

Funds-Axis
UCITS- Core (all jurisdictions)
Rule UCITS16Issuer Review and Testing



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# **Testing Approach**

- 1. Activate Dummy Sandbox Schemes in FundWare for testing purposes; SB0 SB7
- 2. Upload test data to these schemes
- 3. Funds-Axis to apply UCITS regulatory rules to these test schemes;
  - a. Generate a minimum of 1 breach and 1 pass result per UCITS rule
  - b. To validate a minimum of 1 breach and 1 pass result per UCITS rule
- 4. Funds Axis will provide documentation providing explanation of regulatory rule results



# UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body

# Rule Setup Details

| Rule Summary      |   |            |  |  |  |
|-------------------|---|------------|--|--|--|
| Rule Category     | UCITS – CORE (ALL Jurisdictions)                |            |  |  |  |
| Rule Sub-Category | 5. Diversification – Transferable<br>Securities |            |  |  |  |
| Asset Selection   | Asset Category                                  | All Assets |  |  |  |
| Asset Selection   | Asset Type Group                                | N/A        |  |  |  |
| Asset Selection   | Asset Type                                      | N/A        |  |  |  |

|                 | Rule Custom Attributes |   |  |  |  |  |  |
|-----------------|------------------------|---|--|--|--|--|--|
| RCA. Conditions | UCITS Asset Types      | Derivative on a Security Derivatives on Basket for Look Through Fund – OpenClosedNotDefined Loans Money Market Instruments Mortgage Rights Security - Closed End Fund Security - Standard Security Security - Structured Product not embedding a derivative Security Structured Product embedding a derivative Warrants |  |  |  |  |  |
| RCA. Conditions | Is GOPS                | No  |  |  |  |  |  |

| Black/ White List |               |           |  |  |
|-------------------|---------------|-----------|--|--|
| List Conditions   | Covered Bonds | *Exclude* |  |  |

| Rule Conditions  |  |                                  |  |  |  |  |
|------------------|--|----------------------------------|--|--|--|--|
| Rule Conditions  | Holding Level                              | UL Issuer                        |  |  |  |  |
| Rule Conditions  | Rule Level                                 | In Scheme                        |  |  |  |  |
| Rule Conditions  | Aggregator (Base Value in FW Rules Wizard) | Underlying Commitment Exposure   |  |  |  |  |
| Rule Conditions  | Breach Condition                           | > 10%                            |  |  |  |  |
| Rule Conditions  | Pass Condition                             | = 10%</td                        |  |  |  |  |
| Rule Conditions  | Denominator                                | % of Instrument - Market Capital |  |  |  |  |
| Where Conditions | Pass Condition                             | N/A                              |  |  |  |  |
| Where Conditions | Breach Condition                           | N/A                              |  |  |  |  |
| Where Conditions | Denominator                                | N/A                              |  |  |  |  |



UCITS16Issuer: Rule Results

# **Results:**

1 of 2 Sandbox schemes are passing UCITS16

#### Cause:

This rule considers the eligibly of securities and MMI. The maximum amount permissible per a single issuer is 10%; if greater than 10% of securities or MMI is held on any one issuer, then this issuer will breach UCITS16Issuer.

This rule uses commitment exposure as a measurement rather than Market Value as it allows for a more representative view of derivatives for the purpose of UCITS16Issuer.

Commitment Exposure is calculated by the below formula:

(Quantity x Underlying Price x Delta x Multiplier)/ Underlying FX Rate



# **Testing**

# Example 1: Breach Result

<u>Test Example 1:</u> Scheme: SB5 – Sandbox MMI Fund

Rule Result: Failed

Test Result: Success

# **FundWare Investment Compliance Result:**

#### SB5 - Sandbox MMI Fund

Date: 01 June 2018 Valuation Date: -

Scheme NAV in Base Currency: 11,137,506,461.12

|   | Breach ID | Rule  | Status | Breach<br>Days | Exposure  |
|---|-----------|---|--------|----------------|-----------|
|   |           | UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities            |        |                |           |
| ⊟ | 32070-N   | UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body | Failed | 1              | 26.5112 % |
|   |           | BBG001FF6SY2 - Canadian Imperial Bank of Commerce   |        |                | 26,5112 % |
|   |           | BBG001FKBSR3 - Wells Fargo Bank NA  |        |                | 13,5192 % |

#### **FundWare Holding Export Report:**

The Rule Result shown above matches the below extract taken from FundWare: The below Securities have applicable UCITS Asset Types for the purpose of UCITS16Issuer. Each Security is marked as having a non GOPS issuer; and in aggregate, there is greater than 10% exposure to each issuer.

