

# **L&G Longer Dated All Commodities UCITS ETF**

## **FUND SUPPLEMENT**

### **No.7**

*A sub-fund of Legal & General UCITS ETF Plc, an umbrella investment company with variable capital and segregated liability between its Funds incorporated with limited liability in Ireland under registration number 459936.*

The Company and the Directors, whose names appear on page 10 of the Prospectus, are the persons responsible for the information contained in this Fund Supplement and accept responsibility accordingly. To the best of the knowledge and belief of the Company and the Directors (who have taken all reasonable care to ensure that such is the case), the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of the information.

This Fund Supplement contains information relating to the L&G Longer Dated All Commodities UCITS ETF (the “Fund”) which is a separate Fund of Legal & General UCITS ETF Plc (the “Company”), an umbrella fund with segregated liability between its Funds. This Fund Supplement forms part of and should be read in the context of, and together with, the Company’s Prospectus dated 20 April 2020 and any other applicable addenda. Investors should also refer to the Company’s latest published annual report and audited financial statements (if any) and, if published after such report, a copy of the latest semi-annual report and unaudited financial statements. Capitalised expressions used and not defined in this Fund Supplement shall bear the meanings as set out in the Prospectus. If you are in any doubt about the action to be taken or the contents of this Fund Supplement, please consult your stockbroker, bank manager, lawyer, accountant or other independent professional adviser who, if such advice is taken in the United Kingdom, is an organisation or firm authorised or exempted pursuant to the FSMA. Investors should note that this Fund will pursue its investment policy principally through investment in FDIs.

Potential investors should consider the risk factors set out in the Prospectus and in this Fund Supplement before investing in this Fund. An investment in the Fund involves certain risks and may only be suitable for persons who are able to assume the risk of losing their entire investment.

The Prospectus sets forth information on investment risk, management and administration of the Fund, valuation, subscription, redemption and transfer procedures and details of fees and expenses payable by the Fund and should be read subject to the information herein.

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The date of this Fund Supplement is 20 April 2020.

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## INVESTMENT OBJECTIVE

The investment objective of the L&G Longer Dated All Commodities UCITS ETF (the “Fund”) is to provide an exposure to futures contracts on physical commodities.

## INVESTMENT POLICY

In order to achieve this investment objective, the Fund will seek to track the performance of the Bloomberg Commodity Index 3 Month Forward Total Return (the “Index”), subject to the deduction of the TER and other expenses associated with operating the Fund as further described in the “Fees and Expenses” section of the Prospectus.

**In tracking the performance of the Index, the Fund may have an indirect exposure to the individual commodities comprised within the Index of up to 20% of its Net Asset Value, which limit may be raised to 35% for a single commodity in exceptional market conditions, including (but not limited to) circumstances in which such commodity occupies a dominant market position. Please refer to the “Index Description” section below for further information regarding the circumstances in which a single commodity may occupy a dominant market position.**

The Fund will seek to be fully exposed to the performance of the Index using "unfunded" total return OTC swaps with one or more counterparties (each, a “Long Index Swap”) as described under the heading “Unfunded OTC Swap Model” and Schedule II in the Prospectus.

## INDEX DESCRIPTION

The Index provides a return equivalent to a fully “collateralised” investment in a diversified portfolio of commodity futures across the following commodity groups: (1) Energy; (2) Precious Metals; (3) Industrial Metals; (4); Livestock; (5) Grains; and (6) Softs. As at the date of this Fund Supplement there are 24 commodity futures eligible for inclusion in the Index, each of which is traded on a futures exchange in the United States or Europe further information in respect of which is available in Table 2 of Section 2 (“Designated Contracts”) of the methodology used for calculating the Index (“Index Methodology - The Bloomberg Commodity Index Family”) (the “Index Methodology”).

The Index return is comprised of:

- the “spot” return reflecting the day-to-day changes in the prices of the commodity futures comprised within the Index;
- the “roll” return associated with periodically selling the futures contracts that are nearing their expiry dates and buying later-dated equivalents in order to maintain exposure to the commodity futures on an ongoing basis. Please refer to the heading “Roll methodology” below for further information; and
- the “collateral” return reflecting the interest that a “real life” commodity investor would earn by investing the cash that they would ultimately need to settle the futures contract at the future delivery date in 13-week U.S. Treasury Bills. Please refer to the heading “Total return” below for further information.

