

SUPPLEMENT 11

HC Westfield US Growth Equity Fund

(a sub-fund of Harrington Cooper UCITS Funds ICAV)

This Supplement contains information specifically relating to HC Westfield US Growth Equity Fund (the "Fund"), which is a sub-fund of Harrington Cooper UCITS Funds ICAV (the "ICAV"). The ICAV is an open-ended umbrella Irish collective asset-management vehicle with segregated liability between its sub-funds. This Supplement forms part of the prospectus of the ICAV dated 3 July 2026 (together, the "Prospectus") and should be read in the context of and together with the Prospectus.

The general details set out in the Prospectus apply to the Fund save where otherwise stated in this Supplement. To the extent that there is any inconsistency between this Supplement and the Prospectus, this Supplement shall prevail. With the exception of terms defined in this Supplement and unless the context requires otherwise, capitalised terms used in this Supplement shall have the meaning attributed to them in the Prospectus.

The Directors of the ICAV whose names appear in the Prospectus under the heading **"Management and Administration"** accept responsibility for the information contained in this Supplement and the Prospectus. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

An investment in the Fund should be viewed as long term.

As at the date of this Supplement, the following other funds have been established within the ICAV: HC Snyder US All Cap Equity Fund, Thornbridge Nissay Japan Contrarian Value Equity Fund, HC Cadira Sustainable Japan Equity Fund, HC Berenberg Europe ex UK Focus Fund, HC Sephira GEM Long Only UCITS Fund, HC Westfield US Small Cap Growth Fund, HC Vigama Alpha Fund, HC Global Equity Fund, Konwave ATG Emerging Markets Healthcare Fund and Konwave ATG Global Healthcare Fund.

The date of this Supplement is 3 July, 2026.

1. DEFINITIONS

Unless otherwise defined herein or unless the context otherwise requires all defined terms used in this Supplement shall bear the same meaning as in the Prospectus.

"Base Currency", the base currency of the Fund, being US Dollar (USD).

"Business Day", any day (except Saturdays, Sundays and public holidays) on which the retail banks in both Ireland and the United States are generally open for normal banking business or such other day or days as the as may be determined by the Directors and notified to Shareholders in advance.

"Dealing Day", each Business Day and/or such other day or days as may be determined by the Directors and notified to Shareholders in advance provided that there shall be at least one Dealing Day per fortnight.

"Dealing Deadline", in respect of each Share Class, 12.00 noon (Irish time) on the Business Day of the relevant Dealing Day, or other time as the Directors may determine and notify to Shareholders in advance provided that the Dealing Deadline is no later than the Valuation Point.

"Initial Offer Period", the initial offer period for all Classes described in this Supplement under the heading **"Initial Offer Period"**.

"Initial Offer Price", the initial fixed price payable for a Share in the relevant Class, as further detailed in the section below entitled **"Initial Offer Price"**.

"Investment Management Agreement", the investment management agreement between the ICAV, the Manager and the Investment Manager dated, 12 December, 2024, which may be amended by written agreement between the parties from time to time.

"Investment Manager", Westfield Capital Management Company, L.P.

"Benchmark", Russell 3000® Growth Index (RUA Index)

"Sustainability Risk", an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

"Sustainability Factors", environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

"U.S. All Cap", equity securities listed on U.S. stock exchanges with any market capitalisations.

"Valuation Point", in respect of each Share Class, means 9pm (Irish time) on each Dealing Day or such other time as the Directors may determine and notify to Shareholders provided that the Valuation Point shall be after the Dealing Deadline.

2. IMPORTANT INFORMATION

This Supplement comprises information relating to the Shares of the Fund to be issued in accordance with the Prospectus and this Supplement.

2.1 Dividend Policy

The Fund will have both accumulating and distributing Share Classes. The accumulating Share Classes will accumulate dividends, therefore no dividends will be declared in respect of those Share Classes. Instead, the income and profits attributable to an accumulating Share Class will be accumulated and reinvested in the Fund on behalf of the Shareholders in the Share Class. Each distributing Share class will distribute dividends to its Shareholders on an annual basis, based on distributable income as of December 31.

2.2 Share Classes

Details of the available classes of Shares in this Fund are set out at **Appendix 1**.

2.3 Profile of a Typical Investor

The typical investor profile is expected to be an investor seeking to take long-term exposure to U.S. equity securities and who has a medium to high risk appetite. Investors should read and consider the section of this Supplement entitled **"Risk Factors"** as well as the section of the Prospectus entitled **"Risk Factors"** before investing in the Fund.

2.4 Accounts

An annual report and audited accounts in respect of the Fund will be prepared as outlined in the Prospectus under **"Accounts and Information"**. The first annual report and audited financial statements of the Fund will be made up to 31 December, 2027. The first semi-annual report for the Fund will cover the period ending 30 June, 2026.

3. INFORMATION ON THE FUND

3.1 Investment Objective, Investment Policies and Investment Strategy

3.1.1 Investment Objective

The investment objective of the Fund is to achieve capital growth over the long-term by identifying and acquiring U.S. equities.

There can be no assurance that the Fund will achieve its investment objective over any time period.

.1.2 Investment Policies, Structure and Transactions

The Fund invests primarily in equity securities, principally common and preferred stocks of U.S. companies. Under normal market conditions, the Fund invests at least 80% of its Net Asset Value in equity securities of U.S. companies. The Fund is a daily dealing fund.

It is expected that the Fund would maintain a diverse portfolio generally between 40 to 65 equity securities. The Investment Manager will ensure that the Fund will not take positions that will impede the Fund from meeting its liquidity obligations.

As of December 31, 2024, the range of the Benchmark was \$8.22 million to \$3.79 trillion, but it is expected to change frequently. Up to date information on the Benchmark can be found on Bloomberg using the RUA ticker or upon request from the Investment Manager.

Typically, no equity position will exceed the greater of either 5% of the Net Asset Value of the Fund or 2% more than the security's benchmark weight*, both valued at market. Initial portfolio weightings are set by the investment committee of the Investment Manager and are typically less than 2%.

*When a security is represented in the Benchmark by multiple share classes, all associated share classes will be combined to calculate the security's overall benchmark weight. The Investment Manager shall set sector limits of 20% of the Net Asset Value of the Fund or 2.5x the Benchmark sector weight, whichever is greater.