|                     |                         |                              | RCA.Is | List.Covered |            |             |
|---------------------|-------------------------|------------------------------|--------|--------------|------------|-------------|
| UL Issuer           | Security                | RCA.UCITS Asset Types        | GOPS   | Bonds        | Exposure % | % Of Assets |
| Canadian Imperial   | CANADIAN IMPERIAL       |                              |        |              |            |             |
| Bank of Commerce    | BANK OF COMMERCE        | Money Market Instruments     | No     | No           | 16.625     | 16.6252     |
| Canadian Imperial   |                         |                              |        |              |            |             |
| Bank of Commerce    | CAN IMP FLT CD 4/2/19   | Money Market Instruments     | No     | No           | 5.3933     | 5.3933      |
| Canadian Imperial   |                         |                              |        |              |            |             |
| Bank of Commerce    | CDN Imperial 06/08/2018 | Money Market Instruments     | No     | No           | 4.4927     | 4.4927      |
|                     |                         |                              |        |              |            |             |
|                     |                         |                              |        | Sub Total    | 26.5112    | 26.5112     |
|                     | WELLS FARGO BANK        |                              |        |              |            |             |
| Wells Fargo Bank NA | NA2.402513/11/2018      | Security - Standard Security | No     | No           | 13.5192    | 13.5192     |
|                     |                         |                              |        | Sub Total    | 13.5192    | 12 5102     |
|                     |                         |                              |        | Sub rotal    | 13.5192    | 13.5192     |

# **High Level Holdings Overview:**

The fund is made up of the below assets:

Note: The table below has been filtered on assets applicable to rule UCITS16Issuer.

|                         |                                |                          |             | List.Covered |            |              |
|-------------------------|--------------------------------|--------------------------|-------------|--------------|------------|--------------|
| UL Issuer               | Security                       | RCA.UCITS Asset Types    | RCA.Is GOPS | Bonds        | Exposure % | S% Of Assets |
|                         | ABN AMRO BANK NV (AMSTERDAM    |                          |             |              |            |              |
| ABN AMRO Group NV       | BRANCH                         | Money Market Instruments | No          | No           | 1.166      | 1.1661       |
| ABN AMRO Group NV       | ABN AMRO 0% CD                 | Money Market Instruments | No          | No           | 0.3139     | 0.3139       |
| Agence Francaise de     | AGENCE CENTRALE DES ORGANISMES |                          |             |              |            |              |
| Developpement           | 0.0% 19/07/2018                | Money Market Instruments | Yes         | No           | 0.8966     | 0.8967       |
| Australia & New Zealand | AUSTRALIA AND NEW ZEALAND      |                          |             |              |            |              |
| Banking Group Ltd       | BANKING                        | Money Market Instruments | No          | No           | 0.6735     | 0.6735       |