### “Longer dated”

The Index is a “longer dated” version of the Bloomberg Commodity Index that refers to versions of the relevant commodity futures that have expiry dates further into the future than the versions of the commodity futures comprised in the Bloomberg Commodity Index. More specifically, the Index refers to the composition of the Bloomberg Commodity Index looking three months ahead of the “Bloomberg Commodity Index Contract Calendar” at Section 2.8 of the Index Methodology. For example, if, at the beginning of January, you were to compare the Natural Gas future comprised in the Bloomberg Commodity Index with the Natural Gas future comprised in the Index, you would find that the Bloomberg Commodity Index would be referencing the Natural Gas future which expires in March whereas the Index would be referencing the Natural Gas future which expires in May. Further information can be found in Appendix J (“Calculation of the Forward Month BCOM”) of the Index Methodology.

## Step-by-step construction process

The commodity futures comprised within the Index are selected and weighted according to the step-by-step construction process below. The Index is constructed primarily by reference to the construction of the Bloomberg Commodity Index, however, the Index incorporates subsequent modifications that cause it to gain exposure to “longer dated” versions of the commodity futures.

Accordingly, steps 1 to 5 below summarise the initial construction of the Bloomberg Commodity Index as further detailed in Chapter 2 (“*INDEX CONSTRUCTION*”) of the Index Methodology and step 6 below summarises the subsequent construction of the Index itself as further detailed in Appendix J (“*Calculation of the Forward Month BCOM*”) of the Index Methodology.

### Initial construction of the Bloomberg Commodity Index

1. The commodity futures that are eligible for inclusion in the Bloomberg Commodity Index are set out at Section 2.2 (“*Selection of Commodities for Inclusion in the Index*”) of the Index Methodology. The eligible commodities are first weighted according to their relative *liquidity* (a measure of how actively a commodity future has historically traded). The liquidity of each commodity future is determined as a five-year average of trading volume for that commodity future further information in respect of which is available in Section 2.3 (“*Calculation of the Commodity Liquidity Percentages*”) of the Index Methodology.
2. The commodity futures are then separately weighted according to their relative *historical production levels*. The historical production levels of each commodity future are determined as a five-year average of production figures for that commodity future, such information which is derived from the sources listed in Table 5 (“*Sources Used for Production Data*”) of Section 2.4 (“*Calculation of Commodity Production Percentages*”) of the Index Methodology.
3. The weights derived from each of the foregoing categories (i.e. “liquidity” and “historical production levels” respectively) are then combined into a single aggregate weight for each commodity using a 2:1 ratio. The weights derived from historical production are given less priority than the weights derived from liquidity as historical production is believed to underestimate the economic significance of storable commodities such as gold which have lower levels of relative production compared with other commodities.
4. Once the combined weights of each commodity future have been determined in accordance with step 3 above, any commodity future that would (if included in the Bloomberg Commodity Index) represent less than 0.4% of the Bloomberg Commodity Index is excluded.
5. The following diversification rules are then applied in determining the final target weights for each of the commodity futures within the Bloomberg Commodity Index:
  - No single commodity (e.g. natural gas or silver) may constitute more than 15% of the Bloomberg Commodity Index.
  - No single commodity, together with its derivatives (e.g. WTI crude oil, together with ULS diesel and unleaded gas), may constitute more than 25% of the Bloomberg Commodity Index.
  - No related group of commodities (e.g. energy, precious metals, livestock or grains) may constitute more than 33% of the Bloomberg Commodity Index.
  - No single commodity (e.g. natural gas or silver) may constitute less than 2% of the Bloomberg Commodity Index, as liquidity allows.

### Subsequent construction of the Index

6. As described under the heading “*Longer dated*” above, the Index refers to versions of the commodity futures that have expiry dates further into the future than the versions of the commodity futures comprised in the Bloomberg Commodity Index. Accordingly, once the target weights for each of the commodities in the Bloomberg Commodity Index have been established in accordance with steps 1 to 5 above, these target weights are combined with the settlement prices of the relevant commodity futures referenced by the Bloomberg Commodity Index in order to determine Commodity Index Multipliers (“**CIMs**”). The CIMs are then applied to the “longer dated” versions of the commodity futures (as referred to under the heading “*Longer dated*” above) in order to establish the weights of the “longer dated” commodity futures in the Index.

