

Pre-contractual disclosure for financial products referred to in Article 8, paragraphs 1, 2 and 2a of Regulation (EU) 2019/2088 and Article 6, first paragraph of Regulation (EU) 2020/852

Product name: Janus Henderson Tabula Japan High Conviction Equity UCITS ETF

Legal entity identifier: 635400BDHBCI7GIXDC10

Environmental and/or social characteristics

Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system, establishing a list of environmentally sustainable economic activities. For the time being, it does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

- Yes
- It will make a minimum of sustainable investments with an environmental objective: ___%
- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- It will make a minimum of sustainable investments with a social objective: ___%
- No
- It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- with a social objective
- It promotes E/S characteristics, but will not make any sustainable investments

Sustainability indicators

measure how the sustainable objectives of this financial product are attained.

Principal adverse impacts

are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

What environmental and/or social characteristics are promoted by this financial product?

The Sub-Fund promotes support for the UN Global Compact principles (which cover matters including human rights, labor, corruption, and environmental pollution).

Minimizing exposure to issuers with the worst ESG risk ratings, those rated below BB by MSCI or equivalent.

Engagement with issuers who are considered ESG laggards (rated below BB by MSCI or equivalent) to improve their practices.

The Fund also seeks to avoid investments in certain activities with the potential to cause harm to human health and wellbeing by applying binding exclusions.

The Fund does not use a reference benchmark to attain its environmental or social characteristics.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

- Engagements with issuers held with a UNGC status of "fail". The % of the portfolio subject to an engagement plan.
- At least 80% of the Sub-Funds portfolio will be invested in issuers with an ESG rating of BB or above by MSCI or equivalent.
- Engagements with issuers held with an ESG rating below BB. The % of the portfolio subject to an engagement plan.
- ESG Exclusionary screens – see "What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?" below for details on the exclusions.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Not applicable

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

As at the date of this Prospectus, The Investment Manager considers the following principal adverse impacts on sustainability factors (“PAIs”):

- Violations of UNGC and OECD via engagement with violating issuers (PAI 10)
- Exposure to controversial weapons via exclusionary screens (PAI 14)

The Sub-Fund will make information available on how it has considered the PAIs in its periodic report.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management

What investment strategy does this financial product follow?

The Sub-Fund aims to provide capital growth over the long term by investing in a concentrated, actively managed portfolio of shares in Japanese Companies.

The Investment Manager seeks to achieve long-term capital appreciation by investing in undervalued, cash generative and capital-efficient businesses, which can create value for Investors. The focus is on stock selection, which is a result of rigorous, fundamental research

structures, employee relations, remuneration of staff and tax compliance.

and a strict valuation discipline, and incorporates strong risk management. The Sub-Fund will have a diversified portfolio of companies across a variety of sectors, which the Investment Manager believes has the potential to perform well over time.

Investors should read this section in conjunction with the Sub-Fund's investment strategy (as set out in the supplement for the Sub-Fund under the heading "Investment Objective and Policy").

The binding elements of the investment strategy described below that are implemented as screens are coded into the compliance module of an order management system utilising third-party data provider(s) on an ongoing basis. The exclusionary screens are implemented on both a pre and post trade basis enabling any proposed transactions in an excluded security to be blocked and to identify any changes to the status of holdings when third-party data is periodically updated.

Engagement plans are agreed and periodically reviewed for engagement activity including progress against the engagement plan during the 24-month period.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Investment manager will:

- Engage with issuers in breach of UNGC principles and will only invest or continue to be invested if it considers through such engagement that they are on track to improve. If the issuer does not achieve a "pass" rating within 24 months, it will divest, and screens will be applied to exclude the issuer. Further details on the Investment Manager's engagement policy can be found here <https://cdn.janushenderson.com/webdocs/2024%2520Responsible%2520Investment%2520Policy.pdf>.
- Apply screens to ensure that of the portfolio invested in corporate issuers of equities, at least 80% have an ESG risk rating of BB or higher (by MSCI – <https://www.msci.com/>, or equivalent).
- Consider companies with a rating of B or CCC to be ESG laggards. It will engage with such issuers and will only invest or continue to be invested if it considers through such engagement that they are on track to improve and that the rating of the issuer will be upgraded. If the issuer's rating is not upgraded within 24 months, it will divest, and screens will be applied to exclude the issuer. Further details on the Investment Manager's engagement policy can be found here <https://cdn.janushenderson.com/webdocs/2024%2520Responsible%2520Investment%2520Policy.pdf>.
- Apply screens to exclude companies with 10% or more revenue generated from gambling, military contracting, small arms, thermal coal, or tobacco and 5% or more revenue generated from adult entertainment.

The Sub-Fund also applies the Investment Manager's Firmwide Exclusions Policy (the "Firmwide Exclusions Policy"), which includes controversial weapons:

"This applies to all the investment decisions made by the Investment Manager. The Firmwide Exclusions Policy may be updated from time to time. Presently, investment is not permitted in entities involved in the current manufacture of, or minority shareholding of 20% or greater in a manufacturer of controversial weapons, namely:

- Cluster munitions
- Anti-Personnel mines
- Chemical weapons
- Biological weapons

Classification of issuers is primarily based on activity identification fields supplied by the Investment Manager's third-party ESG data providers. This classification is subject to an investment research override in cases where sufficient evidence exists that the third-party data field is not accurate or appropriate. In any scenario where a portfolio position is identified as not meeting this exclusion criteria for any reason (legacy holding, transition holding, etc.) the Investment Manager shall be granted 90 days to review or challenge the classification of the issuer if appropriate. After this period, in the event an investment research override is not granted divestment is required immediately under normal market trading circumstances."