|   | BANK OF MONTREAL (LONDON                                |  |          | 1        | <u> </u>         |                |
|---|---|--|----------|----------|------------------|----------------|
| Bank of Montreal                        | BRANCH)   | Money Market Instruments                           | No       | No       | 1.0341           | 1.034          |
| Bank of Montreal                        | BANK OF MONTREAL FTL VAR CD 06/10/2018                  | Money Market Instruments                           | No       | No       | 0.2695           | 0.2696         |
| Bank of Nova<br>Scotia/Houston          | BANK OF NOVA SCOTIA<br>HOUS2.1527522/08/2018            | Security - Standard Security                       | No       | No       | 0.6744           | 0.6745         |
| Banque et Caisse<br>d'Epargne de l'Etat | BANQUE ET CAISSE EPARGNE                                | Money Market Instruments                           | No       | No       | 0.8902           | 0.890          |
| Becton Dickinson and Co                 | CR IND 0% CD 17/07/18                                   | Money Market Instruments                           | No       | No       | 0.7603           | 0.760          |
| BHP Group PLC                           | BHP GROUP PLC   | Security - Standard Security                       | No       | No       | 0.4005           | 0.400          |
| Caisse des Depots et<br>Consignations   | CAISSE DES DEPOTS ET CONSIGNATIONS                      | Money Market Instruments                           | Yes      | No       | 0.8936           | 0.893          |
| Canadian Imperial Bank                  | CANADIAN IMPERIAL BANK OF                               | ·  |          |          |                  |                |
| of Commerce<br>Canadian Imperial Bank   | COMMERCE CANADIAN IMPERIAL BANK OF                      | Money Market Instruments                           | No       | No       | 16.625           | 16.625         |
| of Commerce Canadian Imperial Bank      | COMMERCE  | Money Market Instruments                           | No       | Yes      | 8.9795           | 8.979          |
| of Commerce                             | CAN IMP FLT CD 4/2/19                                   | Money Market Instruments                           | No       | No       | 5.3933           | 5.393          |
| Canadian Imperial Bank of Commerce      | CDN Imperial 06/08/2018                                 | Money Market Instruments                           | No       | No       | 4.4927           | 4.492          |
| Commonwealth Bank of<br>Australia       | CMNW BK AUS FLT CD 4/2/19                               | Money Market Instruments                           | No       | No       | 0.4943           | 0.494          |
| Commonwealth Bank of                    |   | •  |          |          |                  |                |
| Australia Commonwealth Bank of          | CMNWLTH FLT CD 10/1/19 COMMONWEALTH BANK OF             | Money Market Instruments                           | No       | No       | 0.3601           | 0.360          |
| Australia                               | AUSTRALIA (LO   | Money Market Instruments                           | No       | No       | 0.3595           | 0.359          |
| Commonwealth Bank of<br>Australia       | COMWLTH BK OF FLT CD 05/11/2018                         | Money Market Instruments                           | No       | No       | 0.2695           | 0.269          |
| COMMONWEALTH BANK OF AUSTRALIA, [CTBA]  | COMMONWEALTH BANK OF<br>AUSTRALIA (LO                   | Money Market Instruments                           | No       | No       | 0.2694           | 0.269          |
| Cooperatieve Rabobank                   | COOPERATIEVE RABOBANK UA                                | Manay Market Instruments                           | No       | No       | 1 267            | 1 267          |
| UA<br>Cooperatieve Rabobank             | (LONDON B   | Money Market Instruments                           | No       | No       | 1.267            | 1.267          |
| UA/NY<br>Cooperatieve Rabobank          | COOP RABO FLT CD 1/2/19                                 | Money Market Instruments                           | No       | No       | 0.4044           | 0.404          |
| UA/NY                                   | Rabo FLT CD 8/8/18                                      | Money Market Instruments                           | No       | No       | 0.4043           | 0.404          |
| Credit Suisse AG                        | CREDIT SUISSE AG (LONDON BRANCH)                        | Money Market Instruments                           | No       | No       | 1.3025           | 1.302          |
| Credit Suisse AG                        | Cr Suisse FLT CD 13/8/18                                | Money Market Instruments                           | No       | No       | 0.494            | 0.49           |
| Credit Suisse AG/London                 | CREDIT SUISSE AG (LONDON BRANCH)                        | Money Market Instruments                           | No       | No       | 0.449            | 0.449          |
| Danske Bank A/S                         | DANSKE BANK A/S (LONDON BRANCH)                         | Money Market Instruments                           | No       | No       | 1.7023           | 1.702          |
| Danske Bank A/S DekaBank Deutsche       | DANSKE BANK A/S LONDON BRANCH                           | Money Market Instruments                           | No       | No       | 0.4025           | 0.402          |
| Girozentrale                            | DEKABANK DEUTSCHE GIROZENTRALE                          | Money Market Instruments                           | No       | No       | 0.9745           | 0.974          |
| DNB Bank ASA                            | DNB NOR BANK ASA (LONDON<br>BRANCH)                     | Money Market Instruments                           | No       | No       | 0.6743           | 0.674          |
| DNB Bank ASA                            | DNB BANK ASA  | Money Market Instruments                           | No       | No       | 0.4471           | 0.447          |
| DND Norden IV                           | DNB NOR BANK ASA (LONDON                                | Manay Market Instruments                           | No       | No       | 0.6380           | 0.63           |
| DNB Norden IV DZ Bank AG Deutsche       | BRANCH)   | Money Market Instruments                           | No       | No       | 0.6289           | 0.62           |
| Zentral-<br>Genossenschaftsbank         | DZ BANK AG DEUTSCHE ZENTRAL<br>GENOSS                   | Money Market Instruments                           | No       | No       | 0.8949           | 0.89           |
| ING Bank NV                             | ING FLT CD 5/7/18                                       | Money Market Instruments                           | No       | No       | 0.6755           | 0.675          |
| Japan Tobacco Inc                       | JAPAN TOBACCO INC                                       | Money Market Instruments                           | No       | No       | 1.0192           | 1.019          |
| JT INTL FINANCIAL                       | JT INTERNATIONAL FINANCIAL SERVICE                      | Manay Market Instruments                           | No       | No       | 0.4470           | 0.44           |
| SERVICES B.V.  KBC Group NV             | KBC BANK NV CD 0.0% 31/07/2018                          | Money Market Instruments  Money Market Instruments | No<br>No | No<br>No | 0.4479<br>0.6703 | 0.44           |
| KBC Group NV                            | KBC 0% CD 4/6/18  | Money Market Instruments                           | No       | No       | 0.4216           | 0.670          |
| KBC Group NV                            | CD.KBC BANK NV 0.00% 28/6/2018                          | Money Market Instruments                           | No       | No       | 0.403            | 0.403          |
| KBC Group NV                            | KBC BANK NV (LONDON BRANCH)                             | Money Market Instruments                           | No       | No       | 0.4025           | 0.402          |
| KBC Group NV                            | KBC BANK NV (BRUSSELS)                                  | Money Market Instruments                           | No       | No       | 0.1804           | 0.180          |
| Kingdom of Belgium                      | DEXIA CREDIT LOCAL (PARIS BRANCH)                       | Money Market Instruments                           | Yes      | No       | 0.4465           | 0.446          |
| Kingdom of Belgium                      | DEXIA FLT CP 18/1/19                                    | Money Market Instruments                           | Yes      | No       | 0.3598           | 0.359          |
| Kingdom of Sweden                       | AKADEMISKA HUS AB                                       | Money Market Instruments                           | Yes      | No       | 0.4467           | 0.446          |
| Kingdom of the                          |   |  |          |          |                  |                |
| Netherlands                             | BANK NEDERLANDSE GEMEENTEN NV                           | Money Market Instruments                           | Yes      | No       | 1.2203           | 1.220          |
| -                                       | BANK NEDERLANDSE GEMEENTEN NV KOMMUNINVEST I SVERIGE AB | Money Market Instruments  Money Market Instruments | Yes      | No<br>No | 1.2203<br>0.8957 | 1.220<br>0.895 |



