

SUPPLEMENT 13

Konwave ATG Medtech Innovation Fund

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

This Supplement contains information specifically relating to Konwave ATG Medtech Innovation 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 (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 not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors. 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 Global Healthcare Fund and Konwave ATG Emerging Markets Healthcare Fund.

The date of this Supplement is 26 August 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).

"Benchmark", MSCI World Healthcare Equipment and Supplies Net Total Return Index (USD).

"Business Day", any day (except Saturdays, Sundays and public holidays) on which the retail banks in Ireland, the United States and Switzerland are generally open for normal banking business or such other day or days 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 prior to 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.

"F Share Class", a Share Class that is identified as a "F" type Share Class in **Appendix 1** to this Supplement.

"I Share Class", a Share Class that is identified as an "I" type Share Class in **Appendix 1** to this Supplement.

"I1 Share Class", a Share Class that is identified as an "I1" type Share Class in **Appendix 1** to this Supplement.

"I2 Share Class", a Share Class that is identified as an "I2" type Share Class in **Appendix 1** to this Supplement.

"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, 26 June, 2026, which may be amended by written agreement between the parties from time to time.

"Investment Manager", ATG Healthcare Investments AG.

"PF Share Class", a Share Class that is identified as a "PF" type Share Class in **Appendix 1** to this Supplement.

"Q Share Class", a Share Class that is identified as a "Q" type Share Class in **Appendix 1** to this Supplement.

"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.

"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 Konwave ATG Medtech Innovation 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 in the relevant Class Currency 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 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, 2026. The first semi-annual report for the Fund will cover the period ending 30 June, 2027.

3. INFORMATION ON THE FUND

3.1 Investment Objective, Investment Policies and Investment Strategy

3.1.1 Investment Objective

The objective of the Fund is to achieve long-term capital appreciation by investing primarily in equity securities of medtech companies. The Fund aims to outperform the Benchmark over rolling three- and five-year periods, targeting 2–3% annual net outperformance after fees.

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

3.1.2 Investment Policies, Structure and Transactions

The Fund aims to achieve its investment objective by investing a minimum of 80% of its Net Asset Value in equity securities of medtech companies. The Fund primarily invests in the US medtech market, complemented by select investments in Europe and Asia’s medical technology markets. The Fund focuses on companies across key medtech subsectors, including medical equipment, medical devices, medical services, life science and diagnostics and healthcare supplies. The Fund typically holds between 30 and 50 individual equity positions.

The Fund follows a disciplined, bottom-up investment approach grounded in a Growth at a Reasonable Price (GARP) philosophy which seeks to combine aspects of growth investing with aspects of value investing. This methodology is applied exclusively to publicly listed mid- and large-cap equities within the global medtech sector. GARP is an active-type equity investment style which is based on the premise that corporate earnings will be priced in the medium to long term and the rate of return of growth stocks at a reasonable price (i.e. a low valuation) will exceed those of the market. More specifically, the Investment Manager forecasts corporate earnings growth and it is intended that investments will be made in equities with mid-to-long term and above-average growth potential and relatively low valuations gauged by various valuation metrics. The principle valuation metrics are a fundamental analysis of the equity, internal stock ratings and relative attractiveness rankings within the relevant sector.

Through this strategy, the Investment Manager seeks to identify medtech companies that demonstrate robust financial fundamentals, enduring competitive advantages, that are run by experienced and capable management teams, and whose stocks are traded at valuation levels that offer attractive risk-adjusted returns. Risk control is embedded in both security selection and portfolio construction, ensuring a focus on capital preservation as well as upside potential.

The Fund may invest up to a maximum of 10% of the Net Asset Value of the Fund in collective investment schemes (including UCITS compliant exchange traded funds (ETFs)) in accordance with the requirements of the Central Bank and the investment restrictions set out in **Appendix 2** to the Prospectus. The Fund may invest in ETFs for the purpose of managing market exposure in circumstances where material cash flows arise. It is intended that the ETFs in which the Fund may invest will be listed on a Regulated Market.

The Fund may invest a small portion of the portfolio in securities of companies domiciled in or conducting their principal business activities in countries specified as emerging market countries in the Morgan Stanley Capital International (MSCI) Emerging Markets Index from time to time. Exposure to such emerging market countries will be limited to 10% of the Net Asset Value of the Fund.

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 ancillary liquidity purposes only, in accordance with the requirements of the Central Bank and the investment restrictions set out in **Appendix 2** to the Prospectus.

The Fund promotes the following environmental and social characteristics (i) reduction of carbon emissions intensity; and (ii) improved access to healthcare products and services, as further detailed below. In order to promote the characteristic of improved access to healthcare products and services, the Fund will invest in companies that demonstrably improve access to healthcare, as further described in the SFDR annex in Appendix 2 to this Supplement.

The Fund operates under a long-only mandate and does not utilise FDIs for investment purposes. Currency Forwards are utilised for Class currency hedging purposes (as further described below).

