

EUROPEAN MIFID TEMPLATE - EMT V3.0

2019 12 10 FinDatEx MiFID TEMPLATE V3.0 - EMT V3.0

CRNLN Mgd Gth B II

NUM	DATA (consistent with TPT & EPT for common data point)	DEFINITION	CODIFICATION
-----	---	------------	--------------

**EMT Data Set Information - Mandatory Section**

1	00001_EMT_Version	This field specifies the output version of the template and is used by the recipient to understand the number of fields expected, their labelling and order. The first two characters describe that the output version is V3 and the potential 3rd and 4th characters describe the original source version if converted into V3 from either V1 or V2.  Current and still valid versions of the EMT: V1.0 finalized August 3rd 2017 V2.0 finalized October 22nd 2018 V3.0 finalized November 15th 2019	V3
2	00002_EMT_Producer_Name	If the Manufacturer/Issuer have chosen to outsource the production of an EMT posting to another party responsible for the production and publication of the EMT data set, such party name should be entered in this field.	Smith & Williamson Fund Administration Limited
3	00003_EMT_Producer_LEI	If the Manufacturer/Issuer have chosen to outsource the production of an EMT posting to another party responsible for the production and publication of the EMT data set, such party LEI should be entered in this field.	213800K6C4KNGPPIM966
4	00004_EMT_Producer_Email	Contact entry point for distributors regarding EMT	Legal&Technical@smithandwilliamson.com
5	00005_File_Generation_Date_And_Time	Date and Time of the creation of the EMT file	2021-05-13 12:01:06
6	00006_EMT_Data_Reporting_Target_Market	Specifies if the Target Market section is filled in the current EMT posting.	Y
7	00007_EMT_Data_Reporting_Ex_Ante	Specifies if the Ex-Ante Cost & Charges section is filled in the current EMT posting.	Y
8	00008_EMT_Data_Reporting_Ex_Post	Specifies if the Ex-Post Cost & Charges section is filled in the current EMT posting.	Y

**General Financial Instrument information - Mandatory Section**

9	00010_Financial_Instrument_Identifying_Data	Identification of the financial instrument	GB00B3P4L931
10	00020_Type_Of_Identification_Code_For_The_Financial_Instrument	Codification chosen to identify the financial instrument	1
11	00030_Financial_Instrument_Name	Name of the financial instrument	SVS Comelian Managed Growth Fund Income Class B
12	00040_Financial_Instrument_Currency	Denomination currency of the financial instrument	GBP
13	00045_Financial_Instrument_Performance_Fee	Does this financial instrument have potential performance fees or carried interest?	N
14	00047_Financial_Instrument_Distribution_Of_Cash	Does this financial instrument distribute Income in the form of cash to the investor?	Y
15	00050_General_Reference_Date	Date to which the General data within the EMT refer	2020-12-10
16	00060_Financial_Instrument_Product_Type	Structured Securities or Structured Funds or UCITS or Non UCITS or UCITS Money Market Funds or Non UCITS Money Market Funds or Exchanged Traded Commodities or Bonds	U
17	00065_Maturity_Date	Date of Maturity	
18	00067_May_Be_Terminated_Early	Yes or No	
19	00070_Financial_Instrument_Manufacturer_Name	Name of Manufacturer of the financial instrument. The one who is responsible for the financial instrument management/issuance	Smith & Williamson Fund Administration Limited
20	00073_Financial_Instrument_Manufacturer_LEI	Legal Entity Identifier, LEI of the Manufacturer of the financial instrument	
21	00074_Financial_Instrument_Manufacturer_Email	Contact entry point for communication with the Manufacturer to either provide feedback reporting or to retrieve details on how to provide feedback reporting.	
22	00075_Financial_Instrument_Manufacturer_Product_Governance_Process	A = Product governance procedure pursuant to MiFID II B = Product governance procedure comparable to MiFID II C = Product governance procedure not in accordance with MiFID II D = No information is requested from the issuer	
23	00080_Financial_Instrument_Guarantor_Name	Name of Guarantor of the financial instrument.	
24	00085_Financial_Instrument_Type_Notional_Or_Item_Based	N for Notional based instrument, I for Item based instrument	
25	00090_Product_Category_Or_Nature_Germany	Designation of the respective product category or nature for Germany	
26	00095_Structured_Securities_Product_Category_Or_Nature	Designation of the respective product category or nature. EUSIPA Map/Codes for structured securities ( <a href="https://eusipa.org/governance/#EusipaDMap">https://eusipa.org/governance/#EusipaDMap</a> )	
27	00096_Structured_Securities_Quotation	Defines if the quotation type in the Ex-Ante and Ex-Post section of the EMT file is in UNITS or in PERCENTAGE related to the specific Reference as presented in field 07150,07155, 08110 and 08120 respectively.	
28	00100_Leveraged_Financial_Instrument_Or_Contingent_Liability_Instrument	Yes or No	N
29	00110_Fund_Share_Class_Without_Retrocession	Yes or No	Y
30	00120_Ex_Post_Cost_Calculation_Basis_Italy	Rolling based (last 12 months) or Fixed base (calendar year)	