The Investment Manager may only invest in companies that would be excluded by the screens described above if the Investment Manager believes, based on its own research and as approved by its ESG Oversight Committee, that the third-party data used to apply the exclusions is insufficient or inaccurate.

The Investment Manager may consider that the data is insufficient or inaccurate if, for example, the third-party data provider research is historic, vague, based on out-of-date sources, or the investment manager has other information to make them doubt the accuracy of the research.

If the Investment Manager wishes to challenge the third-party data, then the challenge is presented to a cross functional ESG Oversight Committee who must sign off on the "override" of the third-party data.

If a third-party data provider does not provide research on a specific issuer or excluded activity, the Investment Manager may invest if, through its own research, it is satisfied that the issuer is not involved in the excluded activities.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate.

What is the policy to assess good governance practices of the investee companies?

The companies in which investments are made are assessed by the Investment Manager to follow good governance practices.

The good governance practices of investee companies are assessed prior to making an investment and periodically thereafter in accordance with the Sustainability Risk Policy ("Policy"). The Policy sets minimum standards against which investee companies will be assessed and monitored by the Investment Manager prior to making an investment and on an ongoing basis. Such standards may include, but are not limited to: sound management structures, employee relations, remuneration of staff and tax compliance.

The Policy can be found at www.janushenderson.com/esg-governance.

In addition, the Investment Manager is a signatory to the UN Principles for Responsible Investment (UNPRI). As a signatory, the good governance practices of investee companies are also assessed by having regard to the UNPRI principles prior to making an investment and periodically thereafter.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

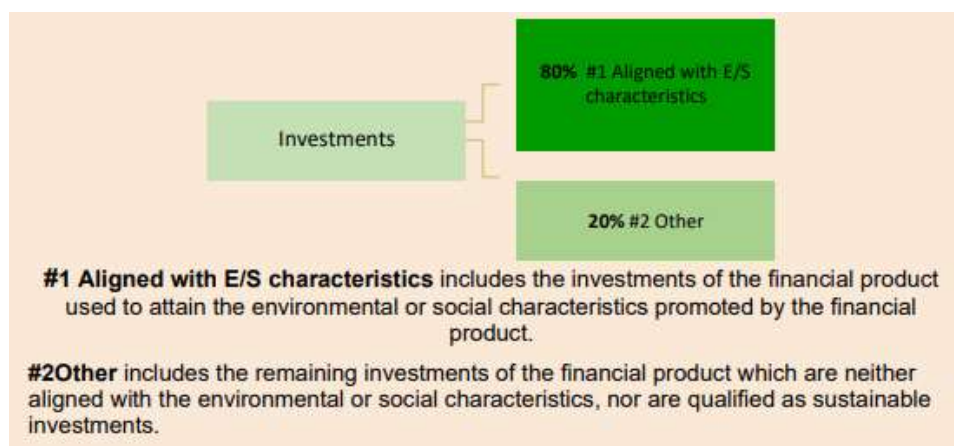
- Turnover reflecting the share of revenue from green activities of investee companies
- Capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy
- Operational expenditure (OpEx) reflecting green operational activities of investee companies

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to fully renewable power or low-

What is the asset allocation planned for this financial product?

A minimum of 80% of the investments of the financial product are used to meet the environmental or social characteristics promoted by the Fund.

The remaining investments, which are not used to meet the environmental or social characteristics, relate to cash held as ancillary liquidity.



How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

Not Applicable – the Fund does not use derivatives to attain its environmental or social characteristics

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The proportion of investments in the Fund which are aligned with the Taxonomy is expected to be 0%. Although the EU Taxonomy provides an ambitious framework to determine the environmental sustainability of economic activities, the EU Taxonomy does not comprehensively cover all industries and sectors, or all environmental objectives. The Investment Manager uses its own methodology to determine whether investments selected for the Sub-Fund are promoting environmental characteristics in accordance with the SFDR rules

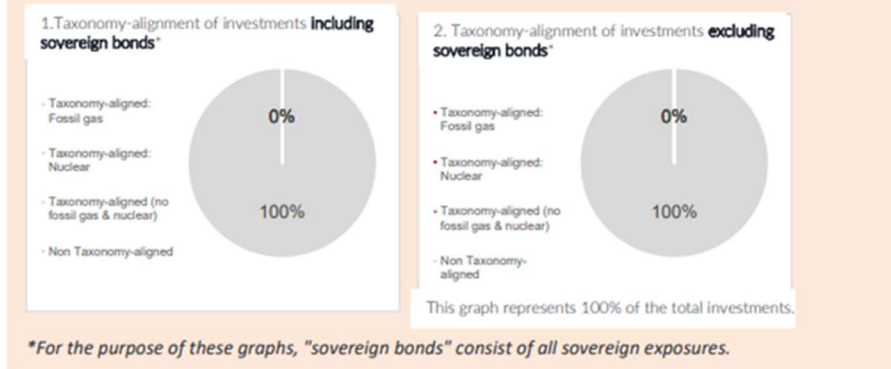
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?¹

Yes (specify below, and details in the graphs of the box)

In fossil gas In nuclear energy

No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first paragraph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What is the minimum share of investments in transitional and enabling activities?

Not applicable

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy*?

Not applicable

What is the minimum share of socially sustainable investments

Not applicable

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

Other assets may include cash or cash equivalents. No minimum environmental or social safeguards are applied to.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable

How does the designated index differ from a relevant broad market index?

Not applicable

Where can the methodology used for the calculation of the designated index be found?

Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://www.tabulaim.com/products/>