The Fund is considered to be actively managed in reference to the Benchmark by virtue of the fact that it seeks to outperform the Benchmark over three and five year periods and the performance fees payable to the Investment Manager are calculated based on the performance of the Fund against the Benchmark. However the Benchmark is not used to define the portfolio composition of the Fund and the Fund may be wholly invested in securities which are not constituents of the Benchmark. The Benchmark is designed to capture the large and mid cap segments across developed markets countries. All securities in the Benchmark are classified in the medtech sector as per the Global Industry Classification Standard (GICS®).¹ The Fund's portfolio is not constrained by reference to any index and the portfolio is constructed using a purely bottom up research approach.

The list of benchmark administrators that are included in the Benchmark Regulation Register is available on ESMA's website at www.esma.europa.eu. As at the date of this Supplement, the following benchmark administrator appears on the Benchmark Register in accordance with the requirements of the Benchmark Regulations: MSCI Deutschland GmbH.

Geographic Allocation and Strategic Approach

Geographic exposure within the Fund is allocated mostly to the US medtech market, with additional investments in Europe and Asia.

The US is prioritised for its dominant leadership in almost all subsegments of medical technology.

3.1.3 Investment Process

Stock Selection Framework

The Fund's investment universe comprises mid- and large-cap medtech companies with a minimum market capitalization of USD 1 billion. Eligible sectors include medical equipment, medical devices, medical services, life science and diagnostics and healthcare supplies and related sectors/industries as described above under "Investment Policies, Structure and Transactions".

The stock selection process integrates three layers of analysis: quantitative screening, qualitative evaluation, and an analysis related to stock's impact to the portfolio's risk characteristics.

Quantitative analysis is employed initially to screen the universe of around 200 medtech companies for their financial strength. The investment team considers indicators such as consistent revenue and earnings growth, profitability, and valuation metrics e.g., price-to-earnings-growth (PEG) ratios. The ideal investment candidates exhibit strong, consistent growth characteristics combined with decent valuations.

¹ GICS® is an industry analysis framework that helps investors understand the key business activities for companies around the world. MSCI and S&P Dow Jones Indices developed this classification standard to provide investors with consistent and exhaustive industry definitions.

This is followed by a comprehensive qualitative assessment. The Investment Manager evaluates the strength and track record of company management and corporate governance practices, assesses the quality and visibility of the research and development pipeline, reviews the issuer's pricing power across key markets, and considers capital allocation discipline as well as the competitive environment.

In addition, the stock's characteristics related to its impact to the portfolio risk are considered into the stock selection framework to inform conviction levels and entry timing. These aspects include trading behavior around analyst estimate revisions, earnings surprises, clinical data, and liquidity metrics such as average daily volume and institutional ownership concentration.

Portfolio Construction and Risk Management

The Fund, while typically holding between 30 and 50 individual equity positions, balances the need for diversification with the desire to concentrate capital in high-conviction ideas. Initial position sizing typically ranges between 1% and 6% of the Fund's Net Asset Value, based on factors such as market cap, liquidity, conviction level, volatility, and downside risk assessments. Position sizes may fluctuate beyond this range due to market movements, benchmark weightings or rebalancing events.

The Fund will maintain a minimum of 80% of its Net Asset Value invested in equity securities at all times. Any cash held in the portfolio is managed tactically to meet liquidity needs and is not used for speculative timing decisions.

Portfolio-level diversification is maintained through active monitoring by the Investment Manager of sector and subsector exposures.

Risk is managed by the Investment Manager on both the position and portfolio level. Scenario analysis is conducted to estimate downside risks and establish valuation buffers. The Fund is assessed regularly to ensure consistency with its moderate risk profile. Correlation analysis is employed by the Investment Manager to mitigate clustering of exposures across similar therapeutic areas or business models.

When a position within the Fund's portfolio underperforms or diverges materially from the original investment thesis, it is subject to a formal review and potential divestment.

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 "SFDR Disclosure" below and the SFDR annex in Appendix 2 to this Supplement.

3.1.5 SFDR Disclosure

The Fund promotes environmental and social characteristics through a combination of exclusionary screening, minimum ESG standards, integrated ESG research, and engagement practices.

Values-Based Exclusion Criteria

To ensure alignment with global sustainability norms and ethical investing standards, the Fund applies revenue-based exclusions at the portfolio level. Companies are excluded from investment if they derive revenue from the following activities beyond specified thresholds as described below, together with the rationale for each exclusion criteria, as it relates to medtech companies:

