



HANetf Management Limited

## Shareholder Engagement Statement

Under the Shareholder Rights Directive II (“**SRD II**”), where a UCITS Management Company invests on behalf of investors in shares traded on an EU regulated market there is a requirement to have a shareholder engagement policy or to publicly explain why that policy is not in place.

Given the nature, size and complexity and the investment strategies of the Sub-Funds managed by HANetf Management Limited (the “**Manager**”), the Manager does not currently have a shareholder engagement policy for the following reasons:

- The majority of the Sub-funds managed by the Manager employ a passive, rules-based methodology and therefore the investment universe, and rules that drive the composition of the Sub-Funds, are systematic and accordingly the investment managers of the Sub-Funds do not actively engage with the companies in their portfolios.
- Where the Sub-fund is actively managed, the Sub-fund will adopt the shareholder engagement policy of the investment manager of that actively managed Sub- Fund.
- Given many of the Sub-funds have all been recently launched and are not significant in terms of assets under management, the Manager does not generally vote proxies. The Manager’s ability to influence outcomes with its relatively small voting powers are very limited.
- HANetf ICAV is a white label ETF provider and the Manager manages and operates Sub-Funds on its platform for third parties who will provide significant input into the voting policy for their Sub-Fund is this is a key factor for the underlying theme. One Sub-Fund, iClima Global Decarbonisation Enablers UCITS ETF (CLMA) currently outsources proxy voting to a third party service provided by Glass Lewis.

The Manager will continue to monitor developments in this area and depending on the nature of the Sub-funds that are launched, it may revise its policy with regards to specific Sub-Funds. .

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