Investors should note that the respective weights of each of the commodities comprised within the Index are expected to fluctuate in-between the annual reconstitutions of the Index.

Pursuant to the Irish Regulations, in tracking the performance of the Index, the Fund is permitted to have an indirect exposure to the individual commodities comprised within the Index of up to 20% of its Net Asset Value, which limit may be raised to 35% for a single commodity in exceptional market conditions, including (but not limited to) circumstances in which such commodity occupies a dominant market position. For the purposes of determining the foregoing limits, sub-categories of a single commodity (for instance, from different regions or markets or derived from the same primary commodity through an industrialised process) are considered as being the same commodity. However, sub-categories of a single commodity are not considered as being the same commodity if they are not highly correlated. It is possible that certain commodities which are derived from a single primary commodity may be, or may at some point in the future become, highly correlated and, as such, be deemed to be a single commodity for the purposes of determining the foregoing limits. Historically, oil and its derivatives have been highly correlated. Given the economic significance of oil and its derivatives relative to the other commodities which are eligible for inclusion within the Index, they tend (when combined) to represent a significant proportion of the Index and may, at any given time, have a combined weighting of more than 20% and up to 35%.

#### “Roll” methodology

A “commodity future” is an agreement between two parties to buy and sell a certain amount of a particular commodity at a certain price and certain date in the future. Unlike shares in companies, which typically entitle the holder to a continuing stake in a company, commodity futures normally specify a certain date in the future for the delivery of the underlying physical commodity. In order to avoid the delivery process and maintain a long futures position, commodity futures that are nearing their physical delivery dates must be sold and replacement contracts that have physical delivery dates which are further into the future must be purchased. This process is known as “rolling” a futures position.

The Index is designed to replicate an actual investment in commodity futures and therefore takes into account the need to “roll” the commodity futures. Specifically, as a commodity future comprised within the Index approaches its delivery date, the Index will be calculated as if the commodity future in the first delivery month is sold and the proceeds of that sale are used to purchase a commodity future in a subsequent delivery month. The commodity futures are rolled on a monthly basis over a period of five business days (beginning on the sixth business day of the relevant month) at a rate of 20% per business day which means that there is a gradual shift over such period from the commodity futures that are nearing their physical delivery dates to the commodity futures that have physical delivery dates which are further into the future.

#### Total return

The Index combines the returns of the Bloomberg Commodity Index 3 Month Forward<sup>SM</sup> with the returns on cash collateral invested in U.S. Treasury Bills in order to represent a fully collateralised investment in the Bloomberg Commodity Index 3 Month Forward<sup>SM</sup>. The returns on cash collateral are calculated by using the most recent weekly auction high rate for 13-week U.S. Treasury Bills, as reported on the website <https://www.treasurydirect.gov/instit/annceresult/annceresult.htm> published by the U.S. Department of the Treasury, or any successor source, which is generally published once per week on Monday.

#### Rebalancing frequency

The Index is reconstituted annually on a price percentage basis in accordance with the selection and weighting parameters described under the heading “*Step-by-step construction process*” above. At the time of each reconstitution of the Index, it is possible that additional commodities not presently represented in the Index will be added, or that one or more commodities presently represented will be removed.

#### Further information

This is a summary of the principal features of the Index and does not purport to be an exhaustive description. Further information on the Index, including the composition of the Index, commodity selection criteria, the designated contract for each commodity, the maturity dates of the underlying futures contracts and the methodology used for calculating the Index (“*Index Methodology - The Bloomberg Commodity Index Family*”), can be found on the Bloomberg website at <http://www.bloombergindexes.com/bloomberg-commodity-index-family/> as of the date of this Fund Supplement.

	ISIN	Bloomberg	Reuters
<b>Index</b> Bloomberg Commodity Index 3 Month Forward Total Return	N/A	BCOMF3T	.BCOMF3T

As at the date of this Fund Supplement, Bloomberg Index Services Limited is listed as an authorised benchmarks administrator on the public register maintained by ESMA under the Benchmark Regulation.

