

Funds-Axis
UCITS- Core (all jurisdictions)
Rule UCITS17Issuer 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



UCITS17Issuer: 40% max. in Securities and MMI of Issuing Bodies in which More than 5% is in

Rule Setup Details

	Rule Summary					
Rule CategoryRule CategoryUCITS - CORE (ALL Jurisdictions						
Rule Sub-Category	Rule Sub-Category	5. Diversification – Transferable 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

	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	> 40%
Rule Conditions	Pass Condition	= 40%</th
Rule Conditions	Denominator	% to Assets of Scheme
Where Conditions	Pass Condition	> 5.0000
Where Conditions	Breach Condition	> 5.0000
Where Conditions	Denominator	Underlying Issuer - Absolute
		Commitment Exposure % of NAV (Netted at UL Instrument)



UCITS17Issuer: Rule Results

Results:

1 of 2 sandbox schemes are passing UCITS17Issuer.

Cause:

This rule considers the eligibly of securities and MMI. In aggregate, a maximum threshold of 40% is allowable for non-government securities and MMI; where each underlying issuer holds greater than 5% absolute exposure to the fund.

Where the underlying issuers hold greater than 5% absolute exposure; the exposure percentage of these holdings are aggregated; if 40% is exceeded, then UCITS17Issuer will breach.

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 UCITS17Issuer.

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

<u>Test Result:</u> 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 Days	Exposure
	UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities			
32518-N	UCITS17Issuer: 40% max. in Securities and MMI of Issuing Bodies in which More than 5% is in	Failed	1	40.0304 %

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 UCITS17Issuer. The Instruments are marked as having a non GOPS issuer; and in aggregate they hold greater than 40% exposure; where each individual issuer has greater than 5% absolute exposure; therefore, meeting all breach criteria for UCITS17Issuer; failing the rule.

			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	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.

III Ianna	Cit	DCA LIGITS Asset Towns	DCA I- CODS	List.Covered	F 0/	50/ 05 4
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 Scotia/Houston	BANK OF NOVA SCOTIA HOUS2.1527522/08/2018	Security - Standard Security	No	No	0.6744	0.6745
Banque et Caisse 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 Consignations	CAISSE DES DEPOTS ET CONSIGNATIONS	Money Market Instruments	Yes	No	0.8936	0.893
Canadian Imperial Bank	CANADIAN IMPERIAL BANK OF	·				
of Commerce 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 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 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 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 Cooperatieve Rabobank	(LONDON B	Money Market Instruments	No	No	1.267	1.267
UA/NY 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 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- Genossenschaftsbank	DZ BANK AG DEUTSCHE ZENTRAL 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 No	No No	0.4479 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 No	1.2203 0.8957	1.220 0.895



Lloyds Banking Group PLC	LLOYDS BANK PLC	Money Market Instruments	No	No	0.6751	0.6751
Malanushinki Cama	CD. MITSUBISHI UFJ TST 0.00%	NA	NI-	N	0.7170	0.710
Mitsubishi Corp Mizuho Financial Group	29/05/2018 MIZUHO BANK LTD (SYDNEY) CD 0.0%	Money Market Instruments	No	No	0.7179	0.718
Inc	19/07/2018	Money Market Instruments	No	No	0.8049	0.8049
Mizuho Financial Group	CD.MIZUHO COR. BK LONDON 0.0%	Widney Warker instruments	140	110	0.0045	0.0045
Inc	05/07/2018	Money Market Instruments	No	No	0.6266	0.6266
Mizuho Financial Group	MIZUHO BANK LTD (LONDON					
Inc	BRANCH)	Money Market Instruments	No	No	0.4444	0.4444
	BANK OF TOKYO-MITSUBISHI UFJ LTD					
MUFG Bank Ltd	(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	NATIONAL AUSTRALIA BANK LTD					
Ltd	(LONDO	Money Market Instruments	No	No	2.0222	2.0223
National Australia	NATIONAL AUSTRALIA BANK LTD (LONDO	Manay Markat Instruments	No	No	0.5380	0.5380
Bank/London	NATIONAL BANK OF CANADA	Money Market Instruments	No	No	0.5389	0.5389
National Bank of Canada	(LONDON BR	Money Market Instruments	No	No	0.6744	0.6745
Nationwide Building	(======================================	,		1		
Society	NATIONWIDE BUILDING SOCIETY	Money Market Instruments	No	No	1.3359	1.3361
Norinchukin Bank/New	NORINCHUKIN BANK (LONDON					
York	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	OVERSEA CHINESE BANKING	,				
Corp Ltd	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					0.0.0	
INTERNATIONAL						
LONDON, [RABO]	RABOBANK INTERNATIONAL UTRECHT	Money Market Instruments	No	No	0.1804	0.1805
	KOREA DEVELOPMENT BANK (NEW					
Republic of Korea	YORK B	Money Market Instruments	Yes	No	0.4492	0.4493
Sumitomo Mitsui Banking	SUMITOMO MITSUI BANKING CORP	84	N-	N-	0.0044	0.0044
Corp Sumitomo Mitsui Banking	(BRUS SUMITOMO MITSUI TRUST BANK LTD	Money Market Instruments	No	No	0.8944	0.8944
Corp	(LO	Money Market Instruments	No	No	0.4927	0.4927
Sumitomo Mitsui Trust	SUMITOMO MITSUI TRUST BANK LTD	mone, market met amene		110	0.1327	0.1327
Bank Ltd	(LO	Money Market Instruments	No	No	0.671	0.6711
Svenska						
Handelsbanken/New York	SVENSKA HANDELSBANKEN					
NY	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	TORONTO DOMINION BANK (LONDON	Worley Warket Histruments	INO	INO	0.2240	0.2240
Bank/The.	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 NA2.402513/11/2018	Security - Standard Security	No	No	13.5192	13.5192
WCIIS I algo balik IVA	WESTPAC BANKING CORP (NEW YORK	Security - Standard Security	140	140	13.3132	13.3192
Westpac Banking Corp	BRA	Money Market Instruments	No	No	0.4043	0.4044
	WESTPAC BANKING CORP NEW YORK	-,				
Westpac Banking Corp	BRA	Money Market Instruments	No	No	0.3327	0.3328
<u></u>	WESTPAC BANKING					
Westpac Banking Corp	CORP2.3736325/05/2018	Security - Standard Security	No	No	0.1896	0.1896
Grand Total					97.7949	97.7999



