

# Shanxi Securities International Asset Management Limited

28 July 2023

This is a passive exchange traded fund. This statement provides you with key information about this product. This statement is a part of the offering document. You should not invest in this product based on this statement alone. The Underlying Index consists of only iron ore futures whose price movements may deviate significantly from the iron ore spot price.		
Quick facts		
Stock codes:	USD Counter: 09047	
	HKD Counter: 03047	
Trading lot size:	100 Units	
Manager:	Shanxi Securities International Asset Management Limited	
Trustee:	HSBC Institutional Trust Services (Asia) Limited	
Designated Depository Bank:	HSBC Bank (China) Company Limited	
Ongoing charges over a year*:	2.26%	
Tracking difference of the last	-7.93%	
calendar year**:		
Underlying Index:	DCE Iron Ore Futures Price Index	
Base currency:	US dollars (USD)	
Trading currency:	USD Counter: US Dollar (USD)	
	HKD Counter: Hong Kong Dollar (HKD)	
Financial year end of this fund:	31 December	
Distribution policy:	At the Manager's sole discretion. Distributions may be made out of	
	capital or effectively out of capital as well as income at the	
	Manager's discretion. All Units will receive distribution in USD only.	
Fund website:	http://am.ssif.com.hk <sup>#</sup>	

- \* The ongoing charges figure is based on the Sub-Fund's ongoing charges expressed as a percentage of the average Net Asset Value ("**NAV**") for the year ended 31 December 2022. This figure may vary from year to year.
- \*\* This is the actual tracking difference of the last calendar year. Investors should refer to the Sub-Fund's website for more up-to-date information on the actual tracking difference.
- # This website has not been reviewed or approved by the Securities and Futures Commission ("SFC").

# What is this product?

The SSIF DCE Iron Ore Futures Index ETF ("**Sub-Fund**") is a sub-fund of SSIF ETF I, which is an umbrella unit trust established under Hong Kong law. The units of the Sub-Fund ("**Units**") are listed on The Stock Exchange of Hong Kong Limited ("**SEHK**"). These Units are traded on the SEHK like listed stocks. The Sub-Fund is a passively managed index tracking exchange traded fund ("**ETF**") under Chapters 8.6 and 8.8 of the Code on Unit Trusts and Mutual Funds ("**Code**").

The Sub-Fund is a passive ETF and invests in iron ore futures contracts ("DCE Iron Ore Futures Contracts") traded on the Dalian Commodity Exchange ("DCE"). The Sub-Fund is denominated in USD.

# **Objective and investment strategy**

### Objective

The investment objective of the Sub-Fund is to provide investment results that, before deduction of fees and expenses, closely correspond to the performance of the DCE Iron Ore Futures Price Index ("**Underlying Index**"). There is no assurance that the Sub-Fund will achieve its investment objective.

# Strategy

In order to achieve the investment objective of the Sub-Fund, the Manager will primarily adopt a full replication strategy by investing directly in DCE Iron Ore Futures Contracts so as to give the Sub-Fund the performance of the Underlying Index. In entering into the DCE Iron Ore Futures Contracts, the Manager anticipates that no more than 40% of the NAV of the Sub-Fund from time to time will be used as margin to acquire the DCE Iron Ore Futures Contracts. Under exceptional circumstances (e.g. increased margin requirement by the exchange and/or brokers in extreme market turbulence), the margin exposure may increase substantially beyond 40% of the NAV of the Sub-Fund.

Not less than 60% of the NAV of the Sub-Fund (this percentage may be reduced proportionally under exceptional circumstances when there is a higher margin exposure, as described above) will be applied by the Manager towards:

- holding cash as deposits (a) in USD, HKD and RMB with banks in Hong Kong and (b) in RMB and USD in the SSIF DCE Iron Ore Futures Index ETF's settlement accounts with the Designated Depository Bank (Direct Access Route) in Mainland China and/or with the Offshore Brokers (Indirect Access Route), as the case may be;
- (ii) holding certificates of deposits in USD issued by banks in Hong Kong; and/or
- (iii) investing up to 60% of the NAV in money market funds denominated in different currencies such as USD, HKD and RMB (but less than 30% of the NAV in each money market fund) authorised by the SFC in accordance with the requirements of the Code and/or up to 10% in money market funds which are not authorised by the SFC.

Yields from such cash deposits, certificates of deposits and money market funds will be used to meet the Sub-Fund's fees and expenses and after deduction of such fees and expenses the remainder will be distributed by the Manager to unitholders in USD.

Other than DCE Iron Ore Futures Contracts, the Sub-Fund may use financial derivative instruments ("**FDI**") for hedging purposes.

The rolling strategy of the Sub-Fund will mimic that of the Underlying Index methodology so as to closely track the Underlying Index. For the Sub-Fund, the roll will generally take place over a 5-day period as stated in the Underlying Index methodology. Under exceptional circumstances, the Manager may use its discretion to deviate from the predefined rolling schedule in the best interests of investors.

The Manager does not currently intend to enter into securities lending transactions and repurchase transactions and other similar over-the-counter transactions on behalf of the Sub-Fund. Should this intention change in the future, the SFC's prior approval (if applicable) will be sought and at least one month's prior notice will be given to unitholders.

# Index

# General

The Underlying Index of the Sub-Fund is the DCE Iron Ore Futures Price Index which tracks the price of DCE Iron Ore Futures Contracts.

The Underlying Index was launched on 7 April 2017 and had a base level of 1,000 on 18 October 2013. The Underlying Index is denominated in RMB (CNY).

## Index provider

The index provider is DCE. The Manager and each of its connected persons are independent of the index provider.