**Target Market Section**

31	01000_Target_Market_Reference_Date	Date to which the Target Market data within the EMT refer	2020-12-10
----	------------------------------------	---	------------

**Investor Type - Hierarchical logic (except for real estate funds in Germany and France)**

32	01010_Investor_Type_Retail	Yes or No or Neutral	Y
33	01020_Investor_Type_Professional	Yes or No or Professional Per Se or Elective Professional	Y
34	01030_Investor_Type_Eligible_Counterparty	Yes or No	Y

**Knowledge and/or Experience - Hierarchical logic**

35	02010_Basic_Investor	Yes or No or Neutral	Y
----	----------------------	----------------------	---

36	02020_Informed_Investor	Yes or No or Neutral	Y
37	02030_Advanced_Investor	Yes or No or Neutral	Y
38	02040_Expert_Investor_Germany	Yes or No or Neutral	

### Client Ability To Bear Losses - Hierarchical logic

39	03010_Compatible_With_Clients_Who_Can_Not_Bear_Capital_Loss	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N
40	03020_Compatible_With_Clients_Who_Can_Bear_Limited_Capital_Loss	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Assessment of loss level is based on investments in the same currency as the instrument denomination and do not take into consideration potential adverse FX market performance. To be filled only for structured securities & funds with an explicit capital protection or for Money Market funds. Yes or No or Neutral	N
41	03030_Limited_Capital_Loss_Level	Loss up to XX%	
42	03040_Compatible_With_Clients_Who_Do_Not_Need_Capital_Guarantee	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral	Y
43	03050_Compatible_With_Clients_Who_Can_Bear_Loss_Beyond_Capital	Loss Beyond the Capital. Yes or No or Neutral	Y

### Risk Tolerance

44	04010_Risk_Tolerance_PRIIPS_Methodology	SRI	
45	04020_Risk_Tolerance_UCITS_Methodology	SRR1	4
46	04030_Risk_Tolerance_Internal_Methodology_For_Non_PRIIPS_And_Non_UCITS	Low/medium/high	
47	04040_Risk_Tolerance_For_Non_PRIIPS_And_Non_UCITS_Spain	Spanish SRI	
48	04050_Not_For_Investors_With_The_Lowest_Risk_Tolerance_Germany	Yes or Neutral	

### Client Objectives & Needs

49	05010_Return_Profile_Client_Looking_For_Preservation	Yes or No or Neutral	N
50	05020_Return_Profile_Client_Looking_For_Capital_Growth	Yes or No or Neutral	Y
51	05030_Return_Profile_Client_Looking_For_Income	Yes or No or Neutral	Y
52	05040_Return_Profile_Hedging	Structured Securities	Yes or No or Neutral
53	05050_Option_Or_Leveraged_Return_Profile	Yes or No or Neutral	
54	05070_Return_Profile_Pension_Scheme_Germany	Yes or No or Neutral	
55	05080_Minimum_Recommended_Holding_Period	Minimum recommending holding period: RHP in years or Very Short Term (<1Y) or Short term (>=1Y) or Medium term (>=3Y) or Long term (>5Y) or Hold To Maturity	V
56	05105_Intended_Compatible_With_Clients_Having_ESG_Preferences	Discloses if the product is developed with the aim of being compatible with clients having ESG preferences.	
57	05115_Other_Specific_Investment_Need	No, Islamic banking or Other	N