Cash shall be a residual of the investment process, and it is expected that the Fund will be fully invested at all times. Cash is to be used for transaction purposes only and should not exceed 10% of the Net Asset Value of the Fund. The performance of the Fund is expected to exceed that of the Benchmark by 150 basis points per annum net of fees over a complete market cycle.

The use of financial derivative instruments by the Fund is prohibited, as a consequence, the Manager believes that market risk is best managed by using the commitment approach. The Fund's gross leverage, which is calculated using the commitment approach, shall not exceed 100% of the Net Asset Value of the Fund.

The Fund may invest in the following:

- U.S. All Cap Securities – All cap securities are defined as stocks with any market capitalisations.
- American Depositary Receipts (ADRs), which are dollar-denominated negotiable certificates traded on domestic U.S. stock exchanges, and non-U.S. incorporated stocks traded in U.S. dollars on U.S. stock exchanges may be held to a maximum of 15% of the Net Asset Value of the Fund. The aforementioned limitation would not apply to U.S. companies that transfer their registration to reduce their U.S. tax liability.

The Investment Manager will not select unlisted stocks for investment by the Fund but may selectively maintain positions in stocks which were listed at the time of the Fund's investment but have subsequently become delisted, if it believes the fundamental case for investment remains intact and that such investments are in accordance with the Fund's investment restrictions as set out in the Prospectus. Such stocks may be held to a maximum of 5% of the Net Asset Value of the Fund.

The Fund is actively managed by the Investment Manager with respect to the Benchmark. The Benchmark is a market-capitalisation-weighted index maintained by FTSE Russell that measures the performance of the all-cap growth segment of the U.S. equity universe. It is constructed to provide a comprehensive and unbiased barometer for the all-cap growth segment. It is completely reconstituted annually to ensure new and growing equities are included and that the represented companies continue to reflect growth characteristics. The Investment Manager believes that the Benchmark is the most appropriate benchmark against which to compare the Fund's performance because it contains such a diversified portfolio of U.S. stocks. However, the Fund will not be managed to replicate the performance of the Benchmark. The Benchmark may have a different composition, volatility, risk, and/or other investment-related factors that may affect the benchmark's ultimate performance results. Therefore, the Fund's investment results may vary significantly from the Benchmark's performance. In addition, the Benchmark is unmanaged and does not incur transaction

or management fees, unlike the Fund. This difference may cause the net performance of an investment in the Shares of the Fund to differ from the performance of the Benchmark. The Benchmark is also used to determine equity position limits and sector limits, as further described above.

3.1.3 Investment Process

The Investment Manager uses a bottom-up process to identify companies that meet its strict fundamental criteria and then performs a qualitative review on each identified company to select approximately 40 to 65 companies for inclusion in the Fund's portfolio. The Investment Manager's research may include personal interviews and other contact with company management. No sectoral focus is embedded into the Investment Process for identifying suitable companies for inclusion in the Fund's portfolio. Rather, sector allocations are the outcome of the Investment Manager's bottom-up investment process.

In selecting stocks for the Fund's portfolio, the Investment Manager looks for companies that it believes possess the following characteristics:

- Accelerating earnings growth.
- Strong balance sheets.
- Attractive valuations as measured by price/earnings to growth ratios.

In addition to the investment considerations outlined above, the Investment Manager integrates research into ESG factors into its investment process. The key ESG considerations may vary depending on the industry, sector, geographic region or other factors and the core business of each issuer, examples of which are outlined in the table below:

Environmental Issues	Social Issue	Corporate Governances Issues
Business growth opportunities from environmental themes	Business growth opportunities from social themes	UN global compact alignment
Greenhouse Gas ("GHG") emission intensity	Female leadership diversity	Sustainable Accounting Standards Board ("SASB") and Global Reporting Initiative ("GRI") reporting
GHG emission reduction targets	Employee safety metrics	Board level ESG oversight
Environmental (climate, water, waste, biodiversity) policies in place	Social policies (fair pay, child labor, human rights, cyber/data security) in place	Diversity, Equity and Inclusion ("DE&I") metrics of the board
		Executive and Board of Director compensation as % of sales

The strategy of the Fund utilises an active, fundamental, bottom-up approach to investing in U.S. equity securities. The Investment Manager employs a growth at a reasonable price (GARP) investment style and favours investing in earnings growth stocks given its conviction that stock prices follow earnings progress and that they offer the best investment opportunities. The Investment Manager believes that reasonably priced stocks of companies with accelerating or underappreciated earnings potential are best identified through in-depth, fundamental research. Through this research, the Investment Manager seeks to identify companies with broad market opportunities, accelerating earnings growth, and quality balance sheets. Superior company management, disciplined capital allocation, strong returns on invested capital trends, solid financial controls and accounting, unit

volume growth, cash flow sufficient to fund growth and unique market position or pricing power are also all criteria on which the Investment Manager places a high premium.

The Investment Manager implements its investment approach when selecting investments for the Fund, with its team that focuses on its core growth at a reasonable price philosophy, with the aim that this strategy will add value over the long-term. The Fund's portfolio is managed in accordance with the Investment Manager's four primary beliefs:

1. Stock prices ultimately follow earnings progress.
2. Large cap companies coexist and compete with small and mid-cap companies, and the investment committee of the Investment Manager is at an advantage because it covers its respective industries across the capitalisation spectrum and understands market dynamics across all cap ranges, and the relationships between the companies in each cap range.
3. Growth can be purchased at a reasonable price, and
4. A team approach ensures collective best thinking is implemented.

The Investment Manager's ability to piece together the information that it gathers from company management, suppliers, users and competitors, and then compare that to information received from industry sources to then ensure a compelling investment theme, sets the Investment Manager apart from its peers. Through conducting in-depth fundamental analysis and uncovering companies with earnings growth potential above market expectations, the Investment Manager can demonstrate its ability to outperform the Benchmark over multiple time periods in many diverse market environments.

The Investment Manager's ESG research program is implemented utilising an integrated, research-driven approach which combines deep fundamental research with independent ESG research to enhance its assessment of investment opportunities and risks. This ESG research process typically includes interviews with key management team contacts, reviews of material sustainability metrics from public filings and third-party data, and additional independent research.