| Lloyds Banking Group PLC                    | LLOYDS BANK PLC                              | Money Market Instruments     | No  | No | 0.6751  | 0.6751  |
|---|--|------------------------------|-----|----|---------|---------|
| Mitsubishi Corp                             | CD. MITSUBISHI UFJ TST 0.00%<br>29/05/2018   | Money Market Instruments     | No  | No | 0.7179  | 0.718   |
| Mizuho Financial Group                      | MIZUHO BANK LTD (SYDNEY) CD 0.0%             |                              |     |    |         |         |
| Inc   | 19/07/2018                                   | Money Market Instruments     | No  | No | 0.8049  | 0.8049  |
| Mizuho Financial Group<br>Inc               | CD.MIZUHO COR. BK LONDON 0.0%<br>05/07/2018  | Money Market Instruments     | No  | No | 0.6266  | 0.6266  |
| Mizuho Financial Group<br>Inc               | MIZUHO BANK LTD (LONDON<br>BRANCH)           | Money Market Instruments     | No  | No | 0.4444  | 0.4444  |
| MUFG Bank Ltd                               | BANK OF TOKYO-MITSUBISHI UFJ LTD<br>(        | Money Market Instruments     | No  | No | 0.6718  | 0.6719  |
| Municipality Finance PLC                    | KUNTARAHOITUS OYJ                            | Money Market Instruments     | No  | No | 0.3679  | 0.368   |
| National Australia Bank<br>Ltd              | NATIONAL AUSTRALIA BANK LTD<br>(LONDO        | Money Market Instruments     | No  | No | 2.0222  | 2.0223  |
| National Australia<br>Bank/London           | NATIONAL AUSTRALIA BANK LTD (LONDO           | Money Market Instruments     | No  | No | 0.5389  | 0.5389  |
| National Bank of Canada                     | NATIONAL BANK OF CANADA<br>(LONDON BR        | Money Market Instruments     | No  | No | 0.6744  | 0.6745  |
| Nationwide Building                         | (LONDON BK                                   | Wioney Warket instruments    | NO  | NO | 0.0744  | 0.0743  |
| Society                                     | NATIONWIDE BUILDING SOCIETY                  | Money Market Instruments     | No  | No | 1.3359  | 1.3361  |
| Norinchukin Bank/New<br>York                | NORINCHUKIN BANK (LONDON<br>BRANCH)          | Money Market Instruments     | No  | No | 1.54    | 1.5401  |
| NTN Corp                                    | NTNWIDE 2.06% CD 4/6/18                      | Money Market Instruments     | No  | No | 0.6765  | 0.6765  |
| Oversea-Chinese Banking<br>Corp Ltd         | OVERSEA CHINESE BANKING<br>CORPORATIO        | Money Market Instruments     | No  | No | 0.5852  | 0.5854  |
| PACCAR Inc                                  | PACCAR FINANCIAL EUROPE BV                   | Money Market Instruments     | No  | No | 0.3407  | 0.3409  |
| RABOBANK<br>INTERNATIONAL<br>LONDON, [RABO] | RABOBANK INTERNATIONAL UTRECHT               | Money Market Instruments     | No  | No | 0.1804  | 0.1805  |
| Republic of Korea                           | KOREA DEVELOPMENT BANK (NEW YORK B           | Money Market Instruments     | Yes | No | 0.4492  | 0.4493  |
| Sumitomo Mitsui Banking<br>Corp             | SUMITOMO MITSUI BANKING CORP<br>(BRUS        | Money Market Instruments     | No  | No | 0.8944  | 0.8944  |
| Sumitomo Mitsui Banking<br>Corp             | SUMITOMO MITSUI TRUST BANK LTD (LO           | Money Market Instruments     | No  | No | 0.4927  | 0.4927  |
| Sumitomo Mitsui Trust<br>Bank Ltd           | SUMITOMO MITSUI TRUST BANK LTD (LO           | Money Market Instruments     | No  | No | 0.671   | 0.6711  |
| Svenska<br>Handelsbanken/New York<br>NY     | SVENSKA HANDELSBANKEN<br>NY2.1312523/08/2018 | Security - Standard Security | No  | No | 0.625   | 0.625   |
| TORONTO DOMINION BANK, [TDOMGB2ESEC]        | TORONTO DOMINION BANK (LONDON BRAN           | Money Market Instruments     | No  | No | 0.2246  | 0.2246  |
| Toronto-Dominion Bank/The.                  | TORONTO DOMINION BANK (LONDON BRAN           | Money Market Instruments     | No  | No | 1.751   | 1.7511  |
| Toronto-Dominion Bank/The.                  | TORONTO FLT CD 24/1/19                       | Money Market Instruments     | No  | No | 0.3597  | 0.3597  |
| UBS AG                                      | UBS AG (LONDON BRANCH)                       | Money Market Instruments     | No  | No | 0.6263  | 0.6263  |
| United Overseas Bank Ltd                    | UNITED OVERSEAS BANK LTD                     | Money Market Instruments     | No  | No | 0.7158  | 0.7159  |
| Wells Fargo Bank NA                         | WELLS FARGO BANK<br>NA2.402513/11/2018       | Security - Standard Security | No  | No | 13.5192 | 13.5192 |
| Westpac Banking Corp                        | WESTPAC BANKING CORP (NEW YORK<br>BRA        | Money Market Instruments     | No  | No | 0.4043  | 0.4044  |
| Westpac Banking Corp                        | WESTPAC BANKING CORP NEW YORK<br>BRA         | Money Market Instruments     | No  | No | 0.3327  | 0.3328  |
| Westpac Banking Corp                        | WESTPAC BANKING<br>CORP2.3736325/05/2018     | Security - Standard Security | No  | No | 0.1896  | 0.1896  |
| Grand Total                                 |  |                              |     |    | 97.7949 | 97.7999 |



