

## Website disclosures: **Tabula EUR HY Bond Paris-Aligned Climate UCITS ETF**

<b>SFDR Classification</b>	Article 9
<b>Reference benchmark</b>	Markit iBoxx MSCI ESG EUR High Yield Paris-Aligned Capped Index.

### a) Summary

<b>No significant harm to the sustainable investment objective</b>	<p>The reference benchmark excludes issuers deemed in violation of social norms (e.g. the UN Global Compact), involved with controversial weapons, fossil fuels (revenue thresholds) or tobacco or causing significant environmental harm. The Investment Manager replicates the reference benchmark as far as possible and practical and also ensures that the same exclusions are applied to the actual holdings of the Sub-Fund.</p> <p><b>This Sub-Fund considers Principal Adverse Impacts (PAIs) on sustainability factors.</b></p>	
<b>Sustainable investment objective of the financial product</b>	<p>The Sub-Fund aims to reduce carbon emissions in Euro high yield bond allocations in alignment with the Paris Agreement. It achieves this by tracking the performance of the reference benchmark, which meets the criteria for an EU Paris-aligned Benchmark (PAB)</p>	
<b>Investment strategy</b>	<p>The Sub-Fund invests in a portfolio of fixed income securities that reflects the composition of the reference benchmark as far as practicable. The Sub-Fund may use optimisation techniques to select securities but intends to invest only in bonds of issuers that meet the sustainability and ESG-related selection criteria described in the reference benchmark methodology. In addition, the Investment Manager performs monthly checks to ensure that the Sub -Fund is maintaining its commitment to a 70% allocation to sustainable investments.</p>	
<b>Proportion of investments</b>	Minimum share of sustainable investments with an environmental objective	70%
	Minimum share of sustainable investments with an environmental objective <i>not</i> aligned with EU Taxonomy	70%
	Minimum share of sustainable investments with an environmental objective aligned with the EU Taxonomy	0%
<b>Monitoring of sustainable investment objective</b>	<p>The reference benchmark is rebalanced monthly to ensure alignment with its objective. The Investment Manager also checks on a monthly basis that the Sub-Fund is meeting its targets for GHG emissions (50% lower than the broad Euro high yield market and a 7% year-on-year reduction) and that any issuers excluded from the reference benchmark are also excluded from the Sub-Fund.</p>	
<b>Methodologies</b>	<p>The Sub-Fund tracks a reference benchmark designed specifically to attain the sustainable investment objective. The reference benchmark methodology is available at <a href="http://www.tabulaim.com">www.tabulaim.com</a>. In addition, the Investment Manager has developed a methodology to calculate the percentage of sustainable investments in the Sub-Fund, in accordance with the three tests specified in Article 2(17) of SFDR.</p>	
<b>Data sources and processing</b>	<p>The reference benchmark administrator uses data sourced from ISS ESG. The Investment Manager uses additional data from MSCI ESG Research to perform additional checks, including monitoring the percentage of sustainable investments and some PAIs.</p>	
<b>Limitations to methodologies and data</b>	<p>The Sub-Fund is designed to track the performance of the reference benchmark. As such, it relies on the ESG and climate data provided to the benchmark administrator (IHS Markit), and the accuracy of the administrator in applying the reference benchmark methodology. Estimates may be used in the calculation of the reference benchmark.</p> <p>The Investment Manager calculates the Sub-Fund's allocation to sustainable investments using its "best efforts" interpretation of SFDR Article 2(17). In the event of further regulatory clarification on the definition of sustainable investments, there is a risk that the Sub-Fund will need to modify its methodology and/or adjust its minimum percentage allocation to sustainable investments.</p>	
<b>Due diligence</b>	<p>The Investment Manager has conducted due diligence on MSCI ESG Research, which was selected by the benchmark administrator as the data provider for the reference benchmark.</p>	
<b>Engagement policies</b>	<p>The Investment Manager actively participates in collaborative engagement on climate via the IIGCC and Climate Action 100+.</p>	
<b>Attainment of the sustainable investment objective</b>	<p>The Investment Manager checks on a monthly basis that the Sub-Fund is meeting its GHG emissions targets, exclusions and minimum allocation of 70% to sustainable investments. Monthly data on GHG emissions, plus annual periodic reports as required under SFDR, will be published at <a href="http://www.tabulaim.com">www.tabulaim.com</a>.</p>	

## b) No significant harm to the sustainable investment objective

The Sub-Fund incorporates a range of measures designed to ensure that it excludes issuers causing significant harm to any environmental or social sustainable investment objective:

**GHG emissions (Principal Adverse Impact #1):** reduces the weighted average GHG emissions of the Sub-Fund by 50 % relative to the parent index, and by 7% per annum

**Exposure to companies active in the fossil fuel sector (Principal Adverse Impact #4):** excludes issuers with revenues from oil, gas, coal and energy intensive electricity above the thresholds specified in the PAB rules.

