EU Sustainable Finance Disclosure Regulation (the SFDR) – ODDO BHF Global 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 Investment Manager will invest in the shares or units of collective investment schemes, being UCITS and ETFs, (**Target Funds**) in a manner consistent with the UCITS Regulations and Central Bank requirements, in order to provide indirect exposure to a diversified global equity portfolio. The Target Funds which the Sub-Fund may invest in will be established in the EU. Such ETFs will also be authorised as UCITS. The Sub-Fund will exclude Target Funds on the basis of environmental, social and governance (**ESG**) criteria, using the ESG ratings produced and monitoring of controversies by MSCI (the **MSCI ESG Rating**) or another source of information deemed acceptable to ODDO BHF Asset Management SAS (the **Investment Manager**). The MSCI ESG Rating methodology uses a rules-based methodology by assigning companies an industry-relative letter rating from AAA to CCC based on how well they manage these risks and opportunities relative their peers. The Sub-Fund will: 1. maintain a weighted average MSCI ESG score that is at all times better than the 100% MSCI ACWI Net Total Return EUR Index (the **Benchmark**). The Sub-Fund does not target a specific level of outperformance in terms of this rating compared to that of the Benchmark (i.e. the margin by which the weighted average MSCI ESG score of the Sub-Fund will be better than that of the Benchmark may ultimately be minimal); and 2. exclude Target Funds which do not have a minimum MSCI ESG Fund Rating of BB; and 3. invest at least 75% of its net assets in Target Funds with a minimum MSCI ESG Fund Rating of BB and which fall within scope of Article 8 and/or 9 of the SFDR and which themselves promote certain of those characteristics or have (a) relevant sustainable investment objective(s).
Proportion of Investments	The Sub-Fund invests at least 75% of its net assets in investments that are aligned with the environmental and social characteristics promoted by the Sub-Fund. Up to 25% of the Sub-Fund's investments are not aligned with these characteristics.

Monitoring of environmental or social characteristics	The Investment Manager follows its Responsible Investment Policy, which describes its definition and assessment of good governance practices. This involves analysis, based on the application of MSCI data, of business ethics, the quality of the management and supervisory bodies, tax transparency and the sustainability strategy of Target Funds for which relevant data is available. The Sub-Fund will invest at least 75% of its net assets in Article 8 and/or 9 Target Funds with an MSCI ESG Rating of BB, which apply their own definition and assessment of good governance in accordance with SFDR requirements (which are applicable to them) and the Investment Manager will ensure these Target Funds have committed to comply with these requirements. With regard to other Target Funds in which the Sub-Fund will invest, for those with a minimum MSCI ESG Fund Rating of BB, their good governance practices are assessed using the relevant MSCI data. The good governance practices of Target Funds which do not yet have a MSCI ESG Fund Rating (for example newly launched Target Funds) are assessed as soon as the relevant MSCI data becomes available.
Methodologies	The Sub-Fund applies the MSCI ESG Ratings. MSCI uses a rules-based methodology by assigning funds (including ETFs) an industry-relative letter rating from AAA to CCC based on how well their underlying holdings 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 analyses extensive historical financial markets data to identify stable momentum trends and suggest allocations to relevant regions. The Investment Manager will consider current and future sustainability activities of Target Funds and sustainability opportunities / risks when making investment decisions. 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 Investment Manager will invest in the shares or units of Target Funds, in a manner consistent with the UCITS Regulations and Central Bank requirements, in order to provide indirect exposure to a diversified global equity portfolio. The Target Funds which the Sub-Fund may invest in will be established in the EU. Such ETFs will also be authorised as UCITS.

The Sub-Fund will exclude Target Funds on the basis of ESG criteria, using the ESG ratings produced and monitoring of controversies by MSCI or another source of information deemed acceptable to the Investment Manager. The MSCI ESG Rating methodology uses a rules-based methodology by assigning companies an industry-relative letter rating from AAA to CCC based on how well they manage these risks and opportunities relative their peers. The Sub-Fund will exclude securities which do not have a minimum rating of BB.

The Sub-Fund will seek to provide indirect exposure to equities within a range of 80% to 100% of net assets.

The Sub-Fund will measure its performance against the Benchmark. For the avoidance of doubt, the Sub-Fund will not seek to track the performance of, or replicate, the Benchmark. Rather, the Sub-Fund will provide indirect exposure to a diversified portfolio of equity securities.

5 PROPORTION OF INVESTMENTS

The Sub-Fund invests at least 75% of its net assets in investments that are aligned with the environmental and social characteristics promoted by the Sub-Fund.

Up to 25% of the Sub-Fund's investments are not aligned with these characteristics. These investments may include investments such as 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 follows its Responsible Investment Policy, which describes its definition and assessment of good governance practices. This involves analysis, based on the application of MSCI data, of business ethics, the quality of the management and supervisory bodies, tax transparency and the sustainability strategy of Target Funds for which relevant data is available. The Sub-Fund will invest at least 75% of its net assets in Article 8 and/or 9 Target Funds with an MSCI ESG Rating of BB, which apply their own definition and assessment of good governance in accordance with SFDR requirements (which are applicable to them) and the Investment Manager will ensure these Target Funds have committed to comply with these requirements. With regard to other Target Funds in which the Sub-Fund will invest, for those with a minimum MSCI ESG Fund Rating of BB, their good governance practices are assessed using the relevant MSCI data. The good governance practices of Target Funds which do not

yet have a MSCI ESG Fund Rating (for example newly launched Target Funds) are assessed as soon as the relevant MSCI data becomes available.

7 METHODOLOGIES

The Sub-Fund applies the MSCI ESG Ratings. MSCI uses a rules-based methodology by assigning funds (including ETFs) an industry-relative letter rating from AAA to CCC based on how well their underlying holdings 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 analyses extensive historical financial markets data to identify stable momentum trends and suggest allocations to relevant regions.

The Investment Manager will consider current and future sustainability activities of Target Funds and sustainability opportunities / risks when making investment decisions. 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