# Example 2: Pass Result

<u>Test Example 2:</u> Scheme: SB6 - Sandbox Fixed Income Fund

Rule Result: Pass

Test Result: Success

# **FundWare Investment Compliance Result:**

#### SB6 - Sandbox Fixed Income Fund

Valuation Date: -

Date: 01 June 2018 Scheme NAV in Base Currency: 232,189,721.95

| Breach ID | Rule  | Status | Breach<br>Days | Exposure |
|-----------|---|--------|----------------|----------|
|           | UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities            |        |                |          |
|           | UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body | Passed |                | 6.1671 % |
|           | BBG001GFHDK7 - Kaisa Group Holdings Ltd   |        |                | 6.1671 % |
|           | BBG001HBSVC2 - Fantasia Holdings Group Co Ltd   |        |                | 3.8540 % |
|           | BBG001HF2TR0 - Powerlong Real Estate Holdings Ltd   |        |                | 3.6586 % |
|           | BBG005P684P3 - Junxi Investments Ltd  |        |                | 3.4372 % |
|           | BBG001HD4WB3 - Central China Real Estate Ltd  |        |                | 3.3700 % |
|           | BBG003MHD257 - CIFI Holdings Group Co Ltd   |        |                | 3.0222 % |
|           | BBG00224MP31 - Hainan Airlines Hong Kong Co Ltd   |        |                | 2.2484 % |
|           | BBG00BC31Y18 - Jiayuan International Group Ltd  |        |                | 2.2129 % |
|           | BBG001FGRRP9 - JSW Steel Ltd  |        |                | 2.2058 % |
|           | BBG001GFPQ56 - Nemaska Lithium Inc  |        |                | 2.1534 9 |
|           | BBG001H0LXR3 - China Singyes Solar Technologies Holdings Ltd                              |        |                | 2.0866 9 |
|           | BBG001FNSLB1 - Plus Earn Consultants Ltd  |        |                | 2.0417 % |
|           | BBG001FLVB69 - Pacific Andes International Holdings Ltd                                   |        |                | 2.0185 9 |
|           | BBG0078SXDF3 - eHi Car Services Ltd   |        |                | 2.0111 9 |
|           | BBG003M66213 - Melco International Development Ltd  |        |                | 1,9967 9 |
|           | BBG001GY3JK8 - China Aoyuan Property Group Ltd  |        |                | 1.9949 % |
|           | BBG006T4H3Y4 - Modernland Realty Tbk PT   |        |                | 1.9676 9 |
|           | BBG00DJ8C8R3 - Road King Infrastructure Ltd   |        |                | 1.9618 9 |
|           | BBG001FP1Q15 - West China Cement Ltd  |        |                | 1,9503 9 |
|           | BBG005W0H7K9 - Redco Group  |        |                | 1.9498 9 |
|           | BBG005X7K30 - Guangzhou R&F Properties Co Ltd   |        |                | 1.9495 9 |
|           |   |        |                |          |
|           | BBG005G95YK4 - Jingrui Holdings Ltd   |        |                | 1.9282 9 |
|           | BBG001FFW6G1 - Korean Air Lines Co Ltd  |        |                | 1.9048 9 |
|           | BBG005NH0S76 - Renowned Brand Investments Ltd   |        |                | 1.8936 9 |
|           | BBG004CDT6T3 - Alam Sutera Realty Tbk PT  |        |                | 1.8896 9 |
|           | BBG001FH5ZJ0 - Shul On Land Ltd   |        |                | 1.8885 9 |
|           | BBG001GHX700 - Newup Holdings Ltd   |        |                | 1.8741 9 |
|           | BBG001GD5HT7 - Yuzhou Properties Co Ltd   |        |                | 1.8661 9 |
|           | BBG005KY8H32 - Dalian Hexing Investment Co Lt   |        |                | 1.7600 9 |
|           | BBG00H43NFY5 - Tonghai Holdings Co Ltd  |        |                | 1.7593 9 |
|           | BBG0058QXZR9 - Grupo R SA de CV   |        |                | 1.6792 9 |
|           | BBG001H750T6 - Maoye International Holdings Ltd   |        |                | 1.6463 9 |
|           | BBG001FHY0T4 - China Huiyuan Juice Group Ltd  |        |                | 1.6151 9 |
|           | BBG0042Y3901 - Oro Negro Drilling Pte Ltd   |        |                | 1.5023 9 |
|           | BBG002Z365W7 - Lippo Karawaci Tbk PT  |        |                | 1.4263 9 |
|           | BBG001H8CYP6 - Honghua Group Ltd  |        |                | 1.1797 9 |
|           | BBG001FN2ZB8 - G3 Exploration Ltd   |        |                | 1.1567 9 |
|           | BBG001P40BP9 - Atlantica Tender Drilling Ltd  |        |                | 1.0817 9 |
|           | BBG004TCCR55 - OUE Hospitality Trust  |        |                | 1.0222 9 |
|           | BBG001H3VW37 - Anton Oilfield Services Group/Hong Kong                                    |        |                | 0.7244 9 |
|           | BBG001FK29Z6 - Noble Group Ltd  |        |                | 0.5628 9 |
|           | BBG001FNH8N9 - Bluewater Holding BV   |        |                | 0.4666 % |
|           | BBG004YP6ZG7 - Soilbuild Business Space REIT  |        |                | 0,4599 9 |
|           | BBG001FQ2WW5 - Country Garden Holdings Co Ltd   |        |                | 0.4385 9 |
|           | BBG00HC12VQ7 - New Metro Global Ltd   |        |                | 0.4203 9 |
|           | BBG00DKL54H0 - Nor Offshore SPV Ltd   |        |                | 0.3710 9 |
|           | BBG001GJS6Z6 - Cache Logistics Trust  |        |                | 0.2479 9 |
|           | BBG001F928V1 - MHP SE   |        |                | 0.24/9 9 |
|           | BBG001FP28V1 - MHP SE BBG001FMF3F3 - China Shanshui Cement Group Ltd                      |        |                | 0.2340 9 |
|           | <u>'</u>  |        |                |          |
|           | BBG003M7K670 - Pacific Drilling V Ltd   |        |                | 0.1120 % |
|           | BBG001FPX4V6 - Li & Fung Ltd  |        |                | 0.0887 9 |



