



J **Jacobi FT Wilshire Bitcoin ETF**

Product SFDR Disclosure

As of 07/08/2023

EU SUSTAINABLE FINANCE DISCLOSURE REGULATION (THE SFDR) – JACOBI FT WILSHIRE BITCOIN ETF (THE FUND)

Website disclosure

SUMMARY

The Fund is subject to article 8 of the European Union's (EU) 2019/2088 Sustainable Finance Disclosure Regulation ("SFDR"). The Fund promotes environmental or social characteristics but does not have a sustainable investment objective.

The Fund aims to solely invest in Bitcoin ("BTC"). In line with the SFDR criteria for sustainable investments, Jacobi Asset Management Ltd (the "Promoter") is utilising an approach to fully decarbonise the Fund's BTC holdings by purchasing Renewable Energy Certificates ("RECs") to ensure the Fund's share (holdings and transactions) of the Bitcoin network's energy consumption is matched with renewable energy.

NO SUSTAINABLE INVESTMENT OBJECTIVE

The Fund promotes environmental or social characteristics, but does not have as sustainable investment as its objective.

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Promoter intends to purchase Renewable Energy Certificates to enable the Fund's entire holding of Bitcoin to be decarbonised.

RECs are tradable, non-tangible energy certificates that represent proof that 1 megawatt-hour (MWh) of electricity was generated from an eligible renewable energy resource (renewable electricity) and was fed into the shared system of power lines which transport energy; also known as Energy Attribute Certificates (EACs).

INVESTMENT STRATEGY

The Fund's objective is to buy and hold all of its assets in long-term holdings of Bitcoin and seeks to provide investors with the opportunity for sustainable, long-term capital appreciation.

PROPORTION OF INVESTMENTS

To achieve its investment objective, the Fund will invest in and hold substantially all of its assets in long-term holdings of Bitcoin.

MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The purchase of the RECs on behalf of the fund is facilitated by a third party firm (the Supplier) The Manager will be responsible for tracking the amount of BTC the Fund transacts. The calculation of the number of RECs required to fully decarbonise the underlying BTC of the fund is done on a quarterly basis. Agreement to purchase RECs, proof of purchase and proof of retirement will all be retained by the Manager and made available upon request.

METHODOLOGIES

The decarbonisation of the Fund by way of RECs will be achieved as follows:

1. At the start of each quarter, Jacobi will commit to (and pay for) "Agreements" to purchase RECs. Agreements are official documents showing that an order for RECs has been placed and the seller is contractually bound to provide it.
2. The Fund holds or transacts BTC by way of its investment strategy.
3. At the end of each quarter, taking into account the amount of BTC held and transacted on-chain during that quarter, the electricity consumption associated with mining that amount of BTC is calculated. (Note that mining is a Scope 3 emission and Jacobi is not directly responsible for the mining)
4. The number of RECs required to fully decarbonise the electricity consumption calculated in step (3), where 1 REC = 1MWh of power, are calculated.
5. The number of RECs calculated in step 4 are purchased from the Supplier on the Fund's behalf and retired.
6. The process is complete. The energy production underpinning the fund's handling of BTC has now been decarbonised with renewable energy. Jacobi subsequently retires the RECs so they cannot be used again.

Note that the above described methodology will be periodically reviewed and could be modified in the future.

DATA SOURCING AND PROCESSING

The Manager will track the BTC the Fund holds and transacts for the quarter. The calculation methodology used for the RECs is the publicly available methodology developed by CCRI and Southpole to attribute electricity consumption. This methodology is available to download [here](#).

LIMITATIONS TO METHODOLOGIES AND DATA

There is no universally agreed framework or methodology for calculating electricity consumption resulting from Bitcoin mining. The methodology currently used for our purchases can be downloaded [here](#). The alternative various methodologies are discussed further in this White Paper [here](#).

Data source – Cambridge Centre for Alternative Finance.

DUE DILIGENCE

The Fund will invest in and hold substantially all of its assets in long-term holdings of Bitcoin. It is not expected for the Fund to hold other assets

ENGAGEMENT POLICIES

Sustainability is one of Jacobi Asset Management's core principles. We have committed to having an ESG review by an independent third party at least bi-annually. Jacobi will make available the results of these reviews and our overall ESG score. We will also work with the reviewer following the scoring to discuss best practices and areas for improvement to further improve our ESG score.

Jacobi Asset Management will ensure that it operates in a responsible manner to its employees, shareholders and the wider community. We will adopt best practices in managing our impact on the environment, social and corporate governance. Our primary focus is to deliver sustainable, long-term investment performance and our day to day operations will reflect this goal.

DESIGNATED REFERENCE BENCHMARK

The reference benchmark for the Fund will be the FT Wilshire Bitcoin Blended Price Index which is administered by FT Wilshire Indexes.