiquid components in an index which the Fund may not be able to, or may choose not to, acquire;

(g) the extent to which a Fund is not invested identically in respect of the composition and/or weighting of the component securities of its respective index, and to which securities in which it is underweighted or overweighted in relation to the index perform differently from the index as a whole; and

(h) the extent to which dividends are reinvested in a Fund.

In seeking to track an index, the Investment Adviser will not normally reduce or increase a Fund's holdings in or exposure to any component security of an index when to do so would reduce the tracking accuracy. Therefore, if an index security is decreasing in value, the Fund will generally continue to hold such security (or any other securities which give exposure or equivalent price performance to such security's price performance) until the weight of the security is reduced in the index, or the security is removed from the index, by the index provider.

For the avoidance of doubt, it is at the discretion of the Investment Adviser as to when to dispose of a security after it ceases to form part of an index.

A Fund will purchase and sell securities having regard to the effect on portfolio turnover. Higher portfolio turnover will cause a Fund to incur additional transaction costs.

- **Accuracy risk** – Where a Fund, in order to meet its investment objective, seeks to achieve a return which corresponds generally to the price and yield performance, before fees and expenses, of the relevant benchmark index (the "Benchmark Index") as published by the relevant index provider, there is no assurance that the index provider will compile the Benchmark Index accurately, or that the Benchmark Index will be determined, composed or calculated accurately. While the index provider does provide descriptions of what the Benchmark Index is designed to achieve, the index provider does not provide any warranty or accept any liability in relation to the quality, accuracy or completeness of data in respect of the Benchmark Index, and does not guarantee that the Benchmark Index will be in line with the described index methodology.

  The ACD, the Investment Advisers, the Company and affiliates do not provide any warranty or guarantee for index provider errors. Errors in respect of the quality, accuracy and completeness of the data may occur from time to time and may not be identified and corrected for a period of time, particularly where the indices are less commonly used. Therefore gains, losses or costs associated with index provider errors will be borne by the

Funds and their investors. For example, during a period where the Benchmark Index contains incorrect constituents, a Fund tracking such published Benchmark Index would have market exposure to such constituents and would be underexposed to the constituents that should have been included in the Benchmark Index. As such, errors may result in a negative or positive performance impact to the Funds and their investors. Investors should understand that any gains from index provider errors will be kept by the Funds and their investors and any losses resulting from index provider errors will be borne by the Funds and their investors.

- **Unscheduled rebalancing risk** – Apart from scheduled rebalances, the index provider may carry out additional ad hoc rebalances to the Benchmark Index in order, for example, to correct an error in the selection of index constituents. Where the Benchmark Index of a Fund is rebalanced and the Fund in turn rebalances its portfolio to bring it in line with its Benchmark Index, any transaction costs (including any capital gains tax and/or transaction taxes) and market exposure arising from such portfolio rebalancing will be borne directly by the Fund and its investors.

  Unscheduled rebalances to the Benchmark Indices may also expose the Funds to tracking error risk, which is the risk that its returns may not track exactly those of the Benchmark Index (see "Tracking risk" for more detail). Therefore, errors and additional ad hoc rebalances carried out by the index provider to a Benchmark Index may increase the costs and market exposure risk of the relevant Fund.

- **Screening risk** – Where specified in Appendix 1, a Fund may track an index which screens out possible investments if they do not meet certain criteria. This may affect the Fund's exposure to certain issuers and cause the Fund to forego certain investment opportunities relative to non-screened indices which cover the same broad universes but which do not apply such screens. Therefore, the relevant Fund may: (a) perform differently to other funds, including underperforming funds that track non-ESG indices which do not seek to screen investments in this way; or (b) experience a higher degree of Tracking Error from the non-screened parent index as a result of the application of the screen as excluded companies may, or may not contribute significantly to the non-screened parent index's overall performance. Details of the screening process for the relevant Funds can be found in Appendix 1.

  Investors should also note that where a Fund uses FDI, such FDI on an index (e.g., swaps, futures) may provide indirect exposure to some underlying constituents which may not meet the relevant criteria applied by the relevant index tracked by the Fund. Similarly, where a Fund engages in stock lending transactions for efficient portfolio management purposes, the Fund may receive collateral which may not meet the relevant criteria applied by the relevant index tracked by the Fund.

Sustainability Risk

Sustainability risks can be singular risks in their own right or may combine with, exacerbate or contribute to other risks such as market risks, liquidity risks or counterparty risks and may be detrimental to the performance or returns of a Fund. Common examples of each of these risks may include, but are not limited to, climate change (environmental), human rights (social) and management remuneration overly focused on short term goals (governance).

Assessment and Mitigation of Sustainability Risks

Vanguard, through its Investment Stewardship activities, scrutinises how portfolio companies and their boards within the internally-managed equity funds oversee, manage and disclose material sustainability risks applicable to their respective businesses, to protect clients' investments, and to help promote long-term shareholder value. For more information, see the "Sustainable Finance" section above.

Investment adviser risk

Each Fund is subject to the risk that the Investment Adviser (or a sub-investment adviser) may do a poor job of selecting investments.

Active management risk

Where indicated in **Appendix 1**, a Fund's assets will be actively managed by the Investment Adviser and / or sub-investment adviser(s), based on the expertise of individual fund managers, who will have discretion (subject to the Fund's investment restrictions) to select investments which it considers will enable the Fund to achieve its objective. There is no guarantee that the Fund's investment objective will be achieved based on the investments chosen.

Unlisted securities risk

The Funds may invest in unlisted securities. Because of the absence of a trading market for these investments, it may take longer, or may not be possible, to liquidate these positions. Accordingly, the ability of the Fund to respond to market movements may be impaired and the Fund may experience adverse price movements upon liquidation of its investments, which increases the capital risk. Although these securities may be resold in privately negotiated transactions, prices realised on these sales could be less than those originally paid by the Fund. Settlement of transactions may be subject to dealing and administrative uncertainties. Further, companies whose securities are not publicly traded will not generally be subject to public disclosure and other investor protection requirements applicable to publicly traded securities. The lack of publicly available information and an actively traded market in unlisted securities will give rise to uncertainty in valuing such securities. In addition, unlisted securities of US entities may also be illiquid due to the need for an exemption from registration under applicable federal and state securities laws.

Country risk

Country risk is the chance that domestic events – such as political upheaval, financial troubles, or natural disasters – will weaken a country's securities markets. The value of the assets of a Fund may be affected by uncertainties such as political developments, changes in government policies, taxation, restrictions on foreign investment and currency repatriation, currency fluctuations and other developments in applicable laws and regulations.

Foreign taxes risk: the Company may be liable to taxes (including withholding taxes) in countries other than the UK on income earned and capital gains arising on its investments in those countries. The Company may not be able to benefit from a reduction in the rate of such foreign tax by virtue of the double taxation treaties between the UK and other countries. The Company may not, therefore, be able to reclaim any foreign withholding tax suffered by it in particular countries. If this position changes and the Company obtains a repayment of foreign tax, the Net Asset Value of the Company will not be restated and the benefit will be allocated to the then-existing Shareholders rateably at the time of repayment.

Emerging markets risk

There are certain risks involved in investing in securities of companies and governments of emerging market countries that are in addition to the usual risks inherent in investment in securities of more-developed countries. Investments in emerging markets may be more volatile than investments in more developed markets.

Some of these markets may have relatively unstable governments, economies based on only a few industries, and securities markets that trade only a limited number of securities. Many emerging markets do not have well developed regulatory systems and disclosure standards may be less stringent than those of developed markets.

The risks of expropriation, nationalisation and social, political and economic instability are likely to be greater in emerging markets than in more developed markets.

The following is a brief summary of some of the more common risks associated with emerging markets investment:

- **Fraudulent Securities** – Given the lack of a regulatory structure it is possible that securities in which investments are made may be found to be fraudulent. As a result, it is possible that loss may be suffered.

- **Currency Exchange Rate Fluctuations** – Significant changes in the currencies of the countries in which investments are made may occur following the investment of a Fund in these currencies. These changes may impact the total return of the Fund to a significant degree. In respect of currencies of certain emerging countries, it is not possible to undertake currency hedging techniques.

- **Settlement and Custody Risks** – Settlement and custody systems in emerging markets are not as well developed as those in developed markets. Standards may not be as high and supervisory and regulatory authorities not as sophisticated. As a result there exists the risk that settlement may be delayed and that cash or securities could be disadvantaged.

- **Investment and Remittance Restrictions** – In some cases, emerging markets may restrict the access of foreign investors to securities. As a result, certain equity securities may not always be available to a Fund because the maximum permitted number of or investment by foreign shareholders has been reached. In addition, the outward remittance by foreign investors of their share of net profits, capital and dividends may be restricted or require governmental approval.

- **Accounting** – Accounting, auditing and financial reporting standards, and other regulatory practices and requirements (in terms of the nature quality and timeliness of information disclosed to investors) applicable to companies in emerging markets are often less rigorous than those applicable in more developed markets. Accordingly, investment possibilities may be difficult to properly assess.

Currency risk

Currency risk is the chance that changes in currency exchange rates will unfavourably affect the value of the investments held by a Fund relative to investors' home currencies.

The Net Asset Value per Share will be computed in the base currency of the relevant Fund or Class, whereas the investments held for the account of that Fund may be acquired in other currencies. The base currency value of the investments of a Fund designated in another currency may rise and fall due to exchange-rate fluctuations in respect of the relevant currencies. Adverse movements in currency exchange rates can result in a decrease in return and a loss of capital. The investments of each Fund may be fully hedged to its base currency. Currency hedging transactions, although potentially reducing the currency risks to which a Fund would otherwise be exposed, involve certain other risks, including the risk of a default by a counterparty.

Where a Fund enters into "cross hedging" transactions (for example, utilising a currency different from the currency in which the security being hedged is denominated), the Fund will be exposed to the risk that changes in the value of the currency used to hedge will not correlate with changes in the value of the currency in which the securities are denominated, which could result in losses for both the hedging transaction and the Fund securities.

Liquidity risk

The ACD's ability to invest and liquidate the assets of Funds in smaller companies may, from time to time, be restricted by the liquidity of the market for smaller company securities in which the Fund, or any collective investment scheme in which the Fund is invested, is invested.

Bond and fixed interest securities risk

Funds that invest in bonds and other fixed interest securities are subject to the following risks:

- **Interest rate risk** – which is the chance that bond prices overall will decline because of rising interest rates.
- **Income risk** – which is the chance that a Fund's income will decline because of falling interest rates.
- **Credit risk** – which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that bond to decline.
- **Call risk** – which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. The Fund would then lose potential price appreciation and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the Fund's income. For mortgage-backed securities, this risk is known as prepayment risk.

In addition, investments in fixed interest securities which are below investment grade may result in a Fund, or a collective investment scheme in which a Fund invests, having a greater risk of loss of principal and/or interest than an investment in debt securities which are deemed to be investment grade or higher.

Financial Derivative Instruments ("FDI") risk

The Funds may employ certain FDI for the purposes of efficient portfolio management (including hedging) as described under **"Portfolio Investment Techniques"** in **Appendix 4**, and, where expressly stated, in order to achieve the investment objective and policy of each Fund. **The aim of any derivative or forward used for such reasons is not to alter materially the risk profile of the Fund; rather, their use is to assist the ACD in meeting the investment objectives of each Fund as set out in Appendix 1. Currently, the investment policy of each Fund provides that it may use derivatives for efficient portfolio management or hedging purposes, but not for purposes of investment.**

The risks associated with the use of FDI are different from, or possibly greater than, the risks associated with investing directly in securities and other traditional investments. Generally, a derivative is a financial contract the value of which depends upon, or is derived from, the value of an underlying asset, reference rate or index, and which may relate to stocks, bonds, interest rates, currencies or currency exchange rates, commodities, and related indices. There is no assurance that any derivative strategy used by a Fund will succeed.

The following risks are particularly relevant in terms of the use of FDI:

Correlation risk. Although the ACD believes that taking exposure to underlying assets through the use of FDI will benefit Shareholders in certain circumstances, by reducing operational costs and creating other efficiencies, there is a risk that the performance of a Fund will be imperfectly correlated with the performance that would be generated by investing directly in the underlying assets.

Interest rate risk. These are risks primarily associated with the chance that the market value of FDI held by a Fund will decline because of rising interest rates. Interest rate risk will be high for a Fund which invests mainly in long-term zero coupon swaps, whose prices are more sensitive to interest rate changes than are the prices of intermediate bonds.

Management risk. FDI are highly specialised instruments that require investment techniques and risk analyses different from those associated with stocks and bonds. The use of FDI requires an understanding not only of the underlying instrument but also of the FDI itself, without the benefit of observing the performance of the FDI under all possible market conditions.

Credit risk. The use of FDI involves the risk that a loss may be sustained as a result of the failure of another party to the contract (usually referred to as the "counterparty") to make required payments or otherwise comply with the contract's terms. Counterparties to these transactions are therefore required to provide collateral, in the form of cash or securities, to protect the Company and the relevant Fund against the risk of the counterparty's default.

There is also the risk that, due to a significant change in the value of the FDI because of market conditions, the collateral posted by the counterparty would not be sufficient to cover the counterparty's obligations under the FDI, should the counterparty become insolvent, bankrupt or default prior to the receipt of additional collateral. This may result in substantial losses to the Company and the relevant Fund. The Company maintains collateralisation policies to mitigate counterparty risk, including as follows:

- cash or securities held by the relevant Fund or by the counterparty, as applicable, are posted as collateral to cover daily mark-to-market changes to the value of the FDI, and specific haircut policies will apply depending on collateral type and risk associated with the underlying security;
- based on changes in the market value of each FDI transaction, collateral is posted, or received, daily on a net basis, to ensure that the value of the collateral covers the relevant Fund's mark-to-market exposure to the counterparty; and
- in the event of a counterparty default, collateral held is immediately available (without recourse) to cover the relevant Fund's current mark-to-market exposure to a counterparty.

Additionally, credit default swaps could result in losses if the Investment Adviser does not correctly evaluate the creditworthiness of the company on which the credit default swap is based.

Collateral reinvestment risk There is a risk that cash collateral reinvestment could result in a reduction of the value of the collateral capital (because the investment declines in value). This, in turn, may cause losses to the Company and the relevant Fund because they are obliged to return collateral to the counterparty. In order to manage this risk, the Company reinvests cash collateral in accordance with the guidelines set out in **Appendix 4**.

Liquidity risk This risk exists when a particular FDI is difficult to purchase or sell. If a derivative transaction is particularly large or if the relevant market is illiquid (as in the case with many OTC derivatives), it may not be possible to initiate a transaction or liquidate a position at an advantageous time or price.

Pricing risk This risk exists when a particular FDI becomes extraordinarily expensive relative to historical prices or the prices of corresponding cash market instruments. Under certain market conditions, it may not be economically feasible to initiate a transaction or liquidate a position in time to avoid a loss or to take advantage of an opportunity.

Gearing (or leverage) risk Because many FDI have a leveraged component, adverse changes in the value or level of the underlying asset, reference rate or index can result in a loss substantially greater than the amount invested in the FDI itself. The Company's Funds are managed on a non-geared basis unless otherwise specified for any Fund in **Appendix 1**.

Market risk Like most other investments, FDI are subject to the risk that the market value of the instrument will change in a way detrimental to the Fund's interests. While hedging strategies involving FDI can reduce the risk of loss, they can also reduce the opportunity for gain or even result in losses by offsetting favourable price movements in other portfolio investments. A Fund may also have to buy or sell a security at a disadvantageous time or price because it is legally required to maintain offsetting positions or asset coverage in connection with certain FDI transactions.

Settlement risk Derivative markets will have different clearance and settlement procedures and in certain markets there have been times when settlements have been unable to keep pace with the volume of transactions, thereby making it difficult to conduct such transactions. Delays in settlement could result in temporary periods when assets of the Fund are uninvested and no return is earned thereon. A Fund's inability to make intended purchases due to settlement problems could cause it to miss attractive investment opportunities. Inability to dispose of portfolio securities due to settlement problems could result either in losses to the Fund due to subsequent declines in the value of the security or, if the Fund has entered into a contract to sell the security, it could result in a possible liability of it to the purchaser.

Legal risk The terms of OTC FDI are generally established through negotiation between the parties thereto. While therefore more flexible, OTC FDI may involve greater legal risk than exchange-traded instruments, which are standardised as to the underlying instrument, expiration date, contract size and strike price, as there may be a risk of loss if the OTC FDI are deemed not to be legally enforceable or are not documented correctly. There may also be a legal or documentation risk that the parties to the OTC FDI may disagree as to the proper interpretation of its terms. If such a dispute occurs, the cost and unpredictability of the legal proceedings required for a Fund to enforce its contractual rights may lead the Fund to decide not to pursue its claims under the OTC FDI. A Fund thus assumes the risk that it may be unable to obtain payments owed to it under OTC arrangements, and that those payments may be delayed or made only after the Fund has incurred the costs of litigation. Further, legal, tax and regulatory changes could occur which may adversely affect a Fund. The regulatory and tax environment for FDI is evolving, and changes in the regulation or taxation of FDI may adversely affect the value of such instruments held by the Fund and the Fund's ability to pursue its trading strategies.

The Company employs a risk management process which enables it to accurately identify, measure, monitor and manage the various risks associated with its own use of FDI. For further information, see "Risk Management" in **Appendix 3**.

Derivatives held in Funds will be accounted for and taxed in accordance with the Statement of Recommended Practice for Open-Ended Investment Companies. The way in which HMRC taxes derivatives held in collective investment schemes may change, which could adversely affect the tax paid by these Funds.

Plain Talk About Derivatives

Derivatives can take many forms. Some forms of derivatives, such as exchange-traded futures and options on securities or indexes, have been trading on regulated exchanges for decades. These types of derivatives are standardised contracts that can easily be bought and sold, and whose market values are determined and published daily. Non-standardised derivatives (such as swap agreements), on the other hand, tend to be more specialised or complex, and may be harder to value, and the impact to a Fund may be greater where complex derivatives are used.

Futures contracts risk

Positions in futures contracts may be closed out only on an exchange that provides a secondary market for such futures. However, there can be no assurance that a liquid secondary market will exist for any particular futures contract at any specific time. Thus, it may not be possible to close a futures position. In the event of adverse price movements, a Fund would continue to be required to make daily cash payments to maintain its required margin. In such situations, if the Fund has insufficient cash, it may have to sell portfolio securities to meet daily margin requirements at a time when it may be disadvantageous to do so. In addition, a Fund may be required to make delivery of the instruments underlying the futures contracts it holds. The inability to close options and futures positions also could have an adverse impact on the ability to effectively hedge the Fund.

A Fund may minimise the risk that it will be unable to close out a futures contract by entering into contracts that are traded on eligible futures exchanges and for which there appears to be a liquid secondary market.

The risk of loss in trading futures contracts in some strategies can be substantial, due both to the low margin deposits required and the extremely high degree of leverage involved in futures pricing. As a result, a relatively small price movement in a futures contract may result in immediate and substantial loss (or gain) to the investor. Thus, a purchase or sale of a futures contract may result in losses in excess of the amount of investment in the contract itself. The relevant Fund also bears the risk that the Investment Adviser will incorrectly predict future stock market trends. However, because the futures strategies of each Fund are currently engaged in only for efficient portfolio management purposes, the Company does not believe that the Funds are subject to the risks of loss frequently associated with futures transactions.

A Fund would generally have sustained comparable losses if, instead of the futures contract, it had invested in the underlying financial instrument and sold it after the decline.

Utilisation of futures transactions by a Fund involves the risk of imperfect or no correlation where the securities underlying the futures contracts have different maturities than the securities being hedged. It is also possible that a Fund could both lose money on futures contracts and experience a decline in the value of its securities. There is also a risk of loss by a Fund of margin deposits in the event of the bankruptcy of a broker with whom the Fund has an open position in a futures contract or related option.

Investment techniques risk

There are certain investment risks that apply in relation to techniques and instruments that the Investment Adviser may employ for efficient portfolio management purposes, as described in **Appendix 4**. To the extent that the Investment Adviser's expectations in employing such techniques and instruments are incorrect, a Fund may suffer a substantial loss with an adverse effect on the Net Asset Value per Share.

A Fund's ability to use such techniques and instruments may be limited by market conditions, regulatory limits, and tax considerations. Use of these techniques involves certain special risks (in addition to those described elsewhere in this “Risk Factors” section), including:

(i) dependence on the Investment Adviser's ability to predict movements in the price of securities being hedged and movements in interest rates;

(ii) imperfect correlation between movements in the securities or currency on which a futures or options contract is based and movements in the securities or currencies in the relevant Fund;

(iii) the absence of a liquid market or of accurate pricing information for any particular instrument at any particular time;

(iv) the fact that, while a Fund may not be leveraged or geared in any way through the use of derivatives, the degree of leverage inherent in futures trading (that is, the low margin deposits normally required in futures trading) means that a relatively small price movement in a futures contract may result in an immediate and substantial loss to the Fund; and

(v) possible impediments to effective portfolio management or the ability to meet redemption requests or other short-term obligations because of the percentage of a Fund's assets segregated to cover its obligations.

Repurchase and reverse repurchase agreements risk

If the seller of a repurchase agreement fails to fulfil its commitment to repurchase the security in accordance with the terms of the agreement, the relevant Fund may incur a loss to the extent that the proceeds realised on the sale of the securities are less than the repurchase price. If the seller becomes insolvent, the transaction may be subject to regulatory stays and moratoriums, which may result in a delay in a Fund's ability to liquidate the collateral notwithstanding the title transfer provided under the terms of the agreement. The relevant Fund may experience both delays in liquidating the underlying securities and losses during the period while it seeks to enforce its rights thereto, including possible sub-normal levels of income and lack of access to income during the period and expenses in enforcing its rights.

Likewise with reverse repurchase agreements, there are risks of counterparty insolvency and decline in the market value of the securities at which the Fund is obliged to repurchase such securities under the agreement.

Stock lending arrangements risk

Counterparty risk: Counterparty risk exists when a Fund may be exposed to credit risk on the counterparties with which it makes stock lending arrangements. The risk is that the borrower of securities will default on its obligation to return the securities, which could result in losses to the Company and the relevant Fund. Borrowers are therefore required to provide collateral in the form of cash or securities to protect the Company against the risk of default.

The Company maintains collateralisation policies to mitigate counterparty risk, including the following:

- ensuring that the value of the collateral required exceeds the market value of securities on loan for each security loan entered into by the Company;
- collateral is posted, or received, on a daily basis, based on changes in the market value of each security loan, to ensure that the value of the collateral held exceeds the market value of the securities on loan; and
- in the event of counterparty default, the collateral held is immediately available to the Company (without recourse) and it will be used to buy the securities lent but not returned.

While the Funds engage in conservative collateralisation policies intended to ensure that all stock lending is fully collateralised, to the extent that any stock lending is not fully collateralised (for example, due to timing lags associated with the posting of cash collateral), a Fund will have a credit risk exposure to the counterparty of a stock lending contract.

Additional risk mitigation against counterparty default is provided through: (i) contractual protections in the event of default of a counterparty; and (ii) ongoing monitoring of the creditworthiness of counterparties.

Collateral reinvestment risk: the risk that collateral cash reinvestment could result in a reduction of the value of the collateral capital (because the investment declines in value). This, in turn, may cause losses to the Company and the relevant Fund because it is obliged to return collateral equivalent to the value of the returned security. In order to manage this risk, the Company reinvests cash collateral in accordance with the guidelines set out in **Appendix 4**.

It is important to understand that, when a stock lending contract is entered into, the lender has the ability to recall the loan at any time, and the borrower has the ability to return the security to the lender at any time. To the extent that collateral may need to be returned at any time, it is important that the collateral be available to return to the securities borrower. The Company maintains collateral reinvestment policies to mitigate this risk. These policies aim to preserve collateral capital and provide sufficient liquidity for the Company to: (i) fund redemption orders; and (ii) return collateral to borrowers who return the loaned securities.

Conflict of interest risk: the Company does not enter into stock lending transactions with any entities within the Vanguard Group of Companies.

Investment via China Stock Connect

The Vanguard FTSE Global All Cap Index Fund, the Vanguard Global Capital Stewards Equity Fund, the Vanguard ActiveLife Climate Aware 40-50% Equity Fund, the Vanguard ActiveLife Climate Aware 60-70% Equity Fund, Vanguard ActiveLife Climate Aware 80-90% Equity Fund the Vanguard Global Equity Fund and the Vanguard Global Emerging Markets Fund may invest in China A-shares via China Stock Connect.

China *A-shares Risk:* China A-shares ("A-shares") are shares of mainland Chinese companies that are traded locally on the Shanghai and Shenzhen stock exchanges. A-shares access will be available through the China Stock Connect Program, subject to separate quota limitations. The developing state of the investment and banking systems of the People's Republic of China ("China", or the "PRC") subjects the settlement, clearing, and registration of securities transactions to heightened risks. Additionally, there are foreign ownership limitations that may result in limitations on investment or the return of profits if a Fund purchases and sells shares of an issuer in which it owns 5% or more of the shares issued within a six-month period. It is unclear if the 5% ownership will be determined by aggregating the holdings of a Fund with affiliated funds.

Due to these restrictions, it is possible that the A-shares quota available to a Fund as a foreign investor may not be sufficient to meet the Fund's investment needs. In this situation, a Fund may seek an alternative method of economic exposure, such as by purchasing other classes of securities or depositary receipts or by utilising derivatives. Any of these options could increase a Fund's index sampling risk (for index funds) or investment cost. Additionally, investing in A-shares generally increases emerging markets risk due in part to government and issuer market controls and the developing settlement and legal systems.

Investing in China A-shares through Stock Connect: The China Stock Connect Program ("Stock Connect") is a mutual market access program designed to, among other things, enable foreign investment in the PRC via brokers in Hong Kong. A Qualified Foreign Institutional Investor ("QFII") or a Renminbi QFII license is not required to trade via Stock Connect. There are significant risks inherent in investing in A-shares through Stock Connect. Specifically, trading can be affected by a number of issues. Stock Connect can only operate when both PRC and Hong Kong markets are open for trading and when banking services are available in both markets on the corresponding settlement days. As such, if one or both markets are closed on a Business Day, a Fund may not be able to dispose of its shares in a timely manner, which could adversely affect the Fund's performance. Trading through Stock Connect may require pre-delivery or pre-validation of cash or securities to or by a broker. If the cash or securities are not in the broker's possession before the market opens on the day of selling, the sell order will be rejected. This requirement may limit a Fund's ability to dispose of its A-shares purchased through Stock Connect in a timely manner. Additionally, Stock Connect is subject to daily quota limitations on purchases into the PRC. Once the daily quota is reached, orders to purchase additional A-shares through Stock Connect will be rejected. In addition, a Fund's purchase of A-shares through Stock Connect may only be subsequently sold through Stock Connect and is not otherwise transferable. Stock Connect utilises an omnibus clearing structure, and the Fund's Shares will be registered in its custodian's name on the Hong Kong Central Clearing and Settlement System. This may limit an advisor's ability to effectively manage a Fund's holdings, including the potential enforcement of equity owner rights.