#### Portfolio Composition

The portfolio of Investments held by the Fund is available daily at <http://www.lgimetf.com>

## PROFILE OF A TYPICAL INVESTOR

Only Authorised Participants may purchase ETF Shares in the Fund directly from the Company. All other investors may acquire or purchase ETF Shares only through the secondary market.

It is expected that investors in the Fund will be sophisticated investors (and/or informed investors who have taken professional advice) who (i) are familiar with commodity futures contracts and understand the concepts “rolling”, “backwardation” and “contango” and the impact that these concepts may have on the performance of the Index, (ii) understand the risks associated with an investment in the Fund, (iii) accept the levels of volatility associated with the relevant commodity futures markets (or sectors thereof) to which the Fund has exposure and (iv) are able to bear the risk of losing their entire investment over the medium to long term.

## RISK MANAGEMENT

### Global exposure

The Investment Manager uses a risk management technique known as relative value-at-risk (“**Relative VaR**”) to assess the global exposure of the Fund on a daily basis. Relative VaR is a measure of the maximum potential loss that may be incurred by the Fund due to market risk rather than by reference to how much the Fund is leveraged.

The Relative VaR of the Fund is determined by dividing the value-at-risk (the “**VaR**”) of the Fund by the VaR of the Index (the “**Reference Portfolio**”). This allows the global exposure of the Fund to be compared, and limited by reference to, the global exposure of the Reference Portfolio.

The Central Bank requires that the VaR of a Fund must not exceed twice the VaR of its Reference Portfolio. It is not expected that the VaR of the Fund shall exceed twice the VaR of the Reference Portfolio. The one-tailed confidence level of the Fund shall be 99% and the holding period shall be one day. The historical observation period will not be less than one year, however, a shorter observation period may be used when appropriate (e.g. as a result of significant recent changes in price volatility).

### Leverage

As the Fund uses VaR for the purpose of calculating its global exposure, it is a requirement of authorisation under the Irish Regulations that the Fund disclose the expected level to which the Fund will be leveraged and, where relevant, the possibility that higher leverage levels may apply. For the purpose of this disclosure, it is a requirement of authorisation under the Irish Regulations that *leverage* be calculated as the *full sum of the notional of all FDI held by the Fund*, irrespective of the actual market exposure arising to the Fund as a result of the use of such FDI. Accordingly, leverage calculated in this manner is a reflection of the sum of all notional market exposures achieved through the use of FDI by the Fund as a percentage of the Fund’s Net Asset Value. Under this approach, the notional value of the relevant FDI is taken into account along with the current mark-to-market value of the FDI. This interpretation of leverage assumes that all FDI positions held by the Fund are leveraged positions, irrespective of netting or hedging arrangements and even if such FDI positions do not actually create any incremental market exposure for the Fund.

#### “Reverse Repurchase Agreement” model

Where the Fund utilises the “Reverse Repurchase Agreement” model as the sole method of cash management (as described in the section entitled “*Unfunded OTC Swap Model*” in the Prospectus), leverage calculated pursuant to the sum of the notionals approach would be comprised of the notional value of the Long Index Swaps as adjusted to reflect their current mark-to-market value (i.e. the unsettled profit or loss on the Long Index Swaps).

The proportion of the Fund’s Net Asset Value that will be invested in the Long Index Swaps will be 100% at each periodic reset (i.e. the point of time at which the profit or loss on the Long Index Swaps is settled and the notional value of the Long Index Swaps is reset against the Net Asset Value of the Fund). Accordingly, the leverage arising pursuant to the Long Index Swaps at such time will equate to the same (i.e. will be 100% of the Fund’s Net Asset Value). However, between the periodic reset dates of the Long Index Swaps, the TER and other expenses paid out of the assets of the Fund will steadily reduce the Fund’s Net Asset Value versus the value of the Long Index Swaps. This will cause the leverage arising pursuant to the Long Index Swaps to increase slightly above 100% of the Fund’s Net Asset Value until such time as the Long Index Swaps are next reset against the Fund’s Net Asset Value. Nonetheless, and on the basis that the leverage arising pursuant to the Long Index Swaps is calculated to the nearest percentile, it is not expected that the leverage arising pursuant to the Long Index Swaps will exceed 100% of the Fund’s Net Asset Value.

