

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

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| NUM | DATA (consistent with TPT & EPT for common data point) | DEFINITION | CODIFICATION |
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EMT Data Set Information - Mandatory Section

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|---|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| 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 | GB00BD6FSN84 |
| 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 Cautious RMP Fund Income Class G |
| 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 (https://eusipa.org/governance/#EusipaDMap) | |
| 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

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|----|------------------------------------------------------------------------|-----------------|---|
| 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 | |

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|----|---------------------------------------------------------------------------------|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 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. | 0,0062 |
| 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. | 0,0030 |
| 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) | 0,0001 |
| 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 | 0,0062 |
| 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 | 0,0030 |
| 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) | 0,0001 |
| 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. | |