

## SUPPLEMENT 4

### HC Cadira Sustainable Japan Equity Fund

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

**This Supplement contains information specifically relating to HC Cadira Sustainable Japan Equity Fund (the "Fund"), which is a separate 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 current prospectus of the ICAV (the "Prospectus") dated 9 May, 2024 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 Fund may invest in derivative instruments for hedging purposes, where applicable. (See "Risk Management" below for details of the leverage effect of investment in FDI). Certain risks attached to investments in derivative instruments are set out in the Prospectus under "Risk Factors".**

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

As at the date of this Supplement, the following other funds have been established within the ICAV: HC Boston Common Global Equity Impact Fund; HC Snyder US All Cap Equity Fund; Thornbridge Nissay Japan Contrarian Value Equity Fund; HC Sephira GEM Long Only UCITS Fund; and HC Sephira GEM Absolute Return Fund.

The date of this Supplement is 9 May, 2024.

#### 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 Japanese Yen.

**"Business Day"**, any day (except Saturday and Sunday) on which the banks in Ireland and the banks in Japan are both open, 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 immediately preceding 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.

**"Index"**, means the TOPIX Total Return Index which represents the total return of the TOPIX Index. TOPIX is a free-float adjusted market capitalization-weighted index that is calculated based on the domestic common stocks listed on the Tokyo Stock Exchange.

**"Investment Manager"**, Cadira Capital Management Co. Ltd.

“**Manager**”, Harrington Cooper Asset Management Limited

“**Property**”, real estate, income from real estate and related assets.

“**SDGs**”, a collection of global goals for society, as described by the United Nations Sustainable Development Goals.

“**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 9 p.m. (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 HC Cadira Sustainable Japan Equity 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 Fund is suitable for retail and institutional investors seeking a medium to long-term investment with a moderate tolerance for volatility.

## 3. INFORMATION ON THE FUND

### 3.1 Investment Objective, Investment Policies, and Investment Strategy

#### 3.1.1 Investment Objective

The Fund has sustainable investment as its objective and aims to achieve long term capital appreciation.

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

#### 3.1.2 Investment Policies, Structure and Transactions

The Fund will invest primarily in sustainable investments by acquiring a selection of equity securities based on the companies issuing these equity securities compliance with environmental, social and/or governance criteria (as further described in this section 3.1.2 and in the SFDR annex in **Appendix 2** to this Supplement).

The Fund's sustainable investment objective is to achieve sustainable capital growth by establishing a portfolio of companies participating in the transition to a more sustainable economy, and by extension those capable of capturing sustainability-related value.

The Fund uses the United Nations Sustainable Development Goals ('SDGs') as a reference for the sustainable investment objectives. In its analysis of the contribution of underlying holdings towards one or multiple of the 17 SDGs, the Investment Manager identifies the relevant sub targets that the holding contributes to. While the analysis is based on a high-level and desk-research based approach, the Investment Manager ensures the analysis is carefully tracked, and a rationale for each selection is provided. The Fund excludes investments that conflict with the Investment Manager's exclusion policy. In addition, the Fund excludes investments that are exposed to severe controversies. The Investment Manager also assesses the governance practices of issuers through the use of governance ratings provided by third-party ESG data providers and analysis conducted on the relevant issuer by the investment management team in order to satisfy itself that the relevant issuers follow good environmental, social and governance practices, in particular with respect to the reduction of carbon emissions, sound management structures, good employee relations, reasonable remuneration of staff and tax compliance.

The Investment Manager monitors compliance with the social and/or environmental characteristics outlined above on a regular basis through the use of sustainability indicators such as carbon footprint and ESG rating provided by third-party ESG data providers. For further information on the Fund's ESG strategy, please refer to **Appendix 2** to this Supplement.

The Fund sees sustainability as a long-term driver for structural change and research shows that companies with sustainable business practices are more successful. The Fund therefore adheres to the approach of building a portfolio by selecting individual stocks through bottom-up research. The Investment Manager emphasizes companies with high stakeholder value and economic value when selecting portfolio companies. These companies are able to generate stable profits by utilizing a solid business foundation built by rewarding not only shareholders but also customers, employees, business partners, local communities, the global environment, and other stakeholders. To identify such companies, the Investment Manager incorporates non-financial information, such as ESG, in addition to financial information, into their research and analysis.

The Fund will invest primarily in equity securities issued by Japanese companies and denominated in Japanese yen. The Fund will consider a Japanese company to be a company organised under the laws of Japan for which the principal securities trading market is Japan or that has a majority of its assets or business in Japan. The equity securities which the Fund may invest in are common stocks, preferred stocks and other rights (which are issued by a company to allow holders to subscribe for additional equity securities issued by that company) which are listed or traded on Recognised Exchanges. The Fund invests in companies regardless of market capitalisation.