# **FundWare Holding Export Report:**

The Rule Result shown above matches the below extract taken from FundWare.

| UL Issuer              | RCA.UCITS Asset Types        | RCA.Is<br>GOPS | List.<br>Covered<br>Bonds | Exposure % | % Of<br>Assets |
|------------------------|------------------------------|----------------|---------------------------|------------|----------------|
| Kaisa Group Holdings   | RCA.UCITS ASSELTYPES         | GUPS           | Bollus                    | Exposure % | ASSELS         |
| Ltd                    | Security - Standard Security | No             | No                        | 6.167      | 6.1671         |
| Fantasia Holdings      |                              |                |                           |            |                |
| Group Co Ltd           | Security - Standard Security | No             | No                        | 3.8537     | 3.8541         |
| Powerlong Real         |                              |                |                           |            |                |
| Estate Holdings Ltd    | Security - Standard Security | No             | No                        | 3.6585     | 3.6585         |
| Junxi Investments Ltd  | Security - Standard Security | No             | No                        | 3.4372     | 3.4372         |
| Central China Real     |                              |                |                           |            |                |
| Estate Ltd             | Security - Standard Security | No             | No                        | 3.3699     | 3.37           |
| CIFI Holdings Group    |                              |                |                           |            |                |
| Co Ltd                 | Security - Standard Security | No             | No                        | 3.0221     | 3.0221         |
| Hainan Airlines Hong   |                              |                |                           |            |                |
| Kong Co Ltd            | Security - Standard Security | No             | No                        | 2.2483     | 2.2484         |
| Jiayuan International  |                              | 1              |                           |            |                |
| Group Ltd              | Security - Standard Security | No             | No                        | 2.2128     | 2.2129         |
| JSW Steel Ltd          | Security - Standard Security | No             | No                        | 2.2057     | 2.2058         |
| Nemaska Lithium Inc    | Security - Standard Security | No             | No                        | 2.1534     | 2.1534         |
| China Singyes Solar    |                              |                |                           |            |                |
| Technologies           |                              |                |                           |            |                |
| Holdings Ltd           | Security - Standard Security | No             | No                        | 2.0865     | 2.0866         |
| Plus Earn Consultants  |                              |                |                           |            |                |
| Ltd                    | Security - Standard Security | No             | No                        | 2.0417     | 2.0417         |
| Pacific Andes          |                              |                |                           |            |                |
| International Holdings |                              |                |                           |            |                |
| Ltd                    | Security - Standard Security | No             | No                        | 2.0185     | 2.0185         |
| eHi Car Services Ltd   | Security - Standard Security | No             | No                        | 2.0111     | 2.0111         |
| Melco International    |                              |                |                           |            |                |
| Development Ltd        | Security - Standard Security | No             | No                        | 1.9967     | 1.9967         |
| China Aoyuan           |                              |                |                           |            |                |
| Property Group Ltd     | Security - Standard Security | No             | No                        | 1.9948     | 1.9949         |
| Modernland Realty      |                              | l              | l                         | 4.0676     | 4.0076         |
| Tbk PT                 | Security - Standard Security | No             | No                        | 1.9676     | 1.9676         |
| Road King              | Consider Chandrad Consider   | NI -           | NI -                      | 1 0617     | 1.0610         |
| Infrastructure Ltd     | Security - Standard Security | No             | No                        | 1.9617     | 1.9618         |
| West China Cement      | Cogurity Ctandard Cogurity   | No             | No                        | 1 0502     | 1 0502         |
| Ltd                    | Security - Standard Security |                |                           | 1.9502     | 1.9503         |
| Redco Group            | Security - Standard Security | No             | No                        | 1.9498     | 1.9498         |
| Guangzhou R&F          | Consuits Chandand Consuits   | NI-            | Na                        | 1 0404     | 1 0405         |