Exclusion Criteria and Revenue Thresholds	Rationale for Exclusion Criteria, as it relates to Healthcare Companies
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Controversial weapons: 0% maximum revenue exposure	For controversial weapons such as biological weapons, the strictest exclusion criteria are employed, i.e. zero tolerance. Medtech as a sector is about saving lives and reducing suffering and controversial weapons are designed to achieve the exact opposite. This creates a fundamental conflict of values. Weapons are banned or heavily restricted under several international norms and legal frameworks. The Fund seeks alignment with global health and humanitarian standards (e.g. WHO, Red cross principle).
Conventional weapons: 10% maximum revenue exposure	The same rationale as above applies. The exclusion limit is less strict as some level is needed for the purpose of country's military expenditure for the purpose of defense.
Thermal coal production or sales: 5% maximum revenue exposure	Burning thermal coal is a leading cause of air pollution. Air pollution contributes to respiratory diseases (e.g. asthma), cardiovascular problems, cancers and premature deaths. According to the WHO, air pollution from fossil fuels is one of the largest global environmental health risks, causing millions of deaths annually. The Fund fosters investments that help to reduce preventable illnesses including lung fibrosis and chronic obstructive pulmonary disease (COPD).
Tobacco product sales: 10% maximum revenue exposure	Tobacco is one of the leading causes of preventable deaths because it is a major factor leading to cancer, cardiovascular diseases and respiratory illness. The Fund invests in healthcare companies that treat or potentially cure many of the diseases caused by tobacco use. The Fund therefore excludes tobacco products.

Although exposure of medtech companies to activities such as controversial weapons, conventional weapons, thermal coal, or tobacco is generally limited, these exclusions remain relevant to the medtech sector. Certain diversified industrial or technology groups with medtech divisions have also been involved in defence or dual-use applications (e.g., medical imaging or material technologies with potential military use). The Fund therefore applies value based exclusions with defined thresholds (as outlined in the above table) to ensure that its medtech investments are not deriving revenues in excess of these thresholds from the above listed activities (which conflict with international humanitarian and public-health objectives, particularly as evolving geopolitical dynamics have increased the potential overlap between civilian and military technologies).

The thermal coal exclusion reflects the established link between fossil-fuel emissions, air pollution, and adverse health outcomes, while the tobacco exclusion addresses the direct contradiction between healthcare promotion and tobacco-related disease. Collectively, these exclusions reinforce the Fund's medtech focus by aligning the investment universe with principles of public health, social responsibility, and ethical innovation, and are applied in conjunction with the Fund's broader ESG integration framework.

These thresholds are strictly applied and reviewed by the Investment Manager on an ongoing basis to ensure continued compliance with the Fund's sustainability mandate.

Minimum ESG Quality Threshold

The Fund is required to maintain a high baseline of ESG quality across its equity holdings. At least 75% of the Fund's investments promote environmental and social characteristics. These investments must be in companies with a minimum MSCI ESG rating of BB or higher. This requirement is monitored by the Investment Manager on a quarterly basis and is designed to reduce exposure to companies with elevated ESG risks, while allowing for measured engagement with improving issuers.

Integrated ESG Research

ESG considerations are embedded in the Investment Manager's fundamental investment analysis. Environmental due diligence includes assessment of the issuer's climate transition strategy, carbon footprint, and alignment with science-based targets (as further outlined in the SFDR Annex below). The Fund targets a weighted average carbon intensity (WACI) of less than 45 tons of CO₂-equivalent per million euros in revenue, based on Scope 1 and Scope 2 emissions data. For the analysis of the carbon footprint, the MSCI ESG database. Companies fulfilling the investment criteria but not fulfilling the WACI targets are questioned about the reasons for missing them and their initiatives to reach these targets.

Social analysis focuses on equitable access to healthcare. Within the medtech universe, the ability to expand access to essential healthcare products and services is measured using verifiable commitments to improving healthcare access in underserved regions, based on publicly available disclosures, third-party reports, or ESG data provider assessments. This approach ensures that the Fund can quantitatively track progress against a clearly defined peer group i.e. the medtech universe. The portfolio is constructed by means of a proprietary bottom-up research process valuing medtech companies.

ESG considerations span the whole medtech universe including medical devices, medical services, medical supplies, diagnostics, life-science tools and similar subsectors. These subsectors are equally integrated into the Fund's ESG analysis and engagement priorities but currently no independent organization is fully covering the important aspect of access to medicine in these areas. For these companies, the MSCI ESG Social Score serves as a proxy for access to medicine. Nevertheless, the Investment Manager will constantly look for other providers which are offering a broader and deeper coverage for the Fund's access to medicine ESG social characteristic. Investee companies are assessed by the Investment Manager through the Fund's integrated ESG research process and active engagement practices, to ensure that they have a minimum MSCI ESG rating of BB or higher (as described further above under the heading "Minimum ESG Quality Threshold"). In addition, during regular company meetings between the Investment Manager and investee company management, the Fund's ambitions relating to fostering access to medicine are addressed and discussed for all medtech companies, regardless of their subsector.

Governance assessments include evaluation of board independence, shareholder rights, transparency, and executive compensation alignment.

Engagement and Stewardship

The Fund actively engages with investee companies and external stakeholders to support ESG improvements. Engagement themes include climate risk management, access to essential medicines, and corporate governance enhancement. Where internal insights from company meetings reveal material developments, the Fund may engage with ESG rating agencies to request timely reviews or corrections to the issuer's ESG ratings.

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

The management of sustainability risk forms an important part of the due diligence process implemented by the Investment Manager.