In order to achieve its objective of sustainable investments, a minimum of 80% of the net asset value of the Fund will be used to make sustainable investments in equity securities issued by companies which are domiciled or exercise the predominant part of their economic activity in Japan, the investment universe of the Fund. Up to 20% of the net asset value of the Fund may, solely for the purposes of ancillary liquidity, be held in cash in the form of Japanese Yen.

The Investment Manager puts emphasis on bottom-up fundamental analysis of individual companies in order to look for the possibility of a value gap narrowing between the market price and the intrinsic value of a stock. Bottom-up fundamental analysis is defined as the focus on a specific company, rather than on the industry in which that company operates or on the economy as a whole. The Investment Manager's investment process involves creating an investment hypothesis based on an individual business irrespective of the sector or overall macroeconomic factors. The investment hypothesis is then verified through face-to-face meetings with individual companies' management. The intrinsic value of a business is estimated using a long-term earnings forecast which is discounted by an estimated risk rate. Both the earnings forecast as well as the estimated risk rate depend on the assessed "sustainability" of the business, or how

the environmental and social aspects of the company strengthen its business model and as a result enhances its corporate value.

As an actively managed Fund, the Fund's holdings are not selected by reference to a specific index or other benchmark. The number of holdings held by the Fund will vary, but the Fund will at most times hold more than 30 holdings. Although the Fund will be considered a diversified portfolio the Fund may employ a relatively focused investment strategy and may hold securities of fewer issuers than other diversified funds.

The Fund typically sells an investment when the reasons for buying it no longer apply, such as when the Investment Manager determines that a company's prospects have changed or believes that a company's stock is fully valued by the market, or when the company begins to show deteriorating fundamentals. The Fund also may sell an investment if it becomes an overweight portfolio position, as determined by the Company and/or the Investment Manager.

The investment objective of the Fund is not to track or benchmark its performance against any index. The Index is used as a reference for performance measurement purposes only and not used to determine the composition of the Fund. As outperforming the Index is not part of the Fund's investment objective, the degree to which the Fund's holdings and weightings are similar to the Index are coincidental. The Fund's investment strategy has no restrictions regarding the extent to which the Fund's holdings may deviate from the Index.

The Fund may (but is not obliged to) engage in currency related transactions through the use of Currency Forwards, Futures or Options, the commercial purpose of which is to hedge the currency exposure of the Fund or any share class of the Fund that is denominated in a currency other than the Base Currency (see Section 3.4 below entitled "Currency Hedging Policy").

### 3.1.3 Classification for SFDR Purposes

The Fund contributes to environmental and social objectives and qualifies as an investment product in accordance with Article 9 of the SFDR. For further information on the Fund's ESG strategy, please refer to the SFDR annex in **Appendix 2** to this Supplement.

### 3.1.4 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.

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.

### 3.1.5 Sustainability Impact Assessment

The Manager, by virtue of being a company that has less than 500 employees and is not a parent undertaking of a group with 500 or more employees, is not, in accordance with the SFDR, currently required to consider 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.

### 3.1.6 Taxonomy Regulation Disclosures

As of the date of this Supplement, it is expected that the minimum proportion of investments of the Fund in environmentally sustainable economic activities aligned with the EU Taxonomy shall be 0% of the net assets of the Fund, which shall include a minimum proportion of 0% of net assets in transitional activities and a minimum proportion of 0% of net assets in enabling activities.

The environmentally sustainable investments of the Fund contribute to the Taxonomy Regulation objectives of climate change mitigation, the sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems.

## 3.2 Investment Manager

Cadira Capital Management Co., Ltd is the Investment Manager of the Fund. The Investment Manager is an investment manager specialising in the management of active Japanese equity investment strategies.

The Investment Manager is registered under the Financial Instruments and Exchange Act of Japan. The Investment Manager is a stock company organised under the laws of Japan and is engaged in the business of discretionary investment management services to "professional investors" (as defined in Article 2, paragraph 31 of the Financial Instruments and Exchange Act of Japan, as well as Article 23 of the Cabinet Office Ordinance on Definitions provided for in Article 2 of the Financial Instruments and Exchange Act of Japan).

Pursuant to the Investment Management Agreement between the ICAV, the Manager and the Investment Manager dated 12 June, 2023 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 either party on giving not less than 90 days' prior written notice to the other party. 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 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 fraud, bad faith, negligence or wilful default of the Investment Manager.

### 3.3 Currency Hedging Policy

The Manager (or its delegate) may (but is not obliged to) engage in currency related transactions through the use of Currency Forwards, Futures or Options, the commercial purpose of which is to hedge the currency exposure of the Fund or any share class of the Fund that is denominated in a currency other than the Base Currency, in accordance with the sections entitled "**Hedging at Portfolio Level**" and "**Hedging at Share Class Level**" in the Prospectus.

**Appendix 1** to this Supplement provides details of the hedged classes of the Fund.

In the case of unhedged classes, performance may be strongly influenced by movements in currency exchange rates because currency positions held by the Fund may not correspond with the securities positions held.

### 3.4 Investment and Borrowing Restrictions

The Investment and borrowing restrictions set out in the Prospectus apply in their entirety to the Fund.