| Properties Co Ltd      | Security - Standard Security | No             | No                        | 1.9494     | 1.9495         |
| Jingrui Holdings Ltd   | Security - Standard Security | No             | No                        | 1.9282     | 1.9282         |
| Korean Air Lines Co    |                              |                |                           | 1 0016     | 4 0040         |
| Ltd                    | Security - Standard Security | No             | No                        | 1.9046     | 1.9048         |
| Renowned Brand         | Consider Chandrad Consider   | NI.            | NI -                      | 1 0025     | 1 0027         |
| Investments Ltd        | Security - Standard Security | No             | No                        | 1.8935     | 1.8937         |
| Alam Sutera Realty     | Cogurity Ctandard Cogurity   | No             | No                        | 1 0006     | 1 0006         |
| Tbk PT                 | Security - Standard Security | No             | No                        | 1.8896     | 1.8896         |
| Shui On Land Ltd       | Security - Standard Security | No             | No                        | 1.8884     | 1.8885         |
| Newup Holdings Ltd     | Security - Standard Security | No             | No                        | 1.874      | 1.8741         |
| Yuzhou Properties Co   | Committee Character LC       | NI-            | Na                        | 1 000      | 1 0000         |
| Ltd<br>Dalian Having   | Security - Standard Security | No             | No                        | 1.866      | 1.8661         |
| Dalian Hexing          | Convity Ctandard Convity     | No             | No                        | 1.70       | 1 70           |
| Investment Co Lt       | Security - Standard Security | No             | No                        | 1.76       | 1.76           |



| T 1 : 11 1 1 1 C                  | T                            |          |     |        |         |
|-----------------------------------|------------------------------|----------|-----|--------|---------|
| Tonghai Holdings Co<br>Ltd        | Security - Standard Security | No       | No  | 1,7593 | 1.7593  |
| Grupo R SA de CV                  | Security - Standard Security | No       | No  | 1.6791 | 1.6792  |
| Maoye International               | Security - Standard Security | INO      | INO | 1.0791 | 1.07 32 |
| Holdings Ltd                      | Security - Standard Security | No       | No  | 1.6462 | 1.6463  |
| China Huiyuan Juice               |                              |          | 1   |        |         |
| Group Ltd                         | Security - Standard Security | No       | No  | 1.615  | 1.6151  |
| Oro Negro Drilling Pte            |                              |          |     |        |         |
| Ltd                               | Security - Standard Security | No       | No  | 1.5023 | 1.5023  |
| Lippo Karawaci Tbk                |                              |          |     |        |         |
| PT                                | Security - Standard Security | No       | No  | 1.4263 | 1.4263  |
| Honghua Group Ltd                 | Security - Standard Security | No       | No  | 1.1797 | 1.1797  |
| G3 Exploration Ltd                | Security - Standard Security | No       | No  | 1.1567 | 1.1567  |
| Atlantica Tender                  |                              |          |     |        |         |
| Drilling Ltd                      | Security - Standard Security | No       | No  | 1.0816 | 1.0817  |
| OUE Hospitality Trust             | Security - Standard Security | No       | No  | 1.0221 | 1.0222  |
| Anton Oilfield                    |                              |          |     |        |         |
| Services Group/Hong               | Consider Chandend Consider   | NI-      | N1- | 0.7242 | 0.7244  |
| Kong                              | Security - Standard Security | No       | No  | 0.7243 | 0.7244  |
| Noble Group Ltd                   | Security - Standard Security | No       | No  | 0.5628 | 0.5628  |
| Bluewater Holding BV              | Security - Standard Security | No       | No  | 0.4665 | 0.4666  |
| Soilbuild Business                |                              | <b>.</b> |     | 0.4500 | 0.4500  |
| Space REIT                        | Security - Closed End Fund   | No       | No  | 0.4598 | 0.4599  |
| Country Garden<br>Holdings Co Ltd | Security - Standard Security | No       | No  | 0.4385 | 0.4385  |
|                                   |                              |          | 111 |        |         |
| New Metro Global Ltd              | Security - Standard Security | No       | No  | 0.4202 | 0.4203  |
| Nor Offshore SPV Ltd              | Security - Standard Security | No       | No  | 0.3709 | 0.371   |
| Cache Logistics Trust             | Security - Closed End Fund   | No       | No  | 0.2478 | 0.2479  |
| MHP SE                            | Security - Standard Security | No       | No  | 0.2339 | 0.234   |
| China Shanshui                    |                              | l        |     | 0.400= | 0.4055  |
| Cement Group Ltd                  | Security - Standard Security | No       | No  | 0.1805 | 0.1806  |
| Pacific Drilling V Ltd            | Security - Standard Security | No       | No  | 0.112  | 0.112   |
| Li & Fung Ltd                     | Security - Standard Security | No       | No  | 0.0886 | 0.0887  |