When assessing the sustainability risk associated with underlying investments, the Investment Manager is assessing the risk that the value of such underlying investments could be materially negatively impacted by an environmental, social or governance event or condition (“ESG Event”).

Using both quantitative and qualitative processes, sustainability risk is identified, monitored and managed by the Investment Manager in the following manner:

(i) Pre-investment / research:

Prior to acquiring investments on behalf of the Fund, the Investment Manager applies an ESG screening overlay to the investment universe of the Fund. As part of this process, the Investment Manager uses ESG metrics of third-party data providers (“Data Providers”) such as MSCI ESG database in order to screen the relevant investment against sustainability risk and to identify whether it is vulnerable to such risk. This process incorporates applying both an exclusion policy (i.e. the Value Based Exclusions described above) whereby potential investments are removed from the investment universe on the basis that they pose too great a sustainability risk to the Fund) and positive screening whereby those investments which have a low sustainability risk rating via a demonstrable social impact e.g. by MSCI ESG Social Score as well as exhibiting strong financial performance are included in the investment universe.

The Investment Manager also conducts fundamental analysis on each potential investment in order to allow it to assess the adequacy of ESG programmes and practices of an issuer to manage the sustainability risk it faces. The information gathered from the fundamental analysis conducted will be taken into account by the Investment Manager in deciding whether to acquire a holding in an issuer and may, in certain circumstances, result in the Investment Manager investing in an issuer which has a lower ESG rating where it believes that the relevant existing ESG rating does not fully capture recent positive sustainability-related changes which have been implemented by the relevant issuer. For positions where ESG remediation is uncertain, the Investment Manager may underweight or cap positions as it deems appropriate. Such positions remain under review and have the potential to become full positions if progress is demonstrated by the relevant position.

(ii) Engagement / stewardship:

During the life of the investment, sustainability risk is monitored through review of ESG data published by the issuer (where relevant), via on site visits and management meetings or with the help of selected Data Providers to determine whether the level of sustainability risk has changed since the initial assessment has been conducted. This review is conducted on a quarterly basis. The Investment Manager maintains a formal engagement policy which outlines set objectives, timelines and escalation steps. Management meetings and on-site visits conducted by the Investment Manager incorporate ESG-specific agendas and follow-up actions, including commitments and timelines.

In addition, where deemed necessary, prioritised engagement cases are defined and the Investment Manager holds in-depth conversations with the relevant company’s management to address identified shortcomings or to seek insight with rating agencies to address different conclusions regarding identified ESG areas. Where the sustainability risk associated with a particular investment has increased beyond the

sustainability 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 Shareholders of the Fund.

The Investment Manager has determined that the sustainability risk (being the risk that the value of the Fund could be materially negatively impacted by an ESG Event) faced by the Fund is under normal circumstances negligible to low, due to the business nature of medtech companies.

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 ATG Healthcare Investments AG to act as Investment Manager to the Fund pursuant to the Investment Management Agreement.

The Investment Manager is authorised and regulated by the Swiss Financial Market Supervisory Authority (FINMA). The Investment Manager was established in 2025. The Investment Manager has entered into a collaboration agreement with Konwave AG, a firm, also regulated and authorised by FINMA, in relation to branding. Konwave AG does not act in any discretionary or advisory capacity with respect to the Fund. The portfolio managers within the Investment Manager have over 30 years of experience managing healthcare portfolios, including portfolios with exposure to the medtech sector.

Pursuant to the Investment Management Agreement between the ICAV, the Manager and the Investment Manager dated 3 June 2026 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 Currency Hedging Policy

Currency Forwards may be used for Class currency hedging purposes. In the case of a hedged Share Class, that Class will be hedged against exchange rate fluctuation risks between the denominated currency of the Share Class and the Base Currency of the Fund. Such hedging strategy shall be subject to the conditions and within the limits laid down by the Central Bank and may not be implemented if the Net Asset Value of the Class falls below a level whereby the Investment Manager considers that it can no longer hedge the currency exposure in an effective manner provided that this shall be notified to Shareholders as soon as practicable.

Further information is set out in the Prospectus at the sections entitled “**Currency Hedging**” and “**Currency Hedging at Share Class Level**”. It should be noted that the successful execution of a hedging strategy which mitigates this currency risk exactly cannot be assured.

3.4 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 FDIs by the Fund at portfolio level is prohibited.

3.5 Risk Management

The Fund may use Currency Forwards as referred to in the sections headed "Investment Policies, Structure and Transactions" and "Currency Hedging Policy" above. The Manager shall use the commitment approach to calculate the global exposure of the Fund as a result of the use of derivatives. Accordingly, global exposure and leverage as a result of its investment in derivatives, as described above, shall not exceed 100% of the Net Asset Value of the Fund.

3.6 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.

Industry Sector Risk

Because the Fund may, from time to time, be more heavily invested in particular medtech subsectors, 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.

Because medtech companies develop instruments, devices and tools there is an inherent development risk that these development programs could not be successful or that a regulator does not approve these products.