China Bonds risk

The Vanguard ActiveLife Climate Aware 40-50% Equity Fund, the Vanguard ActiveLife Climate Aware 60-70% Equity Fund and Vanguard ActiveLife Climate Aware 80-90% Equity Fund may invest in Chinese RMB-denominated government and policy bank bonds (collectively referred to as "**China Bonds**"). China Bonds are predominately traded on the inter-bank bond market which is regulated by the People's Bank of China ("**PBoC**").

Bond Connect is a mutual market access scheme that allows investors from the mainland of China and overseas to trade in each other's respective markets. It is to be one of the primary mechanisms for overseas investors to access China's large domestic bond market alongside the China Interbank Bond Market (the "**CIBM**") Direct scheme. Bond Connect infrastructure contemplates two-way access between Hong Kong and China; however, it is currently only operational in respect of investment through Hong Kong into the CIBM ("Northbound" access).

Bond Connect was set up by the PBoC and the Hong Kong Monetary Authority, establishing a connection between mainland China and Hong Kong based financial institutions. The creation of Bond Connect allows investors to trade between the mainland China and Hong Kong markets electronically which eradicates the need for investor status and quotas that were required under previous access models.

Chinese Interbank Bond Market Risk: Investing in the PRC inter-bank bond market via Bond Connect is subject to regulatory risk. The governing rules and regulations under this regime may be subject to change with minimal notice and have the potential to be applied retrospectively. Any suspension imposed by the Chinese authorities on the PRC inter-bank bond market or in relation to the Bond Connect scheme would adversely impact the fund's ability to acquire or dispose of assets.

Currency Risk (RMB Specific): RMB is the only currency of the People's Republic of China. Whilst both the onshore RMB ("CNY") and offshore RMB ("CNH") are the same currency, they are traded in different and separate markets. These markets operate separately and can be subject to different liquidity constraints and market forces meaning their valuations can vary.

The Bloomberg Global Aggregate index is valued with CNY as the base currency. As part of the standard fund management practices, it will be necessary to hedge the foreign exchange ("FX") exposure arising from the inclusion of China Bonds into the base currency of the relevant Fund. FX hedging utilising CNY would match the index currency. Conversely, FX hedging in CNH would introduce incremental FX risk arising from any divergence between CHN and CNY.

Taxation Risk: There are risks and uncertainties associated with the current China tax laws, the Chinese government has issued guidance exempting foreign institutional investors from China's withholding income tax regulations and value added tax in respect of bond interest income derived from November 7, 2018 to November 6, 2021. However, uncertainties remain with respect to China's tax laws, including the full scope of the exemption and with respect to whether investors are subject to tax on capital gains realised on investments in China via Bond Connect. It should also be noted that there is a possibility of the China tax rules being changed and taxes being applied retrospectively. There is a risk that taxes may be levied in the future for which no provision is made, which may potentially cause substantial losses. The Net Asset Value of a fund may require further adjustment to take into account any retrospective application of new tax regulations and development, including change in interpretation of the relevant regulations by the Chinese tax authorities.

Issuer Risk: In the event of a default or credit rating downgrade of the issuers of the debt, the bonds' value will be adversely affected and investors may suffer a substantial loss as a result. The funds may also encounter difficulties or delays in enforcing their rights against the issuer in relation to these bonds as the issuer is outside Hong Kong and subject to mainland Chinese laws.

Chinese treasury bonds and policy bank bonds are offered on an unsecured basis without collateral and will rank equally with other unsecured debts of the relevant issuer (the Ministry of Finance and the policy banks). As a result, if the issuer becomes bankrupt, proceeds from the liquidation of the issuer's assets will be paid to holders of treasury bonds and policy bank bonds only after all secured claims have been satisfied in full. The funds will be fully exposed to the credit/insolvency risk of its treasury bonds and policy bank bonds issuer counterparties as an unsecured creditor.

Charges to capital

Where this Prospectus states that all or part of the ACD's fee and/or other charges in respect of a Fund and/or Class of Shares may be charged against capital rather than income, this may enhance income returns but may constrain future capital growth and/or result in an erosion of capital. Further information regarding charging to capital and income is set out in the "Allocation of expenses between capital and income" section of this Prospectus. Details of whether charges are made to capital or income for each Fund and/or Class of Shares are set out in **Appendix 1** of this Prospectus.

Suspension of dealings in Shares

Investors are reminded that in certain circumstances their right to redeem Shares (including a redemption by way of switching) may be suspended.

Dilution adjustment risk

As described in the section "Dilution Adjustment", the ACD may, where it so determines, "swing" the NAV of a Fund to attempt to mitigate the potentially dilutive effects of dealing on the NAV on any Dealing Day on which there are net subscriptions or redemptions in the relevant Fund that exceed a pre-determined level. In such cases, investors should be aware that the application of a dilution adjustment may not always prevent the dilution of the NAV through transaction and other dealing costs and the adjustments made to the NAV may also benefit certain investors relative to the Shareholders in the Fund as a whole. In the event that the ACD determines not to make a dilution adjustment, this may have the effect of constraining capital growth.

Liabilities of the Company

Each Fund is treated as a separate entity, with its own segregated portfolio of assets and liabilities. Accordingly, the assets of a Fund belong exclusively to that Fund and shall not be made available to discharge (directly or indirectly) the liabilities of, or claims against, any other person or body, including the Company or any other Fund, and shall not be available for any such purpose.

While the OEIC Regulations and the Instrument of Incorporation provide for segregated liability between the Funds, the concept of segregated liability is relatively new and may not be recognised and upheld by a court in certain contexts. Where claims are brought by local creditors in foreign courts or under foreign law contracts, and the liability relates to one Fund which is unable to discharge its liability, it is not clear whether a foreign court would give effect to the segregation of liability contained in the Instrument of Incorporation. Accordingly, it is not possible to be certain that the assets of a Fund will always be completely insulated from the liabilities of another Fund in every circumstance.

Shareholders are not liable for the debts of the Company. Shareholders are not liable to make any further payment to the Company after they have paid the purchase price of the Shares.

Restriction on Fund's activities due to embargo, etc.

From time to time, a Fund's activities, or the activities of collective investment schemes in which it invests, may be restricted due to governmental and/or regulatory restrictions applicable to the relevant ACD or its delegates or another entity within the relevant respective groups of companies, and/or their internal policies designed to comply with such restrictions. As a result, there may be periods, for example, during which the ACD or a Fund or a collective investment scheme in which a Fund invests may be restricted from engaging in certain transactions.

European Economic Risks

Member States and European businesses and financial institutions and counterparties are currently being affected, some adversely, by severe political and economic difficulties and concerns, including in relation to sovereign and non-sovereign funding and debt. European, IMF and bilateral emergency funding arrangements have already been extended and/or are contemplated in respect of Member States and European based financial institutions.

These developments have had a negative effect in political terms and also in economic terms. Financial markets, investor sentiment and credit ratings of institutions and Member States have already been adversely affected and may continue to do so. In addition, investment activity has been affected, as has the willingness of financial institutions to extend credit and to obtain funding.

Member States within the Eurozone, and certain other Member States, are in ongoing discussions with a view to agreeing stricter financial disciplines. However, it remains unclear whether agreement on these matters will be reached, and even if reached, whether adequate measures will be adopted in the short to medium term.

There are increasing concerns that one or more Member States within the Eurozone may not be able to meet their debt obligations or funding requirements. The depressed economic environment and cost of funding may cause short and medium term budget deficits to expand in these economies, further increasing the risk of default. A sovereign default is likely to have adverse consequences for the economy of the Member State and that of Europe and the wider world economy. The effect on creditors of a sovereign default is likely to be adverse.

The possibility of Member States that have adopted the Euro abandoning or being forced to withdraw from the Euro remains. It is difficult to predict the precise nature of the consequences of a Member State leaving the Euro as there has been no well-defined legal framework put in place in preparation for such an event. However, it is likely that any Euro-denominated assets or obligations that any Fund acquired that are converted into a new national currency would suffer a significant reduction in value if the new national currency falls in value against the Euro or other currencies.

These economic developments and their consequences both in Europe and the wider world economy, have significantly increased the risk of market disruption and governmental intervention in markets. Such disruption and intervention may result in unfavourable currency exchange rate fluctuations, restrictions on foreign investment, imposition of exchange control regulation by governments, trade balances and imbalances and social, economic or political instability.

Predicting the consequences of developments of this kind is difficult. Events affecting the Euro could result in either separate new national currencies, or a new single European currency, and consequently the redenomination of assets and liabilities currently denominated in Euro. In such circumstances, there would be a definite risk of a Fund's Euro-denominated investments becoming difficult to value, which could potentially result in negative consequences for the Fund including suspension of NAV valuations and consequently of redemptions. If the redenomination of accounts, contracts and obligations becomes litigious, difficult conflict of laws questions are likely to arise.

Adverse developments of this nature may significantly affect the value of a Fund's investments. They may also affect the ability of a Fund to transact business including with financial counterparties, to manage investment risk and to hedge currency and other risks affecting a Fund's portfolio. Fluctuations in the exchange rate between Sterling and the Euro or other European currencies could have a negative effect upon the performance of investments.

Ownership limit risk

The ability to purchase or dispose of investments in regulated industries, the derivatives markets, certain international markets, and certain issuers that limit ownership by a single shareholder or group of related shareholders, or to exercise rights on behalf of a Fund, may be restricted or impaired because of limitations on the aggregate level of investment unless regulatory or corporate consents are obtained. As a result, the ACD or the Investment Adviser may be required to limit purchases, sell existing investments, or otherwise restrict or limit the exercise of shareholder rights on behalf of a Fund, including voting rights. If a Fund is required to limit its investment in a particular issue, the Fund may seek to obtain economic exposure to that issuer through alternative means, such as through a derivative, which may be more costly than owning securities of the issuer directly.

Charges and Expenses

ACD's charges and expenses

Preliminary Charge

The ACD currently makes no preliminary charge on a Shareholder's purchase of Shares.

The ACD reserves the right to make a preliminary charge, which would be added to the purchase price of the Shares. Before making any such charge the ACD will provide prior notice to Shareholders in accordance with the COLL Sourcebook (currently 60 days).

Redemption Charge

The ACD currently makes no redemption charge on a Shareholder's redemption of Shares.

The ACD reserves the right to make a redemption charge, which would be deducted from the redemption price of the Shares. Before making any such charge the ACD will provide prior notice to Shareholders in accordance with the COLL Sourcebook (currently 60 days).

Conversion and Switching Charges

The ACD does not currently charge Shareholders for the switch or conversion of Shares.

The ACD reserves the right to make a conversion or switching charge. Before making any such charge the ACD will provide prior notice to Shareholders in accordance with the COLL Sourcebook (currently 60 days) which includes details of how the charge will apply to the purchase and redemption sides of the conversion or switch transaction.

Management Charge

The ACD is entitled to make a periodic management charge (plus value added tax, if any) calculated at an annual percentage rate based upon the value of the property of each Fund. The actual amount applicable to each Class is set out in **Appendix 1**.

The ACD reserves the right to increase or decrease the management charge. Before making any increase in such charge the ACD will provide prior notice to Shareholders in accordance with the COLL Sourcebook (currently 60 days).

The periodic management charge shall accrue daily and will be determined by reference to the value of each Fund on each Dealing Day and shall be deducted and paid at the end of each month.

As mentioned below, the ACD pays the fees of each Investment Adviser from its management charge. Out of such fees each Investment Adviser pays the fees of any sub-investment advisers appointed by it and any costs associated with the provision of Research.

Ongoing Charges Figure

The Ongoing Charges Figure ("OCF") for each Class of a Fund is based on actual expenses for a given period. It covers all aspects of operating the Class during the period, including fees paid for investment management, administration, audit, depositary, legal, registration and regulatory fees. The ACD will usually pay those fees out of its periodic management charge, which means that the OCF will normally equal the rate of management charge. There may, however, be certain unusual or extraordinary expenses which cause the OCF to exceed the annual rate of the management charge.

The OCF does not include portfolio transaction costs or the fees of investors' financial advisers.

SDRT charge

An SDRT charge arises in respect of every subscription for Shares in those Funds investing in U.K. stocks (the "SDRT Charge"). The SDRT Charge is currently paid out of the Scheme Property of the relevant Fund at the applicable rate (currently 0.5%) on the purchase of U.K. stocks. However, the ACD reserves the right to recover the SDRT Charge directly from Shareholders on the purchase or redemption of Shares. The existence of an SDRT Charge for any Fund will be set out in Appendix 1.

Other expenses

In addition to the ACD's management charge and any applicable value added tax thereon, the Company or each Fund (as the case may be) may, so far as the COLL Sourcebook allows, also pay out of the Scheme Property all relevant costs, charges, fees and expenses including the following:

(i) costs incurred by a Fund in connection with transactions on its portfolio, including brokerage fees (excluding costs for research), taxes and linked charges and the market impact of the transaction taking into account the remuneration of the broker and the liquidity of the concerned assets;
(ii) interest on borrowing; and
(iii) payments incurred because of financial instruments.

The ACD is also entitled to be paid by the Company out of the Scheme Property any expenses incurred by the ACD or its delegates of the kinds described above.

Rebates

The ACD may rebate all or part of its remuneration to any party that invests in or provides services to the Company or in respect of any Fund.

Initial expenses and promotion costs

The costs and expenses relating to the authorisation of the Company, the offer of Shares, the preparation, production and printing of the Instrument of Incorporation, this Prospectus and the Key Investor Information Documents, and the fees of the professional advisers to the Company in connection with the offer will be borne by the ACD.

Allocation of charges and expenses between Funds

All charges and expenses payable by the Company will be charged to the Fund in respect of which they were incurred (and, within the Funds, charges and expenses will be allocated between Classes in accordance with the terms of issue of Shares of those Classes). Any charges and expenses not attributable to any one Fund will normally be allocated by the ACD to all Funds pro rata to the values of the Funds, although the ACD has discretion to allocate such charges and expenses in a different manner which it considers fair to Shareholders generally.

Allocation of expenses between capital and income

The ACD shall, in its discretion, determine whether charges and expenses payable by the Company are allocated to the capital property and/or income property in accordance with the Regulations. In determining whether a payment is to be made from the income property or capital property, the ACD will pay due regard to whether the nature of the cost is income related or capital related and shall also consider the objective of the scheme. Where the investment objective of a Fund is to seek to increase the amount of distributable income as a higher priority than obtaining capital growth, or to seek to increase the amount of distributable income and obtain capital growth in equal priority, all or part of a charge and/or expense may be allocated to the capital property of the Fund instead of the income property of the relevant Fund. The treatment of such payments and/or expenses is subject to the agreement of the Depositary in accordance with the Regulations.

In addition, where a Fund has at least one Class of Shares that distributes income and one Class of Shares that accumulates income, the ACD may, in its discretion, determine that a payment be made from:

(a) the capital property of the Fund for the Class(es) of Shares that distribute income; and
(b) the income property of the Fund for Class(es) of Shares that accumulate income.

Details of whether charges are to be made to the capital property or income property for each Fund (or Share Class) are set out in **Appendix 1** of this Prospectus.

If deductions are made from the capital property of a Fund, this will result in capital erosion and will constrain growth (please refer to the “Charges to capital” risk factor of this Prospectus for further information).

Plain Talk About Costs of Investing

Costs are an important consideration in choosing a fund. That's because you, as a Shareholder, pay the costs of operating a fund, plus any transaction costs incurred when the Fund buys or sells securities. These costs can erode a substantial portion of the gross income or the capital appreciation the fund achieves. Even seemingly small differences in expenses can, over time, have a dramatic effect on the fund's performance.

Income

Accounting periods

The annual accounting period of the Company ends each year on 31 October (the accounting reference date). The half-yearly (interim) accounting period ends each year on 30 April. Certain Funds may have additional interim accounting periods within each annual accounting period (see **Appendix 1**).

Income allocations

Allocations of income are made in respect of the income available for allocation in each accounting period in accordance with **Appendix 1**.

For all Income Shares, distributions of income for each Fund are paid on or before the annual income allocation date of 31 December. In addition, interim distributions will be paid on or before the interim income allocation dates set out in **Appendix 1**. The amount available for allocation in an accounting period is calculated by:

(a) taking the aggregate of the income received or receivable for the account of the relevant Fund for the accounting period;

(b) deducting the charges and expenses of the Fund paid or payable out of income where appropriate for that accounting period; and

(c) making such adjustments as the ACD considers appropriate (and after consulting the auditors as appropriate) in relation to tax and certain other issues*.

* Note: Vanguard U.K. Inflation-Linked Gilt Index Fund may retain the indexation adjustment based on changes in the Retail Price Index when calculating the distribution.

If a distribution remains unclaimed for a period of six years after it has become due, it will be forfeited and become part of the capital property of the Company.

The ACD and the Depositary may agree a de minimis amount in respect of which a distribution of income is not required, and how any such amounts are to be treated. Notice of such a decision will be dealt with in accordance with the COLL Sourcebook.

Distributable income payable on Income Shares may be paid by cheque, at the Shareholder's risk, or by electronic bank transfer (including BACS) if the Shareholder has supplied to the ACD appropriate bank details.

In order to conduct a controlled dividend flow to Shareholders interim distributions may be made at the ACD's discretion, up to the maximum of the distributable income available for the period. All remaining income is distributed in accordance with the COLL Sourcebook.

For all Accumulation Shares, no distributions will be paid to the Shareholder and instead income allocations are reflected in the value of the Scheme Property.

Income equalisation

The Company intends to operate income equalisation arrangements in respect of the pro rata entitlement to share in any accrued income of a Fund existing at the time a Share is purchased by a Shareholder and which is therefore reflected in the purchase price of the Share. If a Shareholder acquires Shares at a date when the Fund has accrued income which has not yet been allocated, the ACD may credit to the Shareholder’s equalisation account part of the subscription price representing the accrued income which would be attributable to those Shares on the date of purchase. When income is next allocated, a holder of Income Shares to which income equalisation applies will receive the same amount of cash as the existing Shareholders, but the amount in respect of income accrued before he acquired his Shares will be paid not as income but out of the equalisation account, as capital, comprising the repayment of part of the subscription price. For a holder of Accumulation Shares to which income equalisation applies, no cash payment will be made to that Shareholder from his equalisation account, but an amount equal to that Shareholder’s equalisation account may be added to his acquisition cost when calculating the capital gain realised on a disposal of those Shares.

U.K. Taxation

General

The taxation of income and capital gains of both the Funds and Shareholders is subject to the fiscal law and practice of the U.K. and of the jurisdictions in which Shareholders are resident or otherwise subject to tax. The information below is a general guide based on current U.K. law and HMRC practice, all of which are subject to change. It summarises the tax position of the Company and of investors who are U.K. tax residents and hold Shares as investments.

Prospective investors should consult their own professional advisers on the tax implications of making an investment in, holding or disposing of Shares and the receipt of distributions and deemed distributions with respect to such Shares under the laws of the countries in which they may be liable to taxation.

This summary is based on the taxation law and practice in force at the date of this document, but prospective investors should be aware that the relevant fiscal rules and practice or their interpretation might change. The following tax summary is not a guarantee to any investor of the tax results of investing in the Funds.

The Company

Each Fund will be treated as a separate entity for U.K. tax purposes.

The Funds are generally exempt from U.K. tax on capital gains realised on the disposal of investments (including interest-paying securities and derivatives) held within them.

Provided it falls within certain wide ranging exemptions or is the franked portion of dividend distributions from UK authorised unit trusts and UK open-ended investment companies, dividend income received by a Fund from U.K. or non-U.K. companies is exempt from corporation tax.

The Funds may each be subject to corporation tax at the basic rate at which income tax is charged which is currently 20% (2024/25) on some other types of income but after deducting allowable management expenses and (where relevant) any interest distributions. In addition, where a Fund suffers foreign tax on income received, some or all of this may normally be deducted from the U.K. tax due on that income.

A Fund will make dividend distributions except where over 60% of its property has been invested throughout the distribution period in, broadly, interest-paying investments, in which case it will usually make interest distributions.

Part 2B of the Authorised Investment Funds (Tax) Regulations 2006 provides certainty that specified transactions carried out by an authorised fund, such as the Company, will not be treated as trading transactions for funds that meet a genuine diversity of ownership condition. For these purposes, the ACD confirms that all Classes of the Company are primarily intended for and marketed to the category of retail and institutional investors. The ACD undertakes that Shares in the Company will be widely available and will be marketed and made available sufficiently widely to reach the intended categories of investors and in a manner appropriate to attract those kinds of investors.

Shareholders

Income

Where a Fund makes dividend distributions (which will be automatically retained in the Fund in the case of Accumulation Shares), U.K. tax resident individual taxpayers should be eligible for a tax-free allowance on dividends, currently £500 (as of tax year 2024/25). U.K. tax resident Shareholders holding Accumulation Shares will be liable to tax on their income as if they had actually received a distribution.

Where a Fund makes interest distributions, these will be made on a gross basis, without any deduction for income tax. Shareholders will be obliged to include the full amount of the distribution on their tax returns and pay tax accordingly. UK individual tax payers may be eligible for a tax free allowance of £1,000 (basic rate tax payers) or £500 (higher rate tax payers) (current as of 2024/25). Additional rate tax payers will not be entitled to any tax free allowance on interest income.

HMRC has powers to gather specific information from third parties about a group of taxpayers. HMRC may issue a written notice requiring a data-holder to provide relevant data. The Company is a relevant data-holder and may be required to provide information and documents relating to accounts or sums on which interest paid or credited on money received or retained in the UK is payable.

Income Equalisation

The first income allocation received by an investor after buying Shares may include an amount of income equalisation. This is effectively a repayment of the income equalisation paid by the investor as part of the purchase price. It is a return of capital, and is not taxable. Rather it should be deducted from the acquisition cost of the Shares for capital gains tax purposes. Equalisation will be applied to all of the Funds.

Gains

Shareholders may, depending on their personal circumstances, be liable to capital gains tax or, if a corporate Shareholder, corporation tax on gains arising from the redemption, transfer, switches, or other disposal of Shares (but in general not on conversions or switches between Classes within a Fund). A corporate investor that is, at any time in an accounting period, a Shareholder in a Fund which is, at any time during that period, over 60% invested in, broadly, interest-paying investments must treat the Shares as a creditor relationship of the investor for U.K. corporation tax purposes and all returns on the Shares will be taxed or relieved as an income receipt or expense on a “fair value” basis. Accordingly, a corporate investor in such a Fund may, depending on its own circumstances, incur a charge to corporation tax on an unrealised increase in the value of its holding of Shares (or, likewise, obtain relief against corporation tax on an unrealised reduction in the value of its holding of Shares).

Part of any increase in value of Accumulation Shares represents the accumulation of income (including income equalisation). These amounts may be treated as allowable costs when calculating the capital gain realised on their disposal.

Foreign Account Tax Compliance Act (FATCA)

The International Tax Compliance Regulations 2015 (and amendments thereunder) give effect to an Intergovernmental agreement (“IGA”) between the United States and the United Kingdom in relation to the U.S. Foreign Account Tax Compliance Act (“FATCA”). FATCA is designed to assist the U.S. Internal Revenue Service combat U.S. tax evasion by requiring financial institutions to report certain U.S. investors or U.S. holdings.

The Company intends to carry on its business in such a way to ensure that it is FATCA compliant. Failure of the Company to be FATCA compliant would result in a 30% withholding tax on certain payments of U.S. source income made to the Company which could reduce the amounts available to make payments to investors. The Company or its authorised agents or distributors reserve the right to request such information or documents as is necessary to verify the identity and FATCA status of an applicant for Shares. This can include, but is not limited to, date of birth, countries of citizenship, countries of tax residency and associated taxpayer identification numbers. Failure to provide information as required may result in the rejection of the relevant application. The Company shall have the right to require all investors to be compliant with FATCA. Certain investors, such as non-participating foreign financial institutions ("FFIs") or recalcitrant account holders (as defined by FATCA), may be reported to the local tax authority and redeemed at the sole discretion of the ACD. The Company may disclose the information or documentation that it receives from or regarding investors to HMRC, the US Internal Revenue Service, other taxing authorities, or other parties as necessary to comply with FATCA, related intergovernmental agreements or other applicable law or regulation.

The ACD does not support U.S. tax evasion or any request to help investors avoid detection under FATCA. The ACD is not able to provide tax advice and cannot determine the impact or compliance obligations of FATCA or an applicable IGA for investors' business activities. The ACD strongly encourages investors to seek the advice of an experienced tax advisor to determine what actions investors may need to take.

OECD Common Reporting Standard (CRS)

In addition to the IGA signed with the U.S. relating to FATCA, the U.K. has signed the Multilateral Competent Authority Agreement to implement the Common Reporting Standard ("**CRS**") regime. The CRS regime has been implemented in the UK by the International Tax Compliance Regulations 2015 (as amended).

The CRS regime, which was proposed by the Organisation for Economic Cooperation and Development ("**OECD**"), generalises the automatic exchange of information between participating countries from 1 January 2016. Under the adopted provisions, the ACD may be required to report certain information relating to Shareholders (including name, address, tax residency, tax identification number (TIN), date and place of birth (as appropriate)), and details of income and redemption proceeds received by Shareholders in respect of their Shares. This information may be shared with tax authorities in jurisdictions which implement the OECD's CRS.

Investors should consult their own tax advisers regarding any potential obligations that the CRS may impose on them.

Appendix 1: The Funds

Vanguard FTSE U.K. Equity Income Index Fund

Investment objective and policy

The Vanguard FTSE U.K. Equity Income Index Fund (the "**Fund**") seeks to track the performance of the FTSE U.K. Equity Income Index (the "**Index**").

The Index consists of common shares of companies listed on the London Stock Exchange's main market, that are expected to pay dividends that generally are higher than average. Further information on the composition of the Index may be obtained at "https://www.ftserussell.com/analytics/factsheets/home/constituentsweights" and "https://www.lseg.com/en/ftse-russell/indices/custom-methodologies".