The output of this proprietary research process is a standardised evaluation of a company across several dimensions including:

- Product or Service Impact (What a company makes)
- Operating Environmental & Social Practices (How a company makes their products)
- Governance & Risks (How a company manages risks in making the product)

To derive these individual pillar ratings, the Investment Manager utilises a combination of its own industry knowledge in conjunction with multiple inputs collected from company filings, sustainability reports, third-party vendors, management engagements, and other sources to assess where a company has been and where it currently is in relation to the implementation of their ESG strategy, as well as to assess the potential for future improvements that could be made by the company. Additionally, a critical element of the Investment Manager's evaluation process is accounting for how a business compares on each pillar relative to their industry peers, with consideration given to the market capitalisation of the company to account for the important differences in resources available for ESG efforts and robustness of strategies between large cap and small cap companies. It's the aggregation of data points from numerous sources, consideration of forward-looking opportunities, and relative peer comparison which the Investment Manager believes provides a more complete review on the ESG profile of a company as compared to relying on an external ESG ratings provider.

The output of this research is a proprietary ESG rating of the Investment Manager (Strong, Neutral, Weak). This research is typically discussed for both existing investments and potential new investment candidates. Much like other fundamental inputs, this research is considered alongside other critical inputs during the portfolio construction process but does not in isolation dictate buy and sell decisions.

Engagement

The Investment Manager considers engagement with management teams to be of critical importance regarding both fundamental and ESG related matters. The Investment Manager's investment committee members spend time travelling to meet with company management teams and attend industry conferences, in addition to conducting research. Typically, the Investment Manager will visit with every company before it is included in the Fund's portfolio, and its investment committee averages over 300 company meetings a quarter. The Investment Manager believes that one-on-one meetings with company management teams are critical to its research process, allowing it to evaluate the relevant company's management's strategy for achieving long-term growth and its ability to execute that strategy.

In addition to traditional fundamental analysis, the research conducted by the Investment Manager's sustainable team increases its touch points with company management, often meeting with a company's Chief Sustainability Officer or other members of the company management to determine how they are embedding ESG efforts into their core business strategy. The Investment Manager believes this combination of traditional fundamental analysis combined with sustainability research provides valuable insights into the inner workings of the companies analysed by the Investment Manager, their future goals, and provides a more holistic understanding of future risks and opportunities.

3.1.4 Classification for SFDR Purposes

The Fund promotes environmental and/or social characteristics within the meaning of Article 8 of the SFDR. The Fund does not have sustainable investment as its investment objective. For further information on the Fund's ESG strategy, please refer to the SFDR annex in Appendix 2 to this Supplement.

3.1.5 SFDR Disclosure

Alongside the fundamental analysis described within the “**Investment Policies, Structure and Transactions**” section of the Supplement, the environmental and/or social characteristics promoted by the Fund are outlined below.

1. **Female board representation:** The Fund promotes gender diversity in the board of directors of United States listed companies through stewardship activities, pursuing one or more female director(s) in a company's board of directors.
2. **Fossil fuel extraction free:** The Fund promotes attention to GHG emissions intensity through minimising exposure to United States listed companies in the fossil fuel extraction industry.

A minimum of seventy percent (70%) of the Fund's holdings promote the environmental and/or social characteristics listed above. As such, the Investment Manager makes an ESG assessment for these holdings. This ESG assessment is based on the following considerations.

Female board representation: The Fund promotes gender diversity in the board of directors of United States listed companies through company due diligence and stewardship activities, pursuing one or more female director(s) in a company's board of directors. In order to measure this element, the Investment Manager reviews company documents which typically include regulatory filings, corporate websites, press releases, and investor presentations. While not all holdings will meet this objective, the Fund engages with these holdings regarding advancement of gender diversity at the board level.

Fossil fuel extraction free: The Fund promotes attention to GHG emissions intensity through minimising its exposure to United States listed companies in the fossil fuel extraction industry and through investing in companies not classified in fossil fuel extraction industries. In order to measure this element, the Investment Manager reviews the weight of the portfolio to ensure that a minimum threshold of 70% of the Net Asset Value of the Fund is invested in companies which are not classified as energy sector companies by the Global Industry Classification Standard (“GICS”). As of the date of this Supplement, GICS defines energy sector companies as companies engaged in: the exploration and production; refining and marketing; and storage and transportation of oil, gas, coal and consumable fuels, as well as companies that offer oil and gas equipment and services.

The Investment Manager has determined that companies that are engaged in the following controversial business areas beyond a defined threshold (defined as a percentage of their total turnover) are not included in the Fund's portfolio:

Criteria	Threshold
Turnover from production and/or distribution of weapons	> 10%
Turnover from production and/or distribution of controversial weapons (include anti-personal mines, cluster munitions, biological and chemical weapons*)	> 0%
Turnover from production of tobacco	> 5%
Turnover from production and/or distribution of coal	> 5%

* Serious violations of UN Global Compact (UNGC)

No Consideration of Principal Adverse Impacts on Sustainability Factors

Given the investment objectives and policies of the Fund and the nature and scale of the Investment Manager's business, the Fund, acting through its Investment Manager, does not currently consider the principal adverse impacts of investment decisions on sustainability factors as it believes focusing on the selection of investment opportunities for the Fund to be a greater use of its resources. The decision whether to consider principal adverse impacts of investment decisions on sustainability factors will be reviewed periodically.

3.1.6 Sustainability Risks

Pursuant to Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, the Investment Manager is required to disclose the "likely" impact of the Sustainability Risks listed in the risk factor entitled "Sustainability Risks" on the overall financial returns of the Fund. Having considered these Sustainability Risks in the context of the Fund's portfolio and given that the Investment Manager seeks to mitigate the impacts of such Sustainability Risks on the Fund's returns by integrating a consideration of such Sustainability Risks into its investment decisions in the manner set out above, the Manager currently considers that the likely impact of Sustainability Risks on the overall financial returns of the Fund's portfolio will not be material.

The list of Sustainability Risks in the risk factor entitled "Sustainability Risks" and the Manager's assessment of the likely impact on the financial returns of the Fund are both based on the Manager's good faith assessment and on assumptions which the Investment Manager considers to be reasonable at the time of such assessment. The consideration of Sustainability Risks may include the consideration of criteria which are open to subjective interpretation. The Investment Manager may adapt its implementation of ESG considerations and Sustainability Risk integration in accordance with relevant local laws or regulations.