3.4.1 The Fund shall not invest in other collective investment schemes.

### 3.5 Risk Management

The Fund may use Currency Forwards, Futures or Options 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

An investment in the Fund involves a significant degree of risk which each prospective investor should carefully consider before subscribing to purchase Shares. An investment in the Fund is not intended to provide an investment program meeting all the requirements of an investor. Additionally, investors should invest in the Fund only if they are able and prepared to bear the risk of investment losses, including the potential loss of their entire investment. In addition to the risks set out in the Prospectus, an investment in the Fund involves the following risks:

#### **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.

##### *Custody/Sub-Custody Risk*

The Fund may invest in markets where custodial and/or settlement systems are not fully developed, such as in certain emerging market countries. In such circumstances, there may be very limited regulatory oversight of certain foreign banks or securities depositories that hold foreign securities and foreign currency. The laws of certain emerging market countries may limit the Fund's ability to recover such assets if a foreign bank or depository or their agents goes bankrupt. Such markets include, among others, Indonesia, Korea and India, and such risks include (i) absence of delivery versus payment settlement, (ii) a physical market, and as a consequence the circulation of forged securities, (iii) poor information in regard to corporate actions, (iv) registration process that impacts the availability of the securities, (v) lack of appropriate legal/fiscal infrastructure advices, and (vi) lack of compensation/risk fund with the relevant central depository. Furthermore, even when the Fund settles trades with counterparties on a delivery-versus-payment basis, it may still be exposed to credit risk to parties with whom it trades.

#### *Risks of Derivatives*

The Fund may use derivative instruments, such as Currency Forwards, Options, Futures, and other similar instruments for hedging purposes. Derivatives involve several risks including possible default by the other party to the transaction, illiquidity and, to the extent the Investment Manager's view of certain market or currency movements is incorrect, the risk that the use of such derivatives could result in losses that are significantly greater than if derivatives had not been used.

#### *Japan Investment Risk*

The Fund's performance will be influenced by political, social and economic factors affecting investments in Japanese companies. Special risks associated with investments in Japanese companies include exposure to currency fluctuations, less liquidity, lack of comprehensive company information, potential imposition of governmental laws and restrictions, and differing accounting, auditing, reporting and legal standards.

#### *Exchange Risk*

The Fund's Net Asset Value per share will be affected by the exchange rate fluctuation. Depending on the currency volatility, the value of the share class will go up and down, which may not guarantee an investor's principal amount.

#### *Market Capitalisation Risk*

The securities of small sized (by market capitalisation) companies known as 'small caps', or financial instruments related to such securities, may have a more limited market than the securities of larger companies. Accordingly, it may be more difficult to effect sales of such securities at an advantageous time or without a substantial drop in price than securities of a company with a large market capitalisation and broad trading market. In addition, securities of small sized companies may have greater price volatility as they are generally more vulnerable to adverse market factors such as unfavourable economic reports. Investment in securities traded on Japanese stock exchanges other than Tokyo Stock Exchange Prime Market involve considerations that are not applicable when investing in established, large capitalisation companies, including reduced or less stringent listing standards for companies and markets, less disclosure requirements, illiquidity of securities and markets and increased market risk in general.

### **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 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.

#### *Sustainability (ESG) Investment Guidelines*

The Fund's sustainability (ESG) investing criteria and thematic focus on companies contributing to solutions to environmental and social challenges could cause it to perform differently compared to similar funds that do not have such policies. The application of these criteria may result in the Fund foregoing opportunities to buy certain securities when it might otherwise be advantageous to do so or selling securities for guideline adherence or sustainability reasons when it might be otherwise disadvantageous for it to do so. The Fund will vote proxies in a manner that is consistent with its sustainability criteria and the Investment Manager's proxy voting policy, which may not always be consistent with maximising short-term performance of the issuer.

#### *Sustainability Risks*

The value of the Fund's portfolio may be affected by 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 of the Fund, including actual or perceived changes with respect to the sustainability of the revenue generating activities of the issuer of the investment. Certain examples are included below:

- **Environmental events or conditions** may include:
  - **Climate change / global warming**, such as the impact of adverse weather events on the Fund's physical assets, costs, operations or revenue.
  - **Pollution**, such as damage to biodiversity and crop harvests or the impact of government pollution-reduction initiatives on the operations or revenue of industries in which the Fund invests.
  - **Depletion / cost of natural resources**, such as the impact of reduced natural resources on investments that rely on commodities such as timber, coal or gas, or the impact of reduced water supplies on agricultural, industrial and environmental activities.
- **Social events or conditions** may be internal or external and may be associated with employees, local communities, or customers of companies in which the Fund invests and may include:
  - **Internal events or conditions** such as employee discrimination, internal health and safety breaches, human rights violations, or modern slavery, which may impact consumer sentiment or lead to litigation or regulatory sanctions.
  - **External events or conditions** such as accusations of consumer rights limitations or product quality concerns, which may impact consumer sentiment or lead to regulatory sanctions.
  - **Societal or global trends** such as carbon reduction, automation, artificial intelligence, digital disruption, social media, and other social trends which could impact the viability of industries in which the Fund invests, may cause the Fund's investments to become outdated or could lead to increased compliance costs.
- **Governance events or conditions** may arise in the management of the ICAV, the Manager or the companies in which the Fund invests, including:



- **Lack of board diversity**, leading to poorer decision-making and less effective strategic planning and management of matters impacting the Fund's investments.
- **Inadequate audit controls**, potentially facilitating fraud leading to litigation and loss of consumer sentiment or less rigorous oversight of matters impacting the Fund's investments.
- **Infringement on shareholder rights**, including the Fund, which may impact the Fund's input into decisions by investee companies and limit the Fund's negotiation powers or influence.
- **Corruption**, hindering effective decision-making processes and leading to fraud or scandals which could impact confidence in a company in which the Fund invests, lead to litigation or regulatory sanctions, or impact the company's creditworthiness.
- **Lack of executive pay scrutiny**, including incentivised performance fees which could lead to executives failing to act in the company's best interests.
- **Poor security safeguards** leading to cybersecurity breaches or breaches of employee or customer personal data.
- **Inadequate human resource controls**, leading to discriminatory employment practices, health and safety breaches or workplace discrimination, resulting in loss of key personnel, reduced workplace productivity and increased business costs.

#### *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, 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.

### **Timing of Payment for Subscriptions**

Payment must be received by the Administrator three 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 three 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**

The fees paid by the Fund to the Manager and Investment Manager in respect of an F Share Class, SI Share Class and D Share Class shall not exceed 0.5% per annum of the Net Asset Value of the Fund that is attributable to that F Share Class, SI Share Class and the D Share Class.

The fees paid by the Fund to the Manager and Investment Manager in respect of an I Share Class shall not exceed 0.75% per annum of the Net Asset Value of the Fund that is attributable to that I Share Class.

The fees paid by the Fund to the Manager and Investment Manager in respect of an S Share Class shall not exceed 0.85% per annum of the Net Asset Value of the Fund that is attributable to that S Share Class.

The fees paid by the Fund to the Manager and Investment Manager in respect of an A Share Class shall not exceed 1.70% per annum of the Net Asset Value of the Fund that is attributable to that A Share Class.

### **Distributor Fee**

The fees paid by the Fund to the Distributor in respect of the F Share Class, SI Share Class, I Share Class, S Share Class, A Share Class and D Share Class shall not exceed 0.05% per annum of the Net Asset Value of the Fund that is attributable to that F Share Class, SI Share Class, I Share Class, S Share Class, A Share Class and D Share Class.

### **Fees payable to the Administrator**

The Administrator shall be entitled to receive the following annual fees for fund accounting services calculated as a percentage of the Net Asset Value of the Fund, subject to a minimum fee of EUR 50,000 per annum:

Up to EUR 100 million	0.05%	5 basis points
In excess of EUR 100 and up to EUR 500 million	0.04%	4 basis points

In excess of USD 500 million	0.03%	3 basis points
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The Administrator's minimum annual fee shall be waived in respect of this Fund for the first 6 months launch.

The Administrator shall be entitled to a fee of EUR 5,000 per annum for assisting with the annual financial reporting on behalf of the ICAV's first two Funds and EUR 1,000 for each additional Fund of the ICAV.

The Administrator shall be entitled to receive an annual fee in relation to the transfer agency services it provides on behalf of the Fund including an annual maintenance fee in respect of each Fund of EUR 3,000 per annum, a dealing fee on all automated transactions of EUR 5 per transaction and a dealing fee on all manual transactions of EUR 10 per transaction and a fee for each Share Class of the Fund (applicable to the third Share Class of a Fund and above) of EUR 1000.

Fees payable to the Administrator shall be calculated and accrued as at each Valuation Point and shall be payable monthly in arrears.

The Administrator shall also be entitled to receive an annual fee in relation to the FATCA/CRS services it provides on behalf of the Fund including a new account fee in respect of each Fund of EUR 25 per account opened, an account maintenance fee of EUR 7.50 per account per annum plus a correspondence fee of EUR 25 per event, a reporting to tax authorities fee of EUR 1,800 per report submitted and a nil reporting to tax authorities fee of EUR 225 per nil report submitted.

Fees payable to the Administrator shall be calculated and accrued as at each Valuation Point and shall be 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 the following annual fees for its services calculated as a percentage of the Net Asset Value of the Fund (plus VAT, if any), subject to a minimum fee of EUR 15,000 per annum:

Up to EUR 100 million	0.015%	1.5 basis points
In excess of EUR 100 million	0.01%	1 basis point

The Depositary's minimum annual fee shall be waived in respect of this Fund for the first for 6 months

The Depositary's fee is accrued at each Valuation Point and is payable monthly in arrears at the above rates.

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 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 €45,000) 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 also 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 (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.