The Fund is a passive fund with an investment strategy designed to replicate the performance of the Index by investing in all of the component shares of the Index, holding each share in approximately the same proportion as its weighting in the Index. **The Fund may have exposure to or invest up to 20% of its Net Asset Value in shares issued by the same company, which limit may be raised to 35% for a single company in exceptional market conditions resulting in the dominance of a particular company in the Index.** For more information on the potential implications for investors of this tracking strategy, please see below and refer to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

In tracking the performance of the Index, the Fund attempts to replicate the Index by investing all, or substantially all, of its assets in the securities which make up the Index, holding each security in approximately the same proportion as its weighting in the Index. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.3%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a quarterly basis in March, June, September and December. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund UK Equity Income category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund UK Equity Income category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole discretion of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment

Adviser which has been appointed in respect of the Fund is based; or

(c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "Fund Holiday").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	4.30 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.14% pa / Capital	0.12% pa / Capital
Accounting periods and income allocation dates		
Annual Accounting Period	31 October	
Interim Accounting Period	30 April	
Annual Income Allocation Date	31 December	
Interim Income Allocation Date	30 June	
Grouping Periods for Income Equalisation	Semi-Annual Accounting Periods	
FCA Product Reference Number	**646004**	

Vanguard FTSE Developed World ex-U.K. Equity Index Fund

Investment objective and policy

The Vanguard FTSE Developed World ex-U.K. Equity Index Fund (the "**Fund**") seeks to track the performance of the FTSE Developed ex-U.K. Index (the "**Index**").

The Index is comprised of large and mid-size shares providing coverage of developed markets around the world, excluding the U.K. The Index is a free-float market-capitalisation weighted index derived from the FTSE Global Equity Index Series (GEIS), which covers 98% of the world's investable market capitalisation. Further information on the composition of the Index may be obtained at "https://www.ftserussell.com/analytics/factsheets/home/constituentsweights" and "https://www.ftserussell.com/products/indices/geisac". Free-float means that only shares readily available in the market are included when calculating a company's weight in a given index and excludes locked-in shares (such as those held by governments). Market-capitalisation is the value of a company's outstanding shares in the market and shows the size of a company.

The Fund is a passive fund with an indexing investment strategy designed to replicate the performance of the Index by investing in all of the component shares of the Index, holding each share in approximately the same proportion as its weighting in the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

In tracking the performance of the Index, the Fund attempts to replicate the Index by investing all, or substantially all, of its assets in the securities which make up the Index, holding each security in approximately the same proportion as its weighting in the Index. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.2%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a semi-annual basis in March and September. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund Global Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund Global Large-Cap Blend Equity category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or

(c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "**Fund Holiday**").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.14% pa / Income	0.08% pa / Income
Accounting periods and income allocation dates		
Annual Accounting Period	31 October	
Interim Accounting Period	30 April	
Annual Income Allocation Date	31 December	
Interim Income Allocation Date	None	
Grouping Periods for Income Equalisation	Annual Accounting Periods	
FCA Product Reference Number	**646005**	

Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund

Investment objective and policy

The Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund (the "**Fund**") seeks to track the performance of the FTSE Developed Europe ex-U.K. Index (the "**Index**").

The Index is comprised of large and mid-size common shares across the developed European markets, excluding the U.K. The Index is a free-float market-capitalisation weighted index derived from the FTSE Global Equity Index Series (GEIS), which covers 98% of the world's investable market capitalisation. Further information on the composition of the Index may be obtained at "https://www.ftserussell.com/analytics/factsheets/home/constituentsweights" and "https://www.ftserussell.com/products/indices/geisac". Free-float means that only shares readily available in the market are included when calculating a company's weight in a given index and excludes locked-in shares (such as those held by governments). Market-capitalisation is the value of a company's outstanding shares in the market and shows the size of a company.

The Fund is a passive fund with an indexing investment strategy designed to replicate the performance of the Index by investing in all of the component shares of the Index, holding each share in approximately the same proportion as its weighting in the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

In tracking the performance of the Index, the Fund attempts to replicate the Index by investing all, or substantially all, of its assets in the securities which make up the Index, holding each security in approximately the same proportion as its weighting in the Index. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.3%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a semi-annual basis in March and September. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund Europe ex-UK Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund Europe ex-UK Equity category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole discretion of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance

with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "**Fund Holiday**").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	4.00 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.12% pa / Income	0.08% pa / Income
Accounting periods and income allocation dates		
Annual Accounting Period	31 October	
Interim Accounting Period	30 April	
Annual Income Allocation Date	31 December	
Interim Income Allocation Date	None	
Grouping Periods for Income Equalisation	Annual Accounting Periods	
FCA Product Reference Number	**646006**	

Vanguard U.S. Equity Index Fund

Investment objective and policy

The Vanguard U.S. Equity Index Fund (the "**Fund**") seeks to track the performance of the S&P Total Market Index (the "**Index**").

The Index is a market-capitalisation weighted index representing the U.S. stock market, offering broad exposure to large, mid, small, and micro-size companies regularly traded on the New York Stock Exchange and the Nasdaq over-the-counter market. Further information on the composition of the Index may be obtained at https://www.spglobal.com/spdji/en/supplemental-data/europe/. Market-capitalisation is the value of a company's outstanding shares in the market and shows the size of a company.

The Fund is a passive fund with an indexing investment strategy designed to track the performance of the Index as closely as possible by investing in a representative sample of the component shares of the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer also to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

The Fund attempts to select those securities which will create the representative sample that tracks the performance of the Index as closely as possible. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.2%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a quarterly basis in March, June, September and December. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Investment Adviser

The ACD has appointed Vanguard Global Advisers, LLC as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund US Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund US Large-Cap Blend Equity category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**") .

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.10% pa / Income	0.06% pa / Income
Accounting periods and income		
Annual Accounting Period	31 October	
Interim Accounting Period	30 April	
Annual Income Allocation Date	31 December	
Interim Income Allocation Date	None	
Grouping Periods for Income	Annual Accounting Periods	
FCA Product Reference Number	**646007**	

Vanguard U.K. Inflation-Linked Gilt Index Fund

Investment objective and policy

The Vanguard U.K. Inflation-Linked Gilt Index Fund (the "**Fund**") seeks to track the performance of the Bloomberg U.K. Government Inflation-Linked Float Adjusted Bond Index (the "**Index**").

The Index is a float adjusted market-capitalisation weighted index representing the U.K. government inflation-linked securities market, offering exposure to inflation-linked gilts with maturities greater than one year. Further information on the composition of the Index may be obtained at "https://www.bloomberg.com/professional/product/indices/bloomberg-fixed-income-indices/#/ucits".Float adjusted means that the Index is calculated to include only securities that are readily available to purchase on the market, rather than the total amount of securities issued. Market-capitalisation is the value of an issuer's outstanding securities in the market and shows the size of an issuer's total outstanding securities.

The Fund is a passive fund with an indexing investment strategy designed to track the performance of the Index as closely as possible by investing in a representative sample of the component bonds of the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer also to the "Index–related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in inflation-linked bonds. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

More than 35% in value of the property of the Fund may be invested in government and public securities issued or guaranteed by the Government of the United Kingdom.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

The Fund attempts to select those securities which will create the representative sample that tracks the performance of the Index as closely as possible. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.5%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a monthly basis. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund GBP Inflation-Linked Bond category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund GBP Inflation-Linked Bond category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-

ICVC.pdf

Valuation point	4.15 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge /	0.12% / Income	0.06% pa / Income
Accounting periods and		
Annual Accounting Period	31 October	
Interim Accounting Periods	31 January / 30 April / 30 July	
Annual Income Allocation	31 December	
Interim Income Allocation	31 March / 30 June / 30 September	
Grouping Periods for	Annual Accounting Periods	
FCA Product Reference Number	**646008**	

Vanguard U.K. Long Duration Gilt Index Fund

Investment objective and policy

The Vanguard U.K. Long Duration Gilt Index Fund (the "**Fund**") seeks to track the performance of the Bloomberg U.K. Government 15+ Years Float Adjusted Bond Index (the "**Index**").

The Index is a float adjusted market-capitalisation weighted index representing a segment of the U.K. government bond market, offering exposure to gilts with maturities greater than 15 years. Further information on the composition of the Index may be obtained at "www.bloomberg.com/professional/product/indices/bloomberg-fixed-income-indices/#/ucits". Float adjusted means that the Index is calculated to include only securities that are readily available to purchase on the market, rather than the total amount of securities issued. Market-capitalisation is the value of an issuer's outstanding securities in the market and shows the size of an issuer's total outstanding securities.

The Fund is a passive fund with an indexing investment strategy designed to track the performance of the Index as closely as possible by investing in a representative sample of the component bonds of the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer also to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in bonds. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

More than 35% in value of the property of the Fund may be invested in government and public securities issued or guaranteed by the Government of the United Kingdom.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

The Fund attempts to select those securities which will create the representative sample that tracks the performance of the Index as closely as possible. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.5%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a monthly basis. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund GBP Government Bond category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund GBP Government Bond category.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	4.15 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.12% pa / Income	0.08% pa / Income
Accounting periods and income		
Annual Accounting Period	31 October	
Interim Accounting Periods	31 January / 30 April / 30 July	
Annual Income Allocation Date	31 December	
Interim Income Allocation Dates	31 March / 30 June / 30 September	
Grouping Periods for Income	Annual Accounting Periods	
FCA Product Reference Number	**646009**	

Vanguard FTSE Global All Cap Index Fund

Investment objective and policy

The Vanguard FTSE Global All Cap Index Fund (the "**Fund**") seeks to track the performance of the FTSE Global All Cap Index (the "**Index**").

The Index is a market-capitalisation weighted index representing the performance of large, mid and small-size shares covering developed and emerging markets around the world. Further information on the composition of the Index may be obtained on request from the ACD. Emerging markets are countries that are progressing toward becoming advanced, usually shown by some development in financial markets, the existence of some form of stock exchange and a regulatory body. Market-capitalisation is the value of a company's outstanding shares in the market and shows the size of a company.

The Fund is a passive fund with an indexing investment strategy designed to track the performance of the Index as closely as possible by investing in a representative sample of the component shares of the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer also to the "Index-related risks" section of this Prospectus.

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Tracking Error

The Fund attempts to select those securities which will create the representative sample that tracks the performance of the Index as closely as possible. Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.2%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the Investment Adviser will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the "Excess Return and Tracking Error" section of this Prospectus for further information on Tracking Error.

The Index rebalances on a semi-annual basis, in March and September. For the potential cost impact of rebalancing, please see the "Index rebalancing and costs" section of this Prospectus.

Change of Index

The Fund reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the Fund's agreement with the sponsor of the Index is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance. Further information on the composition of the Index may be obtained at "https://www.ftserussell.com/analytics/factsheets/home/constituentsweights" and "https://www.ftserussell.com/products/indices/geisac".

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund Global Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar's EAA Fund Global Large-Cap Blend Equity category.

Investor profile

- Investors seeking general capital formation and / or asset optimisation.
- Investors with a long-term[11] investment horizon.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are

[11] More than 5 years.

closed and as a result of which 25% or more of the securities in the Index may not be traded; or

(b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or

(c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "**Fund Holiday**").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Initial Offer Price (one day)	GBP Class: £100 per	
Valuation point	9.00 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.23% pa / Income	0.12% pa / Income
Accounting periods and income allocation dates		
Annual Accounting Period	31 October	
Interim Accounting Period	30 April	
Annual Income Allocation Date	31 December	
Interim Income Allocation Date	None	
Grouping Periods for Income Equalisation	Annual Accounting Periods	
FCA Product Reference Number	**763980**	

Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK)

Sustainable investment labels

Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label. While the fund is committed to excluding assets from certain activities, it does not have a sustainability objective. As a result, it does not meet the FCA's requirements for a sustainable investment label.

Investment objective and policy

Investment objective

The Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK) (the "**Fund**") seeks to track the performance of the FTSE Developed All Cap Choice Index (the "**Index**").

Investment policy and strategy

Asset selection

In order to seek to achieve its investment objective, the Fund will generally invest directly into the shares of companies in the Index as described in the section with the heading "Replication and Sampling Strategy" below.

Index description

Overview

The Index is constructed from the FTSE Developed All Cap Index (the "**Parent Index**"). The Parent Index is a market-capitalisation weighted index representing the performance of large, mid and small companies covering developed markets around the world. Market-capitalisation is the value of a company's outstanding shares in the market and shows the size of a company.

The Index is created by screening the Parent Index based on the exclusion criteria shown below.

Exclusion Criteria

The Index provider applies exclusionary screens to all the constituents in the Parent Index, in order to create the Index.

The Index methodology excludes shares of companies from the Parent Index where the Index provider determines that companies are engaged or involved in specific activities of the supply chain for, and / or derive revenue (above thresholds specified by the Index provider and set out in https://fund-docs.vanguard.com/Vanguard_ESG_Scr_Dev_World_All_Cap_Eq_Index_FundUK_Exclusions.pdf) from certain activities relating to the following:

(a) Vice Products: adult entertainment, alcohol, cannabis, gambling, tobacco;
(b) Non-Renewable Energy: nuclear power, fossil fuels (which includes (i) companies that have greater than 50% ownership of companies that own proved or provable reserves in coal, oil or gas, (ii) oil and gas production and supporting services, (iii) coal extraction, production and supporting services, (iv) oil and gas and thermal coal power generation and (v) extraction of arctic oil and gas and oil sands); and
(c) Weapons: chemical and biological weapons, cluster munitions, anti-personnel landmines, nuclear weapons, conventional military weapons and civilian firearms.

The Index methodology also excludes shares of companies based on certain controversial conduct, which is achieved by excluding companies that meet certain criteria in relation to the United Nations Global Compact Principles regarding labour, human rights, environmental, and anti-corruption standards as described further in https://fund-docs.vanguard.com/Vanguard_ESG_Scr_Dev_World_All_Cap_Eq_Index_FundUK_Exclusions.pdf.

The Index provider is independent of Vanguard. Where the Index provider has insufficient or no data available to adequately assess a particular company relative to the Exclusion Criteria of the Index, such companies will be excluded from the Index until such time as they may be determined to be eligible by the Index provider.

Further information on the composition of the Index, including details as to its exact composition, methodology, exclusions, and any revenue thresholds, may be obtained at "https://www.ftserussell.com/analytics/factsheets/home/constituentsweights" and "https://www.ftserussell.com/products/indices/global-choice".

Use of derivatives

To track the Index as closely as possible, the Fund attempts to remain fully invested in shares. The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details on the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Temporary Investment Measures

The Fund may temporarily depart from its investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Additional information

Replication and sampling strategy

The Fund is a passive fund with an investment strategy designed to replicate, to the extent practicable, the performance of the Index by investing in all of the component shares of the Index, holding each share in approximately the same proportion as its weighting in the Index. When it is not practicable to use this replication strategy (for example), the Fund uses an investment strategy designed to track the performance of the Index as closely as possible by investing in a representative sample of the component shares of the Index. For more information on the potential implications for investors of this tracking strategy, please see below and refer to the "Index-related risks" section of this Prospectus.

Tracking Error

Tracking Error reflects the volatility in the difference of performance between the Fund and the Index. Realised (ex-post) Tracking Error may vary from time to time depending on a range of circumstances that may introduce either positive or negative Tracking Error. These include transaction costs, stock lending income, and withholding tax differences. It is anticipated that, under normal market circumstances, the annualised ex-post Tracking Error of the Fund, will be up to 0.2%. While it is anticipated that the ex-post Tracking Error of the Fund will not vary significantly from this level under normal circumstances, there is no guarantee that this level of Tracking Error will be realised, and the ACD will not be liable for any discrepancies between the anticipated Tracking Error and the level of Tracking Error subsequently observed. The annual report of the Company will provide an explanation of any divergence between anticipated and realised Tracking Error for the relevant period. Please refer to the “Excess Return and Tracking Error” section of this Prospectus for further information on Tracking Error.

The Index rebalances on a quarterly basis in March, June, September and December. For information about the potential cost impact of rebalancing, please see the section of this Prospectus with the heading “Index rebalancing and costs”.

Change of Index

The ACD reserves the right to substitute a different index for the Index it currently tracks if the Index is discontinued, if the ACD’s agreement with the Index provider is terminated, or for any other reason determined in good faith by the ACD. In any such instance, the substitute index would measure substantially the same market segment as the Index.

Other information

The Fund may make use of total return swaps for the purpose of efficient portfolio management. See Appendix 4 (Use of total return swaps and Securities Financing Transactions) for more information.

Additional Sustainability Disclosure Requirements

Metrics

The ACD will provide information in its public product-level sustainability report about the proportion of the components of the Parent Index that is excluded from the Fund’s portfolio as a result of application of the exclusionary screens applied by the Index provider.

Investment Adviser

The ACD has appointed Vanguard Asset Management Limited as Investment Adviser for the Fund.

Performance

Target benchmark: The performance of the Fund may be compared against the Index. As the Fund seeks to track the performance of the Index and will invest in its component securities, the ACD considers that this benchmark best reflects the investment strategy of the Fund as a means to assess its performance.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by Morningstar in the EAA Fund Global Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund’s performance. Therefore, the performance of the Fund may also be compared against the performance data for Morningstar’s EAA Fund Global Large-Cap Blend Equity category.

Investor profile

- Investors seeking investment performance that tracks the performance of the Index and / or

exposure to the assets that form part of the Index.
- Investors with a long-term[12] investment horizon.
- Investors who wish to invest in a fund that meets their ESG preferences.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) markets on which the securities included in the Index are listed or traded, or markets relevant to that Index, are closed and as a result of which 25% or more of the securities in the Index may not be traded; or (b) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (c) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf	
Valuation point	9.00 p.m. (London time)	
Cut-off time	12.00 noon (London time)	
Classes of Shares	**GBP**	**Institutional Plus**
Income or Accumulation	Both	Both
Currency of Denomination	GBP	GBP
Minimum Investment	£1,000,000	£100,000,000
Minimum Holding	£1,000,000	£100,000,000
Minimum Subsequent Investment	None	None
Charges	**GBP**	**Institutional Plus**
Preliminary Charge	None	None
Redemption Charge	None	None
Conversion Charge	None	None
Switching Charge	None	None
Management Charge / Charged to	0.20% pa / Income	0.13% pa / Income
Accounting periods and income allocation dates		

[12] More than 5 years.

Annual Accounting Period	31 October
Interim Accounting Period	31 January / 30 April / 31 July
Annual Income Allocation Date	31 December
Interim Income Allocation Date	31 March / 30 June / 30 September
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**926918**

Vanguard Global Emerging Markets Fund

Investment objective and policy

The Vanguard Global Emerging Markets Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years).

The Fund is an active fund and may use a multi-manager structure as further described in the section with the heading "Investment Advisers" below. When there is more than one investment adviser, each investment adviser will use their expertise to pick investments to achieve the Fund's objectives.

The Fund seeks to achieve its investment objective by investing primarily in shares of companies located in emerging markets around the world. Under normal circumstances, at least 80% of the Fund's assets will be invested in shares of such companies. A company is considered to be located in an emerging market country if it is organised under the laws of, or has a principal office in, an emerging country; if it has a class of securities whose principal securities market is in an emerging country; if it derives 50% or more of its total revenue from goods produced, sales made, or services provided in one or more emerging countries; or if it maintains 50% or more of its assets in one or more emerging countries. The Investment Adviser has discretion to determine which countries are regarded as emerging markets, although those classified by the International Monetary Fund (IMF) as emerging or developing economies will typically be included, together with other countries having similar characteristics. Emerging markets are countries that are progressing toward becoming advanced, usually shown by some development in financial markets, the existence of some form of stock exchange and a regulatory body.

The Fund typically invests in a diverse range of companies representing different economic sectors and industry groups across the spectrum of large, mid and small cap value securities, chosen mainly on the basis of an investment approach that focuses on analysing individual shares rather than stock markets. The Fund's country, sector and industry weightings are not driven by views that look at the big picture first, e.g., the economy as a whole. The Fund's holdings will comprise a mix of investments in companies whose earnings are expected to grow faster than their peers in the market (known as 'growth stocks') and those that are considered to have been undervalued by the market (known as 'value stocks') selected from the world's emerging markets.

The Fund may also have exposure to bonds and other fixed income securities, other collective investment schemes (which themselves invest in securities which are consistent with the Fund's objective), money market instruments and deposits, and warrants. Money market instruments are investments usually issued by banks or governments that are a short term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period. A deposit is a fixed term investment that gathers interest over the period of its term. Warrants provide the holder with the right, but not the obligation, to purchase a share at a fixed price or amount at a fixed time in the future.

The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details of the investment powers and restrictions for the Fund are set out in **Appendix 3** headed **"Investment Powers and Restrictions"**.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Baillie Gifford Overseas Limited and Pzena Investment Management, LLC to act as sub-investment advisers to separately manage an assigned portion of the Fund's investments. For further information, please refer to the section of this Prospectus with the heading "Independent Sub-Investment Advisers".

Performance

The performance of the Fund may be compared against the FTSE Emerging Index (the "**Index**"). Whilst the Fund may invest in components of the Index, it is not tracking the Index and the Fund will hold investments that are not components of the Index. The ACD considers that this benchmark is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Global Emerging Markets sector and by Morningstar in the EAA Fund Global Emerging Markets Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Global Emerging Markets sector and Morningstar's EAA Fund Global Emerging Markets Equity category.

Investor profile

- Investors seeking general capital formation and / or asset optimisation.
- Investors with a long-term[13] investment horizon.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance

[13] More than 5 years.

with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "**Fund Holiday**").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.78% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**748432**

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Vanguard Global Equity Fund

Investment objective and policy

The Vanguard Global Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years).

The Fund is an active fund and may use a multi-manager structure as further described in the section with the heading "Investment Advisers" below. When there is more than one investment adviser, each investment adviser will use their expertise to pick investments to achieve the Fund's objectives.

The Fund seeks to achieve its investment objective by investing primarily in shares of companies which may be located anywhere in the world. Under normal circumstances, at least 80% of the Fund's assets will be invested in shares.

The Fund typically invests in a diverse range of companies representing different economic sectors and industry groups across the spectrum of large, mid and small companies, that are considered to have been undervalued by the market (known as 'value stocks'), chosen mainly on the basis of an investment approach that focuses on analysing individual shares rather than stock markets. The Fund's country, sector and industry weightings are not driven by views that look at the big picture first, e.g. the economy as a whole. The Fund's holdings will comprise a mix of investments in companies whose earnings are expected to grow faster than their peers in the market (known as 'growth stocks') and value stocks selected from a broad range of the world's developed and emerging markets. Emerging markets are countries that are progressing toward becoming advanced, usually shown by some development in financial markets, the existence of some form of stock exchange and a regulatory body.

The Fund may also have exposure to bonds and other similar securities, other collective investment schemes (which themselves invest in securities which are consistent with the Fund's objective), money market instruments and deposits, and warrants. Money market instruments are investments usually issued by banks or governments that are a short term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period. A deposit is a fixed term investment that gathers interest over the period of its term. Warrants provide the holder with the right, but not the obligation, to purchase a share at a fixed price or amount at a fixed time in the future.

The Fund may use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details of the investment powers and restrictions for the Fund are set out in **Appendix 3** headed **"Investment Powers and Restrictions"**.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed **Baillie Gifford Overseas Limited** and **Wellington Management Company LLP** to act as sub-investment advisers to separately manage an assigned portion of the Fund's investments. For further information, please refer to the section of this Prospectus with the heading "Independent Sub-Investment Advisers".

Performance

The performance of the Fund may be compared against the FTSE All World Index (the "**Index**"). Whilst the Fund will invest in components of the Index, it is not tracking the Index and the Fund will hold investments that are not components of the Index. The ACD considers that this benchmark is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Global sector and by Morningstar in the EAA Fund Global Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Global sector and Morningstar's EAA Fund Global Large-Cap Blend Equity category.

Investor profile

- Investors seeking general capital formation and / or asset optimisation.
- Investors with a long-term[14] investment horizon.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**").

[14] More than 5 years.

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.48% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**748433**

Vanguard Global Equity Income Fund

Investment objective and policy

The Vanguard Global Equity Income Fund (the "**Fund**") seeks to provide an annual level of income (gross of fees) greater than that of the FTSE Developed Index (the "**Index**") together with an increase in the value of investments over the long-term (more than 5 years).

The Fund is an active fund and may use a multi-manager structure as further described in the section with the heading "Investment Advisers" below. When there is more than one investment adviser, each investment adviser will use their expertise to pick investments to achieve the Fund's objectives.

The Fund seeks to achieve its investment objective by investing primarily in shares of companies which tend to pay out a larger amount of money as income (gross of fees) than an equivalent investment in the Index would pay out. Such companies may be located anywhere in the world. Under normal circumstances, at least 80% of the Fund's assets will be invested in shares.

The Fund generally invests in a diverse range of large and mid-size companies representing different economic sectors and industry groups. The investment strategy involves a combination of an investment approach that focuses on analysing individual shares rather than stock markets, and, to a lesser degree, some quantitative assessment. The Fund's country, sector and industry weightings are not driven by views that look at the big picture first, e.g., the economy as a whole. Companies are typically chosen because they have a history of consistently paying out money in the form of a dividend from shares, while also providing a reasonable increase in the value of investments over the long-term. The Fund's holdings will comprise a mix of investments in companies whose earnings are expected to grow faster than their peers in the market (known as 'growth stocks') and those that are considered to have been undervalued by the market (known as 'value stocks') selected from a broad range of the world's developed and emerging markets. Emerging markets are countries that are progressing toward becoming advanced, usually shown by some development in financial markets, the existence of some form of stock exchange and a regulatory body.

The Fund may also have exposure to bonds and other similar securities, other collective investment schemes (which themselves invest in securities which are consistent with the Fund's objective), money market instruments and deposits, and warrants. Money market instruments are investments usually issued by banks or governments that are a short term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period. A deposit is a fixed term investment that gathers interest over the period of its term. Warrants provide the holder with the right, but not the obligation, to purchase a share at a fixed price or amount at a fixed time in the future.

The Fund may use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details of the investment powers and restrictions for the Fund are set out in **Appendix 3** headed **"Investment Powers and Restrictions"**.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Wellington Management LLP to act as sub-investment adviser to manage approximately two-thirds of the Fund's investments. The Investment Adviser (Vanguard Global Advisers LLC) separately manages approximately one-third of the Fund's assets. For further information, please refer to the section of this Prospectus with the heading "Independent Sub-Investment Advisers".

Performance

The performance of the Fund may be compared against FTSE Developed Index (the "**Index**"). Whilst the Fund will invest in components of the Index, it is not tracking the Index and the Fund may hold investments that are not components of the Index. The ACD considers that this benchmark is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Global Equity Income sector and by Morningstar in the EAA Fund Global Equity Income category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Global Equity Income sector and Morningstar's EAA Fund Global Equity Income category.

Investor profile

- Investors seeking general capital formation and / or asset optimisation.
- Investors with a long-term[15] investment horizon.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**").