Example 2: Pass Result

Test Example 2: Scheme: SB6 - Sandbox Fixed Income Fund

Rule Result: Pass

Test Result: Success

FundWare Investment Compliance Result:

SB6 - Sandbox Fixed Income Fund

Date: 01 June 2018

Scheme NAV in Base Currency: 232,189,721.95

Click on rule to view rule details

Breach ID	Rule	Status	Breach Days	Exposure
	UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities			
	UCITS17Issuer; 40% max. in Securities and MMI of Issuing Bodies in which More than 5% is in	Passed		6.1671 %

FundWare Holding Export Report:

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

UL Issuer	RCA.UCITS Asset Types	RCA.Is GOPS	List. Covered Bonds	Exposure %	% Of Assets
Kaisa Group Holdings					
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
	•••				

High Level Holdings Overview:

The entirety of the fund is made up from:

UL Issuer	RCA.UCITS Asset Types	RCA.Is GOPS	Exposure %	% Of Assets
ILS	Forward FX	No	9.3208	0.0056
USD	Forward FX	No	0	0
EUR	Forward FX	No	6.7923	-0.0951
Northern Trust Company	FundAcc_Cash_Capital	No	0.0198	12.8742
UNKNOWN	Payable Receivables	No	0	-2.2913
Soilbuild Business Space REIT	Security - Closed End Fund	No	0.4598	0.4599
Cache Logistics Trust	Security - Closed End Fund	No	0.2478	0.2479
Kaisa Group Holdings Ltd	Security - Standard Security	No	6.167	6.1671
Fantasia Holdings Group Co Ltd	Security - Standard Security	No	3.8537	3.8541
Powerlong Real Estate Holdings Ltd	Security - Standard Security	No	3.6585	3.6585
Junxi Investments Ltd	Security - Standard Security	No	3.4372	3.4372
Central China Real Estate Ltd	Security - Standard Security	No	3.3699	3.37