## APPENDIX 1

(to Supplement No. 4)

Share Classes – Dealing Information				
Class Currency	Type*	Minimum Initial Subscription**	Initial Offer Period for unlaunched Classes****	Initial Offer Price***
GBP USD EUR CHF NOK SEK DKK JPY	F	300,000,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	100
GBP USD EUR CHF NOK SEK DKK JPY	SI	150,000,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	100
GBP USD EUR CHF NOK SEK DKK JPY	I	25,000,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	100
GBP USD EUR CHF NOK SEK DKK JPY	S	1,000,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	100
GBP USD	A	100,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	100

EUR				
CHF				
NOK				
SEK				
DKK				
JPY				
JPY	D	150,000,000	From 9.00am (Irish time) on 15 <sup>th</sup> September, 2023 to 5.00pm (Irish time) on 8 <sup>th</sup> November, 2024.	1,000,000

\*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 other than the following Classes; JPY I, JPY SI and JPY Founder.

\*\*In USD or the relevant Class currency equivalent.

\*\*\* In the relevant Class currency.

\*\*\*\* As at the date of this Supplement GBP SI Accum., GBP Founder Accum., EUR Founder Accum., USD Founder Accum. and JPY Founder Accum. have launched and are available on any Dealing Day at the Net Asset Value of the relevant Share Class.

## APPENDIX 2

(to Supplement No. 4)

Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: HC Cadira Sustainable Japan Equity Fund

Legal entity identifier: 635400GMYHD5FIDOIX17

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 20%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 20%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



## What is the sustainable investment objective of this financial product?

The Fund's sustainable investment objective is to achieve sustainable capital growth by establishing a portfolio of companies participating in the transition to a more sustainable economy, and by extension those capable of capturing sustainability-related value.

The Fund uses the United Nations Sustainable Development Goals ('SDGs') as a reference for the sustainable investment objectives. The Fund does not focus on any of the SDGs in particular, as it believes that all SDGs are equally important and deeply interconnected.

In its analysis of the contribution of underlying holdings towards one or multiple of the 17 SDGs, the Investment Manager identifies the relevant sub targets that the holding contributes to. While the analysis is based on a high-level and desk-research based approach, the Investment Manager ensures the analysis is carefully tracked, and a rationale for each selection is provided.

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.

### ● **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The Fund uses the following indicators to measure the attainment of the sustainable investment objective:

#### **Sustainable investment assessment indicators**

- Share of investments (% of NAV) that contribute to one or multiple United Nations Sustainable Development Goals ('SDGs'), split out by:
  - Share of investments (% of NAV) that contribute to SDGs with an environmental focus<sup>1</sup>
  - Share of investments (% of NAV) that contribute to SDGs with a social focus<sup>2</sup>
- Share of investments (% of NAV) that do not do significant harm to any environmental or social sustainable investment objective
- Share of investments (% of NAV) that follow good governance practices
- Share of sustainable investments (% of NAV) that contribute to one or multiple SDGs, do not do significant harm to any environmental or social sustainable investment objective, and follow good governance practices

#### **ESG integration to drive environmental and social progress**

To measure if underlying holding are realising environmental and/or social progress, the Fund uses the following indicators:

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<sup>1</sup> The Investment Manager is aware that SDGs are heavily interconnected, and there is no such things as environmental or social SDGs. However, for the purpose of this assessment, the Investment Manager considers the following SDGs to have a more environmental focus: SDG6: Clean Water and Sanitation; SDG7: Affordable and Clean Energy; SDG11: Sustainable Cities and Communities; SDG12: Responsible Consumption and Production; SDG13: Climate Action; SDG14: Life Below Water; SDG15: Life on Land

<sup>2</sup> SDGs with a social focus: SDG1: No Poverty; SDG2: No Hunger; SDG3: Good Health and Well-Being; SDG4: Quality Education; SDG5: Gender Equality; SDG8: Decent Work and Economic Growth; SDG9: Industry, Innovation and Infrastructure; SDG10: Reduced Inequalities; SDG16: Peace, Justice and Strong Institutions; SDG17: Partnerships for the Goals

### **Sustainability**

**indicators** measure how the sustainable objectives of this financial product are attained.



- Scope 1+2 carbon intensity<sup>3</sup>
- Share of investments (% of NAV) that express support to the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations
- Share of investments (% of NAV) committed to The Science Based Targets initiative (SBTi)
- Share of investments (% of NAV) that express support to the OECD Guidelines for Multinational Enterprises
- Share of investments (% of NAV) that express support to the ten principles of the UN Global Compact
- Share of investments (% of NAV) that express support to the UN Guiding Principles on Business and Human Rights

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

### ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

In its sustainable investment analysis, the Fund also assesses for each underlying holding, whether the investment does or may cause harm to any environmental or social sustainable investment objective.

The Investment Manager considers the following indicators for assessing whether the underlying holdings may harm any other environmental or social objective.