[15] More than 5 years.

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged	0.48% pa / Capital
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	31 January / 30 April / 31 July
Annual Income Allocation Date	31 December
Interim Income Allocation Date	31 March / 30 June / 30 September
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**748434**

Vanguard Active U.K. Equity Fund

Investment objective and policy

The Vanguard Active U.K. Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years).

The Fund is an active fund and may use a multi-manager structure as further described in the section with the heading "Investment Advisers" below. When there is more than one investment adviser, each investment adviser will use their expertise to pick investments to achieve the Fund's objectives.

The Fund seeks to achieve its investment objective by investing primarily in shares of U.K. companies, being those which are incorporated, domiciled or conduct a significant portion of their business in the U.K. Such companies may also be listed in the U.K. Under normal circumstances, at least 80% of the Fund's assets will be invested in shares of such companies.

The Fund may invest in companies of all sizes and across a range of different economic sectors and industry groups. These investments are chosen mainly on the basis of an investment approach that focuses on analysing individual shares rather than stock markets. Accordingly, the Fund's sector and industry weightings are not driven by views that look at the big picture first, e.g., the economy as a whole.

The Fund may also have exposure to bonds and other similar securities, other collective investment schemes (which themselves invest in securities which are consistent with the Fund's objective), money market instruments and cash deposits, and warrants. Money market instruments are investments usually issued by banks or governments that are a short term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period. Warrants provide the holder with the right, but not the obligation, to purchase a share at a fixed price or amount at a fixed time in the future.

The Fund may use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund will not use derivatives for speculative purposes, and only a limited percentage of its assets is committed to them. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**.

Further details of the investment powers and restrictions for the Fund are set out in **Appendix 3** headed **"Investment Powers and Restrictions"**.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Investment Adviser's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Investment Adviser deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Baillie Gifford Overseas Limited and Schroder Investment Management North America Inc. to act as sub-investment advisers to separately manage an assigned portion of the

Fund's investments. For further information, please refer to the section of this Prospectus with the heading "Independent Sub-Investment Advisers".

Performance

The performance of the Fund may be compared against the FTSE All-Share Index (the "**Index**"). Whilst the Fund will invest in components of the Index, it is not tracking the Index and the Fund may hold investments that are not components of the Index. The ACD considers that this benchmark is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the UK All Companies sector and by Morningstar in the EAA Fund UK Flex-Cap Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's UK All Companies sector and Morningstar's EAA Fund UK Flex-Cap Equity category.

Investor profile

- Investors seeking general capital formation and / or asset optimisation.
- Investors with a long-term[16] investment horizon.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf
Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**

[16] More than 5 years.

Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.45% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation	31 December
Interim Income Allocation	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	915178

Vanguard Global Capital Stewards Equity Fund

Sustainable investment labels

Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label. Although the Fund focuses on investing in companies that display strong corporate governance and set net-zero targets, it does not have a specific sustainability objective. As a result, it does not meet the FCA's requirements for a sustainable investment label.

Investment objective and policy

Investment objective

The Vanguard Global Capital Stewards Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years), through a combination of capital growth and income. The Fund aims to achieve this whilst selecting investments which meet certain sustainability criteria.

Investment policy

The Fund is actively managed and seeks to achieve its investment objective by investing at least 90% of the Fund's assets) in shares issued by large companies worldwide which demonstrate good governance and act as good "stewards" of their capital. Such investments will be selected following a financial assessment, a governance assessment and in accordance with the sustainability approach set out below.

Overview of asset selection criteria

Sectors, industries and location

Subject to applying the Sustainability Criteria described below, there are no restrictions on the types of company the Fund can invest in. Although the Fund can invest worldwide, the majority of the Fund's investments will be in developed countries. The Fund can invest in all countries, sectors and industries and will typically hold shares of 35 to 45 companies, which are selected by considering the factors below.

(a) ***Financial assessment***

The Manager will seek to invest in companies that show a history of strong financial returns over time and/or long-term growth.

(b) ***Governance assessment***

The Manager will seek to invest in companies whose management teams and boards display strong corporate governance and act as good "stewards" of their capital by balancing the interests of all stakeholders (including customers, employees, communities and stakeholders in the supply chain) in the pursuit of profits and consider environmental, social and governance risks and opportunities in their corporate strategy. The Manager assesses how the company addresses environmental topics as well as whether the company demonstrates appropriate duty of care towards stakeholders (including employees, customers and suppliers). The Manager draws upon a wide variety of internal research and external sources to assess any potential impact on the value of the assets over the time horizon of the Fund. The results of research and engagement with companies are used by the Manager to evaluate and track the return and governance profiles of companies on an ongoing basis and compare them with peers. The Manager is looking for companies with strong management teams, durable governance structures, thoughtful allocation of capital and resources, a long-term orientation and consideration of all stakeholders.

(c) ***Sustainability characteristics***

The Fund (i) considers certain requirements as part of its asset selection and (ii) carries out ongoing monitoring and engagement as further described below, which together make up the sustainability characteristics (being environmental and/or social characteristics) of the Fund.

(i) Asset selection

All potential investments (unless otherwise specified) must meet certain requirements as determined by net zero targets and an exclusions policy before they are considered suitable investments for the Fund.

Carbon emissions and targets

When selecting assets for the Fund (and subject to the net zero targets described below), the Manager will only invest in companies that have at least one of the following three attributes:

- a net zero science-based target;
- a non- science-based target which is a public active emissions reduction target; or
- a combined scope 1+2 carbon intensity (tons CO2/$M revenue) that is at least 25% below their industry average (based on the Global Industry Classification Standard Level 3) based on publicly disclosed emissions. Scope 3 emissions are not included as part of this attribute. Some companies which have Scope 1 and 2 carbon intensity that meets the threshold set out here may have high Scope 3 emissions and may form investments of the Fund.

Scope 1 emissions are emissions that occur from sources owned or controlled by the reporting company, such as emissions associated with fuel combustion in boilers, furnaces and vehicles.

Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the reporting company. Scope 2 emissions physically occur at the facility where the electricity, steam, heating or cooling is generated.

Scope 3 emissions are emissions which are indirectly generated throughout the value chain, from upstream activities such as purchased goods and business travel and downstream activities such as the use of sold products

"Net zero science-based targets" means targets validated by the Science-Based Targets initiative or alternative science-based public active emissions reduction target. The Science-Based Targets initiative sets out a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement: limiting global warming to well below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

Net zero targets

The Manager is committed to investing at least 65% of the Fund's assets in companies with net zero science-based targets by 2030, and all companies that the Fund invests in will have net zero science-based targets by 2040.

The Manager will engage with certain companies it invests in to encourage them to achieve emissions by 2050 in alignment with the Paris Agreement through the establishment of science-based targets.

Exclusions policy

The Manager considers that investments in companies with significant exposure to certain activities would not be suitable for the Fund due to the impact that such companies have on society and/or the environment. Therefore, the Manager seeks to avoid investing in shares issued by companies involved in and/or deriving revenue (above a threshold specified by the Manager and set out in the exclusions policy) from thermal coal extraction or thermal coal-based power generation, oil sands extraction, production of tobacco related products, nuclear weapons and controversial weapons.

To avoid investments in companies involved in and/or deriving revenue from these activities, the Manager has developed and follows an exclusions policy which utilises MSCI factors. The details of the MSCI factors used and relevant revenue thresholds are set out in the Additional Sustainability Disclosure Requirements section below.

The exclusions policy should be referred to for more detail regarding the exclusions applied by the Fund. The latest exclusions policy is available at https://fund-docs.vanguard.com/Vanguard_Capital_Stewards_Equity_Fund_Exclusions_Policy.pdf.

Prior to purchasing any shares for the Fund, the Manager will check that companies issuing such shares are not excluded as a result of the exclusions policy. On an ongoing basis, the Manager checks all companies issuing shares held by the Fund to ensure that there have been no breaches of the exclusions policy. In the event that a breach of the exclusions policy is identified, the Manager will (unless it is otherwise prohibited from selling such assets due to applicable law or regulation) sell the relevant asset(s) within 90 calendar days of identifying such breach.

The exclusions policy is reviewed by the Manager at least annually and more frequently as required and changes to the exclusions policy may occur from time to time with the consent of the ACD.

(ii) Ongoing monitoring and engagement

The Manager reviews and assesses the holdings of the Fund on an ongoing basis to ensure they are aligned with the Sustainability Criteria. Should the Manager determine an investment is not continuing to meet the Sustainability Criteria outlined above, the Manager will engage directly with the company. If initial engagements do not lead to material improvements towards re-alignment with the Sustainability Criteria, the Manager may then engage further through, for example, board-level engagement and proxy voting actions. The Manager's voting policy is available at https://www.wellington.com/en/sustainability/stewardship-and-esg-integration. The Manager may also consider initiating shareholder proposals or divestment of the company.

The Manager will report to investors on the Manager's engagement activities at least annually. The latest reports are available at https://fund-docs.vanguard.com/Vanguard_Capital_Stewards_Equity_Fund_Engagement_report.pdf

Other information

The Fund may have exposure to certain investments that are not subject to the Sustainability Criteria nor the governance assessment. This includes cash, money market instruments and deposits.

The Fund may also use derivatives to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Derivatives will not be subject to the Sustainability Criteria nor the governance assessment (unless the derivative is being used to gain long exposure to an investee company).

Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund is not permitted to invest in derivatives for investment purposes, but derivatives may be used with the aim of reducing risk or managing the Fund more efficiently. Derivatives are not subject to the Sustainability Criteria, however, the Manager will not use derivatives to gain exposure to an asset that it would not be permitted to hold according to the Fund's investment policy. The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under **"Portfolio Investment Techniques"** in **Appendix 4**. Such investments will not be subject to the Sustainability Criteria.

Further details of the investment powers and restrictions for the Fund are set out in **Appendix 3** headed **"Investment Powers and Restrictions"**.

Temporary Investment Measures

The Fund may temporarily depart from this investment policy in response to the Manager's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Manager deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Third party data

The Manager uses a combination of external third-party research and proprietary analysis in its application of the Sustainability Criteria.

Additional Sustainability Disclosure Requirements

Exclusions policy – further details

The details of the MSCI factors used and relevant revenue thresholds of the exclusions policy as at the date of this Prospectus are as follows:

Category	MSCI Factor Used	Revenue Threshold
Nuclear Weapons	Nuclear Weapons - Any Tie	N/A - 'any tie' MSCI factor used
Tobacco	Tobacco Producer	N/A – if factor is "True"
	Tobacco Total - Maximum Percentage of Revenue	Greater than 25% of their revenue in their most recent-year revenue
Thermal Coal	Thermal Coal – Maximum Percentage of Revenue	Greater than 10% of reported or estimated revenue
	Generation Thermal Coal – Maximum Percentage of Revenue	Greater than 30% of reported or estimated revenue
Oil Sands	Oil Sands – Maximum Percentage of Revenue	Greater than 5% of reported or estimated revenue
Controversial Weapons	Controversial Weapons – Any Tie	N/A - 'any tie' MSCI factor used

The above table is included for illustrative purposes only. The exclusions policy should be referred to for more detail regarding the exclusions applied by the Fund.

Metrics

The Manager will report to investors on the Fund's sustainability performance on a periodic basis.

As part of these reports the ACD will provide the following information to investors which the ACD considers will be useful for investors to understand the investment policy of the Fund:

- What percentage of the assets of the Fund have net zero science-based targets;
- The carbon footprint for the fund (shown as the total carbon emissions for the fund normalised by the market value of the fund) shown against the carbon footprint of the FTSE All-World Index;
- The Fund's Weighted Average Carbon Intensity (meaning the Fund's exposure to carbon intensive companies, expressed in tons CO_2e/$M revenue); and
- The number of engagements the Manager has each month with companies invested in by the Fund and examples of the engagements the Manager has had.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed **Wellington Management Company LLP** (the "**Manager**") as sub-investment adviser to manage the Fund's investments, and references to the Manager have effect accordingly. For further information, please refer to the "Independent Sub-Investment Advisers" section of this Prospectus.

Performance

The performance of the Fund may be compared against the FTSE All-World Index (the "**Index**"). Whilst the Fund may invest in components of the Index, it is not tracking the Index and the Fund will hold investments that are not components of the Index. The Index is market capitalisation weighted and designed to measure the equity market performance of developed and emerging markets. The Index does not take into account the sustainability criteria referenced above. Whilst the Fund may hold investments that are components of the Index, the Index is not considered during portfolio construction and the Manager will not manage the extent to which the Fund's investments differ from the Index. The ACD considers that this benchmark is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Global sector and by Morningstar in the EAA Fund Global Large-Cap Blend Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Global sector and Morningstar's EAA Fund Global Large-Cap Blend Equity category.

Investor profile

- Investors seeking capital growth.
- Investors with a long-term[17] investment horizon.
- Investors seeking a fund with sustainability characteristics.
- Investors with at least basic knowledge of and / or experience with financial products.

[17] More than 5 years.

- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf
Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged	0.48% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**964709**

Vanguard ActiveLife Climate Aware 40-50% Equity Fund

Sustainable investment labels

Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label. While the Fund is committed to making sure that a certain portion of its assets demonstrate climate considerations, it does not have a sustainability objective. As a result, it does not meet the FCA's requirements for a sustainable investment label.

Investment objective and policy

Investment objective

The Vanguard ActiveLife Climate Aware 40-50% Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years) together with some money paid out from those investments as income.

Investment policy

The Fund is actively managed and seeks to achieve its investment objective by investing in a combination of shares and bonds.

The Manager will invest:

- 40-50% of the Fund's assets in company shares; and
- 50-60% of the Fund's assets in a combination of (i) bonds issued by companies ("**corporate bonds**") and (ii) bonds issued by entities which are not companies (such as government-related entities) ("**non-corporate bonds**").

The Manager will make sure at least 70% of the Fund's assets meet at least one of the Climate Considerations for company shares, corporate bonds and sovereign bonds as described in the section with the heading "Sustainability Approach" below. The Manager will not invest more than 30% of the gross value of the assets of the Fund in assets that do not demonstrate any of the Climate Considerations.

Overview of asset selection criteria

Sectors, industry groups and location

Overview

The Fund invests in both shares and bonds (which includes corporate bonds and non-corporate bonds) as described in further detail below.

Company shares

Subject to the Sustainability Asset Selection Policy described below (which includes excluding certain companies based on their activities), there are no restrictions on the types of company the Fund can invest in. Although the Fund can invest worldwide, the majority of the Fund's investments will be in developed countries. The Fund can invest in all countries, sectors and industries.

When selecting shares as an investment for the Fund, the Manager looks to identify the long-term value of a company by assessing qualities such as its scale, commitment to paying dividends, stability, growth and governance practices. The Manager also considers whether the company demonstrates at least one of the Climate Considerations set out below.

Bonds

The Fund's bond investments may include corporate bonds and non-corporate bonds.

Non-corporate bonds may include securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), and bonds issued by governments (or government agencies and/or local authorities), sovereigns, treasury organisations and supranationals of developed countries and emerging market countries and international organisations.

When selecting bonds as an investment for the Fund, the Manager considers the broader macroeconomic environment across different regions (including interest rates) and looks at the individual bonds to identify those bonds which would support the Funds objective, including, for corporate bonds, assessing the companies governance practices and whether the company demonstrates at least one of the Climate Considerations set out below and, for non-corporate bonds issued by sovereign entities, whether the fuel exports for the relevant country exceed a certain level as further described below.

The bonds selected are usually rated investment grade at the time of purchase.

Corporate bonds and bonds issued by government-related entities will be subject to the applicable parts of the Sustainability Asset Selection Policy described below.

Sustainability Approach for shares, corporate bonds and sovereign bonds

A. <u>Climate Considerations: Measures supporting the trajectory towards net zero</u>

1. *<u>Shares and corporate bonds</u>*

When purchasing shares and corporate bonds, the Manager will consider whether the company displays at least one of the following qualities, which would enable the Manager to be aware of what the company is doing which might support its journey towards net zero:

i. displays current Scope 1+2 carbon intensity that is at least 25% below the industry average (based on the Global Industry Classification Standard Level 3); and/or
ii. has published an active emissions reduction target

(the "**Corporate Climate Considerations**").

Where a company meets the Corporate Climate Considerations, they will count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations.

Scope 3 emissions are not included in the Corporate Climate Considerations. Some companies which have Scope 1 and 2 carbon intensity that meets the threshold for the Corporate Climate Considerations may have high Scope 3 emissions and may form investments of the Fund.

Scope 1 emissions are emissions that occur from sources owned or controlled by the reporting company, such as emissions associated with fuel combustion in boilers, furnaces and vehicles.

Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the reporting company. Scope 2 emissions physically occur at the facility where the electricity, steam, heating or cooling is generated.

Scope 3 emissions are emissions which are indirectly generated throughout the value chain, from upstream activities such as purchased goods and business travel and downstream activities such as the use of sold products.

The Manager may also invest in shares and corporate bonds issued by companies which do not yet meet the Climate Considerations, provided the Manager is satisfied that such companies are taking appropriate steps to achieve the Corporate Climate Considerations. The Manager will engage with these companies to encourage improvements in their path to net zero by 2050 (as further described in the section with the heading “Engagement” below). Such investments will not count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations. Regardless of whether companies achieve the Corporate Climate Considerations or not, the Fund’s investments may include companies with high carbon emissions, and may, subject to the exclusions policy, include utilities companies and companies involved in activities relating to fossil fuels.

2. *Sovereign bonds*

When purchasing sovereign bonds for the Fund, the Manager will consider whether the relevant country’s sovereign carbon intensity (territorial emissions / GDP) is at least 25% lower than the average carbon intensity of the sovereign constituents within the Composite Index (see the “Performance” section below for details of the Composite Index) (the “**Sovereign Climate Considerations**”). Where a country meets the Sovereign Climate Considerations, sovereign bonds issued by the relevant country will count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations.

The Manager may also invest in sovereign bonds that do not meet the Sovereign Climate Considerations; however, these bonds will only be held for risk management, diversification or liquidity purposes. Such investments will not be considered to have been made in accordance with the Climate Considerations and will not count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations.

Regardless of whether countries achieve the Sovereign Climate Considerations or not, the Fund’s investments may, subject to the exclusions policy described below, include bonds issued in countries with high carbon emissions.

B. Exclusions policy

1. *Shares and corporate bonds*

The Manager considers that investments in companies with significant exposure to certain activities would not be suitable for the Fund due to the impact that such companies have on society and/or the environment. Therefore, in addition to assessing the Corporate Climate Considerations outlined above, the Manager seeks to avoid investing in companies involved in and/or deriving revenue (above a threshold specified by the Manager and set out in the exclusions policy) from thermal coal extraction or thermal coal-based power generation, oil sands extraction, production of tobacco related products, nuclear weapons and controversial weapons.

To avoid investments in companies involved in and/or deriving revenue from these activities, the Manager has developed and follows an exclusions policy which utilises MSCI factors. The details of the MSCI factors used and relevant revenue thresholds are set out in the Additional Sustainability Disclosure Requirements section below.

The exclusions policy should be referred to for more detail regarding the exclusions applied by the Fund. The latest exclusions policy is available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_Range_Exclusions_Policy.pdf.

Prior to purchasing any shares or corporate bonds for the Fund, the Manager will check that companies issuing such shares or corporate bonds are not excluded as a result of the exclusions policy. On an ongoing basis, the Manager checks all companies issuing shares or corporate bonds held by the Fund to ensure that there have been no subsequent breaches of the exclusions policy. In the event that a subsequent breach of the exclusions policy is identified, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying such breach.

The exclusions policy is reviewed by the Manager at least annually and more frequently as required and changes to the exclusions policy may occur from time to time with the consent of the ACD.

2. *Sovereign bonds*

In addition to assessing the Sovereign Climate Considerations outlined above, the Manager will not invest in sovereign bonds issued by countries where the fuel exports for the relevant country exceed 50% of total exports.

Before buying any sovereign bonds for the Fund and on an ongoing basis, the Manager will ensure that the fuel exports for the relevant country do not exceed 50% of total exports. In the event that the Manager identifies that investments are no longer permitted, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying this.

Assets other than shares, corporate bonds and sovereign bonds

The Fund may hold assets that are not subject to the Climate Considerations. This includes securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), bonds issued by government-related entities, government agencies and/or local authorities), treasury organisations, supranational entities, international organisations, open-ended and closed ended collective investment schemes (including closed-ended real estate investment trusts), money market instruments and deposits.

The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as 'efficient portfolio management'). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund is not permitted to invest in derivatives for investment purposes, but derivatives may be used with the aim of reducing risk or managing the Fund more efficiently. Derivatives are not subject to the Sustainability Asset Selection Policy, however, the Manager will not use derivatives with the intention of gaining exposure to an asset that it would not be permitted to hold according to the Fund's investment policy (or to subvert the Sustainability Asset Selection Policy). Within the bond portion of the portfolio, it is intended to use currency derivative contracts to reduce up to 100% of the risk of holding investments in currencies other than GBP. Please refer to the "Currency risk" section of this Prospectus for further information.

The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under "Portfolio Investment Techniques" in Appendix 4. Such investments will not be subject to the Sustainability Asset Selection Policy.

Further details of the investment powers and restrictions for the Fund are set out in Appendix 3 headed "Investment Powers and Restrictions".

Temporary investment measures

The Fund may temporarily depart from its investment policy in response to the Manager's perception of extraordinary market, political or similar conditions. During these periods and for as long as the Manager deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Third party data

The Manager uses a combination of external third-party research and proprietary analysis in its application of its sustainability criteria.

Additional Sustainability Disclosure Requirements

Exclusions policy – further details

The details of the MSCI factors used and relevant revenue thresholds of the exclusions policy as at the date of this Prospectus are as follows:

Category	MSCI Factor Used	Revenue Threshold
Nuclear Weapons	Nuclear Weapons – Any Tie	N/A – 'any tie' MSCI factor used
Tobacco	Tobacco Producer	N/A – if factor is 'true'
	Tobacco Total – Maximum Percentage of Revenue	Greater than 25% of their revenue in their most recent-year revenue
Thermal Coal	Thermal Coal – Maximum Percentage of Revenue	Greater than 10% of reported or estimated revenue
	Generation Thermal Coal – Maximum Percentage of Revenue	Greater than 30% of reported or estimated revenue
Oil Sands	Oil Sands – Maximum Percentage of Revenue	Greater than 5% of reported or estimated revenue
Controversial Weapons	Controversial Weapons – Any Tie	N/A – 'any tie' MSCI factor used

The exclusions policy provides detailed information about the exclusions applied by the Fund.

Metrics

Net Zero Glide Path

The Manager has set interim targets for what proportion of the Fund's investments will be in securities issued by companies with net-zero science-based targets as follows:

Date	% of Fund's assets (by AUM) which is invested in shares and bonds issued by companies with net zero science-based targets
31 December 2027	50%
31 December 2030	60%
31 December 2040	90%
31 December 2050	100%

Net zero science-based targets means targets validated by the Science-Based Targets initiative or alternative science-based public active emissions reduction target.

The Science-Based Targets initiative provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement: limiting global warming to well below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

Sustainability performance reporting

The ACD will report to investors on the Fund's sustainability performance on a periodic basis.

As part of these reports the ACD will provide the following information to investors which the ACD considers will be useful for investors to understand the investment policy of the Fund:

- What percentage of the assets of the Fund have net zero science-based targets shown against what percentage of the assets of the Composite Benchmark have net zero science-based targets;
- The carbon footprint for the Fund (shown as the total carbon emissions for the Fund normalised by the market value of the Fund) shown against the carbon footprint of the Composite Benchmark; and
- The number of engagements the Manager has with companies invested in by the Fund including the percentage of engagements related to science based targets and examples of the engagements the Manager has had.

The ACD will report to investors on the Fund's sustainability performance on a quarterly basis and the Manager's engagement activities on an annual basis. The latest reports are available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_40-50_Equity_Fund_Engagement_report.pdf.

Investment stewardship strategy

Engagement

Engagement with investee companies is important to the Manager's investment philosophy and integrated into the Manager's investment holding process.

The Manager will engage with certain companies held by the Fund to encourage improvements in such companies' paths to net zero by 2050.

Engagement activities might include meeting with company boards, engagement with non-executive directors and participating in stakeholder dialogues.

The Manager prioritises engagements with the companies where the Manager considers that this will have the greatest influence on company behaviour.

If initial engagements do not lead to material improvements, the Manager may then engage further through, for example, board-level engagement and proxy voting actions. The Manager may also consider initiating shareholder proposals or divestment of the company.

Proxy voting

The Manager may also use proxy voting as a way to influence the practices of companies, such as voting on climate-related shareholder proposals. The Manager's proxy voting guidelines are available at https://www.wellington.com/en/sustainability/stewardship-and-esg-integration.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Wellington Management Company LLP (the "**Manager**") as sub-investment adviser to manage both aspects of the Fund's investments (being the share and bond portions of the portfolio), and references to the Manager have effect accordingly. For further information, please refer to the "Independent Sub-Investment Advisers" section of this Prospectus.

Performance

The performance of the Fund may be compared against the Composite Index[18]. The ACD considers that the combination of the indices within the Composite Index provide a benchmark that is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Mixed Investment 20-60% Shares sector and by Morningstar in the EAA Fund GBP Allocation 40-60% Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Mixed Investment 20-60% Shares sector and Morningstar's EAA Fund GBP Allocation 40-60% Equity category.

Investor profile

- Investors seeking capital growth.
- Investors with a long-term[19] investment horizon.
- Investors seeking a fund with sustainability characteristics.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf
Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP

[18] The Composite Index is made up of 4 indices in the following weightings:
i. 45% FTSE Developed Net Tax Index;
ii. 44% Bloomberg Global Aggregate Credit Index;
iii. 5.5% Bloomberg Global Aggregate Treasury Index; and
iv. 5.5% Bloomberg Global Aggregate Securitized Index.

[19] More than 5 years.

Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.48% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**964707**

Vanguard ActiveLife Climate Aware 60-70% Equity Fund

Sustainable investment labels

Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label. While the Fund is committed to making sure that a certain portion of its assets demonstrate climate considerations, it does not have a sustainability objective. As a result, it does not meet the FCA's requirements for a sustainable investment label.

Investment objective and policy

Investment objective

The Vanguard ActiveLife Climate Aware 60-70% Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years) together with some money paid out from those investments as income.

Investment policy

The Fund is actively managed and seeks to achieve its investment objective by investing in a combination of shares and bonds.

The Manager will invest:

- 60-70% of the Fund's assets in company shares; and
- 30-40% of the Fund's assets in a combination of (i) bonds issued by companies ("**corporate bonds**") and (ii) bonds issued by entities which are not companies (such as government-related entities) ("**non-corporate bonds**").