Medtech companies often produce or assemble their products in their own manufacturing plants. Manufacturing issues or supply issues could occur from time to time.

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.

Emerging Markets

The Fund will potentially invest a small portion of the portfolio in securities of companies domiciled in or conducting their principal business activities in countries specified as emerging market countries in the Morgan Stanley Capital International (MSCI) Emerging Markets Index from time to time.

Shareholders and potential investors should consider and take account of the emerging markets risks set out at section 5.32 of the Prospectus.

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.

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

3.7 Share Classes

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

3.8 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, 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.

3.9 Fees and Expenses

Management Fee

Pursuant to the Management Agreement, the Manager is entitled to charge the Fund an annual fee of 0.07% of the Net Asset Value of the Fund, subject to monthly minimum fee of EUR 6,000.

Investment Manager's Fee

The Investment Manager's fee is outlined in the table in **Appendix 1**.

The Investment Manager shall be entitled to be reimbursed by the Fund for reasonable out of pocket expenses properly incurred and any VAT on all fees and expenses payable to or by it.

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 an annual 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.

Performance Fee

The Investment Manager will also be entitled to receive a performance fee in respect of certain Share Classes, as identified in the table in **Appendix 1**, calculated as set out below (the "**Performance Fee**"). The calculation of the Performance Fee is structured so as not to be open to the possibility of manipulation and the calculation shall be verified by the Depositary at the end of each relevant Calculation Period prior to payment.

The Performance Fee in respect of each Share Class will crystallise annually and will be calculated in respect of each calendar year (a "**Calculation Period**"). The end of the Calculation Period is the

last Dealing Day of each calendar year. The Performance Fee will be deemed to accrue on a daily basis as at each Valuation Point.

The first Calculation Period is the period commencing on the Business Day immediately following the end of the Initial Offer Period and ending on the last Dealing Day in that calendar year (save in circumstances whereby a period of less than 12 months has elapsed since the creation of such Share Class, in which case the Calculation Period shall end on the last Dealing Day of the following calendar year). The Initial Price will be taken as the starting price of the first Calculation Period.

Performance Fees are calculated on the amount by which the performance of the Share Class has exceeded the Hurdle Rate during each Calculation Period. The Hurdle Rate is equal to the annual return of the MSCI World Healthcare Equipment and Supplies Net Total Return Index (USD) (M1WO0HE Index).

The Performance Fee is calculated as of the last Dealing Day in each Calculation Period, or if the relevant class is terminated before the end of a Calculation Period, the Dealing Day on which the final redemption of shares takes place (each a "**Payment Date**"). The Performance Fee is normally paid to the Investment Manager in arrears within fourteen (14) calendar days of the end of each Calculation Period. However, in the case of Shares redeemed during a Calculation Period, the accrued Performance Fee in respect of those Shares will be payable within fourteen (14) calendar days after the date of redemption.

The Performance Fee for a Share Class in respect of each Calculation Period will be calculated by reference to the Net Asset Value after the accrual of all other costs but before the deduction of any accrued Performance Fee for the current Calculation Period, other than Performance Fees accrued in relation to the class in respect of redemptions during the Calculation Period but not yet paid, provided that in doing so it is in the investors' best interests.

If the Investment Management Agreement or the Management Agreement is terminated before the end of any Calculation Period, the Performance Fee in respect of the then current Calculation Period will be calculated and paid as though the date of termination were the end of the relevant period.

Further details of the Performance Fee calculations for each Share Class are set out below.

The Investment Manager is entitled to receive a Performance Fee out of the assets attributable to the PF Shares (the "**Performance Fee Class Shares**"). The Performance Fee will accrue on each Valuation Point and the accrual will be reflected in the Net Asset Value of the PF Shares.

If at the end of the relevant Calculation Period, the performance of the Net Asset Value of a Performance Fee Share Class exceeds the Hurdle Adjusted Net Asset Value for that class, a Performance Fee will be calculated in respect of the class at the Relevant Percentage and shall be chargeable on the amount which exceeds the Hurdle Adjusted Net Asset Value, plus any Performance Fee accrued in relation to the class in respect of redemptions during the Calculation Period.

The use of a Hurdle Adjusted Net Asset Value ensures that investors will not be charged a Performance Fee for a Performance Fee Share Class until any previous shortfalls relative to the Hurdle Adjusted Net Asset Value for the class are recovered. The "Hurdle Adjusted Net Asset Value" of a class is the Net Asset Value of the class as at the end of the last Calculation Period after which a Performance Fee was paid increased on each Dealing Day by the value of any subscriptions or reduced pro rata by the value of any redemptions on each Dealing Day and, where relevant, reduced by the value any distributions in respect of the class and adjusted by the Hurdle Rate over the course of the Calculation Period. For the first Calculation Period in which shares of a Performance Fee Share Class are first issued, the end of the relevant Initial Offer Period is considered the beginning of the first Calculation Period for the class and the proceeds of the initial offer are considered the Hurdle Adjusted Net Asset Value for the class at the beginning of the first Calculation Period.