- ESG score<sup>4</sup>
- Occurrence and severity of controversies<sup>5</sup>
- Principal adverse impact indicators<sup>6</sup>

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

The indicators for adverse impacts on sustainability factors are used as input for the sustainable investment analysis, to assess whether underlying holdings may harm any other environmental or social objective. After identifying and prioritising the adverse impacts, the Investment Manager will assess what actions it can take and what targets it can set to mitigate those adverse impacts. When the principal adverse impacts are considered unmanageable, the Fund will consider excluding the investment.

Information on how principal adverse impacts have been considered, including how the indicators for adverse impacts on sustainability factors have been considered, will be disclosed in the Fund's annual report.

<sup>3</sup> Source: Third-party ESG data providers, in Tonnes CO<sub>2</sub>e/USD mn. Due to data quality considerations, the Investment Manager chooses not to include Scope 3 carbon intensity.

<sup>4</sup> Source: Combining data from third-party ESG data providers and own research. Where data is not available, the Investment Manager will apply a best-efforts approach, for example by carrying out additional research, cooperating with other third-party data providers, or making reasonable assumptions and/or estimations.

<sup>5</sup> Source: Third-party ESG data providers identify companies involved in incidents and events that may pose a business or reputation risk to a company due to the potential impact on stakeholders. This is accompanied by an in-depth qualitative assessment through bottom-up research.

<sup>6</sup> Source: Combining data from third-party ESG data providers and own research. Where data is not available, the Investment Manager will apply a best-efforts approach, for example by carrying out additional research, cooperating with other third-party data providers, or making reasonable assumptions and/or estimations.

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

The Fund excludes investments that are exposed to severe controversies, as assessed by third-party ESG data providers. The Investment Manager monitors its investments for any violations or breaches of OECD Guidelines and UN Global Principles on Business and Human Rights and consider this as part of the Investment Manager's investment decision-making process.



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

- Yes, The Investment Manager considers principal adverse impacts of its investment decisions on sustainability factors, both when making investment decisions and when evaluating the existing portfolio (as described in the previous section). When making investment decisions, the Investment Manager uses available data and information to inform a high-level assessment of the target investment's level of adverse impacts, and whether or not these impacts can be considered manageable.

Information on how principal adverse impacts have been considered, including how the indicators for adverse impacts on sustainability factors have been considered, will be disclosed in the Fund's annual report.

- No



**What investment strategy does this financial product follow?**

The Fund has sustainable investment as its objective and aims to achieve long term sustainable capital appreciation. The Fund will invest primarily in sustainable investments by acquiring a selection of equity securities based on the companies issuing these equity securities' compliance with environmental, social and/or governance criteria.

The Fund sees sustainability as a long-term driver for structural change and research shows that companies with sustainable business practices are more successful. The Fund therefore adheres to the approach of building a portfolio by selecting individual stocks through bottom-up research. The Investment Manager emphasizes companies with high stakeholder value and economic value when selecting portfolio companies. These companies are able to generate stable profits by utilizing a solid business foundation built by rewarding not only shareholders but also customers, employees, business partners, local communities, the global environment, and other stakeholders. To identify such companies, the Investment Manager incorporates non-financial information, such as ESG, in addition to financial information, into their research and analysis.

**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 are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?**

The Fund uses several binding elements to select the investments to attain its sustainable investment objective:

- It is intended that each individual investment in the Fund will be a sustainable investment, as defined in the Fund’s sustainable investment analysis, meaning that each investment should meet the following conditions:
  - The investment should contribute to one or multiple SDGs
  - The investment should not do significant harm to any environmental or social sustainable investment objective
  - The investment should follow good governance practices
- The Fund excludes investments that conflict with the Investment Manager’s exclusion policy:
  - *Product-based exclusions*: The Fund excludes, from the scope of investment, businesses with a strong negative impact on society, and businesses whose main sales are derived from controversial business lines that are unsuitable for investment in terms of either stakeholder value or economic value, or both<sup>7</sup>.
  - *Conduct-based exclusions*: The Fund excludes, from the scope of investment, businesses with that have been through any conduct-based issues<sup>8</sup> in the past, and that have not been able to confirm that the issue has been completely resolved, is unlikely to recur, and

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<sup>7</sup> Product-based exclusions:

- Adult Entertainment: The Funds exclude companies deriving 5% or more of their sales from adult-entertainment / pornography-related activities.
- Alcohol: The Funds exclude companies that generate 5% or more of its sales from the production of alcohol. Retailers are also limited to the 5% threshold.
- Conventional Oil & Gas: The Funds exclude companies that generate more than 5% of revenues from oil & gas sales. Oil & gas is defined as companies operating in the exploration, production, refining, transportation and/or storage of oil & gas assets.
- Gambling: The Funds exclude companies that generate 5% or more of its sales from gambling and/or the production of gambling related components.
- Power Production: The Funds are allowed to invest in utilities that have: 1) power generation by coal < 5%; 2) power generation by oil and gas < 5%; 3) power generation by nuclear < 5%
- Thermal Coal and Coal Generation: The Funds exclude mining companies that generate 5% or more of their revenues from thermal coal, and power producers that generate 5% or more of their revenues from thermal coal. Irrespective of this threshold, companies that are expanding their thermal coal and/or coal generation businesses are excluded.
- Tobacco: The Funds exclude companies where 5% or more of its sales are derived from the production of tobacco and related components. Retailers are also limited to the 5% threshold.
- Unconventional Oil & Gas: The Funds exclude oil & gas companies that are active in unconventional oil and gas extraction. Types of unconventional considered: 1) arctic drilling; 2) shale oil/gas; 3) tar sands. Thresholds: a. revenue share < 5%; b. no expansion plans.
- Controversial Weapons: The Funds exclude companies with activities related to the production of controversial weapons, defined as the direct or indirect involvement in the production, manufacture, and sale of weapons that can have a disproportionate and indiscriminate impact on civilian population including anti-personnel mines, cluster munition, depleted uranium and biological & chemical weapons.
- Military Contracting and Small Arms: The Funds exclude companies that generate 5% or more of its sales from Military Contracting and/or the production of small arms. This is defined as the involvement in the production, research and development, management / services / maintenance, integration or customization, testing and/or sales / trade of weapons of war that are the subject to arms export regulations

<sup>8</sup> Conduct-based exclusions:

- Companies critical of protecting human rights or complicit in human rights violations
- Companies that exclude the formation of labour unions and/or collective bargaining or practice forced labour, child labour, and/or discrimination in workplace/jobs
- Companies that are critical of prevention of environmental problems or hinder the dissemination of environmental technologies
- Companies that engage in extortion or corruption
- Companies that sacrifice biodiversity
- Companies with a negative impact on water resources
- Companies that intentionally evade taxes
- Company with an autocratic governance system

will endeavor during the investment period to engage for improvement.

- In addition, the Fund excludes investments that are exposed to severe controversies, as assessed by third-party ESG data providers. In cases where a violation or breach has occurred, the Investment Manager assesses how recently it occurred, the severity of the violation or the breach, and what actions were taken to remedy this feed into Investment Manager's assessment of current governance practices. Exposure to controversies is continuously monitored by the portfolio managers. Besides the effect of the controversy itself, as above, the Investment Manager also considers the company's response to a controversial event. Where the company has used this as a learning experience to improve the robustness of its governance and controls, the Investment Manager would view this in a positive light.

Finally, the Fund also excludes investments that are exposed to sustainability risks or principal adverse impacts that are considered unmanageable. Whether sustainability risks or principal adverse impacts are considered unmanageable is a discretionary decision made by the Fund.

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

In its sustainable investment analysis, the Fund also assesses for each underlying holding, whether the investment follows good governance practices (such as sound management structures, employee relations, remuneration of staff, and tax compliance).

Analysis of good governance practices begins pre-investment and continues throughout the holding period of the investment through the Investment Manager's engagement activities. Elements that are taken into consideration include, but are not limited to, the track record, experience, diversity and composition (e.g. share of independent directors) of board and management, controversies (covering accounting and taxation, and corporate governance), employee relations, remuneration of staff, and tax compliance. The analysis is based on publicly available information and/or direct dialogue with the management teams of portfolio companies.



## What is the asset allocation and the minimum share of sustainable investments?

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

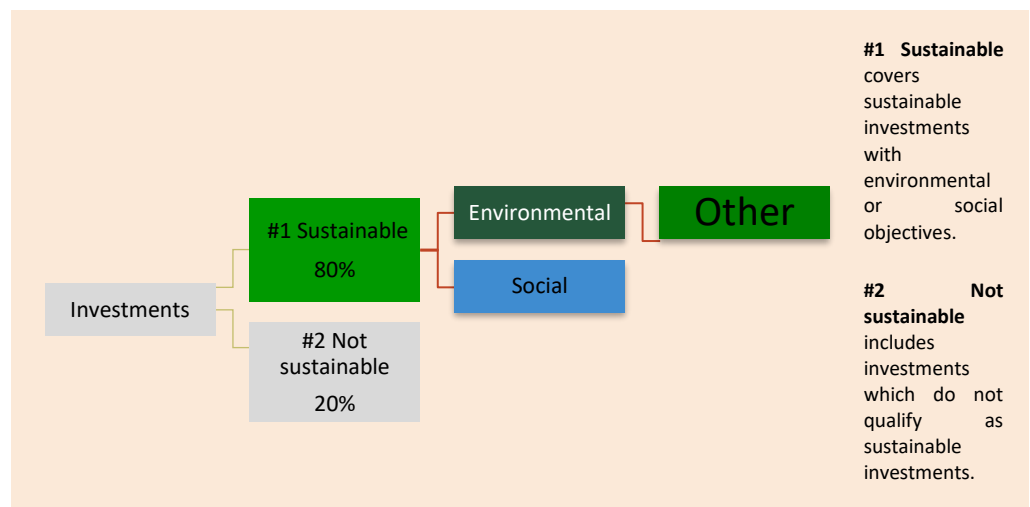
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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

The minimum proportion of the net asset value of the Fund used to meet the sustainable investment objective is 80% and in accordance with the binding elements of the investment strategy.