The Manager will make sure at least 70% of the Fund's assets meet at least one of the Climate Considerations for company shares, corporate bonds and sovereign bonds as described in the section with the heading "Sustainability Approach" below. The Manager will not invest more than 30% of the gross value of the assets of the Fund in assets that do not demonstrate any of the Climate Considerations.

Overview of asset selection criteria

Sectors, industry groups and location

Overview

The Fund invests in both shares and bonds (which includes corporate bonds and non-corporate bonds) as described in further detail below.

Company shares

Subject to the Sustainability Asset Selection Policy described below (which includes excluding certain companies based on their activities), there are no restrictions on the types of company the Fund can invest in. Although the Fund can invest worldwide, the majority of the Fund's investments will be in developed countries. The Fund can invest in all countries, sectors and industries.

When selecting shares as an investment for the Fund, the Manager looks to identify the long-term value of a company by assessing qualities such as its scale, commitment to paying dividends, stability, growth and governance practices. The Manager also considers whether the company demonstrates at least one of the Climate Considerations set out below.

Bonds

The Fund's bond investments may include corporate bonds and non-corporate bonds.

Non-corporate bonds may include securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), and bonds issued by governments (or government agencies and/or local authorities), sovereigns, treasury organisations and supranationals of developed countries and emerging market countries and international organisations.

When selecting bonds as an investment for the Fund, the Manager considers the broader macroeconomic environment across different regions (including interest rates) and looks at the individual bonds to identify those bonds which would support the Funds objective, including, for corporate bonds, assessing the companies governance practices and whether the company demonstrates at least one of the Climate Considerations set out below and, for non-corporate bonds issued by sovereign entities, whether the fuel exports for the relevant country exceed a certain level as further described below.

The bonds selected are usually rated investment grade at the time of purchase.

Corporate bonds and bonds issued by government-related entities will be subject to the applicable parts of the Sustainability Asset Selection Policy described below.

Sustainability Approach for shares, corporate bonds and sovereign bonds

A. <u>Climate Considerations: Measures supporting the trajectory towards net zero</u>

1. *<u>Shares and corporate bonds</u>*

When purchasing shares and corporate bonds, the Manager will consider whether the company displays at least one of the following qualities, which would enable the Manager to be aware of what the company is doing which might support its journey towards net zero:

i. displays current Scope 1+2 carbon intensity that is at least 25% below the industry average (based on the Global Industry Classification Standard Level 3); and/or
ii. has published an active emissions reduction target

(the "**Corporate Climate Considerations**").

Where a company meets the Corporate Climate Considerations, they will count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations.

Scope 3 emissions are not included in the Corporate Climate Considerations. Some companies which have Scope 1 and 2 carbon intensity that meets the threshold for the Corporate Climate Considerations may have high Scope 3 emissions and may form investments of the Fund.

Scope 1 emissions are emissions that occur from sources owned or controlled by the reporting company, such as emissions associated with fuel combustion in boilers, furnaces and vehicles.

Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the reporting company. Scope 2 emissions physically occur at the facility where the electricity, steam, heating or cooling is generated.

Scope 3 emissions are emissions which are indirectly generated throughout the value chain, from upstream activities such as purchased goods and business travel and downstream activities such as the use of sold products.

The Manager may also invest in shares and corporate bonds issued by companies which do not yet meet the Climate Considerations, provided the Manager is satisfied that such companies are taking appropriate steps to achieve the Corporate Climate Considerations. The Manager will engage with these companies to encourage improvements in their path to net zero by 2050 (as further described in the section with the heading “Engagement” below). Such investments will not count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations. Regardless of whether companies achieve the Corporate Climate Considerations or not, the Fund’s investments may include companies with high carbon emissions, and may, subject to the exclusions policy, include utilities companies and companies involved in activities relating to fossil fuels.

Scope 1 emissions are emissions that occur from sources owned or controlled by the reporting company, such as emissions associated with fuel combustion in boilers, furnaces and vehicles. Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the reporting company. Scope 2 emissions physically occur at the facility where the electricity, steam, heating or cooling is generated.

2. *<u>Sovereign bonds</u>*

When purchasing sovereign bonds for the Fund, the Manager will consider whether the relevant country’s sovereign carbon intensity (territorial emissions / GDP) is at least 25% lower than the average carbon intensity of the sovereign constituents within the Composite Index (see the “Performance” section below for details of the Composite Index) (the “**Sovereign Climate Considerations**”). Where a country meets the Sovereign Climate Considerations, sovereign bonds issued by the relevant country will count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations.

The Manager may also invest in sovereign bonds that do not meet the Sovereign Climate Considerations; however, these bonds will only be held for risk management, diversification or liquidity purposes. Such investments will not be considered to have been made in accordance with the Climate Considerations and will not count towards the proportion of the Fund’s assets that are considered to demonstrate the Climate Considerations.

Regardless of whether countries achieve the Sovereign Climate Considerations or not, the Fund’s investments may, subject to the exclusions policy described below, include bonds issued in countries with high carbon emissions.

B. <u>Exclusions policy</u>

1. *<u>Shares and corporate bonds</u>*

The Manager considers that investments in companies with significant exposure to certain activities would not be suitable for the Fund due to the impact that such companies have on society and/or the environment. Therefore, in addition to assessing the Corporate Climate Considerations outlined above, the Manager seeks to avoid investing in companies involved in and/or deriving revenue (above a threshold specified by the Manager and set out in the exclusions policy) from thermal coal extraction or thermal coal-based power generation, oil sands extraction, production of tobacco related products, nuclear weapons and controversial weapons.

To avoid investments in companies involved in and/or deriving revenue from these activities, the Manager has developed and follows an exclusions policy which utilises MSCI factors. The details of the MSCI factors used and relevant revenue thresholds are set out in the Additional Sustainability Disclosure Requirements section below.

The exclusions policy should be referred to for more detail regarding the exclusions applied by the Fund. The latest exclusions policy is available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_Range_Exclusions_Policy.pdf.

Prior to purchasing any shares or corporate bonds for the Fund, the Manager will check that companies issuing such shares or corporate bonds are not excluded as a result of the exclusions policy. On an ongoing basis, the Manager checks all companies issuing shares or corporate bonds held by the Fund to ensure that there have been no subsequent breaches of the exclusions policy. In the event that a subsequent breach of the exclusions policy is identified, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying such breach.

The exclusions policy is reviewed by the Manager at least annually and more frequently as required and changes to the exclusions policy may occur from time to time with the consent of the ACD.

2. *Sovereign bonds*

In addition to assessing the Sovereign Climate Considerations outlined above, the Manager will not invest in sovereign bonds issued by countries where the fuel exports for the relevant country exceed 50% of total exports.

Before buying any sovereign bonds for the Fund and on an ongoing basis, the Manager will ensure that the fuel exports for the relevant country do not exceed 50% of total exports. In the event that the Manager identifies that investments are no longer permitted, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying this.

Assets other than shares, corporate bonds and sovereign bonds

The Fund may hold assets that are not subject to the Climate Considerations. This includes securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), bonds issued by government-related entities, government agencies and/or local authorities), treasury organisations, supranational entities, international organisations, open-ended and closed ended collective investment schemes (including closed-ended real estate investment trusts), money market instruments and deposits.

The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as ‘efficient portfolio management’). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund is not permitted to invest in derivatives for investment purposes, but derivatives may be used with the aim of reducing risk or managing the Fund more efficiently. Derivatives are not subject to the Sustainability Asset Selection Policy, however, the Manager will not use derivatives with the intention of gaining exposure to an asset that it would not be permitted to hold according to the Fund’s investment policy (or to subvert the Sustainability Asset Selection Policy). Within the bond portion of the portfolio, it is intended to use currency derivative contracts to reduce up to 100% of the risk of holding investments in currencies other than GBP. Please refer to the “Currency risk” section of this Prospectus for further information.

The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under “Portfolio Investment Techniques” in Appendix 4. Such investments will not be subject to the Sustainability Asset Selection Policy.

Further details of the investment powers and restrictions for the Fund are set out in Appendix 3 headed “Investment Powers and Restrictions”.

Temporary investment measures

The Fund may temporarily depart from its investment policy in response to the Manager’s perception of extraordinary market, political or similar conditions. During these periods and for as long as the Manager deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Third party data

The Manager uses a combination of external third-party research and proprietary analysis in its application of its sustainability criteria.

Additional Sustainability Disclosure Requirements

Exclusions policy – further details

The details of the MSCI factors used and relevant revenue thresholds of the exclusions policy as at the date of this Prospectus are as follows:

Category	MSCI Factor Used	Revenue Threshold
Nuclear Weapons	Nuclear Weapons – Any Tie	N/A – ‘any tie’ MSCI factor used
Tobacco	Tobacco Producer	N/A – if factor is ‘true’
	Tobacco Total – Maximum Percentage of Revenue	Greater than 25% of their revenue in their most recent-year revenue
Thermal Coal	Thermal Coal – Maximum Percentage of Revenue	Greater than 10% of reported or estimated revenue
	Generation Thermal Coal – Maximum Percentage of Revenue	Greater than 30% of reported or estimated revenue
Oil Sands	Oil Sands – Maximum Percentage of Revenue	Greater than 5% of reported or estimated revenue
Controversial Weapons	Controversial Weapons – Any Tie	N/A – ‘any tie’ MSCI factor used

The exclusions policy provides detailed information about the exclusions applied by the Fund.

Metrics

Net Zero Glide Path

The Manager has set interim targets for what proportion of the Fund’s investments will be in securities issued by companies with net-zero science-based targets as follows:

Date	% of Fund’s assets (by AUM) which is invested in shares and bonds issued by companies with net zero science-based targets
31 December 2027	50%
31 December 2030	60%
31 December 2040	90%
31 December 2050	100%

Net zero science-based targets means targets validated by the Science-Based Targets initiative or alternative science-based public active emissions reduction target.

The Science-Based Targets initiative provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered ‘science-based’ if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement: limiting global warming to well below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

Sustainability performance reporting

The ACD will report to investors on the Fund's sustainability performance on a periodic basis.

As part of these reports the ACD will provide the following information to investors which the ACD considers will be useful for investors to understand the investment policy of the Fund:

- What percentage of the assets of the Fund have net zero science-based targets shown against what percentage of the assets of the Composite Benchmark have net zero science-based targets;
- The carbon footprint for the Fund (shown as the total carbon emissions for the Fund normalised by the market value of the Fund) shown against the carbon footprint of the Composite Benchmark; and
- The number of engagements the Manager has with companies invested in by the Fund including the percentage of engagements related to science based targets and examples of the engagements the Manager has had.

The ACD will report to investors on the Fund's sustainability performance on a quarterly basis and the Manager's engagement activities on an annual basis. The latest reports are available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_60-70_Equity_Fund_Engagement_report.pdf.

Investment stewardship strategy

Engagement

Engagement with investee companies is important to the Manager's investment philosophy and integrated into the Manager's investment holding process.

The Manager will engage with certain companies held by the Fund to encourage improvements in such companies' paths to net zero by 2050.

Engagement activities might include meeting with company boards, engagement with non-executive directors and participating in stakeholder dialogues.

The Manager prioritises engagements with the companies where the Manager considers that this will have the greatest influence on company behaviour.

If initial engagements do not lead to material improvements, the Manager may then engage further through, for example, board-level engagement and proxy voting actions. The Manager may also consider initiating shareholder proposals or divestment of the company.

Proxy voting

The Manager may also use proxy voting as a way to influence the practices of companies, such as voting on climate-related shareholder proposals. The Manager's proxy voting guidelines are available at https://www.wellington.com/en/sustainability/stewardship-and-esg-integration.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Wellington Management Company LLP (the "**Manager**") as sub-investment adviser to manage both aspects of the Fund's investments (being the share and bond portions of the portfolio), and references to the Manager have effect accordingly. For further information, please refer to the "Independent Sub-Investment Advisers" section of this Prospectus.

Performance

The performance of the Fund may be compared against the Composite Index[20]. The ACD considers that the combination of the indices within the Composite Index provide a benchmark that is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Mixed Investment 40-85% Shares sector and by Morningstar in the EAA Fund GBP Allocation 60-80% Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Mixed Investment 40-85% Shares sector and Morningstar's EAA Fund GBP Allocation 60-80% Equity category.

Investor profile

- Investors seeking capital growth.
- Investors with a long-term[21] investment horizon.
- Investors seeking a fund with sustainability characteristics.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day	Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser: (a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or (b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded, (each such Business Day, being a "**Fund Holiday**"). A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf
Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)

[20] The Composite Index is made up of 4 indices in the following weightings:
i. 65% FTSE Developed Net Tax Index;
ii. 28% Bloomberg Global Aggregate Credit Index;
iii. 3.5% Bloomberg Global Aggregate Treasury Index; and
iv. 3.5% Bloomberg Global Aggregate Securitized Index

[21] More than 5 years.

Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000
Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.48% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**748431**

Vanguard ActiveLife Climate Aware 80-90% Equity Fund

Sustainable investment labels

Sustainable investment labels help investors find products that have a specific sustainability goal. This product does not have a UK sustainable investment label. While the Fund is committed to making sure that a certain portion of its assets demonstrate climate considerations, it does not have a sustainability objective. As a result, it does not meet the FCA's requirements for a sustainable investment label.

Investment objective and policy

Investment objective

The Vanguard ActiveLife Climate Aware 80-90% Equity Fund (the "**Fund**") seeks to provide an increase in the value of investments over the long-term (more than 5 years) together with some money paid out from those investments as income.

Investment policy

The Fund is actively managed and seeks to achieve its investment objective by investing in a combination of shares and bonds.

The Manager will invest:

- 80-90% of the Fund's assets in company shares; and
- 10-20% of the Fund's assets in a combination of (i) bonds issued by companies ("**corporate bonds**") and (ii) bonds issued by entities which are not companies (such as government-related entities) ("**non-corporate bonds**").

The Manager will make sure at least 70% of the Fund's assets meet at least one of the Climate Considerations for company shares, corporate bonds and sovereign bonds as described in the section with the heading "Sustainability Approach" below. The Manager will not invest more than 30% of the gross value of the assets of the Fund in assets that do not demonstrate any of the Climate Considerations.

Overview of asset selection criteria

Sectors, industry groups and location

Overview

The Fund invests in both shares and bonds (which includes corporate bonds and non-corporate bonds) as described in further detail below.

Company shares

Subject to the Sustainability Asset Selection Policy described below (which includes excluding certain companies based on their activities), there are no restrictions on the types of company the Fund can invest in. Although the Fund can invest worldwide, the majority of the Fund's investments will be in developed countries. The Fund can invest in all countries, sectors and industries.

When selecting shares as an investment for the Fund, the Manager looks to identify the long-term value of a company by assessing qualities such as its scale, commitment to paying dividends, stability, growth and governance practices. The Manager also considers whether the company demonstrates at least one of the Climate Considerations set out below.

Bonds

The Fund's bond investments may include corporate bonds and non-corporate bonds.

Non-corporate bonds may include securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), and bonds issued by governments (or government agencies and/or local authorities), sovereigns, treasury organisations and supranationals of developed countries and emerging market countries and international organisations.

When selecting bonds as an investment for the Fund, the Manager considers the broader macroeconomic environment across different regions (including interest rates) and looks at the individual bonds to identify those bonds which would support the Funds objective, including, for corporate bonds, assessing the companies governance practices and whether the company demonstrates at least one of the Climate Considerations set out below and, for non-corporate bonds issued by sovereign entities, whether the fuel exports for the relevant country exceed a certain level as further described below.

The bonds selected are usually rated investment grade at the time of purchase.

Corporate bonds and bonds issued by government-related entities will be subject to the applicable parts of the Sustainability Asset Selection Policy described below.

Sustainability Approach for shares, corporate bonds and sovereign bonds

A. Climate Considerations: Measures supporting the trajectory towards net zero

1. *Shares and corporate bonds*

When purchasing shares and corporate bonds, the Manager will consider whether the company displays at least one of the following qualities, which would enable the Manager to be aware of what the company is doing which might support its journey towards net zero:

i. displays current Scope 1+2 carbon intensity that is at least 25% below the industry average (based on the Global Industry Classification Standard Level 3); and/or
ii. has published an active emissions reduction target

(the "**Corporate Climate Considerations**").

Where a company meets the Corporate Climate Considerations, they will count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations.

Scope 3 emissions are not included in the Corporate Climate Considerations. Some companies which have Scope 1 and 2 carbon intensity that meets the threshold for the Corporate Climate Considerations may have high Scope 3 emissions and may form investments of the Fund.

Scope 1 emissions are emissions that occur from sources owned or controlled by the reporting company, such as emissions associated with fuel combustion in boilers, furnaces and vehicles.

Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the reporting company. Scope 2 emissions physically occur at the facility where the electricity, steam, heating or cooling is generated.

Scope 3 emissions are emissions which are indirectly generated throughout the value chain, from upstream activities such as purchased goods and business travel and downstream activities such as the use of sold products.

The Manager may also invest in shares and corporate bonds issued by companies which do not yet meet the Climate Considerations, provided the Manager is satisfied that such companies are taking appropriate steps to achieve the Corporate Climate Considerations. The Manager will engage with these companies to encourage improvements in their path to net zero by 2050 (as further described in the section with the heading "Engagement" below). Such investments will not count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations. Regardless of whether companies achieve the Corporate Climate Considerations or not, the Fund's investments may include companies with high carbon emissions, and may, subject to the exclusions policy, include utilities companies and companies involved in activities relating to fossil fuels.

2. *Sovereign bonds*

When purchasing sovereign bonds for the Fund, the Manager will consider whether the relevant country's sovereign carbon intensity (territorial emissions / GDP) is at least 25% lower than the average carbon intensity of the sovereign constituents within the Composite Index (see the "Performance" section below for details of the Composite Index) (the "**Sovereign Climate Considerations**"). Where a country meets the Sovereign Climate Considerations, sovereign bonds issued by the relevant country will count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations.

The Manager may also invest in sovereign bonds that do not meet the Sovereign Climate Considerations; however, these bonds will only be held for risk management, diversification or liquidity purposes. Such investments will not be considered to have been made in accordance with the Climate Considerations and will not count towards the proportion of the Fund's assets that are considered to demonstrate the Climate Considerations.

Regardless of whether countries achieve the Sovereign Climate Considerations or not, the Fund's investments may, subject to the exclusions policy described below, include bonds issued in countries with high carbon emissions.

B. Exclusions policy

1. *Shares and corporate bonds*

The Manager considers that investments in companies with significant exposure to certain activities would not be suitable for the Fund due to the impact that such companies have on society and/or the environment. Therefore, in addition to assessing the Corporate Climate Considerations outlined above, the Manager seeks to avoid investing in companies involved in and/or deriving revenue (above a threshold specified by the Manager and set out in the exclusions policy) from thermal coal extraction or thermal coal-based power generation, oil sands extraction, production of tobacco related products, nuclear weapons and controversial weapons.

To avoid investments in companies involved in and/or deriving revenue from these activities, the Manager has developed and follows an exclusions policy which utilises MSCI factors. The details of the MSCI factors used and relevant revenue thresholds are set out in the Additional Sustainability Disclosure Requirements section below.

The exclusions policy should be referred to for more detail regarding the exclusions applied by the Fund. The latest exclusions policy is available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_Range_Exclusions_Policy.pdf.

Prior to purchasing any shares or corporate bonds for the Fund, the Manager will check that companies issuing such shares or corporate bonds are not excluded as a result of the exclusions policy. On an ongoing basis, the Manager checks all companies issuing shares or corporate bonds held by the Fund to ensure that there have been no subsequent breaches of the exclusions policy. In the event that a subsequent breach of the exclusions policy is identified, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying such breach.

The exclusions policy is reviewed by the Manager at least annually and more frequently as required and changes to the exclusions policy may occur from time to time with the consent of the ACD.

2. *Sovereign bonds*

In addition to assessing the Sovereign Climate Considerations outlined above, the Manager will not invest in sovereign bonds issued by countries where the fuel exports for the relevant country exceed 50% of total exports.

Before buying any sovereign bonds for the Fund and on an ongoing basis, the Manager will ensure that the fuel exports for the relevant country do not exceed 50% of total exports. In the event that the Manager identifies that investments are no longer permitted, the Manager will usually sell the relevant asset(s) within 30 calendar days of identifying this.

Assets other than shares, corporate bonds and sovereign bonds

The Fund may hold assets that are not subject to the Climate Considerations. This includes securitised bonds and similar securities (including asset-backed securities and/or mortgage-backed securities), bonds issued by government-related entities, government agencies and/or local authorities, treasury organisations, supranational entities, international organisations, open-ended and closed ended collective investment schemes (including closed-ended real estate investment trusts), money market instruments and deposits.

The Fund may also use derivatives in order to reduce risk or cost and/or generate extra income or growth (often referred to as ‘efficient portfolio management’). Generally speaking, a derivative is a financial contract whose value is based on the value of a financial asset (such as a share, bond, or currency) or a market index. The Fund is not permitted to invest in derivatives for investment purposes, but derivatives may be used with the aim of reducing risk or managing the Fund more efficiently. Derivatives are not subject to the Sustainability Asset Selection Policy, however, the Manager will not use derivatives with the intention of gaining exposure to an asset that it would not be permitted to hold according to the Fund’s investment policy (or to subvert the Sustainability Asset Selection Policy). Within the bond portion of the portfolio, it is intended to use currency derivative contracts to reduce up to 100% of the risk of holding investments in currencies other than GBP. Please refer to the “Currency risk” section of this Prospectus for further information.

The Fund may also use certain techniques and instruments in accordance with the limits and conditions specified under “Portfolio Investment Techniques” in Appendix 4. Such investments will not be subject to the Sustainability Asset Selection Policy.

Further details of the investment powers and restrictions for the Fund are set out in Appendix 3 headed “Investment Powers and Restrictions”.

Temporary investment measures

The Fund may temporarily depart from its investment policy in response to the Manager’s perception of extraordinary market, political or similar conditions. During these periods and for as long as the Manager deems it necessary, the Fund may increase its holdings of cash and near cash. In doing so, the Fund may succeed in avoiding losses, but may otherwise fail to achieve its investment objective.

Third party data

The Manager uses a combination of external third-party research and proprietary analysis in its application of its sustainability criteria.

Additional Sustainability Disclosure Requirements

Exclusions policy – further details

The details of the MSCI factors used and relevant revenue thresholds of the exclusions policy as at the date of this Prospectus are as follows:

Category	MSCI Factor Used	Revenue Threshold
Nuclear Weapons	Nuclear Weapons – Any Tie	N/A – 'any tie' MSCI factor used
Tobacco	Tobacco Producer	N/A – if factor is 'true'
	Tobacco Total – Maximum Percentage of Revenue	Greater than 25% of their revenue in their most recent-year revenue
Thermal Coal	Thermal Coal – Maximum Percentage of Revenue	Greater than 10% of reported or estimated revenue
	Generation Thermal Coal – Maximum Percentage of Revenue	Greater than 30% of reported or estimated revenue
Oil Sands	Oil Sands – Maximum Percentage of Revenue	Greater than 5% of reported or estimated revenue
Controversial Weapons	Controversial Weapons – Any Tie	N/A – 'any tie' MSCI factor used

The exclusions policy provides detailed information about the exclusions applied by the Fund.

Metrics

Net Zero Glide Path

The Manager has set interim targets for what proportion of the Fund's investments will be in securities issued by companies with net-zero science-based targets as follows:

Date	% of Fund's assets (by AUM) which is invested in shares and bonds issued by companies with net zero science-based targets
31 December 2027	50%
31 December 2030	60%
31 December 2040	90%
31 December 2050	100%

Net zero science-based targets means targets validated by the Science-Based Targets initiative or alternative science-based public active emissions reduction target.

The Science-Based Targets initiative provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement: limiting global warming to well below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

Sustainability performance reporting

The ACD will report to investors on the Fund's sustainability performance on a periodic basis.

As part of these reports the ACD will provide the following information to investors which the ACD considers will be useful for investors to understand the investment policy of the Fund:

- What percentage of the assets of the Fund have net zero science-based targets shown against what percentage of the assets of the Composite Benchmark have net zero science-based targets;
- The carbon footprint for the Fund (shown as the total carbon emissions for the Fund normalised by the market value of the Fund) shown against the carbon footprint of the Composite Benchmark; and
- The number of engagements the Manager has with companies invested in by the Fund including the percentage of engagements related to science based targets and examples of the engagements the Manager has had.

The ACD will report to investors on the Fund's sustainability performance on a quarterly basis and the Manager's engagement activities on an annual basis. The latest reports are available at https://fund-docs.vanguard.com/Vanguard_ActiveLife_Climate_Aware_80-90_Equity_Fund_Engagement_report.pdf.

Investment stewardship strategy

Engagement

Engagement with investee companies is important to the Manager's investment philosophy and integrated into the Manager's investment holding process.

The Manager will engage with certain companies held by the Fund to encourage improvements in such companies' paths to net zero by 2050.

Engagement activities might include meeting with company boards, engagement with non-executive directors and participating in stakeholder dialogues.

The Manager prioritises engagements with the companies where the Manager considers that this will have the greatest influence on company behaviour.

If initial engagements do not lead to material improvements, the Manager may then engage further through, for example, board-level engagement and proxy voting actions. The Manager may also consider initiating shareholder proposals or divestment of the company.

Proxy voting

The Manager may also use proxy voting as a way to influence the practices of companies, such as voting on climate-related shareholder proposals. The Manager's proxy voting guidelines are available at https://www.wellington.com/en/sustainability/stewardship-and-esg-integration.

Investment Advisers

The ACD has appointed Vanguard Global Advisers LLC (VGA) as Investment Adviser for the Fund.

VGA has appointed Wellington Management Company LLP (the "**Manager**") as sub-investment adviser to manage both aspects of the Fund's investments (being the share and bond portions of the portfolio), and references to the Manager have effect accordingly. For further information, please refer to the "Independent Sub-Investment Advisers" section of this Prospectus.

Performance

The performance of the Fund may be compared against the Composite Index[22]. The ACD considers that the combination of the indices within the Composite Index provide a benchmark that is representative of the investment universe of the Fund and reflects the investment strategy of the Fund and therefore can be used to assess the performance of the Fund.

Peer Group: Many funds sold in the UK are grouped into sectors to help investors to compare funds with broadly similar characteristics. This Fund is currently classified by the Investment Association in the Flexible Investment sector and by Morningstar in the EAA Fund GBP Allocation 80%+ Equity category. Some independent data providers prepare and publish performance data on the funds in these sectors/categories and you can use this to assess the Fund's performance. Therefore, the performance of the Fund may also be compared against the performance data for the Investment Association's Flexible Investment sector and Morningstar's EAA Fund GBP Allocation 80%+ Equity category.