#### “Short Basket Swap” model

Where the Fund utilises the “Short Basket Swap” model as the sole method of cash management (as described in the section entitled “*Unfunded OTC Swap Model*” in the Prospectus), leverage calculated pursuant to the sum of the notionals approach would be comprised of (i) the notional value of the Long Index Swaps as adjusted to reflect their current mark-to-market value (i.e. the unsettled profit or loss on the Long Index Swaps) and (ii) the notional value of the Short Basket Swaps as adjusted to reflect their current mark-to-market value (i.e. the unsettled profit or loss on the Short Basket Swaps).

The proportion of the Fund’s Net Asset Value that will be invested in the Long Index Swaps will be 100% at each periodic reset (i.e. the point of time at which the profit or loss on the Long Index Swaps is settled and the notional value of the Long Index Swaps is reset against the Net Asset Value of the Fund). Accordingly, the leverage arising pursuant to the Long Index Swaps at such time will equate to the same (i.e. will be 100% of the Fund’s Net Asset Value). However, between the periodic reset dates of the Long Index Swaps, the TER and other expenses paid out of the assets of the Fund will steadily reduce the Fund’s Net Asset Value versus the value of the Long Index Swaps. This will cause the leverage arising pursuant to the Long Index Swaps to increase slightly above 100% of the Fund’s Net Asset Value until such time as the Long Index Swaps are next reset against the Fund’s Net Asset Value. Nonetheless, and on the basis that the leverage arising pursuant to the Long Index Swaps is calculated to the nearest percentile, it is not expected that the leverage arising pursuant to the Long Index Swaps will exceed 100% of the Fund’s Net Asset Value.

The proportion of the Fund’s Net Asset Value that will be invested in the Short Basket Swaps will vary between 90% and a maximum of 100% of the Fund’s Net Asset Value at each periodic reset (i.e. the point of time at which the profit or loss on the Short Basket Swaps is settled and the notional value of the Short Basket Swaps is reset against the Net Asset Value of the Fund). Accordingly, the leverage arising pursuant to the Short Basket Swaps at such time will equate to the same (i.e. will be between 90% and 100% of the Fund’s Net Asset Value). However, between the periodic reset dates of the Short Basket Swaps, the mark-to-market value of the Short Basket Swaps may deviate from the Fund’s Net Asset Value by up to 10% until such time as the Short Basket Swaps are next reset against the Fund’s Net Asset Value. Accordingly, the leverage arising pursuant to the Short Basket Swaps may be between 90% and 110% of the Fund’s Net Asset Value.

By combining the leverage arising pursuant to the Long Index Swaps with the leverage arising pursuant to the Short Basket Swaps, it is expected that the Fund will be leveraged between 190% and a maximum of 210%, when calculated to the nearest percentile.

#### Combination of the “Reverse Repurchase Agreement” and “Short Basket Swap” models

Where the Fund utilises a combination of the “Reverse Repurchase Agreement” model and the “Short Basket Swap” model, the actual level of leverage at any given time will vary according to the degree to which the Fund is invested in each of the respective models at such time. Accordingly, the Fund is expected to be leveraged between 100% and a maximum of 210% at any given time.

## RISK FACTORS

Investors are specifically referred both to the section headed “*Risk Factors*” and to Schedule II in the Prospectus and should consider the following risk factors prior to investing in the Fund.

