EU Sustainable Finance Disclosure Regulation (the SFDR) – ODDO BHF US Equity Active UCITS ETF (the Sub-Fund), a sub-fund of HANetf ICAV

Sub-Fund Website Disclosure

1 SUMMARY

No Sustainable Investment Objective	The Sub-Fund promotes environmental and social characteristics but does not have sustainable investment as its objective.
Environmental or social characteristics of the financial product	The Sub-Fund promotes: (1) climate transition (i.e. a reduction in carbon emissions); (2) natural capital (i.e. the protection of biodiversity and reduction of environmental damage); and (3) human rights and human capital (i.e. health and safety, human capital development, labour management, community relations, privacy and data security and product safety and quality).

Investment Strategy	The Sub-Fund is actively managed. In order to achieve its investment objective, the Sub-Fund will invest, in a manner consistent with the UCITS Regulations and Central Bank requirements, at least, 70% of its net assets in equities of the S&P 500 Index (USD, NR) (the **Benchmark**) and up to 30% of its net assets in investment grade fixed or floating rate bonds issued by corporate or sovereign issuers. An investment grade rating is a classification of BBB- or above by Standard & Poor or the deemed equivalent by ODDO BHF Asset Management SAS (the **Investment Manager**) or the Investment Manager's internal rating. The selection of equity securities for the Sub-Fund is performed using the Investment Manager's proprietary quantitative trend-following model. The portfolio construction process is optimised in order to build a high-momentum US equity portfolio subject to various risk management constraints.
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	The Investment Manager's Responsible Investment Policy sets out the Investment Manager's definition and assessment of good corporate governance. Analysis of good corporate governance practices is based on the quality of the management team, the strategy for sustainable development, the rights of minority shareholders, anti-corruption practices, track record and other criteria. The investment strategy screens companies for compliance with UN Global Compact principles. Companies for which a severe violation is detected in the screening process and confirmed after an internal due diligence will be excluded from the selection and any companies for which an evaluation cannot be made due to insufficient and/or missing information or data will also be excluded. A check is carried out on whether companies have introduced a sustainability strategy or have set corresponding targets. If so, further analysis is performed on the measures implemented to achieve these targets, who is in charge and whether there is a link between achieving these targets and executive remuneration.

Methodologies	The ESG criteria is taken into consideration through an approach which can be broken down into two stages. (1) The Sub-Fund applies the common exclusion framework as detailed in the Investment Manager's exclusion policy, which is available at am.oddo-bhf.com. The exclusions are the following: non-conventional weapons, coal mining, coal power, coal development projects, tobacco, unconventional oil and gas, arctic exploration, governance and international norms and conventions and biodiversity. (2) The Sub-Fund then applies the MSCI ESG Ratings. MSCI uses a rules-based methodology by assigning issuers an industry-relative letter rating from AAA to CCC based on how well they manage sustainability risks and opportunities (those relevant to the environmental and social characteristics set out above being: (1) Climate transition: carbon emissions, climate change vulnerability, opportunities in cleantech, opportunities in green building, and opportunities in renewable energy; (2) Natural capital: biodiversity and land use, raw material sourcing, and water stress; and (3) Human rights and human capital: Health and safety, human capital development, labour management, community relations, privacy and data security and product safety and quality) relative to their peers. AAA is the best rating on the rating scale and CCC is the worst.
Data sourcing and processing	The Investment Manager employs a quantitative trend-following model which rates US equities using a momentum strategy by analysing extensive historical financial markets data to identify stable momentum trends in the US equity market. The Investment Manager will consider current and future sustainability activities of issuers and sustainability opportunities/risks when making investment decisions, as well as the significant negative impact of investment decisions on sustainability factors. This is based on internal research and the use of data and research from third parties.
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 to not 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	N/A

2 NO SUSTAINABLE INVESTMENT OBJECTIVE

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

3 ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Sub-Fund promotes: (1) climate transition (i.e. a reduction in carbon emissions); (2) natural capital (i.e. the protection of biodiversity and reduction of environmental damage); and (3) human rights and human capital (i.e. health and safety, human capital development, labour management, community relations, privacy and data security and product safety and quality).

4 INVESTMENT STRATEGY

The Sub-Fund is actively managed. In order to achieve its investment objective, the Sub-Fund will invest, in a manner consistent with the UCITS Regulations and Central Bank requirements, at least, 70% of its net assets in equities of the Benchmark and up to 30% of its net assets in investment grade fixed or floating rate bonds issued by corporate or sovereign issuers. An investment grade rating is a classification of BBB- or above by Standard & Poor or the deemed equivalent by the Investment Manager or the Investment Manager's internal rating.

The selection of equity securities for the Sub-Fund is performed using the Investment Manager's proprietary quantitative trend-following model. The portfolio construction process is optimised in order to build a high-momentum US equity portfolio subject to various risk management constraints.

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.

6 MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The Investment Manager's Responsible Investment Policy sets out the Investment Manager's definition and assessment of good corporate governance. Analysis of good corporate governance practices is based on the quality of the management team, the strategy for sustainable development, the rights of minority shareholders, anti-corruption practices, track record and other criteria.

The investment strategy screens companies for compliance with UN Global Compact principles. Companies for which a severe violation is detected in the screening process and confirmed after an internal due diligence will be excluded from the selection and any companies for which an evaluation cannot be made due to insufficient and/or missing information or data will also be excluded.

A check is carried out on whether companies have introduced a sustainability strategy or have set corresponding targets. If so, further analysis is performed on the measures implemented to achieve these targets, who is in charge and whether there is a link between achieving these targets and executive remuneration.

7 METHODOLOGIES

The ESG criteria is taken into consideration through an approach which can be broken down into two stages.

(1) The Sub-Fund applies the common exclusion framework as detailed in the Investment Manager's exclusion policy, which is available at am.oddo-bhf.com. The exclusions are the following: non-conventional weapons, coal mining, coal power, coal development projects, tobacco, unconventional oil and gas, arctic exploration, governance and international norms and conventions and biodiversity.

(2) The Sub-Fund then applies the ESG ratings provided by the external data provider, MSCI (the **MSCI ESG Ratings**). The MSCI uses a rules-based methodology by assigning issuers an industry-relative letter rating from AAA to CCC based on how well they manage sustainability risks and opportunities (those relevant to the environmental and social characteristics set out above being: (1) Climate transition: carbon emissions, climate change vulnerability, opportunities in cleantech, opportunities in green building, and opportunities in renewable energy; (2) Natural capital: biodiversity and land use, raw material sourcing, and water stress; and (3) Human rights and human capital: Health and safety, human capital development, labour management, community relations, privacy and data security and product safety and quality) relative to their peers. AAA is the best rating on the rating scale and CCC is the worst.

8 DATA SOURCES AND PROCESSING

The Investment Manager employs a quantitative trend-following model which rates US equities using a momentum strategy by analysing extensive historical financial markets data to identify stable momentum trends in the US equity market.

The Investment Manager will consider current and future sustainability activities of issuers and sustainability opportunities/risks when making investment decisions, as well as the significant negative impact of investment decisions on sustainability factors. This is based on internal research and the use of data and research from third parties.

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

Direct engagement with selected companies is not part of the Sub-Fund's environmental and social investment strategy. The current policy of the Manager in relation to Sub-Fund is to not 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

N/A