### Distribution strategy

58	06010_Execution_Only	Retail or Professional or Both or Neither	B
59	06020_Execution_With_Appropriateness_Test_Or_Non_Advised_Services	Retail or Professional or Both or Neither	B
60	06030_Investment_Advice	Retail or Professional or Both or Neither	B
61	06040_Portfolio_Management	Retail or Professional or Both or Neither	B

### Cost & Charges Ex-Ante Section

- All ongoing cost disclosures must be reported in annualized terms regardless of time of existence
- Negative costs are reported using a minus sign "-"

62	07020_Gross_One-off_Cost_Financial_Instrument_Maximum_Entry_Cost_Non_Acquired	Funds	Maximum not acquired to the fund. Expressed as a % of the amount to be invested.	0
		Structured Securities	"Ask Price" - Fair Value (as of Reference Date Ex-Ante)	
63	07025_Net_One-off_Cost_Structured_Products_Entry_Cost_Non_Acquired	Structured Funds	Expressed as a % of the amount to be invested. Subscription NAV - Fair Value	
		Structured Securities	Net_One-off Entry cost = 07020 less upfront distribution fee embedded in the 07020. In practice 07025 will be the portion of the 07020 retained by the manufacturer.	
64	07030_One-off_Cost_Financial_Instrument_Maximum_Entry_Cost_Fixed_Amount_Italy	Funds	Maximum fixed amount per subscription, not incorporated. Flat fixed fee defined by the manufacturer (Linked to Paying Agent)	0
65	07040_One-off_Cost_Financial_Instrument_Maximum_Entry_Cost_Acquired	Funds	Subscription fees acquired to the fund Expressed as a % of the amount to be invested	0
66	07050_One-off_Costs_Financial_Instrument_Maximum_Exit_Cost_Non_Acquired	Funds	Maximum not acquired to the fund Expressed as a % of the NAV.	0
67	07060_One-off_Costs_Financial_Instrument_Maximum_Exit_Cost_Fixed_Amount_Italy	Funds	Maximum fixed amount per redemption, not incorporated. Flat fee defined by the manufacturer	0
68	07070_One-off_Costs_Financial_Instrument_Maximum_Exit_Cost_Acquired	Funds	Maximum Exit fees acquired to the fund. Expressed as a % of the NAV	0
69	07080_One-off_Costs_Financial_Instrument_Typical_Exit_Cost	Funds	Current exit cost linked to the RHP or Time to Maturity or 1Y (V) or 3Y(S) or 5Y (M L) (the value of 05080_Minimum_Recommended_Holding_Period)	
		Structured Securities	Exit cost at the RHP	