1. An investment in the Fund exposes an investor to the market risks associated with fluctuations in the value of the commodity futures comprised within the Index. The value of the Index can increase as well as decrease and the value of an investment in the Fund will fluctuate accordingly. Investors can lose all of the capital invested in the Fund.
2. Trading in futures contracts on physical commodities, including trading in the commodity futures comprised within the Index, is speculative and can be extremely volatile. Market prices of the commodity futures comprised within the Index and the underlying physical commodities may fluctuate rapidly based on numerous factors, including (but not limited to) changes in supply and demand relationships (whether actual, perceived, anticipated, unanticipated or unrealised); weather; agriculture; trade; fiscal, monetary and exchange control programs; domestic and foreign political and economic events and policies; disease; pestilence; technological developments; changes in interest rates, whether through governmental action or market movements; and monetary and other governmental policies, action and inaction. The current or “spot” prices of the underlying physical commodities may also affect, in a volatile and inconsistent manner, the prices of the commodity futures corresponding to the relevant physical commodity. These factors may affect the value of the Index in varying ways, and different factors may cause the prices of the commodity futures comprised within the Index, and the volatility of their prices, to move in inconsistent directions at inconsistent rates.
3. The Index is composed of commodity futures contracts rather than physical commodities. Unlike equities, which typically entitle the holder to a continuing stake in a corporation, commodity futures contracts normally specify a certain date for delivery of the underlying physical commodity. As the exchange-traded futures contracts that comprise the Index approach expiration, they are replaced by similar contracts that have a later expiration. Thus, for example, a futures contract purchased and held in October may specify a March expiration in the following year. As time passes, the contract expiring in March may be replaced by a contract for delivery in May. This process is referred to as “rolling”. If the market for these contracts is in “backwardation,” which means that the prices are lower in the distant delivery months than in the nearer delivery months, the purchase of the May contract would take place at a price that is lower than the sale price of the March contract. Conversely, if the market for these contracts is in “contango,” which means that the prices are higher in the distant delivery months than in the nearer delivery months, the purchase of the May contract would take place at a price that is higher than the sale price of the March contract. The difference between the prices of the two contracts when they are rolled is sometimes referred to as a “roll yield,” and the change in price that contracts experience while they are components of the Index is sometimes referred to as a “spot return.” An investor in the Index cannot receive either the roll yield or the spot return separately. The presence of contango in the commodity markets could result in negative roll yields, which could adversely affect the value of the Index. Because of the potential effects of negative roll yields, it is possible for the value of the Index to decrease significantly over time even when the near-term or spot prices of underlying commodities are stable or increasing. It is also possible, when near-term or spot prices of the underlying commodities are decreasing, for the value of the Index to decrease significantly over time even when some or all of the constituent commodity futures are experiencing backwardation. Certain of the commodity futures included in the Index, such as gold, have historically traded in contango markets, and the Index has experienced periods in which many of the commodity futures in the Index are in contango. Although certain of the contracts included in the Index have historically experienced periods of backwardation, it is possible that such backwardation will not be experienced in the future.
4. At present, the Index is composed exclusively of regulated futures contracts. However, the Index may in the future include OTC contracts (such as swaps and forward contracts) traded on trading facilities that are subject to lesser degrees of regulation or, in some cases, no substantive regulation. As a result, trading in such contracts, and the manner in which prices and volumes are reported by the relevant trading facilities, may not be subject to the provisions of, and the protections afforded by applicable statutes and related regulations, that govern trading on regulated U.S. futures exchanges, or similar statutes and regulations that govern trading on regulated U.K. futures exchanges. In addition, many electronic trading facilities have only recently initiated trading and do not have

significant trading histories. As a result, the trading of contracts on such facilities, and the inclusion of such contracts in the Index may be subject to certain risks not presented by U.S. or U.K. exchange-traded futures contracts, including risks related to the liquidity and price histories of the relevant contracts.

5. Hedged Share Classes

Currency-hedging transactions carried out in respect of any particular Hedged Share Class are designed to minimise the effect, on the returns of the relevant Hedged Share Class, of movements in the currency of denomination of the Index constituents relative to the “hedged” currency of the relevant Hedged Share Class.

Investors should only invest in a Hedged Share Class if they are willing to forego potential gains from appreciations in the currency of denomination of the Index constituents against the “hedged” currency of the relevant Hedged Share Class.

Currency hedging employed with respect to the Hedged Share Classes aims to reduce currency risk rather than to eliminate it completely. Investors should also refer to the risk factor entitled “*Currency*” in the section of the Prospectus entitled “*Risk Factors*”.

## THE SHARES

As at the date of this Fund Supplement, the Fund has three classes of Shares which are ETF Shares as detailed in the table below. Additional classes of Shares may be added in the future in accordance with the requirements of the Central Bank.

Share Class	Share Class Type	Share Class Currency	Minimum Subscription / Redemption Amount	TER*	Dividend policy
USD Accumulating ETF	ETF Shares	USD	USD 1,000,000	0.30%	N/A
EUR Hedged Accumulating ETF	ETF Shares	USD	USD 1,000,000	0.35%	N/A
GBP Hedged Accumulating ETF	ETF Shares	USD	USD 1,000,000	0.35%	N/A

\*Expressed as a % per annum of the Net Asset Value of the Share class.