Prior to acquiring investments on behalf of a Fund, the Investment Manager makes an ESG assessment of the proposed holdings, as noted above under "SFDR Disclosure". The results of the assessment will be taken into account by the Investment Manager in deciding whether to acquire a holding in an issuer or not. The assessment ultimately assists the Investment Manager with screening the relevant investment against Sustainability Risk and to identify whether it is vulnerable to such risk. This process incorporates applying a screening policy (whereby potential investments are removed from the investment universe on the basis that they would negatively impact the Sustainability Risk of the Fund). , Sustainability Risk is monitored through ongoing periodic reviews of the ESG assessment of the current and proposed holdings to determine whether the level of Sustainability Risk has materially changed since the initial assessment was conducted. Where the sustainability risk associated with a particular investment has increased beyond the ESG risk appetite for the Fund, the Investment Manager will consider selling or reducing the Fund's exposure to the relevant investment, taking into account the best interests of the Fund and the Shareholders.

Assessment of Sustainability Risks is complex and may be based on ESG data that are difficult to obtain. Such data may be incomplete, estimated, outdated, or otherwise materially inaccurate. The Sustainability Risks in the risk factor entitled "Sustainability Risks" is not an exhaustive list of all Sustainability Risks related to the environmental, social, or governance risks that could have a negative impact (material or immaterial) on the value of an investment in the Fund's portfolio and there can be no guarantee that the actual impact of the Sustainability Risks on the Fund's returns will not be materially greater than the likely impact as assessed by the Investment Manager.

3.1.7 Sustainability Impact Assessment

The Manager, being a company which has less than 500 employees and which is not a parent undertaking of a group with 500 or more employees, is not, in accordance with the SFDR, currently required to consider the principal adverse impacts of investment decisions of the Fund on Sustainability Factors in the manner prescribed under Article 4(1)(a) of the SFDR. The Manager takes account of Sustainability Risks in the investment decision-making process applied to the Fund's investments in the manner described above, but has determined, for the time being, not to consider (in the manner specifically contemplated by Article 4(1)(a) of the SFDR), the principal adverse impacts of investment decisions of the Fund on Sustainability Factors.

This decision has been made due to the lack of information and data currently available to adequately assess such principal adverse impacts. This decision will be kept under consideration by the Manager who may consider the adverse impacts of Fund investment decisions on Sustainability Factors in the manner contemplated under Article 4(1)(a) of the SFDR in the future.

3.1.8 Taxonomy Regulation Disclosures

While the Fund promotes environmental and/or social characteristics within the meaning of Article 8 of the SFDR, it should be noted that as the investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation, the Fund's portfolio alignment with the Taxonomy Regulation is not calculated. It follows that the Fund does not currently commit to investing more than 0% of its assets in investments aligned with the Taxonomy Regulation. The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

3.2 Investment Manager

The Manager has appointed Westfield Capital Management Company, L.P. to act as Investment Manager to the Fund pursuant to the Investment Management Agreement.

The Investment Manager is authorised and regulated by the U.S. Securities and Exchange Commission (the "**SEC**") under file number 801-69413 as an SEC registered investment advisor. The Investment Manager was established on 1st July, 1989.

As of 30th November, 2025, the Investment Manager acts as an investment advisor to 17 funds with assets under management of USD 8,006 billion.

Pursuant to a side letter dated 3 July 2026 to the Investment Management Agreement between the ICAV, the Manager and the Investment Manager 12 December, 2024, the Investment Manager has been appointed as the Investment Manager to the Fund. The Investment Manager will be entitled to receive fees as described in the "Fees and Expenses" section below. The Investment Management Agreement may be terminated by any party on giving not less than 90 days' prior written notice to the other parties. The Investment Management Agreement may also be terminated forthwith by either party giving notice in writing to the other party upon the occurrence of certain events such as unremedied breach after notice or the insolvency of a party. The Investment Management Agreement provides that the Investment Manager shall not be liable for any loss or damage arising out of the performance of its duties hereunder unless such loss or damage is the direct result of a material breach of the Investment Management Agreement by the Investment Manager or the gross negligence, wilful default, bad faith or fraud by the Investment Manager in the performance or non-performance of its duties. The Investment Management Agreement contains indemnities in favour of

the Investment Manager excluding matters arising by reason of the fraud, bad faith, negligence or wilful default of the Investment Manager.

Details of the fees paid to the Investment Manager are set out below under the heading “**Fees and Expenses**”.

3.3 Investment and Borrowing Restrictions

The investment and borrowing restrictions set out in the Prospectus apply in their entirety to the Fund. The Fund may only borrow on a temporary basis and the aggregate amount of such borrowings may not exceed 10% of the Net Asset Value of the Fund.

The use of financial derivative instruments by the Fund is prohibited.

3.4 Risk Factors

There is no guarantee that the investment objective of the Fund will be achieved. Stocks fluctuate in price and the value of investment in the Fund may go down. This means that an investor could lose money on an investment in the Fund or the Fund may not perform as well as other investment options. Principal risks impacting the Fund include:

Growth Style Risk

Over time, a growth oriented investing style may go in and out of favour, which may cause the Fund to underperform other equity funds that use different investing styles.

Equity Risk

The values of equity or equity-related securities may decline due to general market conditions that are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. They may also decline due to factors that affect a particular industry or industries, such as labour shortages or increased production costs and competitive conditions within an industry. Equity securities generally have greater price volatility than fixed income securities.

Market Risk

Securities markets are volatile and can decline significantly in response to adverse market, economic, political, regulatory or other developments, which may lower the value of securities held by the Fund, sometimes rapidly or unpredictably. Events such as war, acts of terrorism, social unrest, natural disasters, recessions, inflation, rapid interest rate changes, supply chain disruptions, sanctions, the spread of infectious illness or other public health threats could also significantly impact the Fund and its investments.

ESG Factors Risk

The consideration of ESG factors by the Investment Manager could cause the Fund to perform differently than other funds. ESG factors are not the only consideration used by the Investment Manager in making investment decisions for the Fund and the Fund may invest in a company that scores poorly on ESG factors if it scores well on other criteria. ESG factors may not be considered for every investment decision.

Issuer Risk

An adverse event affecting a particular issuer in which the Fund is invested, such as an unfavourable earnings report, may depress the value of that issuer's stock, sometimes rapidly or unpredictably.

