EU Sustainable Finance Disclosure Regulation (the SFDR)

Making Europe Great Again UCITS ETF (the Sub-Fund), a sub-fund of HANetf ICAV

Sub-Fund SFDR Website Disclosure

1 **SUMMARY**

No Sustainable Investment Objective	The Sub-Fund promotes environmental and social characteristics but does not have sustainable investment as its investment objective.
Environmental or social characteristics of the financial product	The Sub-Fund promotes adherence to and the conduct of business activities in accordance with global environmental and social norms by avoiding investment in companies that violate UNGC Principles or the OECD Guidelines. This helps to avoid investments that, at a minimum, do not meet social and environmental norms with regards to human rights, labour, and anti-corruption, as well as environmental degradation. The Sub-Fund also promotes: (i) human rights by avoiding investment in controversial weapons-related activities; (ii) health and avoidance of harm due to significant and well-documented public health risks associated with tobacco use; and (iii) climate change mitigation and avoidance of harm to the environment arising from the use of thermal coal. Specifically, the VettaFi Making Europe Great Again Index (the **Index**) excludes companies which: (i) violate the UNGC Principles or the OECD Guidelines; (ii) are linked to, or derive any percentage of their revenues from, controversial weapons, in particular, companies that are involved in the production, development or maintenance of anti-personnel mines, biological or chemical weapons, cluster munitions or depleted uranium; (iii) are linked to, or derive 5% or more of their revenues from, the manufacturing, distribution or sale of tobacco; and/or (iv) are linked to, or derive any percentage of their revenues from, the exploration, mining or refining of thermal coal (together, the **Exclusionary Criteria**).

Investment Strategy	The Sub-Fund will adopt a "passive management" investment strategy and will seek to employ a replication methodology, meaning as far as possible and practicable, it will invest in all of the securities in proportion to the weightings comprising the Index. The Index methodology excludes companies which do not meet the Exclusionary Criteria.
Proportion of Investments	The Sub-Fund invests at least 90% of its net assets in investments that are aligned with the environmental and social characteristics promoted by the Sub-Fund. Up to 10% of the Sub-Fund's investments are not aligned with these characteristics.
Monitoring of environmental or social characteristics	Companies that fail the screening process will be excluded from the Index Universe. The Investment Manager performs a regular assessment of the alignment of the Sub-Fund's environmental and social characteristics with the Index, which takes account of the good governance criteria embedded in the Index methodology. The Index is adjusted and rebalanced on a quarterly basis in January, April, July and October. Securities which do not meet the environmental and social characteristics will be removed from the Index.
Methodologies	The Sub-Fund employs a replication methodology, meaning as far as possible and practicable, it invests in all of the securities in proportion to the weightings comprising the Index, which is comprised of a global investable universe of securities of European headquartered publicly listed companies which derive more than 50% of revenues from one of the following segments: (i) Defence: companies involved in the manufacturing and development of defence equipment (aerospace, military armoured vehicles & tanks, weapon systems and missiles, munitions and accessories, electronics & mission systems, and naval ships) or defence technology applications. (ii) Energy: companies engaged in the exploration, production, refining, marketing, storage and/or transportation of oil, gas, coal and consumable fuels. It also includes companies engaged in oil and gas equipment and services. (iii) Infrastructure: companies involved in the building, designing, owning, management and/or operation of new or existing infrastructure. All companies involved in nearshoring are eligible for inclusion in the Index Universe. The Index Universe will include companies involved in transportation related industries within countries involved in nearshoring and industries in countries benefitting from nearshoring buildout. The Index promotes environmental and social characteristics by applying the Exclusionary Criteria.
Data sourcing and processing	The Investment Manager evaluates companies eligible for inclusion in the Index based on the Exclusionary Criteria. Companies for which an evaluation cannot be made due to insufficient and/or missing data will also be excluded from the Index Universe.
Limitations to methodologies and data	Information from third party data or research providers may be incomplete, inaccurate or unavailable. This in turn may result in the incorrect inclusion or exclusion of a company in the Sub-Fund.

Due Diligence	A due diligence process to identify eligible assets for investment by the Sub-Fund is integral to the selection methodology employed by the Investment Manager.
Engagement Policies	The current policy of the Manager in relation to Sub-Fund is not to exercise voting rights relating to instruments invested in by the Sub-Fund. The Investment Manager may engage directly with the companies invested in by the Sub Fund.
Designated Reference Benchmark	The Index has been designated as a reference benchmark to meet the environmental and social characteristics promoted by the Sub-Fund. Information on the Index can be found at https://www.vettafi.com/indexing/index/vfmega**.**

2 NO SUSTAINABLE INVESTMENT OBJECTIVE

The Sub-Fund promotes environmental and social characteristics but does not have sustainable investment as its investment objective.