For the avoidance of doubt, the Performance Fee will be payable on the relative return of each Share Class against the Hurdle Rate. Furthermore, the Performance Fee is payable on the outperformance of the Hurdle Rate and not the Net Asset Value. **The Performance Fee shall also be payable in the event of negative performance by a Performance Fee Share Class, provided that the Net Asset Value of the Performance Fee Share Class has outperformed the Hurdle Rate over the Calculation Period.**

For the avoidance of doubt, any underperformance of the Hurdle Rate in a Calculation Period must be recouped in future Calculation Periods before any Performance Fee will become payable.

Where Performance Fees are payable by the Sub-Fund, these will be based on net realised and net unrealised gains and losses as at each Payment Date. As a result, Performance Fees may be paid on unrealised gains which may subsequently never be realised.

The Hurdle Rate used to calculate a Performance Fee has been determined by the Investment Manager to be consistent with the Sub-Fund's investment policy.

Simplified example for illustrative purposes:

PF Class Shares	Proceeds of Initial Offer	NAV at end of Year 1 before performance fees	NAV at end of Year 2 before performance fees	NAV at end of Year 3 before performance fees
Investor A subscribes in Initial Offer Period	USD 100	USD 210	USD 310	USD 220
Hurdle return (assumed for the example as constant 2% annually)				
Additional subscriptions		USD 105 in Year 1	USD 106 in Year 2	
Investor A redeems in Year 3 at USD 103, when NAV is USD 310				No performance fee due on Investor A's redemption
Hurdle Rate Adjusted NAV		$(\text{USD } 100 + \text{USD } 105) + 2\% = \text{USD } 209.10$	$(\text{USD } 209.82 + \text{USD } 106) + 2\% = \text{USD } 322.14$	$(\text{USD } 322.14 - (\text{USD } 103/310 * \text{USD } 322.14)) + 2\% = \text{USD } 219.41$
Performance fee due		$(\text{USD } 210 - \text{USD } 209.10) * 20\% = \text{USD } 0.18$	None. NAV < Hurdle Rate Adjusted NAV	$\text{USD } 220 - \text{USD } 219.41 * 20\% = \text{USD } 0.12$
NAV after payment of performance fees		USD 209.82	USD 310	USD 219.88

** Subscriptions are assumed in the example to have been made immediately after the start of the period, so that a full year's Hurdle Rate is used.*

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.

3.10 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.

3.11 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.

APPENDIX 1

(to Supplement No. 11)

Share Classes – Dealing Information							
Class Currency	Type*	Minimum Initial Subscription	Initial Offer Period for unlaunched Classes	Distributio n Fee***	Investmen t Manager's Fee***	Performan ce Fee	Initial Offer Price**
GBP USD EUR CHF NOK SEK DKK JPY	F	300,000,000**	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) on 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 0.80%	None	100
GBP USD EUR CHF NOK SEK DKK JPY	I1	USD 50,000,000	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) on 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 0.50%	None	100
GBP USD EUR CHF NOK SEK DKK JPY	I2	USD 10,000,000	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 0.80%	None	100
GBP USD EUR CHF NOK SEK DKK JPY	I	USD 500,000	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) on 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 0.90%	None	100

GBP USD EUR CHF NOK SEK DKK JPY	Q	USD 10,000	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) on 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 1.50%	None	100
GBP USD EUR CHF NOK SEK DKK JPY	PF	USD 10,000,000	From 9.00am (Irish time) on 27 August 2026 to 5.00pm (Irish time) on 26 February 2027.	0.05% of the Net Asset Value per Share	Shall not exceed 1.50%	20%	100

*Each type of Share Class is available as; (i) an accumulating or a distributing Class; and (ii) a hedged or unhedged Class (other than Classes in the Base Currency).

**In USD or the relevant Class currency equivalent.

*** May be charged / shall not exceed.

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: Konwave ATG Medtech Innovation Fund Legal entity identifier: 635400UNALEKTABQ9G35

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**

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:

- reduction of carbon emissions intensity; and
- improved access to healthcare products and services.

The Fund promotes investments in medtech companies that demonstrably **improve access to healthcare products and services**, all over the world but particularly in underserved communities or low-income markets. This includes:



- Companies providing **affordable medical products**, diagnostics, and medical technologies in developing countries or low-income populations.
- Firms with strategies to increase **geographic and economic access** to essential health services.
- Companies that invest in **digital health solutions** or mobile care delivery models to reach remote areas.
- Inclusion of **health equity** in business strategy (e.g., inclusive clinical trials, localized pricing strategies).

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?**

Reduction of carbon emission intensity:

The Fund invests in medtech companies demonstrating lower-than-sector-average carbon intensity, defined as tonnes of CO₂-equivalent per million euros of revenue (tCO₂e/€m). Carbon intensity is measured using Scope 1 and 2 emissions, with Scope 3 included where reliable data is available.