Preferred Stock Risk

Preferred stocks in which the Fund may invest are sensitive to interest rate changes, and are also subject to equity risk, which is the risk that stock prices will fall over short or extended periods of

time. The rights of preferred stocks on the distribution of a company's assets in the event of a liquidation are generally subordinate to the rights associated with a company's debt securities.

Industry Sector Risk

Because the Fund may, from time to time, be more heavily invested in particular sectors, the value of its shares may be especially sensitive to factors and economic risks that specifically affect those sectors. As a result, the Fund's share price may fluctuate more widely than the value of shares of a mutual fund that invests in a broader range of sectors.

Liquidity Risk

By comparison with larger companies, small-cap companies may be less liquid and more volatile. This may result in greater volatility in the Net Asset Value of the Fund than would be the case in relation to funds invested in larger companies. In addition, if a large number of investments have to be realised at short notice to meet substantial redemption requests in the Fund such sales may have to be effected at unfavourable prices which may in turn have an adverse effect on the Net Asset Value of the Fund.

Investment Risks

Risks Associated with Investments in Securities

Any investment in securities carries certain market risks. The value of the Fund is directly related to the value of its investments. The value of each of the Fund's investments will fluctuate, and there is no assurance that the Fund will achieve its investment objectives. The profit or loss derived from the Fund's investment transactions consists of the price differential between the price of the securities purchased and the value ultimately realised from their disposal, plus any dividends or interest received during the period that the securities are held, less transaction costs, consisting mainly of brokerage commissions, and management fees. If the securities do not increase in value, the Fund may sell them without a gain or at a loss.

Highly Volatile Markets

Price movements of equity and other securities and instruments, in which the Fund's assets may be invested, are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of government, and national and international political and economic events and policies. The Fund's investments are also subject to the risk of failure of any of the exchanges on which they are traded or the failure of the clearinghouses.

Fund Risks

Reliance on Investment Manager

The success of the Fund will depend upon the ability of the Investment Manager to develop and implement investment strategies that achieve the Fund's investment objectives. Subjective decisions made by the Investment Manager may cause the Fund to incur losses or to miss profit opportunities on which it would otherwise have capitalised. There can be no assurance that all of the personnel of the Investment Manager will continue to be associated with the Investment Manager for any length of time. The loss of the services of one or more principals or key employees of the Investment Manager could have an adverse impact on the ability of the Fund to realise its sustainability and financial investment objectives. In such circumstances, the Manager would take appropriate actions in the best interests of the Shareholders.

Lack of Management Control by the Shareholders

Shareholders will have no right or power to take part in the management or control of the business of the Fund, its investments, or to remove or replace the Investment Manager.

Institutional Risks

The institutions, including brokerage firms and banks, with which the Fund (directly or indirectly) does business, or to which securities have been entrusted for custodial purposes, may encounter financial difficulties that impair the operational capabilities or the capital position of the Fund.

Substantial Redemptions

Substantial redemptions by shareholders could cause the Fund to liquidate positions more rapidly than would otherwise be desirable, which could adversely affect the value of the Fund. Substantial redemptions might also cause the liquidation of the Fund.

Risks associated with companies of various market capitalisations

Investment in all companies regardless of their particular market capitalisation and their locations may give rise to certain risks and we have set out below some applicable risks dependent on the relevant market capitalisations, noting that comparative market capitalisation of companies will also vary from country to country.

The risk factors set out above do not purport to be an exhaustive list of the risks involved in investing in the Fund.

3.5 Share Classes

The Share Classes of the Fund are set out at **Appendix 1**.

3.6 Dealing Information

Details of dealing information applicable to each separate Share Class are set out at **Appendix 1**.

Initial Offer Period

Details of the initial offer period for each Share Class are set out in Appendix 1.

In respect of each Share Class of the Fund, the initial offer period for Shares in the Fund may be of such shorter or longer period than outlined in Appendix 1 for any Class as the Directors may in their discretion determine. Payment for subscriptions during the relevant initial offer period must be received by the Administrator prior to the close of the relevant initial offer period. Following the closure of the initial offer period for a particular Share Class, the relevant Share Class will be available at Net Asset Value per Share

Initial Offer Price

During the initial offer period, Shares in a Share Class of the Fund shall be offered at the Initial Offer Price per Share for that Share Class as set out at **Appendix 1**.

Timing of Payment for Subscriptions

Payment must be received by the Administrator within two Business Days after the relevant Dealing Day. Shares will be deemed to have been issued on the Business Day immediately following the relevant Dealing Day in respect of each Share Class.

Timing of Payment for Redemptions

Payment will typically be made within two Business Days of the relevant Dealing Day and, in all cases, under normal circumstances, will be paid within ten Business Days after the Dealing Deadline for the relevant Dealing Day. Shares will be deemed to have been redeemed on the Business Day immediately following the relevant Dealing Day in respect of each Share Class. Fees and Expenses.

3.7 Fees and Expenses

Management Fee

The fees paid by the Fund to the Manager and Investment Manager in respect of an F Share Class shall not exceed 0.30% per annum of the Net Asset Value of the Fund that is attributable to that F Share Class.

The fees paid by the Fund to the Manager and Investment Manager in respect of a SI Share Class shall not exceed 0.60% per annum of the Net Asset Value of the Fund that is attributable to that SI Share Class.

The fees paid by the Fund to the Manager and Investment Manager in respect of a I Share Class shall not exceed 0.72% per annum of the Net Asset Value of the Fund that is attributable to that I Share Class.

Distribution Fee

The Distributor's fee, where applicable, is outlined in the table in **Appendix 1**.

Fees payable to the Administrator

The Administrator shall be entitled to receive an annual fee of up to 0.05% of the Net Asset Value of the Fund (plus VAT, if any), subject to an annual minimum fee of EUR 50,000 per annum for the Fund. The Administrator's fee is accrued at each Valuation Point and is payable monthly in arrears.

The Administrator shall be entitled to be reimbursed out of the assets of the Fund for all reasonable out-of-pocket expenses incurred by the Administrator in the proper performance of its duties.

Fees payable to the Depositary

The Depositary shall be entitled to receive an annual fee of up to 0.015% of the Net Asset Value of the Fund (plus VAT, if any), subject to a minimum fee of EUR 15,000 per annum for the Fund. The Depositary's fee is accrued at each Valuation Point and is payable monthly in arrears.