Shares are freely transferable subject to and in accordance with the provisions of the Articles and as set out in the Prospectus.

As with other Irish companies limited by shares, the Company is required to maintain a register of Shareholders. ETF Shares will be held by the Common Depository’s Nominee (as registered holder) in registered form. Only persons appearing on the register of Shareholders (i.e. the Common Depository’s Nominee) will be a Shareholder. Fractional Shares will not be issued. No temporary documents of title or Share certificates will be issued (save for the Global Share Certificate, as set out in Prospectus). A trade confirmation will be sent by the Administrator to the Authorised Participants.

For performance measurement purposes, the benchmark for each class of Shares in the Fund shall be the version of the Index as set out in the table immediately below (each, a “**Performance Benchmark**”).

Share Class	Performance Benchmark	
	Name	Bloomberg code
USD Accumulating ETF	Bloomberg Commodity Index 3 Month Forward Total Return	BCOMF3T
EUR Hedged Accumulating ETF	Bloomberg Commodity Index 3 Month Forward Total Return (EUR Hedged) USD**	
GBP Hedged Accumulating ETF	Bloomberg Commodity Index 3 Month Forward Total Return (GBP Hedged) USD**	

**\*\***Each Performance Benchmark that is a Hedged Index incorporates a daily currency-hedging adjustment to reduce the currency exposure as between the currency of denomination of the Index constituents and the “hedged” currency of the relevant Hedged Index. The notional currency-hedging position of each Hedged Index is reset daily to account for movements in the value of the Index.

Currency-hedging for each Hedged Share Class is achieved through the use of unfunded total return OTC Swaps referencing the corresponding Hedged Index. Accordingly, the daily currency-hedging mechanism incorporated into each Hedged Index is automatically incorporated into the return of the corresponding Hedged Share Class. Each Hedged Share Class is therefore expected to deliver a return that closely corresponds with the return of its corresponding Hedged Index. In respect of each Hedged Share Class, as the currency-hedging adjustment incorporated into the corresponding Hedged Index (which the OTC Swaps provide exposure to) is adjusted on a daily basis, any over-hedged or under-hedged positions which arise on an intra-day basis will be re-set at the end of the day. Accordingly, no day-to-day adjustments are required to be made to the OTC Swaps themselves as a result of changes in the value of the Index constituents. Adjustments will only be made to the size of the OTC Swaps to account for subscriptions and redemptions for Shares in a relevant Hedged Share Class.

## TRACKING ERROR

The estimated anticipated tracking error for the Fund in normal market conditions is 0.03% (annualised), which is the anticipated volatility of the difference between the return of the Fund’s portfolio (as a whole) and the return of the Index. As the return of the Fund as a whole is comprised of the returns of multiple Share classes (some of which are hedged and some of which are unhedged), the foregoing figure may not be a useful measure of anticipated tracking error for investors in a particular Share class.

Accordingly, in order to provide a useful measure to investors that takes account of hedging only where relevant, the table below sets out the anticipated volatility of the difference in normal market conditions between the return of the unhedged Share class (i.e. the USD Accumulating ETF) and the unhedged Performance Benchmark (i.e. the Index) as well as the anticipated volatility of the difference in normal market conditions between the return of each Hedged Share Class and the return of the corresponding hedged Performance Benchmark (i.e. the relevant Hedged Index). Investors should note that the estimates below are not intended to be exact and may be expected to vary over time.

USD Accumulating ETF	0.03% (annualised)
EUR Hedged Accumulating ETF	0.04% (annualised)
GBP Hedged Accumulating ETF	0.04% (annualised)

## STOCK EXCHANGE LISTINGS

Application has been made to the stock exchange(s) listed below for the admission to trading of the specified classes of ETF Shares. Applications for the admission to additional stock exchanges of existing and new classes of ETF Shares may be made from time to time.