Indicator	Metric	Target/Goal	Data Source
Portfolio Weighted Average Carbon Intensity (WACI)	% of holdings with a Weighted average of carbon intensity <45tCO ₂ e/€m	> 75%	MSCI ESG / company reports
% of portfolio companies with disclosed emissions	% of holdings disclosing Scope 1+2 emissions	> 75%	MSCI ESG / Company reports

The Fund monitors its **Weighted Average Carbon Intensity (WACI)** and aims to maintain it below < 45 tCO₂e/€m revenue as defined by leading ESG data providers. This indicator is considered appropriate to measure the attainment of the Fund's environmental characteristic, which is to promote lower carbon intensity among medtech companies. The Fund targets maintaining at least 75% of its portfolio holdings (by weight) in companies with carbon intensity of less than 45 tCO₂e/€ million revenue. By targeting this threshold, the Fund demonstrates a systematic preference for companies with lower-than-sector-average emissions within the medtech universe. This approach ensures that the indicator remains both ambitious and achievable, reflecting the Fund's environmental characteristic of supporting a transition toward lower carbon intensity. Data is sourced from reputable ESG providers including MSCI ESG Research and Science Based Targets initiative (SBTi).

The indicator “% of portfolio companies with disclosed emissions” is considered appropriate to measure the attainment of the Fund's environmental characteristic, which is to promote lower carbon intensity among global healthcare companies. Accordingly, the threshold represents a level that is both realistic for the global healthcare universe and directionally aligned with global decarbonisation pathways. By maintaining more than 75% of portfolio holdings below this level, the Fund demonstrates a measurable and transparent preference for companies with lower relative emissions, consistent with its environmental characteristic of supporting a transition to reduced carbon intensity.

The Fund also engages with companies lacking emissions disclosure or targets to encourage improved transparency and climate action. If a company discloses more than >350tCO₂e/€m, the company will be contacted directly in order to assess what initiatives it has already employed or is planning to employ to reduce its carbon footprint.

Improved access to healthcare products and services

Measurement indicator: MSCI ESG Social Score

Metric: at least 30% of the investee companies' market value is ranked in the top half of the investment universe based on MSCI ESG Social Score. All portfolio holdings are assessed using the MSCI ESG Social Score, with at least 30% of the portfolio scoring above average (>50%-tile) compared to the investment universe

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to

on a weighted basis. The Investment Manager considers being in the top half MSCI ESG Social Score as a suitable goal to promote social responsibility and access to medicine for under privileged communities and in underserved regions.

The portfolio is constructed by means of a proprietary bottom-up research process valuing companies of all medtech subsectors as described in the Supplement.

Data source: MSCI ESG Social Scoring for portfolio holdings and investment universe.

- **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



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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What investment strategy does this financial product follow?

The Fund follows a fundamental, bottom-up investment approach with a GARP style. The Fund primarily invests in the US medtech market, complemented by select investments in Europe and Asia's medical technology markets. The Fund focuses on companies across key medtech subsectors, including medical equipment, medical devices, medical services, life science and diagnostics and healthcare supplies.

The Fund promotes two environmental and social characteristics:

- **Access to healthcare**, focusing on companies that improve the availability and affordability of essential healthcare products, especially for underprivileged communities and in underserved regions;
- **Carbon footprint**, by considering companies' greenhouse gas emissions intensity and climate-related practices.

*The financial product uses the **MSCI World Healthcare Equipment and Supplies Net Total Return Index (USD) (the "Benchmark")** as its financial benchmark. The Benchmark does not integrate sustainability factors and is used for performance comparison only.*

The investment process incorporates ESG factors relevant to the promoted characteristics, alongside traditional financial analysis. The Fund applies exclusions based on internationally recognised norms related to human rights and environmental standards.

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?

*To promote the environmental and social characteristics of **access to healthcare** and **carbon footprint reduction**, the Fund's investment strategy incorporates the following binding elements:*

1. ESG Integration and Minimum Eligibility Criteria:

Investments are screened to include only companies that meet minimum sustainability performance thresholds, as follows;

- **At least 75% of the portfolio's holdings (excluding cash)** must have an **MSCI ESG rating of BB or higher** to ensure a baseline level of ESG quality;
- **At least 30% of the portfolio's market value** which is invested in medtech companies is ranked in the top half of the investment universe based on **MSCI ESG Social Score**.
- Portfolio carbon intensity (measured as **Scope 1 and 2 greenhouse gas emissions per million USD revenue on WACI**) is targeted to be < 45 tCO₂e/€m revenue

2. Value-Based and Sector Exclusions:

Criteria	Revenue threshold
Controversial weapons	0%
Conventional weapons	10%
Thermal coal	5%
Sale of tobacco	10%

3. **Portfolio Construction Constraints:**

The portfolio construction process ensures that the overall holdings align with the promoted characteristics by balancing exposure across companies with strong access to healthcare credentials and lower carbon footprints, while maintaining the Fund's GARP fundamental bottom-up style.

In order to assist with the above listed binding elements, the Fund leverages ESG data providers and benchmarks (e.g., MSCI ESG Ratings, CDP climate scores) to measure and monitor adherence to social and environmental characteristics.