Investor profile

- Investors seeking capital growth.
- Investors with a long-term[23] investment horizon.
- Investors seeking a fund with sustainability characteristics.
- Investors with at least basic knowledge of and / or experience with financial products.
- Investors that can bear financial losses (up to the total loss of the invested amount) and attach no importance to capital guarantees.

Fund Details

Dealing Day

Each Business Day will be a Dealing Day except for any day on which, in the sole determination of the Investment Adviser:

(a) there is a public holiday in the jurisdiction in which the Investment Adviser or a delegate of the Investment Adviser which has been appointed in respect of the Fund is based; or

(b) the fair and accurate valuation of the Fund's portfolio of securities, or a significant portion thereof, in accordance with the COLL Sourcebook, this Prospectus and the Instrument of Incorporation of the Company, is impeded,

(each such Business Day, being a "**Fund Holiday**").

A calendar of the Fund Holidays for the Fund is available on https://fund-docs.vanguard.com/Vanguard-Investments-Funds-ICVC.pdf

Valuation point	9.00 p.m. (London time)
Cut-off time	12.00 noon (London time)
Classes of Shares	**A GBP**
Income or Accumulation	Both
Currency of Denomination	GBP
Minimum Investment	£100,000
Minimum Holding	£75,000

[22] The Composite Index is made up of 4 indices in the following weightings:
i. 85% FTSE Developed Net Tax Index;
ii. 12% Bloomberg Global Aggregate Credit Index;
iii. 1.5% Bloomberg Global Aggregate Treasury Index; and
iv. 1.5% Bloomberg Global Aggregate Securitized Index.

[23] More than 5 years.

Minimum Subsequent Investment	None
Charges	
Preliminary Charge	None
Redemption Charge	None
Conversion Charge	None
Switching Charge	None
Management Charge / Charged to	0.48% pa / Income
Accounting periods and income allocation dates	
Annual Accounting Period	31 October
Interim Accounting Period	30 April
Annual Income Allocation Date	31 December
Interim Income Allocation Date	None
Grouping Periods for Income Equalisation	Annual Accounting Periods
FCA Product Reference Number	**964708**

Glossary of Terms - 'Investment Objective' and 'Investment Policy'

Accumulation share/unit – Funds are divided into portions called shares or units. In accumulation shares/units, the income earned by the fund is paid into the fund and reflected by an increase in the value of each share/unit.

Active – Where the fund manager uses their expertise to pick investments to achieve the fund's objectives.

Advanced/developed markets – Countries with relatively high levels of personal income and established economies.

Annual management charge – An ongoing fee paid to the management company for managing the fund, usually charged as a percentage of the investment.

Asset allocation – Dividing the money invested in the fund across different investments ('assets'), e.g., in different geographic areas or by industry sectors such as oil and gas or financial companies.

Bond/Fixed Income – A loan, usually to a company or government, that pays interest.

Bottom-up – An investment approach that focuses on analysing individual shares rather than stock markets.

Capital markets – Markets that raise money from those who want to invest and make those funds available to businesses or governments.

Currency exposure – The potential for a fund that invests overseas to lose or gain money purely because of changes in the currency exchange rate.

Deposit – A deposit is a fixed term investment that gathers interest over the period of its term. A deposit cannot be withdrawn until its term ends unless early termination is granted.

Derivatives – Investments whose value is linked to another investment, or to the performance of a stock exchange or to some other variable factor, such as interest rates.

Dilution levy/adjustment – An amount you pay to cover the dealing costs incurred by the Fund when it buys or sells investments as a result of you buying or selling shares/units in the Fund. It is normally only charged when those costs are significant.

Diversification – Holding a variety of investments that typically perform differently from one another.

Efficient portfolio management – Managing the fund in a way that is designed to reduce risk or cost and/or generate extra income or growth.

Emerging markets – Countries that are progressing toward becoming advanced, usually shown by some development in financial markets, the existence of some form of stock exchange and a regulatory body.

Entry/Initial charge – An up-front fee paid to the management company when you buy shares/units.

Equity – See **'Share'**.

Excess Return – The discrepancy between the Benchmark performance and the Fund performance. Excess return shows how a product's performance compares with that of its benchmark over a stated period of time.

Float adjusted – Float adjusted only counts shares that are available to purchase on the market rather than the total amount of shares issued when calculating a company's weight in a given index.

Growth – The increase in value of investments.

Growth stocks – A company whose earnings are expected to grow faster than the market (or peers if you prefer). Opposite to value stocks, they tend to be more expensive than the overall market i.e., you pay premium for growth.

Hedging – Using some investments as a way to reduce risk.

Income – Money paid out by an investment, such as interest from a bond or a dividend from a share.

Income share/unit – Funds are divided into portions called 'shares' or 'units.' In income shares/units, the income earned by the Fund is paid out to investors.

Inflation-linked Bond – Inflation can have a dampening effect on the performance of an investment as it affects buying power for consumers in a negative way when it rises. Inflation linked considers this and helps to protect investors of inflation risk by linking the bond's principal to a nationally recognised inflation measure (Retail Price Index in the UK)

Large/mid/small cap – Essentially a tiering process based on market cap, the most common are**:**

- **Small cap** – $250 million-$2 billion
- **Mid cap** – $2-$10 billion
- **Large cap** – $10-$100 billion

Market capitalisation – The value of a company's outstanding shares in the market and in a monetary value shows how big a company is. To calculate we multiply the number of outstanding shares by the company's individual share price.

Money market instruments – Investments usually issued by banks or governments that are a short-term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period.

Ongoing Charges Figure (OCF) – A measure of what it costs to invest in a fund. It includes the fee paid to the management company and other operating costs.

Passive – The fund manager aims to track the performance of a stock exchange index or another investment.

Platform – An online service that allows you to buy and sell shares and funds and see your investments in one place.

Relative return – The profit or loss on an investment compared to how other investments have performed.

Return – The money made or lost on an investment.

Share – An equal portion representing part ownership of a company. Can also apply to a fund.

Share class – One of the types of share representing part ownership of the fund that is different to other share classes for some reason, such as it pays out income rather than paying it back into the fund.

Stock lending – Process whereby those holding investments (such as a fund) lend them to other parties who pay a fee for borrowing.

Top-down – An investment approach that looks at the big picture first, e.g., the economy, then at the detail, like how individual shares are performing.

Tracking Error – When using an index or benchmarking strategy, it looks at the volatility in the difference of performance between the fund and its index.

Unit – An equal portion representing part ownership of a unit trust fund.

Value (stocks) – Investments that are considered to have been undervalued by the market.

Volatility – A measure of the size of short-term changes in the value of an investment.

Warrants – Provide the holder with the right, but not the obligation, to purchase a stock at a fixed price or amount at a fixed time in the future. A warrant is similar to an option but is issued by a company.

Yield – The income from an investment, usually stated as a percentage of the value of the investment.

Appendix 2: Valuation

Calculation of the net asset value

The Company's Instrument of Incorporation provides that the value of the Scheme Property of the Company or Fund (as the case may be) shall be the value of its assets less the value of its liabilities determined in accordance with the following provisions:

1. All the Scheme Property (including receivables) is to be included, subject to the following provisions.

2. Property which is not cash (or other assets dealt with in paragraphs 3 and 4 below) shall be valued as follows and the prices used shall (subject as follows) be the most recent prices which it is practicable to obtain:

   (a) units or shares in a collective investment scheme:
      (i) if a single price for buying and selling units or shares is quoted, at that price; or
      (ii) if separate buying and selling prices are quoted, at the average of the two prices provided the buying price has been reduced by any initial charge included therein and the selling price has been increased by any exit or redemption charge attributable thereto; or
      (iii) if, in the opinion of the ACD, the price obtained is unreliable or no recent traded price is available or if no recent price exists, at a value which in the opinion of the ACD is fair and reasonable;

   (b) exchange-traded derivative contracts:
      (i) if a single price for buying and selling the exchange-traded derivative contract is quoted, at that price; or
      (ii) if separate buying and selling prices are quoted, at the average of the two prices;

   (c) over-the-counter derivative contracts shall be valued in accordance with the method of valuation as shall have been agreed between the ACD and the Depositary;

   (d) any other investment:
      (i) if a single price for buying and selling the security is quoted, at that price; or
      (ii) if separate buying and selling prices are quoted, at the average of the two prices; or
      (iii) if, in the opinion of the ACD, the price obtained is unreliable or no recent traded price is available or if the most recent price available does not reflect the ACD's best estimate of the value, at a value which in the opinion of the ACD, is fair and reasonable; and

   (e) property other than that described in (a), (b), (c) and (d) above: at a value which, in the opinion of the ACD, represents a fair and reasonable mid-market price.

3. Cash and amounts held in current, deposit and margin accounts and in other time-related deposits shall be valued at their nominal values.

4. In determining the value of the Scheme Property, all instructions given to issue or cancel Shares shall be assumed (unless the contrary is shown) to have been carried out and any cash payment made or received and all consequential action required by the Regulations or the Instrument of Incorporation shall be assumed (unless the contrary has been shown) to have been taken.

5. Subject to paragraphs 6 and 7 below, agreements for the unconditional sale or purchase of property which are in existence but uncompleted, shall be assumed to have been completed and all consequential action required to have been taken. Such unconditional agreements need not be taken into account if made shortly before the valuation takes place and, in the opinion of the ACD, their omission shall not materially affect the final net asset amount.

6. Futures or contracts for differences which are not yet due to be performed and unexpired and unexercised written or purchased options shall not be included under paragraph 5.

7. All agreements are to be included under paragraph 5 which are, or ought reasonably to have been, known to the person valuing the property assuming that all other persons in the ACD's employment take all reasonable steps to inform it immediately of the making of any agreement.

8. Deduct an estimated amount for anticipated tax liabilities (on unrealised capital gains where the liabilities have accrued and are payable out of the Scheme Property; on realised capital gains in respect of previously completed and current accounting periods; and on income where liabilities have accrued) including (as applicable and without limitation) capital gains tax, income tax, corporation tax, value added tax, stamp duty and SDRT.

9. Deduct an estimated amount for any liabilities payable out of the Scheme Property and any tax thereon, treating periodic items as accruing from day to day.

10. Deduct the principal amount of any outstanding borrowings whenever payable and any accrued but unpaid interest on borrowings.

11. Add an estimated amount for accrued claims for tax of whatever nature which may be recoverable.

12. Add any other credits or amounts due to be paid into the Scheme Property.

13. Add a sum representing any interest or any income accrued due or deemed to have accrued but not received and any SDRT provision anticipated to be received.

14. Currencies or values in currencies other than the base currency or (as the case may be) the designated currency of a Fund shall be converted at the relevant Valuation Point at a rate of exchange that is not likely to result in any material prejudice to the interests of Shareholders or potential Shareholders.

Appendix 3: Investment Powers and Restrictions

Investment restrictions

The investment objectives and policies of the Funds, as set out in **Appendix 1**, are subject to the limits on investment for U.K. UCITS Schemes under Chapter 5 of the COLL Sourcebook, relevant parts of which are summarised below.

1. **Prudent Spread of Risk**

The ACD must ensure that, taking account of the investment objectives and policy of each Fund, the Scheme Property aims to provide a prudent spread of risk.

2. **Transferable Securities**

Each Fund may invest, except where otherwise specifically stated, in transferable securities (as defined for the purposes of the COLL Sourcebook) that are:

(i) admitted to or dealt in on an eligible market; or

(ii) recently issued transferable securities, provided that the terms of the issue include an undertaking that application will be made to be admitted to an eligible market and such admission is secured within a year of issue.

Each Fund may invest up to 10% of its net asset value in aggregate in transferable securities not falling within (i) or (ii) above and approved money market instruments not admitted to or dealt in on an eligible market (described under "Approved Money Market Instruments" below).

Eligible markets for the Funds are explained and set out under Section 20 below headed "Eligible Markets for Funds".

Units in a closed end fund will be taken to be transferable securities for the purposes of investment by a Fund, provided the closed end fund fulfils the relevant criteria in Chapter 5 of the COLL Sourcebook

3. **Government and Public Securities**

No more than 35% in value of the following Funds may be invested in government and public securities issued by any one body:

– Vanguard FTSE U.K. Equity Income Index Fund
– Vanguard FTSE Developed World ex-U.K. Equity Index Fund
– Vanguard FTSE Developed Europe ex-U.K. Equity Index Fund
– Vanguard U.S. Equity Index Fund
– Vanguard FTSE Global All Cap Index Fund
– Vanguard ESG Screened Developed World All Cap Equity Index Fund (UK)
– Vanguard Global Capital Stewards Equity Fund
– Vanguard ActiveLife Climate Aware 40-50% Equity Fund
– Vanguard ActiveLife Climate Aware 60-70% Equity Fund
– Vanguard ActiveLife Climate Aware 80-90% Equity Fund
– Vanguard Global Emerging Markets Fund
– Vanguard Global Equity Fund
– Vanguard Global Equity Income Fund
– Vanguard Active U.K. Equity Fund

More than 35% and up to 100% in value of both the Vanguard U.K. Inflation-Linked Gilt Index Fund and Vanguard U.K. Long Duration Gilt Index Fund may be invested in government and public securities issued or guaranteed by any one body.

In respect of any Fund which invests more than 35% of its in value in such securities issued or guaranteed by any one body then:

(a) the ACD is required, before any such investment is made, to consult with the Depositary and as a result consider that the issuer of such securities is one which is appropriate in accordance with the investment objectives of the Fund;
(b) no more than 30% in value of the Fund may consist of such securities of any one issue;
(c) the Fund shall include such securities issued by that or another issuer of at least six different issues.

The issuers in respect of which more than 35% and up to 100% in value of a Fund may invest are as set out in the details of the Funds in Appendix 1.

4. **Risk Management**

The ACD applies a risk management process enabling it to monitor and measure at all times the risk associated with a Fund's positions and their contribution to the overall risk profile of the Fund.

The following details of the risk management process must be notified regularly by the ACD to the FCA and at least on an annual basis:

(a) a true and fair view of the types of derivatives and forward transactions to be used within a Fund, together with their underlying risks and any relevant quantitative limits; and
(b) the methods for estimating risks in derivative and forward transactions.

An investor may obtain on request from the ACD details of the quantitative limits and methods used in applying the risk management of each Fund as well as any recent developments in the risks and yields of the main categories of investment of those Funds.

5. **Nil and Partly Paid Securities**

A transferable security or an approved money market instrument (as defined in the COLL Sourcebook) on which any sum is unpaid may be invested in only if it is reasonably foreseeable that the amount of any existing and potential call for any sum unpaid could be paid by the Fund, at the time when payment is required, without contravening the other investment restrictions in this Appendix 3 and the COLL Sourcebook.

6. **Collective Investment Schemes**

Each Fund may invest in units or shares of any other collective investment schemes which are:

(a) U.K. UCITS Schemes or EEA UCITS Schemes;
(b) recognised schemes authorised by the supervisory authorities of Guernsey, Jersey or the Isle of Man (provided the requirements of COLL 5.2.13AR are met);
(c) non-UCITS retail schemes as defined in the FCA Handbook, provided the requirements provided the requirements of COLL 5.2.13AR(1), (3) and (4) are met;
(d) schemes authorised in an EEA State, provided the requirements of COLL 5.2.13AR are met; or
(e) schemes authorised by the competent authority of an OECD member country (other than an EEA State) which has signed the IOSCO Multilateral Memorandum of Understanding and approved the scheme's management company, rules and depositary/custody arrangements (provided the requirements of COLL 5.2.13AR are

met),

provided that the schemes invested in must have terms that prohibit more than 10% in value of the property of that scheme to consist of units or shares in other collective investment schemes. Where a scheme invested in is a sub-fund of an umbrella scheme, the provisions set out above and the spread limits in Section 11 below apply to each sub-fund of the umbrella as if it were a separate scheme.

Whilst investment may be made in schemes in any of the categories mentioned in paragraphs (a) to (e) above, not more than 30% in value of a Fund may be invested in schemes which are within paragraphs (b) to (e).

The Funds may invest in units or shares of collective investment schemes managed or operated by the ACD or an associate of the ACD provided there is no charge to the Funds in connection with the investment in or disposal of the units or shares.

A Fund may invest in or dispose of Shares in another Fund of the Company ("**second Fund**") provided the second Fund does not hold Shares in any other Fund of the Company.

Each Fund will not invest more than 10% of its respective Net Asset Value in units or shares of collective investment schemes.

7. **Approved Money Market Instruments**

Each Fund may invest, where this is specifically stated in its investment objective and policy, in the following approved money market instruments (as defined for the purposes of the COLL Sourcebook):

(a) approved money market instruments admitted to or dealt in on an eligible market;
(b) other approved money market instruments where the issue or issuer is regulated for the purpose of protecting investors and savings which are:

    (i) issued or guaranteed by a central, regional or local authority or central bank of the U.K. or an EEA State, the Bank of England, the European Central Bank or a central bank of an EEA State, the EU or the European Investment Bank, a non-EEA State or, in the case of a federal state, by one of the members making up the federation, or by a public international body to which the U.K. or one or more EEA States belong;
    (ii) issued by a body, any securities of which are dealt in on an eligible market; or
    (iii) issued or guaranteed by an establishment subject to prudential supervision in accordance with criteria defined by U.K. or EU law or an establishment which is subject to and complies with prudential rules considered by the FCA to be at least as stringent as those laid down by U.K or EU law.

Each Fund may invest up to 10% of its net asset value in aggregate in approved money market instruments not falling within (a) or (b) above and transferable securities that are not admitted to or dealt in on an eligible market and recently issued transferable securities (as described in "Transferable Securities" above).

Eligible markets for the Funds are explained and set out under Section 20 below headed "Eligible Markets for Funds".

8. **Deposits**

Without limitation, each Fund may invest in deposits, only with an Approved Bank (as defined in the COLL Sourcebook), which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months.

9. **Ancillary Liquid Assets – Cash and Near Cash**

The property of each Fund may consist of cash and near cash where this may reasonably be regarded as necessary in order to enable the pursuit of each Fund's investment objective, redemption of shares, efficient portfolio management of the Fund in question in accordance with its investment objective or other purposes which may reasonably be regarded as ancillary to the investment objective of that Fund. During the period of the initial offer, the property of each Fund may consist of cash and near cash without limitation.

10. **Financial Derivative Instruments ("FDI")**

The ACD has the power to buy and sell FDI both on exchange and off exchange, in all Funds to the extent permitted by the Regulations and as set out below in Sections 10.1 and 10.2. Where a Fund invests in FDI, the exposure to the underlying assets must not exceed the limits set out in Section 11.

The limits do not apply to index-based FDI where, provided the composition of the relevant index is sufficiently diversified, the index represents an adequate benchmark for the market to which it refers, and the index is published in an appropriate manner. The underlying constituents of the index do not have to be taken into account for the purposes of the spread limits. The ACD must continue to ensure a prudent spread of risk.

An FDI transaction must have underlying assets consisting of any one or more of the investments permitted in this Appendix 3 but may also include financial indices.

An FDI transaction which will or may lead to the delivery of the underlying asset for the account of the Fund may be entered into only if that asset can be held for the account of the Fund, and the ACD, having taken reasonable care, determines that delivery of the asset under the transaction will not occur or will not lead to a breach of the rules in the COLL Sourcebook.

An FDI transaction must not cause a Fund to diverge from its investment objectives as stated in this Prospectus and must not be effected if the intended effect is to create the potential for an uncovered sale of one or more transferable securities, money market instruments, units in collective investment schemes or derivatives.

Any forward transaction must be with an Eligible Institution or an Approved Bank (as those terms are defined in the FCA Handbook). Where a transferable security or approved money market instrument embeds an FDI, this must be taken into account for the purposes of complying with the rules in the COLL Sourcebook on derivatives and forward transactions.

When using derivatives the ACD will employ its risk management process as set out in Section 4. An investor may obtain on request from the ACD details of the quantitative limits and methods used in applying the risk management of each Fund as well as any recent developments in the risks and yields of the main categories of investment of those Funds.

10.1 Use of FDI for Efficient Portfolio Management

FDI may be used for efficient portfolio management purposes as described in **Appendix 4** ("Portfolio Investment Techniques"). **The aim of any FDI used for such purposes is not to alter materially the risk profile of the Fund; rather, their use is to assist the ACD in meeting the investment objectives of each Fund as set out in Appendix 1.**

10.2 Use of FDI for Specific Investment

Where permitted pursuant to the investment objective and policy of a Fund, each Fund may use FDI for specific investment purposes in accordance with the rules summarised in this Section 10. This may lead to a higher volatility in the Share price of those Funds.

Currently, the investment policy of each Fund provides that it may use FDI for efficient portfolio management or hedging purposes, but not for purposes of investment.

10.3 FDI Dealt on Exchange

Any FDI transaction entered into on an exchange must be effected on or under the rules of an eligible derivatives market.

10.4 OTC Derivative Transactions

The Company may, subject to the FCA Handbook, enter into OTC derivative transactions. Any transaction in an OTC derivative must be:

(a) with a counterparty which is an Eligible Institution or an Approved Bank (as defined in the FCA Handbook) or which is authorised by the FCA or its home state regulator to enter into transactions as principal off exchange;
(b) on approved terms within the requirements of the COLL Sourcebook, in that the ACD: (i) carries out, at least daily, a reliable and verifiable valuation in respect of that transaction corresponding to its fair value (being the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction) and which does not rely only on market quotations by the counterparty; and (ii) can enter into one or more transactions to sell, liquidate or close out the transaction at any time, at its fair value;
(c) capable of reliable valuation, in that the ACD having taken reasonable care determines that, throughout the life of the derivative (if the transaction is entered into), it will be able to value the investment concerned with reasonable accuracy (i) on the basis of an up-to-date market value which the ACD and the Depositary have agreed is reliable, or (ii) if the value referred to in (i) is not available, on the basis of a pricing model which the ACD and the Depositary have agreed uses an adequate recognised methodology; and
(d) subject to verifiable valuation in that, throughout the life of the derivative (if the transaction is entered into) verification of the valuation is carried out by (i) an appropriate third party which is independent from the counterparty of the derivative, at an adequate frequency and in such a way that the ACD is able to check it; or (ii) a department within the ACD which is independent from the department in charge of managing the scheme property and which is adequately equipped for such a purpose.

The maximum exposure under an OTC derivative contract to any one counterparty is 5% of a Fund's assets (10% where the counterparty is an Approved Bank (as defined in the COLL Sourcebook)).

For these purposes, a Fund's exposure to a counterparty must be calculated using the positive mark-to-market value of the OTC derivative contract with that counterparty.

OTC derivative positions with the same counterparty may be netted, provided the ACD is able legally to enforce netting agreements with the counterparty on behalf of the Fund and these netting agreements do not apply to any other exposures the Fund may have with that same counterparty.

The exposure to a counterparty on an OTC derivative transaction may be reduced through the receipt of collateral. See **Appendix 4** for details regarding collateral.

10.5 Cover and Exposure

The ACD must ensure that the global exposure relating to all derivative and forward transactions held in a Fund does not exceed the net value of its Scheme Property. The ACD must calculate the Fund's global exposure on at least a daily basis. For these purposes, exposure must be calculated taking into account the current value of the underlying assets, the counterparty risk, future market movements and the time available to liquidate the FDI positions.

The ACD must calculate each Fund's global exposure using either the commitment approach or the value at risk approach. It is the current policy of the ACD to calculate each Fund's global exposure using the commitment approach.

In using the commitment approach to calculate a Fund's global exposure:

(a) the ACD must:

(i) ensure that it applies this approach to all derivative and forward transactions (including embedded derivatives), whether used as part of the Fund's general investment policy, for the purposes of risk reduction or for the purposes of efficient portfolio management; and
(ii) convert each derivative or forward transaction into the market value of an equivalent position in the underlying asset of that derivative or forward (the standard commitment approach);

(b) the ACD may:

(i) apply other calculation methods which are equivalent to the standard commitment approach;
(ii) take account of netting and hedging arrangements, where those arrangements do not disregard obvious and material risks and result in a clear reduction in risk exposure.

Where the use of derivative or forward transactions does not generate incremental exposure for the Fund, the underlying exposure need not be included in the commitment calculation; and

Where the commitment approach is used, temporary borrowing arrangements entered into on behalf of the Fund in accordance with the COLL Sourcebook (as set out under Section 15 below headed "Borrowing") need not form part of the global exposure calculation.

A Fund must not dispose of property or rights unless the obligation thus created could immediately be honoured by the Fund by delivery of property or the assignment of rights which belong to the Fund at the time of the agreement.

This requirement does not apply to a deposit. The FCA has stated that this requirement may be met where:

(a) the risks of the underlying financial instrument of a derivative can be appropriately represented by another financial instrument and the underlying instrument is highly liquid or the ACD or the Depositary has the right to settle the derivative in cash and cover exists within the property of a Fund which is also liquid; or
(b) the ACD or the Depositary has the right to settle the derivative in cash and the Fund has property which is either cash or liquid debt instruments or other highly liquid assets having regard to their correlation with the underlying financial instrument of the derivative instruments, subject to

appropriate safeguards.

The FCA has also stated that, for these purposes the underlying asset of a derivative will be considered liquid if it can be converted into cash in no more than seven business days at a price closely corresponding to the current valuation of the instrument on its own market.

11. **Spread Limits**

The following spread limits apply to each Fund:

(a) For the purposes of this Section 11, companies included in the same group for the purposes of consolidated accounts as defined in accordance with section 399 of Companies Act 2006, Directive 2013/34/EU or, in the same group in accordance with international accounting standards, are regarded as a single body.
(b) Not more than 20% in value of the property of each Fund is to consist of deposits with a single body.
(c) Not more than 5% in value of the property of each Fund is to consist of Transferable Securities (as defined in the COLL Sourcebook) or approved money market instruments issued by any single body.
(d) The limit of 5% in (c) is raised to 10% in respect of up to 40% in value of the property of each Fund. Covered bonds need not be taken into account for the purpose of applying the limit of 40%.
(e) The limit of 5% in (c) is raised to 25% in value of the property of each Fund in respect of covered bonds, provided that when a Fund invests more than 5% in covered bonds issued by a single body, the total value of covered bonds held must not exceed 80% in value of the Fund.
(f) In applying (c) and (d), certificates representing certain securities (as defined in the FCA Handbook) are to be treated as equivalent to the underlying security.
(g) The exposure to any one counterparty in an OTC derivatives transaction must not exceed 5% in value of the property of each Fund. This limit is raised to 10% where the counterparty is an Approved Bank (as defined in the FCA Handbook).
(h) Not more than 20% in value of the property of each Fund is to consist of transferable securities and approved money market instruments issued by the same group (as referred to in (a)).