**Violations of UN Global Compact Principles and OECD Guidelines for Multinational Enterprises (Principal Adverse Impact #10):** excludes issuers deemed in violation of the UN Global Compact Principles or involved with very severe ESG controversies, including violation of international norms such as the OECD Guidelines.

**Significant environmental harm:** excludes issuers involved with severe or very severe controversies, including those related to land use and biodiversity, toxic spills and releases, energy and climate change, water management, operational non-hazardous waste, the environmental impact of products and services, and management of supply chain environmental impact.

**Exposure to controversial weapons (Principal Adverse Impact #14):** excludes issuers involved with controversial weapons, including chemical and biological weapons, landmines and cluster munitions.

**Exposure to additional harmful business activities:** excludes issuers involved with alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, nuclear power, nuclear weapons, civilian firearms or recreational cannabis, subject to certain revenue thresholds.

Note that these measures are built into the methodology of the reference benchmark and applied using data provided by MSCI. Please refer to the reference benchmark methodology for more information. The Investment Manager takes them into account by a) replicating the reference benchmark as far as possible and practical and b) ensuring that the same constraints are applied to the actual holdings of the Sub-Fund.

This Sub-Fund considers the Principle Adverse Indicators (PAIs), including the 14 mandatory PAIs plus one optional climate-related PAI (Investments in companies without carbon emission reduction initiatives). The measures above show how some PAIs are formally considered in the investment process. The remaining PAIs are not incorporated in index methodology and therefore cannot be considered in the day-to-day investment process. However, the Investment Manager monitors these PAIs on a quarterly basis using MSCI data. It also considers these PAIs in annual reviews with index providers, to assess whether the quality and availability of data is sufficient to incorporate them into the reference benchmark methodology. Disclosures pursuant to Article 11(2) of Regulation (EU) 2019/2088 will be published at [www.tabulaim.com](http://www.tabulaim.com).

## b) Sustainable investment objective of the financial product

The sustainable investment objective of the Sub-Fund is to reduce carbon emissions in Euro high yield bond allocations in alignment with the Paris Agreement. It achieves this by tracking the performance of the **Markit iBoxx MSCI ESG EUR High Yield Paris-Aligned Capped Index**. This is a reference benchmark meeting the criteria for an EU Paris-aligned Benchmark (PAB) described in regulation (EU) 2020/1818. The methodology for the reference benchmark is available at [www.tabulaim.com](http://www.tabulaim.com)

Bonds, including any sustainable investments, are selected and weighted so as to deliver a portfolio with 50% lower GHG emissions than the broad Euro high yield market and a 7% year-on-year reduction in GHG emissions.

## c) Investment strategy

The Sub-Fund invests in a portfolio of fixed income securities that reflects the composition of the reference benchmark as far as practicable.

The reference benchmark is designed to provide diversified exposure to EUR-denominated high yield bonds, with reduced carbon emissions and an improved ESG profile relative to the broad Euro high yield universe. It targets 50% lower GHG emissions than the Euro high yield market (as represented by iBoxx EUR High Yield 3% Issuer Cap Custom Index) and reduces its GHG emissions by 7% per annum. It excludes issuers in violation of social norms (e.g. the UN Global Compact), involved with controversial weapons, fossil fuels (revenue thresholds) or tobacco or causing significant environmental harm. To enhance ESG characteristics, the reference benchmark applies additional screens (alcohol, adult entertainment, gambling, conventional weapons, civilian firearms, nuclear power, GMO, nuclear weapons and cannabis). It also overweights issuers with strong or improving ESG ratings and vice versa.

The Sub-Fund may use optimisation techniques to select securities. However, it is intended that the Sub-Fund will only invest in bonds of issuers that meet the sustainability and ESG-related selection criteria described in the reference benchmark methodology.

