

Website disclosures: Tabula Global HY Fallen Angels Paris-Aligned Climate UCITS ETF

SFDR Classification	Article 9
Reference benchmark	Bloomberg MSCI Global Corporate Fallen Angels Paris-Aligned Index

a) Summary

No significant harm to the sustainable investment objective	<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), thermal coal 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>This Sub-Fund considers Principal Adverse Impacts (PAIs) on sustainability factors.</p>	
Sustainable investment objective of the financial product	<p>The Sub-Fund aims to reduce carbon emissions in global high yield fallen angel bond allocations in alignment with the Paris Agreement and contribute to a range of broader environmental objectives. It achieves this by tracking the performance of the reference benchmark, which meets the criteria for an EU Paris-aligned Benchmark (PAB)</p>	
Investment strategy	<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.</p>	
Proportion of investments	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%
Monitoring of sustainable investment objective	<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 global high yield fallen angel market and a 7% year-on-year reduction) and green revenues, and that any issuers excluded from the reference benchmark are also excluded from the Sub-Fund.</p>	
Methodologies	<p>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.</p>	
Data sources and processing	<p>The reference benchmark administrator uses data sourced from MSCI ESG Research. The Investment Manager uses additional data from MSCI ESG Research to perform additional checks, including monitoring the PAIs.</p>	
Limitations to methodologies and data	<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 (Bloomberg), and the accuracy of the administrator in applying the reference benchmark methodology. Estimates may be used in the calculation of the reference benchmark.</p>	
Due diligence	<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>	
Engagement policies	<p>The Investment Manager actively participates in collaborative engagement on climate via the IIGCC and Climate Action 100+.</p>	
Attainment of the sustainable investment objective	<p>The Investment Manager checks on a monthly basis that the Sub-Fund is meeting the GHG emissions targets and the exclusions required by the PAB rules, plus its green revenue targets. Monthly data on GHG emissions, plus annual periodic reports as required under SFDR, will be published at www.tabulaim.com.</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 (Bloomberg Global Corporate Fallen Angels 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; also excludes issuers deriving any revenue from thermal coal

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, recreational cannabis, conventional weapons, adult entertainment, nuclear weapons or civilian firearms, 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.

b) Sustainable investment objective of the financial product

The sustainable investment objective of the Sub-Fund is to reduce carbon emissions in global high yield fallen angel bond allocations in alignment with the Paris Agreement and contribute to broader environmental objectives. It achieves this by tracking the performance of the **Bloomberg MSCI Global Corporate Fallen Angels Paris-Aligned 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

Bonds are selected and weighted so as to deliver a portfolio with 50% lower GHG emissions than the broad global high yield fallen angels market, as represented by the parent index (Bloomberg Global Corporate Fallen Angels Index), a 7% year-on-year reduction in GHG emissions and green revenues greater than the parent index. Green revenues include revenues derived from six themes (alternative energy, energy efficiency, green building, pollution prevention, sustainable water, or sustainable agriculture).

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 exposure to global high yield fallen angel bonds, with reduced carbon emissions and higher green revenues relative to the parent index. It targets 50% lower GHG emissions than the parent index and reduces its GHG emissions by 7% per annum. The reference benchmark excludes issuers in violation of social norms (e.g. the UN Global Compact), involved with controversial weapons, fossil fuels (revenue thresholds), thermal coal or tobacco or causing significant environmental harm. To enhance ESG characteristics, the reference benchmark applies additional screens (alcohol, recreational cannabis, conventional weapons, adult entertainment, nuclear weapons, civilian firearms), subject to certain revenue thresholds.

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.

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	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%
Minimum share of investments in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy	0%
Minimum share of investments in transitional and enabling activities	0%
Are derivatives or other indirect exposures used to attain the sustainable investment objective?	No
Minimum share of sustainable investments with a social objective	0%

Up to 30% of the Sub-Fund may be allocated to corporate bonds classified as "not sustainable". Any such holdings will be consistent with the Sub-Fund's overall sustainable objective of reducing portfolio GHG emissions (50% reduction relative to parent index, 7% reduction per annum) and subject to the environmental and social safeguards described in section (c).

However, note that, in April 2023, the European Commission clarified that products tracking Paris-Aligned Benchmarks were deemed to be making sustainable investments. (https://www.esma.europa.eu/sites/default/files/2023-04/Answers_to_questions_on_the_interpretation_of_Regulation_%28EU%29_20192088.PDF). Since the Sub-Fund aims to track the reference benchmark and reflect its composition as far as practical, it is likely that the actual allocation to sustainable investments will be significantly higher than 70%.

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. 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.

The Investment Manager also checks on a monthly basis that the Sub-Fund is meeting its targets for GHG emissions (50% lower than the parent index and a 7% year-on-year reduction) and green revenues, 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

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.

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, green revenues and exclusions
- 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.

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 parent index and a 7% year-on-year reduction) and green revenues (higher than parent index) and that any issuers excluded from the reference benchmark are also excluded from the Sub-Fund.

Monthly data on GHG emissions, plus annual periodic reports, as required under SFDR, will be published at www.tabulaim.com.