In applying the limits in (b), (c), (d), (f) and (g) in relation to a single body, and subject to (e), not more than 20% in value of the property of a Fund is to consist of any combination of two or more of the following:

(a) transferable securities (including covered bonds) or approved money market instruments issued by that body; or
(b) deposits made with that body; or
(c) exposures from off-exchange derivatives transactions made with that body. In applying the 20% limit with respect to a single body, government and public securities issued by that body must be taken into account.

None of the preceding limits apply to government and public securities, as to which see Section 3 above.

12. **Index Replication**

Notwithstanding the investment restrictions in Section 11 (Spread Limits), a Fund may invest up to 20% in value of its Scheme Property in shares and debentures which are issued by the same body where the investment policy of that Fund is to replicate the composition of a relevant index which satisfies the criteria specified below.

Replication of the composition of a relevant index shall be understood to be a reference to replication of the composition of the underlying assets of that index or investing in a representative sample of the components of the index, including the use of techniques and instruments permitted for the purpose of efficient portfolio management.

This 20% limit can be raised for a particular Fund up to 35% in value of its Scheme Property, but only in respect of one body and where justified by exceptional market conditions.

For these purposes, a relevant index is one which satisfies the following criteria:

(a) the composition is sufficiently diversified, in that its components adhere to the spread and concentration requirements for U.K. UCITS Schemes in COLL 5.2;
(b) the index represents an adequate benchmark for the market to which it refers, in that its provider uses a recognised methodology which generally does not result in the exclusion of a major issuer of the market to which it refers; and
(c) the index is published in an appropriate manner, in that it is accessible to the public and the index provider is independent from the Fund, although this does not preclude the index provider and the Fund from forming part of the same group, provided that effective arrangements for the management of conflicts of interest are in place.

Please refer to Appendix 1 for further information regarding the Vanguard FTSE U.K. Equity Income Index Fund.

13. **Significant Influence**

The Company must not acquire transferable securities issued by a body corporate and carrying rights to vote (whether or not on substantially all matters) at a general meeting of that body corporate if immediately before the acquisition, the aggregate of any such securities held by the Company gives the Company power to influence significantly the conduct of business of that body corporate; or the acquisition gives the Company that power.

The Company is to be taken to have power significantly to influence the conduct of business of a body corporate if it can, because of the transferable securities held by it, exercise or control the exercise of 20% or more of the voting rights in that body corporate (disregarding for this purpose any temporary suspension of voting rights in respect of the transferable securities of that body corporate).

14. **Concentration**

Each Fund must not acquire:

(a) transferable securities (other than debt securities) which do not carry a right to vote on any matter at a general meeting of the body corporate that issued them and represent more than 10% of those securities issued by that body corporate;
(b) more than 10% of the debt securities issued by any single body;
(c) units representing more than 25% in value of the Scheme Property in (i) a collective investment scheme that is not an umbrella or a sub-fund; or (ii) a sub-fund of an umbrella;.
(d) more than 10% of the approved money market instruments issued by any single body.

However, a Fund need not comply with the above stated limits if, at the time of acquisition, the net amount in issue of the relevant investment cannot be calculated. Where the conditions under COLL 5.2.29(6) are satisfied, the limit at (c) above does not apply.

15. **Borrowing**

The Company may, subject to the rules in the COLL Sourcebook, borrow money from an Eligible Institution or an Approved Bank (as these terms are defined in the FCA Handbook) for the use of each Fund on terms that the borrowing is to be repayable out of the Scheme Property.

Borrowing must be on a temporary basis, must not be persistent and in any event must not exceed three months without the prior consent of the Depositary, which may be given only on such conditions as appear appropriate to the Depositary to ensure that the borrowing does not cease to be on a temporary basis. The ACD must ensure that borrowing does not, on any business day, exceed 10% of the value of the property of each Fund.

These borrowing restrictions do not apply to “back to back” borrowing for currency hedging purposes, i.e., borrowing permitted in order to reduce or eliminate risk arising by reason of fluctuations in exchange rates.

Note: the Company, and certain other funds managed within the Vanguard Group of Companies, participate in a US$4.3 billion committed credit facility (“Facility”) provided by a syndicate of lenders pursuant to a credit agreement which may be renewed annually. Each Fund of the Company is individually liable only for its own borrowings, if any, under the Facility. Borrowings may be utilised for temporary or emergency purposes, and are subject to the regulatory restrictions described above. The Funds are charged administrative fees and their proportionate shares of an annual commitment fee of the undrawn amount of the Facility, which are borne by the ACD. Any borrowings made under the Facility would bear interest at a rate equal to the higher of the federal funds rate or SONIA reference rate plus an agreed spread, payable by the borrowing Fund. At the date of this Prospectus, none of the Funds has made any borrowings or incurred any interest charges under the Facility.

16. **Stock lending**

The Company, or the Depositary at the Company’s request, may enter into a repo agreement or a stock lending agreement of the kind described in Section 263B of the Taxation of Chargeable Gains Act 1992, as amended (without extension by Section 263C) and will be carried out in accordance with the Regulations and on the terms specified in the COLL Sourcebook.

There is no limit on the value of the property of a Fund which may be the subject of repo contracts or stock lending transactions.

For more information on stock lending, please refer to the “Stock lending arrangements risk” section under “Risk Factors” and to **Appendix 4**.

17. **Exchange Traded Funds**

Investment may be made by each Fund in exchange traded funds. The ACD will consider each investment in exchange traded funds on an individual basis to determine how the investment should be categorised. Generally, an investment in open-ended exchange traded funds will be categorised as an investment in collective investment schemes and any investment in closed-ended exchange traded funds will be categorised as an investment in transferable securities.

18. **Other Investment Restrictions**

In the event that one of the Funds invests in or disposes of shares or units in another collective investment scheme managed or operated by the ACD or an associate of the ACD, the ACD shall be under a duty to make the payments referred to in Rule 5.2.16 of the COLL Sourcebook.

19. **Interests in Immovable and Tangible Movable Property**

The Company will not have any direct interest in any immovable property (for example, its office) or tangible movable property (for example, its office equipment).

20. **Eligible Markets for Funds**

To protect investors, markets on which certain investments of a Fund are admitted to or dealt in must be of an adequate quality ("eligible") at the time of acquisition of the investment and until it is sold. If a securities market ceases to be eligible, investments on that market cease to be approved securities and the 10% restriction on investing in non-approved securities will apply to them. If a derivatives market ceases to be eligible, investments on that market cease to be approved derivatives and the restrictions on OTC derivatives will apply to them.

For these purposes, an eligible market is:

(a) a regulated market as defined in the FCA Handbook (which definition will include all regulated markets operated within the U.K. and the EEA);
(b) any other exchange or market (including any board of trade or similar entity, or automated quotation system) which is regulated, operates regularly and is open in the U.K. or any EEA State; or
(c) one of the additional securities or derivatives markets, as set out below, which the ACD, after consultation with the Depositary, has decided is appropriate for the purpose of investment of or dealing in the Scheme Property.

Part one additional Eligible Securities Markets (all Funds):

- Australia
  - Australian Securities Exchange
- Canada
  - Toronto Stock Exchange (TSX)
- Hong Kong
  - Hong Kong Stock Exchange
- Israel
  - Tel Aviv Stock Exchange
- Japan
  - Tokyo Stock Exchange
- Korean Republic
  - Korea Exchange (KRX)
  - Korea Exchange (Stock Market)
  - Korea Exchange (KOSDAQ)
- Singapore
  - Singapore Exchange
  - Singapore Exchange (Catalist)
- Switzerland
  - Swiss Stock Exchange
- United Kingdom
  - London Stock Exchange
- U.S.A.
  - New York Stock Exchange
  - NASDAQ
- Vietnam
  - Hanoi Stock Exchange
  - Ho Chi Minh Stock Exchange

Part one additional Eligible Derivatives Markets (all Funds):

- ASX 24
- CBOE Futures Exchange
- Chicago Board of Trade
- Chicago Mercantile Exchange
- Hong Kong Futures Exchange
- ICE Futures U.S.
- Korea Exchange (Derivatives)
- Montreal Exchange
- NASDAQ
- Osaka Exchange
- Singapore Exchange
- Tokyo Stock Exchange

Part two additional Eligible Securities Markets (certain Funds only*):

- Brazil
  - B3 S.A. (Brasil Bolsa Balcão)
- Canada
  - Canadian Securities Exchange
- Chile
  - Bolsa de Santiago (Santiago Exchange)
- China
  - Shanghai Stock Exchange
  - Shenzhen Stock Exchange
- Colombia
  - Bolsa De Valores De Colombia (Colombia Exchange)
- Egypt
  - Egyptian Exchange
- India
  - National Stock Exchange of India
  - Bombay Stock Exchange
- Indonesia
  - Indonesia Stock Exchange
- Japan
  - Fukuoka Stock Exchange
  - Nagoya Stock Exchange
  - Sapporo Securities Exchange
- Malaysia
  - Bursa Malaysia Berhad
- Mexico
  - Bolsa Mexicana de Valores (Mexican Stock Exchange)
- Morocco
  - Bourse de Casablanca (Casablanca Stock Exchange)
- New Zealand
  - New Zealand Exchange
- Nigeria
  - Nigerian Stock Exchange
- Pakistan
  - Pakistan Stock Exchange
- Peru
  - Bolsa de Valores de Lima (Lima Stock Exchange)
- Philippines
  - Philippine Stock Exchange
- Qatar
  - Qatar Stock Exchange
- South Africa
  - Johannesburg Stock Exchange
- Taiwan
  - Taiwan Stock Exchange
  - Taipei Exchange
- Thailand
  - Stock Exchange of Thailand
- Turkey
  - Borsa Istanbul
- United Arab Emirates

Part two additional Eligible Derivatives Markets (certain Funds only*):

- Brazil
  - B3 S.A. (Brasil Bolsa Balcão)
- Canada
  - TSX Venture Exchange
- China
  - Shanghai Futures Exchange
- India
  - National Stock Exchange of India
- Japan
  - Tokyo Financial Exchange
- Malaysia
  - Bursa Malaysia Derivatives Berhad
- Mexico
  - Mercado Mexicano de Derivados
- South Africa
  - Johannesburg Stock Exchange (Derivatives)
- Taiwan
  - Taiwan Futures Exchange
- Thailand
  - Stock Exchange of Thailand
- Turkey
  - Borsa Istanbul

  - Abu Dhabi Securities Market
  - Dubai Financial Market
  - NASDAQ Dubai
- U.S.A
  - NYSE Arca
  - NASDAQ PHLX

***Note: the part two additional eligible securities and derivatives markets listed above are for Vanguard FTSE Global All Cap Index Fund, Vanguard ActiveLife Climate Aware 40-50% Equity Fund, Vanguard ActiveLife Climate Aware 60-70% Equity Fund, Vanguard ActiveLife Climate Aware 80-90% Equity Fund, Vanguard Global Emerging Markets Fund, Vanguard Global Equity Fund, and Vanguard Global Equity Income Fund only**.

In addition to the eligible securities and derivatives markets listed above, the following are also eligible securities markets for the Vanguard Global Emerging Markets Fund, the Vanguard Global Equity Fund and the Vanguard FTSE Global All Cap Index Fund:

- **Kuwait – Boursa Kuwait (Kuwait Stock Exchange)**
- **Saudi Arabia – Saudi Stock Exchange**

Additional eligible markets may be added for a Fund (by appearing in a supplement to, or an updated version of, this Prospectus) and markets will only be transacted on for a Fund if:

(i) the ACD, after consultation with and notification to the Depositary, decides that market is appropriate for investment of, or dealing in, the Scheme Property of the relevant Fund and the Depositary agrees in writing that the addition is of minimal significance to the investment strategy of the Fund; and

(ii) the Depositary has taken reasonable care to determine that: (a) adequate custody arrangements can be provided for the investment dealt in on that market; and (b) the ACD has taken all reasonable steps in considering the eligibility of that market.

However, a market will not be considered appropriate unless it is regulated, operates regularly, is recognised as a market or exchange or as a self-regulating organisation by an overseas regulator, is open to the public, is adequately liquid and has adequate arrangements for unimpeded transmission of income and capital to or to the order of investors.

Notice of any changes to the eligible markets in relation to a Fund will be dealt with in accordance with the COLL Sourcebook.

Appendix 4: Portfolio Investment Techniques

General

The Company may employ investment techniques and instruments relating to transferable securities and money market instruments ("Portfolio Investment Techniques") for efficient portfolio management of the assets of any Fund. Portfolio Investment Techniques may include hedging against market movements, currency exchange or interest rate risks under the conditions and within the limits stipulated under the COLL Sourcebook, as described below. In particular, the Company may enter into spot and forward contracts, repurchase and reverse repurchase agreements and stock lending arrangements, and may purchase securities on a "when issued" or "forward-commitment" basis.

Portfolio Investment Techniques which are used for the purpose of efficient portfolio management, including financial derivative instruments ("FDI") which are not used for direct investment purposes, shall be understood as a reference to techniques and instruments which fulfil the following criteria:

(i) they are economically appropriate in that they are realised in a cost effective way:

(ii) they are entered into for one or more of the following specific aims:
  (a) reduction of risk;
  (b) reduction of cost;
  (c) generation of additional capital or income for a Fund with a risk level which is consistent with the risk profile of the Fund and the risk diversification rules under the COLL Sourcebook;

(iii) their risks are adequately captured by the risk management procedures implemented by the Company; and

(iv) they cannot result in a change to a Fund's declared investment objectives or add substantial supplementary risks to the Fund's risk profile .

While the use Portfolio Investment Techniques will be in line with the best interests of the Company, individual techniques may result in increased counterparty risk and potential conflicts of interest. Details of the proposed Portfolio Investment Techniques and the policies adopted by the Company in relation to their use are set out below. Details of the relevant risks are set out in the Risk Factors section of this Prospectus.

The Company will ensure, at all times, that the terms of the Portfolio Investment Techniques, including any investment of cash collateral, will not impact on its ability to meet with its redemption obligations.

The annual report of the Company will contain details of: (i) the exposure obtained through Portfolio Investment Techniques; (ii) the counterparties to the Portfolio Investment Techniques; (iii) the type and amount of collateral received by the Funds to reduce counterparty exposure; and (iv) revenues arising from Portfolio Investment Techniques for the reporting period, together with direct and indirect operational costs and fees incurred.

All of the revenues arising from Portfolio Investment Techniques, net of direct and indirect operational costs, will be retained by the relevant Fund.

The Company may enter into Portfolio Investment Techniques with certain brokers, stock lending agents, derivative counterparties and financial institutions. There may be direct and indirect operational costs or fees arising from such transactions, but these will at all times be paid at normal commercial rates, and there will be no hidden fees or revenue payable to any of these entities. The Company does not envisage any other direct or indirect operational costs or fees payable by the Company as a result of its Portfolio Investment Techniques, and, to the extent that there are any such additional direct or indirect operational costs or fees payable by the Company, this will be disclosed in the Company's annual report. The Company shall not enter into any Portfolio Investment Techniques with any entities within the Vanguard Group of Companies, and no entity within the Vanguard Group of Companies shall derive any direct or indirect fees from the Company's use of Portfolio Investment Techniques. The Company's sole stock lending agent is JP Morgan Chase Bank N.A. (London Branch). As noted above, all other counterparties to Portfolio Investment Techniques shall be disclosed in the Company's annual report.

Hedging currency risk

Except as may be permitted by the COLL Sourcebook and specified in this Prospectus, the Company may not leverage or gear a Fund through the use of FDI; that is, the total exposure of a Fund, including but not limited to its exposure from the use of any FDI, shall not exceed the total net assets of the Fund. FDI used for efficient portfolio management shall comply with the COLL Sourcebook.

A Fund may invest in securities denominated in a currency other than the base currency of the Fund and may purchase currencies to meet settlement requirements. In addition, subject to the restrictions imposed by the COLL Sourcebook, a Fund may enter into various currency transactions, i.e., forward foreign currency contracts, currency swaps, foreign currency or currency index futures contracts and put and call options on such contracts or on currencies, to protect against uncertainty in future exchange rates. Forward foreign currency contracts are agreements to exchange one currency for another at a future date. The future date, the amount of currency to be exchanged and the price at which it will take place are fixed for the term of the contract once negotiated.

Currency transactions undertaken by a Fund to alter the currency exposure characteristics of transferable securities held by that Fund through the purchase or sale of currencies other than the currency of denomination of that Fund or the relevant transferable securities shall not be speculative in nature, i.e., they will not constitute investments in their own right. To the extent that such currency transactions alter the currency exposure characteristics of transferable securities of a Fund, they must be fully covered by the cash flows of the transferable securities held by that Fund, including any income therefrom.

The performance of a Fund may be strongly influenced by movements in currency rates because currency positions held by the Fund may not correspond with the securities positions held.

A Fund may "cross-hedge" one foreign currency exposure by selling a related foreign currency into the base currency of the Fund. Also, in emerging or developing markets, local currencies are often expressed as a basket of major market currencies such as the U.S. Dollar, Euro or Japanese Yen; a Fund may hedge the exposure to currencies other than its base currency in the basket by selling a weighted average of those currencies forward into the base currency.

Use of repurchase / reverse repurchase agreements ("repo contracts") and stock lending arrangements

A Fund may enter into repurchase agreements, reverse repurchase agreements, and stock lending arrangements for the purposes of efficient portfolio management.

A Fund may enter into repurchase agreements, under which it sells a security and agrees to repurchase it at a mutually agreed upon date and price.

The resale price reflects the purchase price plus an agreed market rate of interest which is unrelated to the coupon rate or maturity of the purchased security. Where a Fund enters into a repurchase agreement, the Fund will have the right to recall any securities subject to the agreement or to terminate the repurchase agreement at any time.

Under a reverse repurchase agreement, the Fund acquires securities from a seller (for example, a bank or securities dealer) who agrees, at the time of sale, to repurchase the securities at a mutually agreed-upon date (usually not more than seven days from the date of purchase) and price, thereby determining the yield to the relevant Fund during the term of the reverse repurchase agreement. Where a Fund enters into a reverse repurchase agreement, it will have the right to recall the full amount of cash or to terminate the reverse repurchase agreement on either an accrued or a mark-to-market basis at any time. Where the cash is recallable at any time on a mark-to-market basis, the mark-to-market value of the reverse repurchase agreement shall be used for the purposes of the calculation of the Net Asset Value of the relevant Fund.

Fixed-term repo contracts which do not exceed seven days shall be regarded as arrangements on terms which allow the assets to be recalled at any time by the relevant Fund.

Under stock lending arrangements, a Fund lends its securities to brokers, dealers and other financial institutions.

The Company or the Depositary acting in accordance with the instruction of the ACD, may enter into a repo agreement or a stock lending arrangement of the kind described in section 263B of the Taxation of Chargeable Gains Act 1992 (without extension by section 263C), but only if:

(a) all the terms of the agreement under which securities are to be reacquired by the Depositary for the account of the Company are in a form which is acceptable to the Depositary and are in accordance with good market practice;

(b) the counterparty is: (i) an authorised person; (ii) a person authorised by a Home State regulator; (iii) a person regisrered as a broker dealer with the Securities and Exchange Commission of the U.S.; (iv) a bank, or a branch of a bank, supervised and authorized to deal in investments as principal, with respect to OTC derivatives by at least one of the following federal banking supervisory authorities of the U.S.: (a) the Office of the Comptroller of the Currency; (B) the Federal Deposit Insurance Corporation; and the Board of Governors of the Federal Reserve System; and

(c) high quality and liquid collateral is obtained to secure the obligation of the counterparty under the terms referred to in (a) and the collateral is: (i) acceptable to the Depositary; (ii) adequate; and (iii) sufficiently immediate.

The Company will have the right to terminate a stock lending arrangement at any time and demand the return of any or all of the securities loaned. The agreement must provide that, once such notice is given, the borrower must redeliver the securities within five business days or such other period as normal market practice dictates. Stock lending arrangements will typically include provisions to protect the counterparty, or any agent through which securities are lent, against any losses incurred by them that are caused by any default by the Company. A Fund will limit its use of stock lending so that no more than 50% of its net assets are subject to stock lending arrangements and that no more than 20% of its net assets are subject to stock lending arrangements with any single counterparty. Any interest or dividends paid on securities which are the subject of stock lending arrangements shall accrue to the benefit of the relevant Fund.

Repo contracts and/or stock lending arrangements do not constitute borrowing or lending for the purposes of the COLL Sourcebook.

Use of total return swaps

A Fund may utilise total return swaps ("**TRS**") for the purpose of efficient portfolio management, within the limits and conditions specified in this Appendix 4. Utilising TRS for efficient portfolio management enables a Fund to manage exposures to certain individual securities, a basket of securities, or securities indices, for example in circumstances where local market, regulatory or other factors might prevent a direct holding, to reduce transaction costs or taxes, to allow exposure in the case of illiquid stocks or, where applicable, to minimise tracking error. A Fund will not be leveraged through its use of TRS for efficient portfolio management. Passively-managed Funds will not use TRS to gain exposure outside of the relevant index being tracked.

A TRS is an agreement between two parties whereby one party makes payments to the other based on an agreed rate, while the other party makes payments to the first party based on the return of an underlying asset or assets, such as one or more securities, a currency, an index or an interest rate. The reference assets underlying the TRS, if any, may be any security or basket of securities which are consistent with the investment policies of the Fund. A TRS allows one party to derive the economic benefit of owning an asset or index without buying directly that asset or index.

Collateral

General

Subject to the COLL Sourcebook, a Fund may enter into Portfolio Investment Techniques provided that collateral obtained under the relevant Portfolio Investment Technique complies at all times with the following criteria:

(i) Liquidity: collateral (other than cash) must be highly liquid and traded on a regulated market or multi-lateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to its pre-sale valuation. Collateral should comply with the provisions of the COLL Sourcebook.
(ii) Valuation: collateral must be capable of being valued on a daily basis, and assets that exhibit high price volatility shall not be accepted as collateral unless suitably conservative haircuts are in place.
(iii) Issuer credit quality: collateral must be of high quality.
(iv) Correlation: collateral must be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.
(v) Diversification: collateral must be sufficiently diversified in terms of country, markets and issuers.

All assets received in respect of a Fund in the context of Portfolio Investment Techniques will be considered as collateral for the purposes of the COLL Sourcebook and will comply with the criteria above. Risks linked to the management of collateral, including operational and legal risks, are identified and mitigated by risk management procedures employed by the Company.

Where there is a title transfer, the collateral received will be held by the Depositary, or its agent. For other types of collateral arrangement, the collateral may be held by a third-party custodian which is which is subject to prudential supervision and which is unrelated to the provider of the collateral.

Collateral received shall be capable of being fully enforced by the Fund at any time without reference to or approval from the counterparty. Accordingly, collateral will be immediately available to the Fund without recourse to the counterparty in the event of default by that entity.

Permitted types of collateral

Collateral is adequate for the purposes of this section if it is:

(i) cash;
(ii) government or other public securities denominated in the currency of the country of its issuer;
(iii) certificates of deposit;
(iv) letters of credit with a residual maturity of three months or less, which are unconditional and irrevocable and which are issued by Relevant Institutions;
(v) commercial paper with no embedded derivative content;

(vi) any other security which is: (i) admitted to official trading on an exchange in the UK or an EEA Member State; (ii) regularly traded on or under the rules of an exchange in the UK or an EEA Member State; or (iii) regularly traded on or under the rules of a recognised investment exchange or designated investment exchange; or

(vii) a qualifying money market fund.

Reinvestment of collateral

The use of stock lending or the reinvestment of cash collateral should not result in a change of the declared investment objectives or add substantial supplementary risks to the Fund's risk profile. Collateral taking the form of cash may only be invested in one of the investments listed above. Reinvested cash collateral will be diversified in accordance with the diversification requirements applicable to non-cash collateral. Invested cash collateral may not be placed on deposit with, or invested in securities issued by, the counterparty or a related entity.

Non-cash collateral received by a Fund may not be sold, re-invested or pledged.

Without prejudice to the requirements set out above regarding cash collateral and non-cash collateral, a Fund may be permitted to undertake repo contract transactions pursuant to which additional leverage is generated through the re-investment of collateral, in which case the repo contract transactions will be taken into consideration for the calculation of global exposure required by the COLL Sourcebook. Any global exposure generated shall be added to the global exposure created through the use of derivatives, and the total of these shall not exceed 100% of the Fund's Net Asset Value. Where collateral is reinvested in financial assets that provide a return in excess of the risk-free return, the Fund shall include in the calculation of global exposure: (i) the amount received if cash collateral is held; and (ii) the market value of the instrument concerned if non-cash collateral is held.

Stress testing policy

If a Fund receives collateral for 30% or more of its net assets, it will implement a stress testing policy to ensure that regular stress tests are carried out under normal and exceptional liquidity conditions in order to allow it to assess the liquidity risk attached to collateral.

Haircut policy

The Company has implemented a haircut policy in respect of each class of assets received as collateral. This policy takes account of the characteristics of the relevant asset class, including the credit standing of the issuer of the collateral, the price volatility of the collateral, and the results of any tests which may be performed under the stress testing policy. The value of the collateral, adjusted in light of the haircut policy, shall at all times equal or exceed in value the relevant counterparty exposure.

"When-issued" and "forward-commitment" securities

A Fund may purchase securities on a "when-issued" basis and may purchase or sell securities on a "forward- commitment" basis. The price, which is generally expressed in yield terms, is fixed at the time the commitment is made, but delivery and payment for the securities take place at a later date. "When-issued" securities and forward-commitments may be sold prior to the settlement date, but a Fund will usually enter into "when-issued" and forward commitments only with the intention of actually receiving or delivering the securities or to avoid currency risk, as the case may be. No income accrues on securities that have been purchased pursuant to a forward commitment or on a "when-issued" basis prior to delivery of the securities. If the Fund disposes of the right to acquire a "when-issued" security prior to its acquisition or disposes of its right to deliver or receive against a forward commitment, the Fund may incur a gain or loss. There is a risk that the securities may not be delivered and that the Fund may incur a loss. "When-issued" and "forward-commitment" securities are taken into account when calculating the limits set out under **"Investment Powers and Restrictions"** in **Appendix 3** to this Prospectus.

Securities Financing Transactions

The ACD is subject to the provisions of the UK Securities Financing Transactions Regulation (the "**SFTR**"). The SFTR sets out certain disclosure requirements regarding the use of securities financing transactions ("**SFTs**") and total return swaps ("**TRS**"), as set out below.