3 ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Sub-Fund promotes environmental and social characteristics by seeking to track the Index. The Sub-Fund promotes:

(iv) human rights by avoiding investment in controversial weapons-related activities;

(v) health and avoidance of harm due to significant and well-documented public health risks associated with tobacco use; and

(vi) climate change mitigation and avoidance of harm to the environment arising from the use of thermal coal.

Specifically, the Index excludes companies on the basis of the Exclusionary Criteria.

4 INVESTMENT STRATEGY

The Sub-Fund will adopt a “passive management” investment strategy and will seek to employ a replication methodology, meaning as far as possible and practicable, it will invest in all of the securities in proportion to the weightings comprising the Index. The Index methodology excludes companies on the basis of the Exclusionary Criteria.

5 PROPORTION OF INVESTMENTS

The Sub-Fund invests at least 90% of its net assets in investments that are aligned with the environmental and social characteristics promoted by the Sub-Fund.

Up to 10% of the Sub-Fund's investments are not aligned with these characteristics. These investments may include ancillary liquid assets, money market instruments, investments in ETFs authorised as UCITS, futures, currency swaps and currency forwards. It may also include securities which no longer meet the social criteria described above but will not be removed from the Index until the next Index rebalance.

6 MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

Companies that fail the screening process will be excluded from the Index Universe. The Investment Manager performs a regular assessment of the alignment of the Sub-Fund’s environmental and social characteristics with the Index, which takes account of the good governance criteria embedded in the Index methodology, including when it may not be possible or practicable to purchase all of the securities in the Index, for example, due to lot size issues or local market restrictions which may apply in certain emerging or frontier markets.

The Index is adjusted and rebalanced on a quarterly basis in January, April, July and October. The Index seeks to ensure compliance with the Exclusionary Criteria at each balance or review date.

7 METHODOLOGIES

The Sub-Fund employs a replication methodology, meaning as far as possible and practicable, it invests in all of the securities in proportion to the weightings comprising the Index, which is comprised of a global investable universe of securities of European headquartered publicly listed companies which derive more than 50% of revenues from one of the following segments:

(iv) Defence: companies involved in the manufacturing and development of defence equipment (aerospace, military armoured vehicles & tanks, weapon systems and missiles, munitions and accessories, electronics & mission systems, and naval ships) or defence technology applications.

(v) Energy: companies engaged in the exploration, production, refining, marketing, storage and/or transportation of oil, gas, coal and consumable fuels. It also includes companies engaged in oil and gas equipment and services.

(vi) Infrastructure: companies involved in the building, designing, owning, management and/or operation of new or existing infrastructure.

All companies involved in nearshoring are eligible for inclusion in the Index Universe. The Index Universe will include companies involved in transportation related industries within countries involved in nearshoring and industries in countries benefitting from nearshoring buildout.

The Index promotes environmental and social characteristics by applying the Exclusionary Criteria. The Sub-Fund may, from time to time, use a sampling methodology under various circumstances.

8 DATA SOURCES AND PROCESSING

The Investment Manager evaluates companies eligible for inclusion in the Index based on ESG screens, with any companies violating any of the ESG screens excluded from the Index Universe. The ESG screening is based on research and data provided by the Index Provider. Companies for which an evaluation cannot be made due to insufficient and/or missing data will also be excluded from the Index Universe.

9 LIMITATIONS TO METHODOLOGIES AND DATA

Information from third party data or research providers may be incomplete, inaccurate or unavailable. This in turn may result in the incorrect inclusion or exclusion of a company in the Sub-Fund.

10 DUE DILIGENCE

A due diligence process to identify eligible assets for investment by the Sub-Fund is integral to the selection methodology employed by the Investment Manager.

11 ENGAGEMENT POLICIES

The current policy of the Manager in relation to Sub-Fund is not to exercise voting rights relating to instruments invested in by the Sub-Fund. The Investment Manager may engage directly with the companies invested in by the Sub Fund.

12 WHERE AN INDEX IS DESIGNATED AS A REFERENCE BENCHMARK TO ATTAIN THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT, DESIGNATED REFERENCE BENCHMARK

The Index has been designated as a reference benchmark to meet the social characteristics promoted by the Sub-Fund. Information on how the Index is aligned with the social characteristics promoted by the Sub-Fund, including

the input data, methodologies used to select those data, the rebalancing methodologies and how the Index is calculated can be found here: https://www.vettafi.com/indexing/index/vfmega.