The Depositary shall also be entitled to receive, out of the assets of the Fund, certain safe keeping fees (which shall vary from country to country) and shall also be entitled to be reimbursed by the Fund any reasonable out-of-pocket expenses properly incurred by it on behalf of the Fund including those arising from settlement and custody activities in specific markets.

Sales Fee

It is not the intention of the Directors to charge a Sales Fee.

Switching Fee

The Directors may, at their discretion, charge a switching fee of up to 3% of the Redemption Price of the Shares for each Share Class of the Fund on the conversion of the Shares in the original Share Class to Shares in another Share Class of the Fund or in a Share Class of another Fund. For further information, please refer to the section of the Prospectus entitled "Switching Fee".

Redemption Fee

It is not the intention of the Directors to charge a Redemption Fee.

Other Fees and Expenses

The Fund shall bear its attributable proportion of the organisational and operating expenses of the ICAV. Details of these expenses and of other fees and expenses are set out in the Prospectus in the section entitled "Fees and Expenses".

All fees and expenses relating to the establishment of the Fund (which shall not exceed €65,000) will be borne by the Fund and will be amortised over the first 60 months of the lifetime of the Fund or such other period as the Directors may determine and will be charged as between the various Share Classes of the Fund within the amortisation period and in such manner as the Directors (with the consent of the Depositary) deem fair and equitable.

Certain other costs and expenses incurred in the operation of the Fund will be borne out of the assets of the Fund, including without limitation, research fees, registration fees and other expenses relating to regulatory, supervisory or fiscal authorities in various jurisdictions, the cost of establishing and maintaining a listing of Shares on The Irish Stock Exchange plc, trading as Euronext Dublin (if applicable); client service fees; writing, typesetting and printing the Prospectus, sales, literature and other documents for investors; taxes and commissions; issuing, purchasing, repurchasing and redeeming Shares; transfer agents, dividend dispersing agents, registrars; printing, mailing, auditing, accounting and legal expenses; reports to Shareholders and governmental agencies; meetings of Shareholders and proxy solicitations therefor (if any); insurance premiums; association and membership dues; and such nonrecurring and extraordinary items as may arise.

3.8 Dilution Measures

Swing Pricing

In order to prevent a dilution effect as a result of costs of liquidity related to investment and/or divestment of assets being borne by the Fund, the Directors have determined that a “swing pricing adjustment” will be applied which will result in the Net Asset Value per Share to be adjusted upwards or downwards to take account of costs of liquidity in accordance with Central Bank Requirements by the swing factor disclosed below where the net capital activity exceeds, as a consequence of the aggregate transactions in the Fund on a Dealing Day, 10% of the Net Asset Value of the Fund. The swing factor shall include estimated Explicit Transaction Costs and estimated Implicit Transaction Costs, including where relevant any significant market impact of asset purchases or sales to meet those subscriptions or redemptions. A swing factor of up to 1% of the Net Asset Value per Share may be applied in normal market conditions. A higher swing factor may be charged by the ICAV in abnormal market conditions where necessary to take account of costs of liquidity. The use of the “swung” Net Asset Value for the purposes of calculating the Fund’s fees and expenses may result in more or less fees and expenses being charged to the Fund than would otherwise be the case.

3.9 Minimum Fund Level

All the Shares of the Fund may be compulsorily redeemed at the discretion of the Directors if the Net Asset Value of the Fund falls below €100 million for a period of more than 90 days.

3.10 SFTR

The Fund will not invest in or utilise total return swaps, contracts for difference or repurchase/reverse repurchase agreements or engage in securities lending.

3.11 Benchmarks Regulation

As a result of its use of the Benchmark for asset allocation, as noted above, the Fund shall be subject to the requirements of the Benchmarks Regulation.

As at the date of this Supplement, the benchmark administrator of the Benchmark, namely FTSE International Limited, is availing of the grandfathering arrangements afforded under the Benchmarks Regulation and accordingly does not appear on the register of administrators and benchmarks maintained by ESMA pursuant to Article 36 of the Benchmarks Regulation.

As required under the Benchmarks Regulation, the Manager has put in place appropriate contingency arrangements setting out the actions which will be taken in the event that the Benchmark materially changes or ceases to be provided. A copy of the Manager’s policy on cessation or material change to a benchmark is available upon request from the Manager.

APPENDIX 1

(to Supplement No. 11)

Class Currency	Type*	Minimum Initial Subscription**	Initial Offer Period for unlaunched Classes	Distribution Fee***	Initial Offer Price**
GBP USD EUR CHF NOK SEK DKK JPY	F	500,000,000	From 9.00am (Irish time) on 6 July 2026 to 5.00pm (Irish time) on 6 January 2027.	0.05% of the Net Asset Value per Share	100
GBP USD EUR CHF NOK SEK DKK JPY	SI	100,000,000	From 9.00am (Irish time) on 6 July 2026 to 5.00pm (Irish time) on 6 January 2027.	0.05% of the Net Asset Value per Share	100
GBP USD EUR CHF NOK SEK DKK JPY	I	10,000,000	From 9.00am (Irish time) on 6 July 2026 to 5.00pm (Irish time) on 6 January 2027.	0.05% of the Net Asset Value per Share	100

*Each type of Share Class is available as an accumulating or a distributing Class.

Each type of Share Class is available as a hedged or an unhedged Class

**In USD or the relevant Class currency equivalent.

*** GBP F ACC is intended for UK investors and there is no distribution fee applicable to this Share class due to jurisdictional reasons.

APPENDIX 2

(to Supplement No.11)

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: HC Westfield US Growth Equity Fund

Legal entity identifier: 635400VLVRQTTLBTB207

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective**: ____%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of **sustainable investments with a social objective**: ____%



It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable

investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



What environmental and/or social characteristics are promoted by this financial product?

The environmental and/or social characteristics promoted by the Fund are outlined as follows:

1. **Female board representation:** The Fund promotes gender diversity in the board of directors of United States listed companies through stewardship activities, pursuing one or more female director(s) in a company's board of directors.
2. **Fossil fuel extraction free:** The Fund promotes attention to GHG emissions intensity through minimising exposure to United States listed companies in the fossil fuel extraction industry.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

In order to measure the social characteristic of female board representation (binding element #1) promoted by the Fund, the Investment Manager will review company documents (U.S. Securities and Exchange Commission filings, corporate press releases, corporate websites, and other sources) to measure the number of female directors on the board of directors.