The Funds may use SFTs, which are defined in the SFTR as a repurchase or reverse-repurchase transaction, securities or commodities lending and securities or commodities borrowing, a buy-sell back transaction or sell-buy back transaction or a margin lending transaction for efficient portfolio management purposes. They may also use TRS. The limitations on the use of SFTs and TRS are explained above and in Appendix 3. The Funds' use of SFTs and TRS is consistent with their respective investment objectives and policies, and accordingly SFTs and TRS may be used to reduce risk, reduce cost and/or generate additional capital or income with a risk level that is consistent with that of the relevant Fund and the risk diversification rules laid down in the COLL Sourcebook.

Subject to the limitations referred to above, any assets of a Fund may be subject to SFTs and / or TRS. Up to 100% of a Fund's assets may be the subject of SFT(s), with an expectation that at any time up to 5% of a Fund's assets may be subject to such arrangements. Up to 5% of a Fund's assets may be the subject of TRS, with an expectation that at any time less than 2% of a Fund's assets will be subject to such arrangements. SFT(s) and TRS combined shall not exceed 100% of a Fund's assets. SFTs and TRS will only be entered into with "approved counterparties" as defined in the FCA Handbook. Other than this restriction, there are no pre-specified restrictions on the legal status, country of origin or minimum credit rating of any counterparty in such transactions.

The types of acceptable collateral, as well as the diversification requirements, are explained above under the sub-heading "Collateral". Any collateral obtained by a Fund pursuant to an SFT or TRS will be valued in accordance with the ACD's valuation and haircut policy detailed above. Such haircut policy allows for the fact that the valuation of the collateral or liquidity profile may deteriorate over time.

The section of this Prospectus entitled "Risk Factors" provides a description of the risks associated with the use of derivatives, stock lending, repurchase and reverse repurchase agreements, and other investment techniques which are likely to fall within the definition of SFT or apply equally to TRS.

The assets of a Fund that are subject to SFTs and TRS, and any collateral received, are held by the Depositary.

While the reuse of collateral is limited by the COLL Sourcebook to certain asset classes, such reuse should not result in a change to a Fund's investment objectives nor increase substantially a Fund's risk profile. For the avoidance of doubt, the assets received as collateral by the Fund pursuant to a reverse repurchase agreement shall not be sold, reinvested, pledged or otherwise transferred in accordance with COLL Sourcebook. The relevant diversification requirements are set out above under the sub-heading "Collateral".

All of the revenues arising from SFTs and TRS, net of direct and indirect operational costs, will be retained by the relevant Fund.

The ACD will disclose in the Company's annual report certain information regarding its use of SFTs and TRS.

Appendix 5: General Information

Register of Shareholders

The Register is maintained by the Administrator and Registrar at the address of its registered office at St. Nicholas Lane, Basildon, Essex SS15 5FS. It may be inspected by any Shareholder or his duly authorised agent during normal business hours at that address, without charge. Copies of the entries in the Register relating to a Shareholder are available on request by that Shareholder without charge. The Company has the power to close the Register for any period or periods not exceeding 30 days in any one year.

Accounting periods and annual and interim reports

The annual accounting period of the Company ends each year on 31 October, and the interim accounting period ends on 30 April each year.

Reports for each Fund of the Company in respect of each annual accounting period will be published in accordance with the Regulations not later than the last day of February each year. Half yearly reports for each Fund of the Company will be published in accordance with the Regulations not later than 30 June each year.

Copies of reports may be obtained from the ACD, free of charge, on request or inspected at the ACD's offices at 4th Floor, The Walbrook Building, 25 Walbrook, London EC4N 8AF.

Shareholder meetings and voting rights

General Meetings

Notice of the date, place and time of general meetings will be given to Shareholders.

The convening and conduct of Shareholders' meetings and the voting rights of Shareholders at those meetings are governed by the Company's Instrument of Incorporation and the COLL Sourcebook, which are summarised below.

Where Shareholders are corporations rather than individuals, the following will apply:

(i) Any corporation which is a Shareholder may, by resolution of its Directors or other governing body and in respect of any Share or Shares of which it is the holder, authorise such individual as it thinks fit to act as its representative at any general meeting of the Shareholders or of any Class meeting or Fund meeting. The individual so authorised shall be entitled to exercise the same powers on behalf of such corporation as the corporation could exercise in respect of such Share or Shares if it were an individual Shareholder.

(ii) A corporation which holds Shares as nominee may appoint more than one such representative, each in respect of a specified number of Shares which the corporation holds, and each such representative shall be entitled to exercise such powers aforesaid only in respect of the Shares concerned.

Requisitions of Meetings

The ACD has elected not to hold Annual General Meetings in accordance with the Regulations and, accordingly, the Company does not hold Annual General Meetings. The ACD or the Depositary may convene a general meeting at any time.

Shareholders may also requisition a general meeting. A requisition by Shareholders must state the objects of the meeting, be dated and signed by the Shareholders who, at the date of the requisition, are registered as holding not less than one-tenth in value of all Shares then in issue. The ACD must convene a general meeting no later than eight weeks after the receipt of such a requisition at the head office of the Company.

Notice and Quorum

Shareholders will receive at least 14 days' written notice of a general meeting. They are entitled to be counted in the quorum and to vote at a meeting either in person or by proxy. The quorum for a meeting is two Shareholders, present in person or by proxy. Notice convening a general meeting of Shareholders will be given in accordance with the Regulations.

An instrument of proxy may be in the usual common form or in any other form which the ACD shall approve executed under the hand of the appointor or of his attorney duly authorised in writing or, if the appointor is a corporation, either under the common seal or under the hand of an officer or attorney so authorised. A person appointed to act as a proxy need not be a Shareholder. For the appointment of a proxy to be effective, the instrument of proxy must be received as provided pursuant to the COLL Sourcebook not less than 48 hours before the relevant meeting or adjourned meeting.

Voting Rights

At a meeting of Shareholders, on a show of hands every Shareholder who (being an individual) is present in person or (being a corporation) is present by its properly authorised representative shall have one vote.

On a poll vote, Shareholders may vote in person or by proxy. The voting rights attaching to each Share are such proportion of the voting rights attached to all Shares in issue that the price of the Share bears to the aggregate prices(s) of all the Shares in issue on the date seven days before the notice of meeting is deemed to have been served. Shareholders who are entitled to more than one vote need not, if they vote, use all of their votes or cast all the votes used in the same way.

Except where the COLL Sourcebook or the Instrument of Incorporation of the Company requires an extraordinary resolution (which needs 75% of the votes cast at the meeting to be in favour if the resolution is to be passed), any resolution required by the COLL Sourcebook will be passed by a simple majority of the votes validly cast for and against the resolution (an ordinary resolution).

The ACD may not be counted in the quorum for a general meeting, and neither the ACD nor any associate of the ACD is entitled to vote at any general meeting except in respect of Shares which the ACD or associate holds on behalf of or jointly with a person who, if the registered Shareholder, would be entitled to vote and from whom the ACD or associate has received voting instructions.

'Shareholders' in this context means Shareholders on the date seven days before the notice of meeting is deemed to have been served, but excluding persons who are known to the ACD not to be Shareholders at the time of the meeting.

Class Meetings

The above provisions apply to meetings of Shareholders of a Fund or Class as they apply to general meetings of Shareholders, but by reference to the Fund or Class concerned.

Variation of Class Rights

The rights attached to a Class of Shares or a Fund may not be varied without the sanction of an ordinary resolution passed at a meeting of the Shareholders of that Class or Fund.

Notifications of changes to the Company and/or a Fund

The ACD may notify Shareholders of the Company and/or the relevant Fund, as applicable, of changes to the Company and/or the Fund where appropriate. In such cases, the nature of the notice given to Shareholders by the ACD will depend on the nature of the changes proposed, as deemed by the ACD. Changes may be fundamental, significant or notifiable.

Where the ACD deems changes to the Company and/or the relevant Fund to be fundamental, Shareholders of the Company and/or the relevant Fund, as applicable, will be required to approve the change by way of an extraordinary resolution prior to implementation.

Where the ACD deems changes to the Company and/or the relevant Fund to be significant, Shareholders of the Company and/or the relevant Fund, as applicable, will be provided with at least 60 days' prior notice before implementation of the change.

Where the ACD deems changes to the Company and/or the relevant Fund to be notifiable, Shareholders of the Company and/or the relevant Fund, as applicable, will be informed at or after the date of implementation of the change.

Winding up of the Company or termination of a Fund

The Company may not be wound up except as an unregistered company under Part V of the Insolvency Act 1986 or, if the Company is solvent, under the Regulations. A Fund may only be terminated under the COLL Sourcebook.

Where the Company is to be wound up or a Fund terminated under the COLL Sourcebook, such winding up or termination may only be commenced following approval by the FCA. The FCA will only give its approval if the ACD provides a statement (following an investigation into the affairs, business and property of the Company or Fund) either confirming that the Company or Fund will be able to meet all its liabilities within 12 months of the date of the statement or stating that such confirmation cannot be given. The Company may not be wound up under the COLL Sourcebook if there is a vacancy in the position of authorised corporate director at the relevant time.

The Company may be wound up or a Fund terminated under the COLL Sourcebook:

(a) if an extraordinary resolution to that effect is passed by the Shareholders; or

(b) if the period (if any) fixed for the duration of the Company or the Fund by the Instrument of Incorporation expires, or an event (if any) occurs on the occurrence of which the Instrument of Incorporation provides that the Company or Fund is to be wound up (for example, if the share capital of the Company is below its prescribed minimum or (in relation to any Fund) if the value of the Fund is less than £50 million or the equivalent in the currency of denomination at any time on or after one year from the date of first issue of Shares in that Fund, or if a change in the laws or regulations of any country means that, in the ACD's opinion, it is desirable to terminate the Fund); or

(c) on the effective date of an agreement by the FCA in response to a request by the ACD for the winding up of the Company or the termination of the Fund; or

(d) on the effective date of a duly approved scheme of arrangement which is to result in the Company ceasing to hold any Scheme Property; or

(e) in the case of a Fund, on the effective date of a duly approved scheme of arrangement which is to result in the Fund ceasing to hold any Scheme Property; or

(f) on the date on which all of the Funds fall within (e) or have otherwise ceased to hold any Scheme Property, notwithstanding that the Company may have assets and liabilities that are not attributable to any particular Fund.

A Fund may also be terminated in accordance with the terms of a scheme of amalgamation or reconstruction, in which case Shareholders in the Fund will become entitled to receive shares or units in another regulated collective investment scheme in exchange for their Shares in the Fund.

On the occurrence of any of the events in paragraphs (a) to (c) above and provided the FCA has given its approval:

(i) chapter 5 and sections 6.2 and 6.3 of the COLL Sourcebook (relating to investment and borrowing powers and pricing and dealing) will cease to apply to the Company or the Fund;
(ii) the Company will cease to issue and cancel Shares in the Company or the Fund, and the ACD shall cease to sell or redeem Shares or to arrange for the Company to issue or cancel them;
(iii) no transfer of a Share shall be registered and no other change to the Register shall be made without the sanction of the ACD;
(iv) where the Company is being wound up, the Company shall cease to carry on its business except for its beneficial winding up; and
(v) the corporate status and powers of the Company and, subject to the provisions of paragraph (i) and (iv) above, the powers of the ACD shall remain until the Company is dissolved.

The ACD shall, as soon as practicable after the winding up of the Company or the termination of a Fund has commenced, cause the Scheme Property to be realised and the liabilities of the Company or Fund to be met out of the proceeds. Where sufficient liquid funds are available after making adequate provision for the expenses of the winding up or termination and the discharge of the Company's or the Fund's remaining liabilities, the ACD may arrange for the Depositary to make one or more interim distributions out of the proceeds to Shareholders proportionately to the right of their Shares to participate in the Scheme Property at the commencement of the winding up or termination. The ACD shall arrange for the Depositary to make a final distribution to Shareholders, on or prior to the date on which the final account is sent to Shareholders, of any balance remaining in proportion to their holdings in the Company or the particular Fund.

On completion of a winding up of the Company, the Company will be dissolved and any money (including unclaimed distributions) standing to the account of the Company will be paid into court within one month of dissolution.

Following the completion of a winding up of the Company or of a termination of a Fund, the Depositary shall notify the FCA and at the same time the ACD or the Depositary shall request the FCA to revoke the relevant authorisation order.

Following the completion of a winding up of the Company or of a termination of a Fund, the ACD must prepare an account showing how the winding up or termination has been conducted and how the Scheme Property has been disposed of. The auditor of the Company shall make a report in respect of the final account, or termination account, stating their opinion as to whether the final account or termination account has been properly prepared. The final account or termination account and the auditor's report must be sent to the FCA, and to each relevant Shareholder within two months of the date of completion of the termination or winding up.

As the Company is an umbrella company, any liabilities attributable or allocated to a particular Fund under the COLL Sourcebook shall be met out of the Scheme Property attributable or allocated to that Fund.

Documents of the Company

The following documents may be inspected free of charge between 9.00 a.m. and 5.00 p.m. on any working day at the head office of the ACD, 4th Floor, The Walbrook Building, 25 Walbrook, London EC4N 8AF:

(i) the most recent annual and half-yearly long reports of the Company;
(ii) the Instrument of Incorporation (and any amending instrument);
(iii) the Prospectus and the Key Investor Information Documents; and
(iv) the ACD Agreement.

Copies of the documents referred to above may also be obtained from the head office of the ACD.

Material contracts

The following contracts, not being contracts entered into in the ordinary course of business, have been entered into by or in relation to the Company and are, or may be, material:

(i) the ACD Agreement dated 16 June 2009 between the Company and the ACD (as amended);
(ii) the Depositary Agreement dated 13 July 2016 as amended pursuant to an addendum agreement dated 23 April 2019 between the Company and the Depositary;
(iii) the Advisory Agreement dated 1 January 2025 between the ACD and Vanguard Global Advisers, LLC; and
(iv) the Advisory Agreement dated 1 January 2025 between the ACD and Vanguard Asset Management Limited.

Details of the above contracts are given in the "Management and Administration" section of this Prospectus.

Complaints

If you have any complaints, please write in the first instance to the Head of Compliance at the ACD's address above. A copy of the ACD's Complaint Handling Procedures is available on request from the ACD. You may also contact us via your financial adviser. If you are not satisfied with the outcome of your complaint, you may also complain directly to the Financial Ombudsman Service:

Financial Ombudsman Service
South Quay
Exchange Tower
Harbour Exchange London E14 9SR
Tel: 0800 023 4567
Website: www.financial-ombudsman.org.uk

The ACD is covered by the Financial Services Compensation Scheme (FSCS. Eligible Shareholders may be entitled to compensation from the FSCS if the ACD cannot meet its obligations. Eligibility depends on the type of claimant and the circumstances of the claim (e.g., a private individual will typically be covered in relation to a personal investment). The maximum compensation for investments is currently capped at £85,000 per eligible person per firm. Further information about the FSCS is available on request, or by contacting the FSCS at Financial Services Compensation Scheme, PO Box 300, Mitcheldean, GL17 1DY (or visit the website at www.fscs.org.uk). Tel: 0800 678 1100.

Notice to Shareholders

A notice is duly served if it is delivered to the Shareholder's address as appearing in the Register or is delivered by electronic means in accordance with the COLL Sourcebook. Any notice or document served by post is deemed to have been served on the second Business Day following the day on which it is posted. Any document left at a registered address or delivered other than by post is deemed to have been served on that day.

Further information

All information concerning the Company and about investing in Shares of the Company is available from the Administrator and Registrar at Vanguard Investments Funds, P.O. Box 10315, Chelmsford, CM99 2AT. All applications for Shares are made solely on the basis of the current prospectus of the Company, and investors should ensure that they have the most up-to-date version.

Telephone recordings

Please note that the ACD and/or the Administrator and Registrar may record telephone calls for regulatory, training or monitoring purposes or to confirm investors’ instructions.

Risk management

The ACD will provide, upon the request of a Shareholder, further information relating to:

(i) the quantitative limits applying in the risk management of any Fund;
(ii) the methods used in relation to (i) above; and
(iii) any recent development of the risk and yields of the main categories of investment.

Appendix 6: Delegation of Safekeeping Duties by the Depositary

The Depositary has delegated those safekeeping duties set out in the COLL Sourcebook to State Street Bank and Trust Company with registered office at One Congress Street, Suite 1, Boston, Massachusetts, 02114-2016, U.S, with an office at 20 Churchill Place, Canary Wharf, London E14 5HJ, UK, whom the Depositary has appointed as its global sub-custodian.

At the date of this Prospectus, State Street Bank and Trust Company as global sub-custodian has appointed local sub-custodians within the State Street Global Custody Network as listed below.

MARKET	SUB-CUSTODIAN
Albania	Raiffeisen Bank sh.a.
Argentina	Citibank, N.A.
Australia	The Hongkong and Shanghai Banking Corporation Limited
Austria	Deutsche Bank AG
	UniCredit Bank Austria AG
Bahrain	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Bangladesh	Standard Chartered Bank
Belgium	Deutsche Bank AG
Bermuda	HSBC Bank Bermuda Limited
Botswana	Standard Chartered Bank Botswana Limited | Standard Chartered Bank
Brazil	Citibank, N.A.
Bulgaria	Citibank Europe plc, Bulgaria Branch | Citibank, N.A.
	UniCredit Bulbank AD | UniCredit S.p.A.
Canada	Desjardins Trust Inc. | The Federation Des Caisses Desjardins Du Quebec
	Natcan Trust Company
	Royal Bank of Canada
	State Street Trust Company Canada
Chile	Itaú CorpBanca S.A.
China A and CIBM	Agricultural Bank of China
	Bank of China
	China Construction Bank Corporation
	Citibank (China) Co Limited| Citibank, N.A.
	Deutsche Bank (China) Co., Ltd.
	Industrial and Commercial Bank of China
	Standard Chartered Bank (China) Limited| Standard Chartered Bank
	Shanghai Pudong Development Bank
China A, B and CIBM	HSBC Bank (China) Co. Ltd.
Clearstream	Clearstream Banking Luxembourg

Colombia	Cititrust S.A. | Citibank, N.A.
Costa Rica	Banco BCT S.A.
Croatia	Privredna Banka Zagreb d.d.
	Zagrebacka Banka d.d. | UniCredit S.p.A.
Cyprus	BNP Paribas Securities Services
Czech Republic	Československá obchodní banka, a.s.
	UniCredit Bank Czech Republic and Slovakia | UniCredit S.p.A.
Denmark	Skandinaviska Enskilda Banken AB (publ)
Egypt	Citibank N.A. Egypt
Estonia	AS SEB Pank
Eswatini	Standard Bank Eswatini Limited
Euroclear	Euroclear SA/NV
Federation of Bosnia and Herzegovina	UniCredit Bank D.D. | UniCredit S.p.A.
Finland	Skandinaviska Enskilda Banken AB (Publ)
France	Deutsche Bank AG, Amsterdam Branch
Republic of Georgia	JSC Bank of Georgia
Germany	State Street Bank International Bank GmbH
	Deutsche Bank AG
Ghana	Standard Chartered Bank Ghana Limited | Standard Chartered Bank
Greece	BNP Paribas Securities Services
Hong Kong - Stock Connect SPSA, Bond Connect	Standard Chartered Bank (Hong Kong) Limited | Standard Chartered Bank
Hong Kong - Stock Connect TPC	Citibank, N.A.
Hong Kong - HK Market and Stock Connect TPC	The Hongkong Shanghai Banking Corporation Limited
Hungary	Citibank Europe Plc, Hungarian Branch Office | Citibank, N.A.
	UniCredit Bank Hungary Zrt. | UniCredit S.p.A.
Iceland	Landsbankinn hf.
India	Deutsche Bank AG
	Citibank N.A.
Indonesia	Deutsche Bank AG
	Standard Chartered Bank
Israel	Bank Hapoalim B.M.
Italy	Deutsche Bank S.p.A. – Milan
	Intesa Sanpaolo S.p.A.
Ivory Coast	Standard Chartered Bank Côte d'Ivoire S.A. | Standard Chartered Bank
Japan	Mizuho Bank, Ltd.

	The Hongkong and Shanghai Banking Corporation Limited
	Sumitomo Mitsui Banking Corporation
Jordan	Standard Chartered Bank
Kazakhstan	JSC Citibank Kazakhstan
Kenya	Standard Chartered Bank Kenya Limited | Standard Chartered Bank
Republic of Korea	Deutsche Bank AG
	The Hongkong and Shanghai Banking Corporation Limited
Kuwait	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Latvia	AS SEB banka
Lithuania	AB SEB bankas
Malawi	Standard Bank Limited, Malawi | Standard Bank of South Africa Limited
Malaysia	Deutsche Bank (Malaysia) Berhad
	Standard Chartered Bank Malaysia Berhad | Standard Chartered Bank
Mauritius	The Hongkong and Shanghai Banking Corporation Limited
Mexico	Banco Nacional de México, S.A. | Citibank, N.A.
Morocco	Citibank Maghreb S.A. | Citibank, N.A.
Namibia	Standard Bank Namibia Limited
Netherlands	Deutsche Bank AG
New Zealand	The Hongkong and Shanghai Banking Corporation Limited
Nigeria	Stanbic IBTC Bank Plc.
Norway	Skandinaviska Enskilda Banken AB (publ)
Oman	HSBC Bank Oman S.A.O.G. (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Pakistan	Deutsche Bank AG
Panama	Citibank, N.A.
Peru	Citibank del Perú, S.A. | Citibank, N.A.
Philippines	Standard Chartered Bank
	Deutsche Bank AG
Poland	Bank Handlowy w Warszawie S.A. | Citibank, N.A.
Portugal (Interbolsa)	Deutsche Bank AG
Qatar	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Republic of Srpska	UniCredit Bank D.D. | UniCredit S.p.A.
Romania	Citibank Europe Plc, Dublin – Romania Branch | Citibank, N.A.
Russia	AO Citibank, Moscow | Citibank, N.A.
Saudi Arabia	HSBC Saudi Arabia (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Serbia	UniCredit Bank Serbia JSC
	UniCredit S.p.A

Singapore	Citibank N.A.
Slovak Republic	UniCredit Bank Czech Republic and Slovakia, a.s., Pobocka Zahranicnej Banky | UniCredit S.p.A.
Slovenia	UniCredit Banka Slovenija D.D. | UniCredit S.p.A.
South Africa	FirstRand Bank Limited
	Standard Bank of South Africa Limited
Spain	Deutsche Bank S.A.E.
Sri Lanka	The Hongkong and Shanghai Banking Corporation Limited
Sweden	SEB Merchant Banking, Skandinaviska Enskilda Banken AB (publ)
Switzerland	Credit Suisse (Switzerland) Ltd.
	UBS Switzerland AG
Taiwan	Bank of Taiwan
	Citibank, N.A.
	Deutsche Bank AG
	HSBC Bank (Taiwan) Limited | The Hongkong and Shanghai Banking Corporation Limited
	JP Morgan Chase Bank
	Standard Chartered Bank, Plc
Tanzania	Standard Chartered Bank Tanzania Limited | Standard Chartered Bank
Thailand	Standard Chartered Bank (Thai), PCL | Standard Chartered Bank
Tunisia	Union Internationale de Banques | Societe Generale
Turkey	Citibank, A.Ş. | Citibank, N.A.
	Deutsche Bank A.Ş.
Uganda	Standard Chartered Bank Uganda Limited | Standard Chartered Bank
Ukraine	JSC Citibank | Citibank, N.A.
United Arab Emirates (ADX, DFM, Nasdaq Dubai)	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
United Kingdom	Royal Bank of Scotland
United States	State Street Bank and Trust Company
Uruguay	Banco Itaú Uruguay S.A.
Vietnam	HSBC Bank (Vietnam) Ltd | The Hongkong and Shanghai Banking Corporation Limited
Zambia	Standard Chartered Bank Zambia Plc.
Zimbabwe	Stanbic Bank Zimbabwe Limited

Disclaimers

The past performance of the benchmark indices utilised by the Funds (the "**Benchmark Indices**") is not a guide to future performance. The ACD, the Investment Adviser, the Company and affiliates do not guarantee the accuracy or completeness of the Benchmark Indices or any data included therein and the ACD, the Investment Adviser, the Company and affiliates shall have no liability for any errors, omissions or interruptions therein. The ACD, the Investment Adviser, the Company and affiliates make no warranty, express or implied, to any person or entity, as to the results obtained by the Funds from the use of the Benchmark Indices or any data included therein. In no event shall the ACD, the Investment Adviser, the Company or affiliates have any liability for any special, direct, indirect or consequential damages (including loss of profit) arising from such inaccuracies, omissions or other errors in or as a result of the Benchmark Indices, even if notified of the possibility of such damages. The ACD, the Investment Adviser, the Company and affiliates are not responsible for screening the constituents of the Benchmark Indices.

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The Vanguard U.K. Inflation-Linked Gilt Index Fund and Vanguard U.K. Long Duration Gilt Index Fund are not sponsored, endorsed, sold or promoted by Bloomberg. Bloomberg does not make any representation or warranty, express or implied, to the owners of or counterparties to the Vanguard U.K. Inflation-Linked Gilt Index Fund, Vanguard U.K. Long Duration Gilt Index Fund, or any member of the public regarding the advisability of investing in securities generally or in the Vanguard U.K. Inflation-Linked Gilt Index Fund and Vanguard U.K. Long Duration Gilt Index Fund particularly. The only relationship of Bloomberg to the ACD is the licensing of certain trademarks, trade names and service marks and of the Bloomberg U.K. Government Inflation-Linked Float Adjusted Bond Index and Bloomberg U.K. Government 15+ Years Float Adjusted Bond Index, which is determined, composed and calculated by BISL without regard to the ACD or the Vanguard U.K. Inflation-Linked Gilt Index Fund or Vanguard U.K. Long Duration Gilt Index Fund. Bloomberg has no obligation to take the needs of the ACD or the owners of the Vanguard U.K. Inflation-Linked Gilt Index Fund or Vanguard U.K. Long Duration Gilt Index Fund into consideration in determining, composing or calculating the Bloomberg U.K. Government Inflation-Linked Float Adjusted Bond Index and Bloomberg U.K. Government 15+ Years Float Adjusted Bond Index. Bloomberg is not responsible for and has not participated in the determination of the timing of, prices at, or quantities of the Vanguard U.K. Inflation-Linked Gilt Index Fund or Vanguard U.K. Long Duration Gilt Index Fund to be issued. Bloomberg shall not have any obligation or liability, including, without limitation, to Vanguard U.K. Inflation-Linked Gilt Index Fund or Vanguard U.K. Long Duration Gilt Index Fund customers, in connection with the administration, marketing or trading of the Vanguard U.K. Inflation-Linked Gilt Index Fund or Vanguard U.K. Long Duration Gilt Index Fund.

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