70	07090_One-off_Cost_Financial_Instrument_Exit_Cost_Structured_Products_Prior_RHP	Structured Funds Structured Securities	Expressed as a % of the amount to be divested. Fair Value - Exit Value (e.g. Bid Price) Fixed amount	
71	07100_Financial_Instrument_Gross_Ongoing_Costs	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied) Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference in 07150 or 07155 respectively.	0,0150
72	07105_Financial_Instrument_Borrowing_Costs_Ex_Ante_UK	Funds	Financing costs related to borrowing for the purposes of gearing expressed as a % of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	
73	07110_Financial_Instrument_Management_Fee	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied) Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference Value in 07150 or 07155 respectively.	0,0100
74	07120_Financial_Instrument_Distribution_Fee	Funds	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	0
75	07130_Financial_Instrument_Transaction_Costs_Ex_Ante	Funds	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	0,0005
76	07140_Financial_Instrument_Incidental_Costs_Ex_Ante	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied). Includes Performance Fees and other costs. Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference Value in 07150 or 07155 respectively.	0
77	07150_Structured_Securities_Reference_Price_Ex_Ante	Structured Securities	The Reference Price is the instrument price to which a Unit disclosed Ex-Post cost is based and to which a Percentage disclosed cost should be multiplied in order to retrieve the Unit cost. This field is conditional and only used if 07155 is not used.	
78	07155_Structured_Securities_Notional_Reference_Amount_Ex_Ante	Structured Securities	The Notional Reference Amount is the amount expressed in number of currency units to which a Unit disclosed Ex-Post cost is based and to which a Percentage disclosed cost should be multiplied in order to retrieve the Unit cost. This field is conditional and only used if 07150 is not used.	
79	07160_Ex_Ante_Costs_Reference_Date		The Reference Date to which all Ex-Ante Cost disclosures refer (i.e. NOT to be mistaken for General Reference Date, field 00050 or Generation Date and Time, field 00005)	2021-04-15

## Cost & Charges Ex-Post Section

- All ongoing cost disclosures must be reported in annualized terms regardless of time of existence
- Negative costs are reported using a minus sign "-"

80	08010_Gross_One-off_Cost_Structured_Securities_Entry_Cost_Ex_Post	Structured Securities	Fixed Amount	
81	08015_Net_One-off_Cost_Structured_Securities_Entry_Cost_Ex_Post	Structured Securities	Net One-off Entry cost = 08010 less upfront distribution fee embedded in the 08010. In practice 08015 will be the portion of the 08010 retained by the manufacturer.	
82	08020_One-off_Costs_Structured_Securities_Exit_Cost_Ex_Post	Structured Securities	Fixed amount	
83	08025_One-off_Cost_Financial_Instrument_Entry_Cost_Acquired	Funds	% of NAV	
84	08030_Financial_Instrument_Ongoing_Costs_Ex_Post	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied) Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference Value in 08110	0,0150
85	08040_Structured_Securities_Ongoing_Costs_Ex_Post_Accumulated	Structured Securities	Sum of each daily Recurring Product Costs	
86	08045_Financial_Instrument_Borrowing_Costs_Ex_Post_UK	Funds	Financing costs related to borrowing for the purposes of gearing expressed as a % of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	
87	08050_Financial_Instrument_Management_Fee_Ex_Post	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied) Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference Value in 08110	0,0100
88	08060_Financial_Instrument_Distribution_Fee_Ex_Post	Funds	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	0
89	08070_Financial_Instrument_Transaction_Costs_Ex_Post	Funds	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied)	0,0005
90	08080_Financial_Instrument_Incidental_Costs_Ex_Post	Funds Structured Securities	% of NAV of the Financial Product expressed in annualized terms (rate of cost deduction to be applied) Expressed as a % of NAV / Notional (or currency amount for Absolute quotation) of the Financial Product in annualized terms related to Reference Value in 08110	0
91	08090_Beginning_Of_Reference_Period		The Date that specifies the start of the Reference Period. Defined as "From and including". All ex-post cost disclosures apart from 08040 refers to all dates in such period.	2020-04-16
92	08100_End_Of_Reference_Period		The Date that specifies the end of the Reference Period. Defined as "To and including". All ex-post cost disclosures apart from 08040 refers to all dates in such period. For the avoidance of doubt, this date can be specified as equal to the date specified in 08090.	2021-04-15
93	08110_Structured_Securities_Reference_Price_Ex_Post	Structured Securities	The Reference Price is the instrument price to which a Unit disclosed Ex-Post cost is based and to which a Percentage disclosed cost should be multiplied in order to retrieve the Unit cost. This field is conditional and only used if 08120 is not used.	
94	08120_Structured_Securities_Notional_Reference_Amount	Structured Securities	The Notional Reference Amount is the amount expressed in number of currency units to which a Unit disclosed Ex-Post cost is based and to which a Percentage disclosed cost should be multiplied in order to retrieve the Unit cost. This field is conditional and only used if 08110 is not used.	