In order to measure the environmental characteristic of fossil fuel extraction free (binding element #2) promoted by the Fund, the Investment Manager will measure the company exposure in the Fund to fossil fuel extraction industries utilising standard industry classifications.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not applicable

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

☐

Yes.

☒

No



What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The strategy of the Fund utilises an active, fundamental, bottom-up approach to investing in U.S. equity securities. The Investment Manager employs a growth at a reasonable price (GARP) investment style and favours investing in earnings growth stocks given its conviction that stock prices follow earnings progress and that they offer the best investment opportunities. The Investment Manager believes that reasonably priced stocks of companies with accelerating or underappreciated earnings potential are best identified through in-depth, fundamental research.

The Investment Manager implements its investment approach when selecting investments for the Fund, with its team that focuses on its core growth at a reasonable price philosophy, its strategy will add value over the long-term. The Fund's portfolio is managed in accordance with our four primary beliefs:

- 1. Stock prices ultimately follow earnings progress.*
- 2. Large cap companies coexist and compete with small and mid-cap companies, and the investment committee of the Investment Manager is at an advantage because it covers its respective industries across the capitalisation spectrum and understands market dynamics across all cap ranges, and the relationships between the companies in each cap range.*
- 3. Growth can be purchased at a reasonable price, and*
- 4. A team approach ensures collective best thinking is implemented.*

The Investment Manager's ability to piece together information that it gathers from company management, suppliers, users and competitors, and then compare that to information received from industry sources to then ensure a compelling investment theme, sets the Investment Manager apart from its peers. Through conducting in-depth fundamental analysis and uncovering companies with earnings growth potential above market expectations, the Investment Manager can demonstrate its ability to outperform the Benchmark over multiple time periods in many diverse market environments.

The Investment Manager's ESG research program is implemented utilising an integrated, research-driven approach which combines deep fundamental research with independent ESG research to enhance its assessment of investment opportunities and risks. This ESG research process typically includes interviews with key management team contacts, reviews of material sustainability metrics from public filings and third-party data, and additional independent research.

The output of this proprietary research process is a standardised evaluation of a company across several dimensions including:

- Product or Service Impact (What a company makes)*
- Operating Environmental & Social Practices (How a company makes their products)*
- Governance & Risks (How a company manages risks in making the product)*

To derive these individual pillar ratings, the Investment Manager utilises a combination of its own industry knowledge in conjunction with multiple inputs collected from company filings, sustainability reports, third-party vendors, management engagements, and other sources to assess where a company has been and where it currently is, as well as to assess the potential for future improvements that could be made by the company. Additionally, a critical element of the Investment Manager's evaluation process is accounting for how a business compares on each pillar relative to their industry peers, with consideration given to the market capitalisation of the company to account for the important differences in resources available for ESG efforts and robustness of strategies between large cap and small cap companies. It's the aggregation of data points from numerous sources, consideration of forward-looking opportunities, and relative peer comparison

which the Investment Manager believes provides a more complete review on the ESG profile of a company as compared to relying on an external ESG ratings provider.

The output of this research is a proprietary ESG rating of the Investment Manager (Strong, Neutral, Weak). This research is typically discussed for both existing investments and potential new investment candidates. Much like other fundamental inputs, this research is considered alongside other critical inputs during the portfolio construction process but does not in isolation dictate buy and sell decisions.

Engagement

The Investment Manager considers engagement with management teams to be of critical importance regarding both fundamental and ESG related matters. The Investment Manager's investment committee members spend time traveling to meet with company management teams and attend industry conferences, in addition to conducting research. Typically, the Investment Manager will visit with every company before it is included in the portfolio, and its investment committee averages over 300 company meetings a quarter. The Investment Manager believe that one-on-one meetings with company management teams are critical to its research process, allowing it to evaluate management's strategy for achieving long-term growth and its ability to execute that strategy.

In addition to traditional fundamental analysis, the research conducted by the Investment Manager's sustainable team increases its touch points with company management, often meeting with a company's Chief Sustainability Officer or other members of the company management to determine how they are embedding ESG efforts into their core business strategy. The Investment Manager believes this combination of traditional fundamental analysis combined with sustainability research provides valuable insights into the inner workings of the companies analysed by the Investment Manager, their future goals, and provides a more holistic understanding of future risks and opportunities.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

Female board representation: The Fund promotes gender diversity in the board of directors of public equities listed on U.S. stock exchanges through company due diligence and stewardship activities, pursuing one or more female director(s) in a company's board of directors. In order to measure this element, the Investment Manager reviews company documents which typically include regulatory filings, corporate websites, press releases, and investor presentations. While not all holdings will meet this objective, the Fund engages with these holdings regarding advancement of gender diversity at the board level.

Fossil fuel extraction free: The Fund promotes attention to GHG emissions intensity through minimising its exposure to public equities listed on U.S. stock exchanges in the fossil fuel extraction industry and through investing in companies not classified in fossil fuel extraction industries. In order to measure this element, the Investment Manager reviews the weight of the portfolio to ensure that a minimum threshold of 70% of the Net Asset Value of the Fund is invested in companies which are not classified as energy sector companies by the Global Industry Classification Standard ("GICS"). As at the date of this Supplement, GICS defines energy sector companies as companies engaged in: the exploration and production; refining and marketing; and storage and transportation of oil, gas, coal and consumable fuels, as well as companies that offer oil and gas equipment and services.