ESG considerations are fully integrated into the analysis and investment decisions and play an important role in determining the investment universe and portfolio construction of the Fund, as described above. The Fund promotes environmental and social characteristics by investing a substantial portion of the portfolio in companies with sound ESG quality and good governance based on the Investment Manager's ESG methodology, which aims for a portfolio with 75% or more of its equity exposure invested in BB or better rated stocks/companies.

The Fund aims to achieve long-term capital growth by investing up to at least 75% (excluding cash) of its assets in a portfolio of carefully selected equities and other equity securities of companies in the healthcare sector that are selected taking into account the environmental and social characteristics promoted by the Fund and have a corresponding ESG rating as mentioned above under 1.ESG Integration and Minimum Eligibility Criteria above.

● **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?**

The Investment Manager will assess the governance practices of issuers by incorporating the governance rating of the external ESG rating provider MSCI. In doing so, the external ESG rating provider will consider various factors such as sound management structure, employee relations, employee compensation and business ethics to satisfy itself that the relevant issuers have good governance practices in place, in particular with respect to sound management structure, employee relations, employee compensation and tax transparency.



Asset allocation describes the share of investments in specific assets.

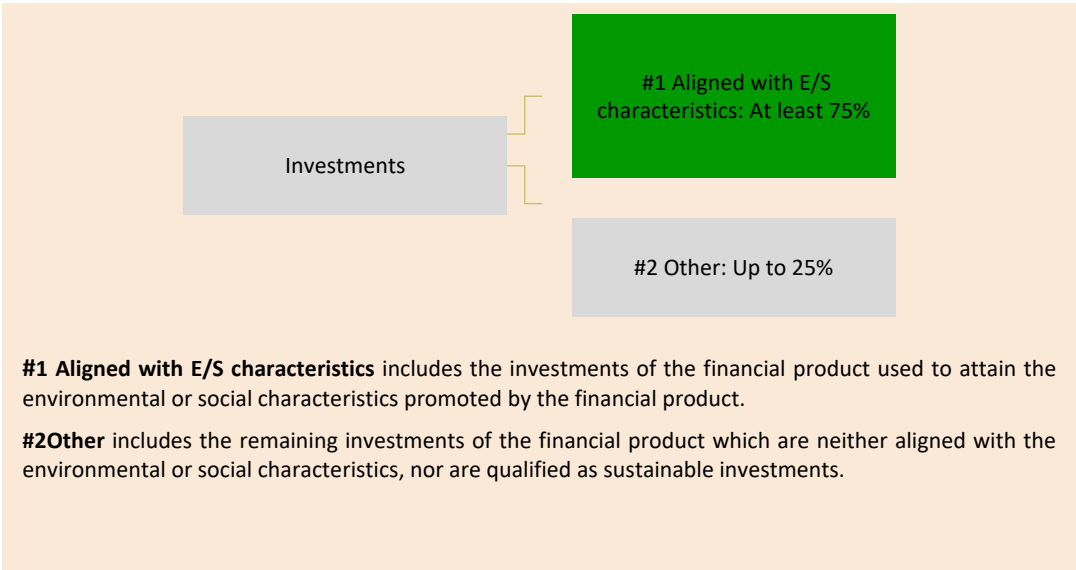
What is the asset allocation planned for this financial product?

The Fund primarily invests in **equities of medtech companies** spanning subsectors like medical equipment, medical devices, medical services, life sciences and diagnostics and healthcare supplies. as well as related sectors (as described above). The Fund primarily targets investments in the US, complemented by investments in Europe and Asia.

The expected asset allocation is approximately:

The Fund maintains its proportion of holdings that promote the environmental and social characteristics at a minimum of **75%**.

The maximum proportion of the Fund’s “Other” holdings is **25%** and includes hedging instruments, unscreened investments for diversification purposes, investments for which data are 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?

Derivatives are not used to attain the environmental or social characteristics promoted by the Fund.

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.



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

Not Applicable.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy²?

☐

Yes:

☐

In fossil gas

☐

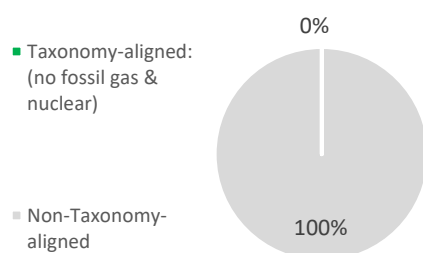
In nuclear energy

☒

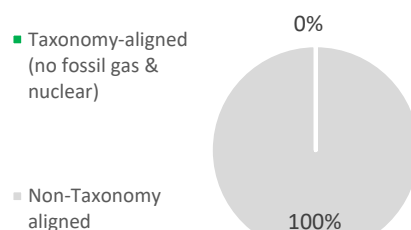
No

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

1. Taxonomy-alignment of investments including sovereign bonds*



2. Taxonomy-alignment of investments excluding sovereign bonds*



This graph represents 100% of the total investments.

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



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

² 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.

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 the Fund 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

- **Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- **sustainable investments** with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



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/>