*While 80% of the net asset value will be invested in sustainable investments, at any given time the allocation between socially sustainable and environmentally sustainable investments may vary. At all times the minimum net asset value of the Fund comprising socially sustainable investments will be 20% and the minimum net asset value comprising environmentally sustainable investments will be 20%.*

Up to 20% of the Fund's investments identified as (#2 Not Sustainable) not sustainable in the below diagram will be held in cash for subscription and/or redemption purposes.

There are no minimum environmental or social safeguards applicable to these investments.



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.

● **How does the use of derivatives attain the sustainable investment objective?**

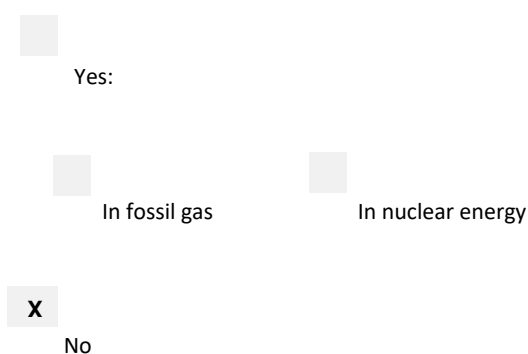
Derivatives are not used to attain the Fund’s sustainable investment objective.



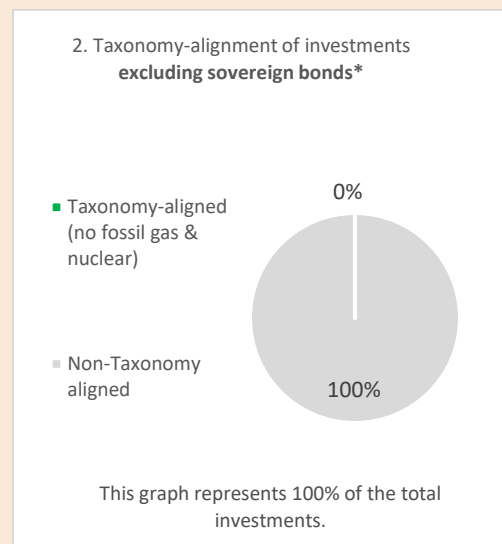
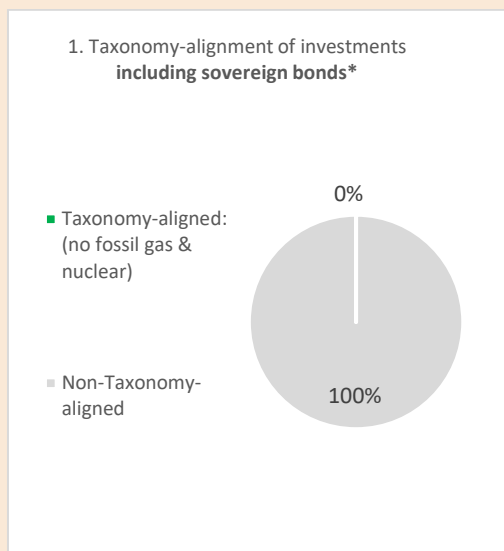
**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>9</sup>?**



*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

<sup>9</sup> 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 objectives - 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.



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Given that 0% of the investments of the Fund are expected to be aligned to the EU Taxonomy, the share of transitional and enabling activities will be 0% for both categories respectively.



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

*A minimum of 20% of the Fund's net asset value will be comprised of sustainable investments with an environmental objective and which are not Taxonomy-aligned investments.*

*In assessing whether an investment is considered to be in aligned with the EU Taxonomy, the Investment Manager must be satisfied that the relevant economic activity (i) contributes substantially to the environmental objective of climate change mitigation or climate change adaptation, (ii) does not significantly harm any of the environmental objectives outlined in Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (the "Taxonomy Regulation"); (iii) is carried out in compliance with the minimum safeguards laid down in the Taxonomy Regulation and (iv) complies, as of the date of this Supplement, with the technical screening criteria relating to climate change mitigation and climate change adaptation (as applicable) set down in Commission Delegated Regulation 2021/2139 (EU).*

*As at the date of this Annex, the Investment Manager cannot currently satisfy itself that the investments within the portfolio meet the aforementioned criteria.*



**What is the minimum share of sustainable investments with a social objective?**

The Fund commits to making a minimum share of sustainable investments with a social objective of 20%.



**What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?**

Up to 20% of the Fund's net asset value identified as (#2 Not Sustainable) not sustainable in the above diagram may be invested in cash and/or money market instruments. for subscription and/or redemption purposes.

There are no minimum environmental or social safeguards applicable to these investments.



### **Where can I find more product specific information online?**

More product-specific information can be found on the website:  
<https://harringtoncooper.com/harrington-cooper-asset-management-funds/>