The Investment Manager has determined that companies that are engaged in the following controversial business areas beyond a defined threshold (defined as a percentage of their total turnover) are not included in the Fund's portfolio:

Criteria	Threshold
<i>Turnover from production and/or distribution of weapons</i>	<i>> 10%</i>
<i>Turnover from production and/or distribution of controversial weapons (include anti-personal mines, cluster munitions, biological and chemical weapons*)</i>	<i>> 0%</i>
<i>Turnover from production of tobacco</i>	<i>> 5%</i>
<i>Turnover from production and/or distribution of coal</i>	<i>> 5%</i>

** Serious violations of UN Global Compact (UNGC)*

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not applicable

- **What is the policy to assess good governance practices of the investee companies?**

In analysing potential and existing investments, the strategy considers a wide range of governance metrics and practices to assess good governance, which typically include:

<i>Share of Independent Directors</i>
<i>Female Board Member Representation</i>
<i>Executive Compensation</i>
<i>Board of Directors Compensation</i>
<i>Size of Board of Directors</i>
<i>Board of Directors Tenure</i>
<i>Separation of Chairperson/CEO Roles</i>
<i>Independent Director as Compensation Committee Chair</i>
<i>Classified/Unclassified Board Structure</i>
<i>Presence of Poison Pill</i>
<i>Unequal Voting Rights</i>
<i>Board Level ESG Committee</i>
<i>ESG Linked Compensation</i>
<i>History of Controversies</i>

In addition to consideration of these representative governance factors, direct engagement with management teams can be used to gain additional insight into a Company's governance practices, to communicate our governance views as shareholders, and to encourage improvement in governance practices that may be suboptimal.



Asset allocation describes the share of investments in specific assets.

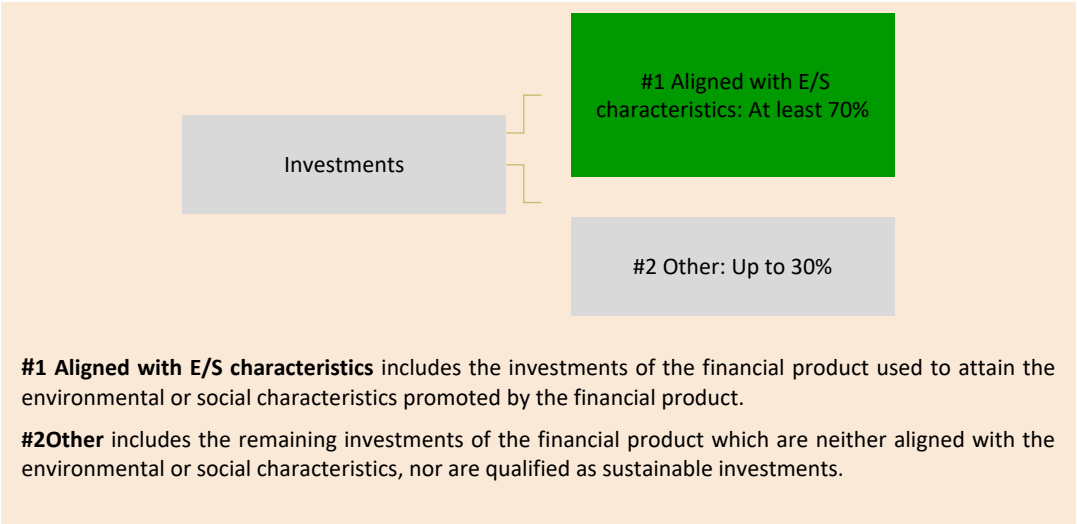
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

What is the asset allocation planned for this financial product?

The Fund maintains its proportion of holdings that promote the environmental and social characteristics at a minimum of 70%.

The maximum proportion of the Fund’s “Other” holdings is 30% and includes investments which do not yet meet the objectives, investments for which data to measure the objectives is lacking or cash held as ancillary liquidity. There are no minimum environmental or social safeguards associated with these investments.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The Fund does not use derivatives.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

While the Fund promotes environmental and/or social characteristics, as at the date of this document, it is expected that the minimum proportion of investments of the Fund in environmentally sustainable economic activities aligned with the “EU Taxonomy” (being Regulation (EU) 2020/852 of the European Parliament and the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investments) (including in transitional and enabling activities) shall be 0% of the net assets of the Fund.

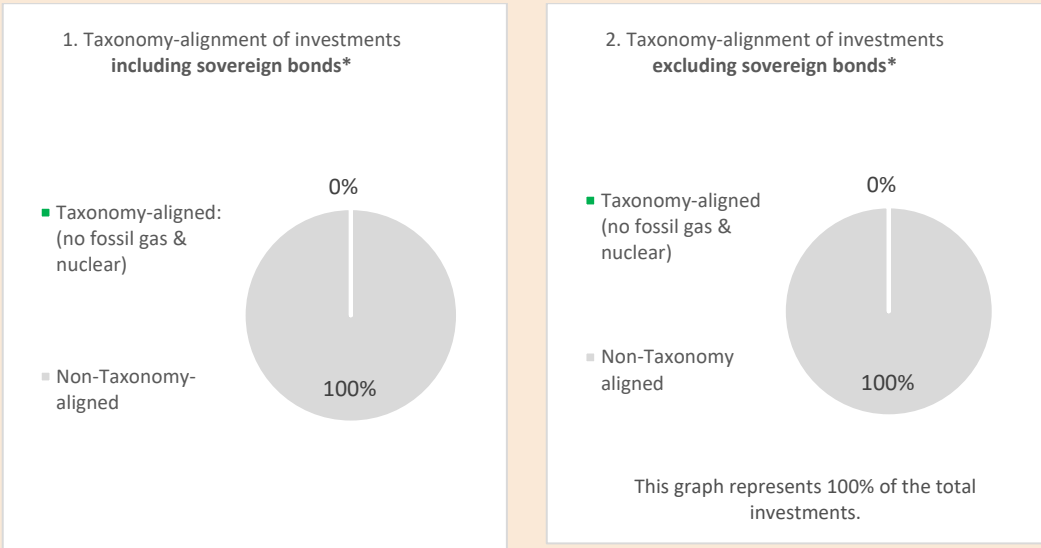
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds



* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

- **What is the minimum share of investments in transitional and enabling activities?**

Not Applicable



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not applicable



What is the minimum share of socially sustainable investments?

Not applicable



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The Fund’s investments classified under “Other” holdings include investments which do not yet meet the objectives, investments for which data to measure the objectives is lacking or cash held as ancillary liquidity. There are no minimum environmental or social safeguards associated with these investments.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

There is no specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes.

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable

- **How does the designated index differ from a relevant broad market index?**

Not applicable

- **Where can the methodology used for the calculation of the designated index be found?**

Not applicable



Where can I find more product specific information online?

More product-specific information can be found on the website:

Further information can be found at <https://harringtoncooper.com/harrington-cooper-asset-management-funds/>