Valuation Date: -



CIFI Holdings Group Co Ltd	Security - Standard Security	No	3.0221	3.0221
Hainan Airlines Hong Kong Co Ltd	Security - Standard Security	No	2.2483	2.2484
Jiayuan International Group Ltd	Security - Standard Security	No	2.2128	2.2129
JSW Steel Ltd	Security - Standard Security	No	2.2057	2.2058
Nemaska Lithium Inc	Security - Standard Security	No	2.1534	2.1534
China Singyes Solar Technologies Holdings Ltd	Security - Standard Security	No	2.0865	2.0866
Plus Earn Consultants Ltd	Security - Standard Security	No	2.0417	2.0417
Pacific Andes International Holdings Ltd	Security - Standard Security	No	2.0185	2.0185
eHi Car Services Ltd	Security - Standard Security	No	2.0111	2.0111
Melco International Development Ltd	Security - Standard Security	No	1.9967	1.9967
China Aoyuan Property Group Ltd	Security - Standard Security	No	1.9948	1.9949
Modernland Realty Tbk PT	Security - Standard Security	No	1.9676	1.9676
Road King Infrastructure Ltd	Security - Standard Security	No	1.9617	1.9618
West China Cement Ltd	Security - Standard Security	No	1.9502	1.9503
Redco Group	Security - Standard Security	No	1.9498	1.9498
Guangzhou R&F Properties Co Ltd	Security - Standard Security	No	1.9494	1.9495
Jingrui Holdings Ltd	Security - Standard Security	No	1.9282	1.9282
Korean Air Lines Co Ltd	Security - Standard Security	No	1.9046	1.9048
Renowned Brand Investments Ltd	Security - Standard Security	No	1.8935	1.8937
Alam Sutera Realty Tbk PT	Security - Standard Security	No	1.8896	1.8896
Shui On Land Ltd	Security - Standard Security	No	1.8884	1.8885
Newup Holdings Ltd	Security - Standard Security	No	1.874	1.8741
Yuzhou Properties Co Ltd	Security - Standard Security	No	1.866	1.8661
Dalian Hexing Investment Co Lt	Security - Standard Security	No	1.76	1.76
Tonghai Holdings Co Ltd	Security - Standard Security	No	1.7593	1.7593
Grupo R SA de CV	Security - Standard Security	No	1.6791	1.6792
Maoye International Holdings Ltd	Security - Standard Security	No	1.6462	1.6463
China Huiyuan Juice Group Ltd	Security - Standard Security	No	1.615	1.6151
Oro Negro Drilling Pte Ltd	Security - Standard Security	No	1.5023	1.5023
Lippo Karawaci Tbk PT	Security - Standard Security	No	1.4263	1.4263
Mongolia	Security - Standard Security	Yes	1.3457	1.3458
Honghua Group Ltd	Security - Standard Security	No	1.1797	1.1797
G3 Exploration Ltd	Security - Standard Security	No	1.1567	1.1567
Atlantica Tender Drilling Ltd	Security - Standard Security	No	1.0816	1.0817
OUE Hospitality Trust	Security - Standard Security	No	1.0221	1.0222
Anton Oilfield Services Group/Hong Kong	Security - Standard Security	No	0.7243	0.7244
Noble Group Ltd	Security - Standard Security	No	0.5628	0.5628
Bluewater Holding BV	Security - Standard Security	No	0.4665	0.4666
Country Garden Holdings Co Ltd	Security - Standard Security	No	0.4385	0.4385
Huarong Finance II Co Ltd	Security - Standard Security	Yes	0.4353	0.4353
New Metro Global Ltd	Security - Standard Security	No	0.4202	0.4203
Nor Offshore SPV Ltd	Security - Standard Security	No	0.3709	0.371
MHP SE	Security - Standard Security	No	0.2339	0.234
China Shanshui Cement Group Ltd	Security - Standard Security	No	0.1805	0.1806
Pacific Drilling V Ltd	Security - Standard Security	No	0.112	0.112
Li & Fung Ltd	Security - Standard Security	No	0.0886	0.0887
Huarong Finance 2017 Co Ltd	Security - Standard Security	Yes	0.0873	0.0873
Grand Total			105.6362	100.0003



UCITS17Issuer: Overview of Rule Results

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 Days	Exposure
	UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities			
32518-N	UCITS17Issuer: 40% max. in Securities and MMI of Issuing Bodies in which More than 5% is in	Failed	1	40.0304 9

SB6 - Sandbox Fixed Income Fund

Date: 01 June 2018 Valuation Date: -

Scheme NAV in Base Currency: 232,189,721.95

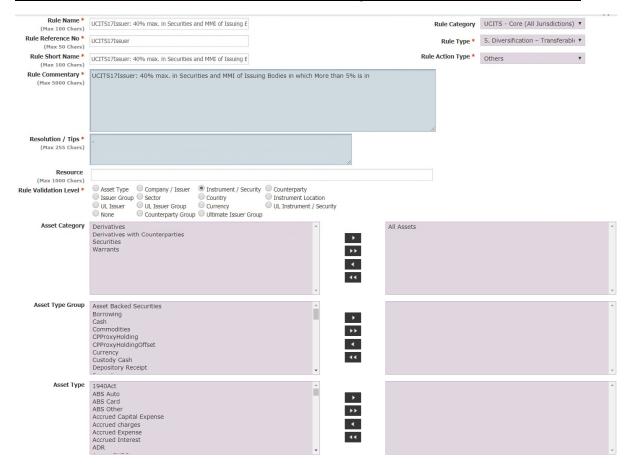
Click or	i rule t	o view	rule o	letails

Breach ID	Rule	Status	Breach Days	Exposure	
	UCITS - Core (All Jurisdictions): 5. Diversification – Transferable Securities				
	UCITS17Issuer: 40% max, in Securities and MMI of Issuing Bodies in which More than 5% is in	Passed		<u>6.1671 %</u>	



Appendix A: Rule Construction in FundWare

UCITS17Issuer: 40% max. in Securities and MMI of Issuing Bodies in which More than 5% is in



END