In addition, the Investment Manager performs monthly checks to ensure that the Sub -Fund is maintaining its commitment to a 70% allocation to sustainable investments.

## d) Proportion of investments

The Sub-Fund allocates a minimum of 70% to sustainable investments, with an objective of emissions reduction and climate mitigation, that are not aligned with the EU Taxonomy. Alignment with the EU Taxonomy is not currently in the criteria for PABs and is not incorporated in the reference benchmark methodology. As a result, to ensure that the fund closely tracks the reference

benchmark, the Investment Manager cannot currently commit to a specific minimum percentage alignment with the EU Taxonomy.

The asset allocation is summarised as follows:

Minimum share of sustainable investments with an environmental objective	<b>70%</b>
Minimum share of sustainable investments with an environmental objective <i>not</i> aligned with EU Taxonomy	<b>70%</b>
Minimum share of sustainable investments with an environmental objective aligned with the EU Taxonomy	<b>0%</b>
Minimum share of investments in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy	<b>0%</b>
Minimum share of investments in transitional and enabling activities	<b>0%</b>
Are derivatives or other indirect exposures used to attain the sustainable investment objective?	<b>No</b>
Minimum share of sustainable investments with a social objective	<b>0%</b>

Up to 30% of the Sub-Fund may be allocated to corporate bonds classified as "not sustainable". These holdings are consistent with the Sub-Fund's overall sustainable objective of reducing portfolio GHG emissions (50% reduction relative to broad Euro high yield market, 7% reduction per annum) and are included in the calculation of these metrics in accordance with the PAB rules. These additional investments help to ensure diversification across countries and sectors and are subject to the environmental and social safeguards described in section (c).

The Sub-Fund may also hold a small Cash Component for the purposes of efficient portfolio management and may invest in FX forwards for currency hedging purposes. No minimum environmental or social safeguards are applied to these assets.

### e) Monitoring of sustainable investment objective

The reference benchmark is rebalanced monthly by its benchmark administrator (IHS Markit). At each rebalance, bonds are selected and weighted so as to meet the GHG reduction targets and additional ESG criteria described above, using ESG and climate data from MSCI as of two days prior to rebalance.

The Investment Manager also checks on a monthly basis that the Sub-Fund is meeting its targets for GHG emissions (50% lower than the broad Euro high yield market and a 7% year-on-year reduction) and that any issuers excluded from the reference benchmark are also excluded from the Sub-Fund.

Data relating to the GHG emissions of both the reference benchmark and the Sub-Fund is published monthly at [www.tabulaim.com](http://www.tabulaim.com)

In addition, the Investment Manager checks on a monthly basis that the Sub-Fund is maintaining a minimum allocation of 70% to sustainable investments.

### f) Methodologies

The Sub-Fund tracks a reference benchmark designed specifically to attain the sustainable investment objective. The reference benchmark methodology is available at [www.tabulaim.com](http://www.tabulaim.com).

In addition, the Investment Manager has developed a methodology to calculate the percentage of sustainable investments in the Sub-Fund, in accordance with the three tests specified in Article 2(17) of SFDR:

<p><b>1. Contribution to environmental or social objectives</b></p>	<p>For PABs, there is an objective of emissions reduction, which is aligned with the EU environmental objective of climate mitigation. The Investment Manager uses a number of climate- and emissions-related criteria to assess an issuer's contribution, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Positive alignment with SDG 13 (Climate Action)</li> <li>• YoY emissions reduction of 7% or more</li> <li>• Science-based target for emissions reduction (committed to or approved)</li> </ul>
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<p><b>2. Not significantly harming any environmental or social objective</b></p>	<p>The Investment Manager uses a combination of the 14 mandatory PAIs and the DNSH screens already built into the reference benchmark methodology (as per the PAB rules), as follows:</p> <ul style="list-style-type: none"> <li>• PAIs 1-3 (greenhouse gas emissions): targets for aggregate ETF emissions are built into the reference benchmark. The Investment Manager also considers the emissions of individual issuers (see above under Test 1).</li> <li>• PAI 4 (fossil fuel exposure): screening is already built into the reference benchmark as per PAB rules, with maximum revenue thresholds.</li> <li>• PAIs 5-9 (other environmental): data availability for these PAIs is mixed and in some cases it is also difficult to establish meaningful minimum or maximum thresholds. Until data quality improves, the Investment Manager relies on the "significant environmental harm" screen already built into the index under the PAB rules.</li> <li>• PAI 10 (UNGC and OECD Guidelines violations): screening is already built into the reference benchmark</li> <li>• PAIs 11 &amp; 12 (Process for monitoring UNGC and OECD Guidelines, Gender pay gap): the level of disclosure by corporate issuers is currently low. Until data quality improves the Investment Manager uses MSCI ESG Governance Controversy as a proxy measure</li> <li>• PAID 13 (Board diversity): the Investment Manager applies a screen using MSCI data</li> <li>• PAI 14 (Controversial weapons): screening is already built into the reference benchmark as per PAB rules</li> </ul>
<p><b>3. Good governance</b></p>	<p>The reference benchmark already includes a screen for MSCI ESG Controversies. This is aligned with OECD Guidelines for Multinational Enterprises, which incorporates governance standards.</p> <p>In addition, the Investment Manager uses MSCI data to check for Governance and Labour Rights Controversies at each rebalance:</p> <ul style="list-style-type: none"> <li>• Issuers with a red flag are excluded</li> <li>• Issuers with an orange flag are reviewed on a case by case basis</li> </ul>

## g) Data sources and processing

The reference benchmark uses ESG and climate data provided by MSCI ESG Research. The Investment Manager also uses MSCI data to perform additional checks, as follows:

- Ensuring that the actual holdings of the Sub-Fund meet the Sub-Funds sustainable investment objective, including GHG reduction targets and exclusions
- Calculating the percentage of sustainable investments
- Monitoring the PAIs

## h) Limitations to methodologies and data

### Reference benchmark

The Sub-Fund is designed to track the performance of the reference benchmark. As such, it relies on the ESG and climate data provided to the benchmark administrator (IHS Markit), and the accuracy of the administrator in applying the reference benchmark methodology.

Estimates may be used in the calculation of the reference benchmark. In particular, GHG emissions, where not reported, may be estimated. Further information is available in the reference benchmark methodology, available at [www.tabulaim.com](http://www.tabulaim.com).

### Sustainable investments

The Investment Manager calculates the Sub-Fund's allocation to sustainable investments using its "best efforts" interpretation of the three tests described in SFDR Article 2(17). In the event of further regulatory clarification on the definition of sustainable investments, there is a risk that the Sub-Fund will need to modify its methodology and/or adjust its minimum percentage allocation to sustainable investments.

## i) Due diligence

The Investment Manager has conducted due diligence on MSCI ESG Research, which was selected by the benchmark administrator as the data provider for the reference benchmark. Factors considered included the following:

- Availability of data for the Sub-Fund's investment universe (note that coverage of fixed income issuers is typically poorer than for equity issuers)
- Detailed review of metrics required under SFDR, including the PAIs and EU Taxonomy Alignment
- Data sourcing and calculations, including estimation methodologies for GHG emissions

The Investment Manager endeavours to review its benchmark administrators and data providers on a regular basis and engages where necessary to improve both the quality of benchmarks and the metrics used to calculate those benchmarks.

#### **j) Engagement policies**

Engagement is not formally part of the Sub-Fund's sustainable investment objective. However, the Investment Manager does engage on climate via its membership of the Institutional Investors Group on Climate Change and Climate Action 100+. Tabula is actively involved with collaborative engagements via both these organisations and aims to further the objectives of both the Paris Agreement and the Task Force on Climate-Related Financial Disclosures. Engagement targets can include both investee companies and companies that are in the broader investment universe but currently excluded from the Sub-Fund.

#### **k) Attainment of the sustainable investment objective**

The Investment Manager checks on a monthly basis that the Sub-Fund is meeting its targets for GHG emissions (50% lower than the broad Euro high yield market and a 7% year-on-year reduction) and that any issuers excluded from the reference benchmark are also excluded from the Sub-Fund. In addition, the Investment Manager checks on a monthly basis that the Sub-Fund is maintaining a minimum allocation of 70% to sustainable investments.

Monthly data on GHG emissions, plus annual periodic reports, as required under SFDR, will be published at [www.tabulaim.com](http://www.tabulaim.com).