Share Class	Share Class Type	Listing Exchange	Listing Currency	ISIN	Bloomberg code	Reuters code
USD Accumulating ETF	ETF Shares	London Stock Exchange	USD	IE00B4WPHX27	COMF LN	COMF.L
		London Stock Exchange	GBP	IE00B4WPHX27	CMFP LN	CMFP.L
		Deutsche Börse	EUR	DE000A1CXBV8	ETL2 GY	ETL2.DE
		Borsa Italiana	EUR	IE00B4WPHX27	COMF IM	COMF.MI
		SIX Swiss Exchange	CHF	IE00B4WPHX27	COMF SW	ECCOMF.S
		NYSE Euronext	EUR	IE00B4WPHX27	COMF NA	COMF.AS

## DEALING PROCEDURES

The procedures for subscribing for and redeeming of Shares are outlined in the Prospectus. Subscriptions and redemptions in the Fund may be made in cash only.

Shares may be subscribed for in the manner set out in the Prospectus under the heading “*Subscriptions*”, beginning on page 55.

Shares in the Fund may be redeemed as described in the Prospectus under the heading “*Redemptions*” beginning on page 63.

## DEALING INFORMATION

Base Currency	USD
Share Class Currency	The dealing currency and currency of denomination for each class of Shares as specified in the table contained in the section above entitled “ <i>The Shares</i> ”.
Business Day	A day on which banks and markets and exchanges are open for business in the United Kingdom.
Dealing Day	An Index Publication Day and a day on which no Significant Markets are closed for business or such Business Day(s) as the Directors may from time to time determine (subject to advance Shareholder notice) for dealings in the Fund provided always that there shall be at least one Dealing Day each fortnight. The Promoter maintains an online “ <i>Dealing Day Calendar</i> ” at: <a href="http://www.lgimetf.com">http://www.lgimetf.com</a> , where advance notice of all expected Dealing Days for the Fund is published on an ongoing basis. The Dealing Day Calendar is also available on request from the Manager and from the Promoter.
Dealing Deadline	The cut-off time in respect of any Dealing Day for receipt of applications for subscriptions and redemptions in the Fund as shall be set out on <a href="http://www.lgimetf.com">http://www.lgimetf.com</a> , which information shall be kept up to date.
Minimum Subscription Amount	Please refer to the table contained in the section above entitled “ <i>The Shares</i> ”.
Minimum Redemption Amount	Please refer to the table contained in the section above entitled “ <i>The Shares</i> ”.
Settlement Time	Settlement of subscriptions and redemptions must generally occur between one and three Business Days after the relevant Dealing Day (as prescribed by the Manager or its delegate from time to time).
Valuation	The Valuation Point is the time at which the value of the Index is determined.  The Fund gains exposure to the Index through the use of Long Index Swaps which are valued in accordance with the relevant provisions of the Prospectus.
TER	Please refer to the table contained in the section above entitled “ <i>The Shares</i> ” for the TER applicable to each Share class.  Brokerage and extraordinary expenses are excluded from the TER – see section entitled “ <i>Fees and Expenses</i> ” on page 72 of the Prospectus.  Fees and expenses relating to the establishment of the Fund are borne by the Manager.

## TAXATION

A description of the taxation applicable to the Company and its investors is outlined under the heading “*Taxation*” in the Prospectus.

## INDEX DISCLAIMER

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The Prospectus relates only to the Fund and does not relate to the exchange-traded physical commodities underlying any of the Bloomberg Commodity Index components, including the Bloomberg Commodity Index 3 Month Forward Total Return components. Purchasers of the Shares in the Fund should not conclude that the inclusion of a futures contract in the Bloomberg Commodity Index, including the Bloomberg Commodity Index 3 Month Forward Total Return, is any form of investment recommendation of the futures contract or the underlying exchange-traded physical commodity by Bloomberg, UBS AG, UBS Securities or any of their subsidiaries or affiliates. The information in the Prospectus regarding the Bloomberg Commodity Index and Bloomberg Commodity Index 3 Month Forward Total Return components has been derived solely from publicly available documents. None of Bloomberg, UBS AG, UBS Securities or any of their subsidiaries or affiliates has made any due diligence inquiries with respect to the Bloomberg Commodity Index and Bloomberg Commodity Index 3 Month Forward Total Return components in connection with the Fund. None of Bloomberg, UBS AG, UBS Securities or any of their subsidiaries or affiliates makes any representation that these publicly available documents or any other publicly available information regarding the Bloomberg Commodity Index and Bloomberg Commodity Index 3 Month Forward Total Return components, including without limitation a description of factors that affect the prices of such components, are accurate or complete.

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