# **High Level Holdings Overview:**

The entirety of the fund is made up from:

| RCA.UCITS Asset Types        | RCA.Is GOPS | List.Covered Bonds | Exposure % | % Of Assets |
|------------------------------|-------------|--------------------|------------|-------------|
| Security - Standard Security | No          | No                 | 86.9274    | 86.9307     |
| Security - Standard Security | Yes         | No                 | 1.8683     | 1.8684      |
| FundAcc_Cash_Capital         | No          | No                 | 0.0198     | 12.8742     |
| Security - Closed End Fund   | No          | No                 | 0.7076     | 0.7078      |
| Forward FX                   | No          | No                 | 16.1131    | -0.0895     |
| Payable Receivables          | No          | No                 | 0          | -2.2913     |
| Grand Total                  |             |                    | 105.6362   | 100.0003    |



# UCITS16Issuer: Overview of Rule Results

# SB5 - Sandbox MMI Fund

Date: 01 June 2018 Valuation Date: -

Scheme NAV in Base Currency: 11,137,506,461.12

Click on rule to view rule details

|   | Breach ID                          | Rule  | Status | Breach<br>Days | Exposure  |  |
|---|------------------------------------|---|--------|----------------|-----------|--|
|   |                                    | UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities            |        |                |           |  |
| ⊟ | 32070-N                            | UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body | Failed | 1              | 26.5112 % |  |
|   |                                    | BBG001FF6SY2 - Canadian Imperial Bank of Commerce   |        |                |           |  |
|   | BBG001FKBSR3 - Wells Fargo Bank NA |   |        |                |           |  |

#### SB6 - Sandbox Fixed Income Fund

Date: 01 June 2018 Valuation Date: -

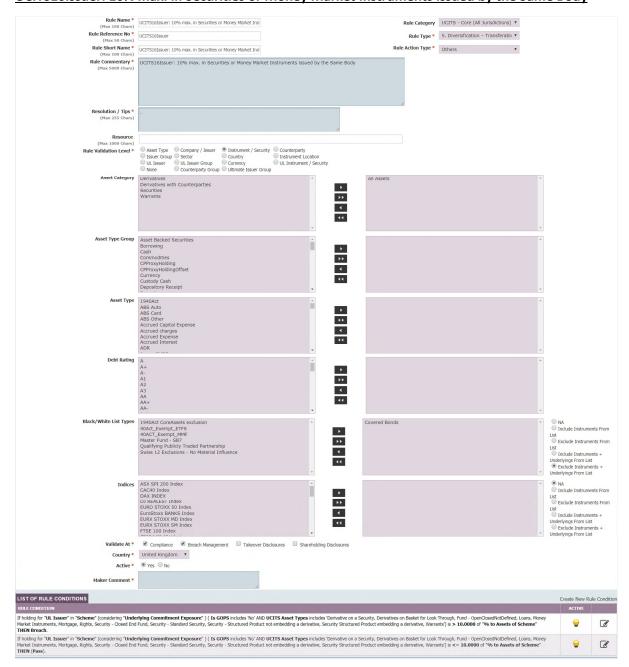
Scheme NAV in Base Currency: 232,189,721.95 Click on rule to view rule details

|   | Breach ID | Rule  | Status | Breach<br>Days | Exposure |
|---|-----------|---|--------|----------------|----------|
|   |           | UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities            |        |                |          |
| + |           | UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body | Passed |                | 6.1671 % |



# Appendix A: Rule Construction in FundWare

# UCITS16Issuer: 10% max. in Securities or Money Market Instruments issued by the Same Body



**END**