## Constituents

The Underlying Index is comprised of DCE Iron Ore Futures Contracts listed on the DCE. The specific DCE Iron Ore Futures Contracts included in the Underlying Index is the main DCE Iron Ore Futures Contract, which is the DCE Iron Ore Futures Contract with the largest open interest, and if there are two DCE Iron Ore Futures Contract would be the contract with the larger trading volume. If there are two DCE Iron Ore Futures Contracts with same open interest and trading volume, then the one with a later expiry month would be the main DCE Iron Ore Futures Contract.

Index constituents will be available on http://am.ssif.com.hk and will be updated on a monthly basis.

### Futures roll

The Underlying Index incorporates a methodology for the replacement (also referred to as "rolling") of the main DCE Iron Ore Futures Contract with the next main DCE Iron Ore Futures Contract.

On the closing of each trading day of DCE, the main DCE Iron Ore Futures Contract is determined using the criteria mentioned in "*Constituents*" above.

The Underlying Index gradually reduces the weighting of the main DCE Iron Ore Futures Contract and increases the weighting of the next main DCE Iron Ore Futures Contract over a five consecutive business day period so that on the first day of the roll-over period the main DCE Iron Ore Futures Contract represents 80% and the next main DCE Iron Ore Futures Contract represents 20% of the Underlying Index, and on the 5<sup>th</sup> day of the roll-over period the next main DCE Iron Ore Futures Contract represents 100% of the Underlying Index.

If, on the last trading day of DCE two months prior to the settlement date of the then main DCE Iron Ore Futures Contract, no new main DCE Iron Ore Futures Contract is identified, there will be a mandatory rolling. In such circumstance, the then main DCE Iron Ore Futures Contract will be rolled-over to the next main DCE Iron Ore Futures Contract will be rolled-over to the next main DCE Iron Ore Futures Contract with a later expiry month (i.e. the DCE Iron Ore Futures Contract with the second largest open interest and with a later expiry month), over a 5-day roll-over period mentioned above.

Under exceptional circumstances, the Manager may use its discretion to deviate from the roll-over schedule as mentioned above in the best interests of the Sub-Fund and the unitholders.

#### Index information Wind Code: DCEIOFI

For further details, please refer to the website of the index provider at http://www.dce.com.cn/.

# Use of derivatives / investment in derivatives

The Sub-Fund's net derivative exposure may be more than 50% but up to 100% of the Sub-Fund's NAV.

# What are the key risks?

Investment involves risks. Please refer to the Prospectus for details including the risk factors.

1. Investment risk

• The Sub-Fund's investment portfolio may fall in value due to any of the key risk factors below and therefore your investment in the Sub-Fund may suffer losses. There is no guarantee of the repayment of principal.

# 2. New product risk

- The Sub-Fund is a futures-based ETF investing directly in DCE Iron Ore Futures Contracts. The
  novelty and untested nature of such an ETF and the fact that the Sub-Fund is one of the first few
  futures-based ETFs in Hong Kong makes the Sub-Fund potentially riskier than traditional ETFs
  investing in equity securities.
- The Sub-Fund is the first exchange traded fund managed by the Manager. As such, the Manager will substantially make use of and rely upon the risk management tools to support the investments of the Sub-Fund. In the event of a breakdown or disruption in such tools, the operations of the Sub-Fund may be adversely affect.

# 3. Iron ore market risk

- Concentration / single commodity risk: As the exposure of the Sub-Fund is concentrated in the iron
  ore market by investing in single DCE Iron Ore Futures Contract; generally, this may result in large
  concentration risk. The Sub-Fund is more susceptible to the effects of iron ore price volatility than
  more diversified funds and an ETF which holds futures contracts with different expiring months.
- Iron ore commodity volatility risk: Iron ore prices are highly volatile and may fluctuate widely and may be affected by numerous events or factors such as production decisions by other iron ore producers, complex interaction of supply and demand of iron ore, economic conditions, speculator's activities and financial market conditions.

# 4. Futures contracts risk

- Contango risk: A "roll" occurs when a new main DCE Iron Ore Futures Contract is determined and is replaced in the Underlying Index with the next main DCE Iron Ore Futures Contract. Where the Underlying Index is calculated with reference to these DCE Iron Ore Futures Contracts, the value of the Underlying Index (and so the NAV per Unit) may be adversely affected by the cost of rolling positions forward (due to the increased price of the DCE Iron Ore Futures Contract, i.e. "contango").
- *Volatility risk*: The price of DCE Iron Ore Futures Contracts can be highly volatile and is influenced by, among other things, interest rates, changing market supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments.
- Leverage risk: Because of the low margin deposits normally required in futures trading, an extremely high degree of leverage is typical of a futures trading account. As a result, a relatively small price movement in a DCE Iron Ore Futures Contract may result in a proportionally high impact and substantial losses to the Sub-Fund, having a material adverse effect on the NAV. Like other leveraged investments, a futures transaction may result in losses in excess of the amount invested.
- Liquidity risk: The Underlying Index is calculated with reference to DCE Iron Ore Futures Contracts exposing the Sub-Fund and the investors to a liquidity risk linked to DCE Iron Ore Futures Contracts which may affect their value.
- *Margin risk:* Generally, most leveraged transactions, such as DCE Iron Ore Futures Contracts, involve the posting of margin or collateral. Increases in the amount of margin or collateral or similar payments may result in the need for the Sub-Fund to liquidate its investments at unfavourable prices in order to meet margin or collateral calls. This may result in substantial losses to unitholders.
- Risk relating to measures taken by relevant parties: Regarding the Sub-Fund's futures positions, relevant parties (such as clearing brokers, execution brokers, participating dealers and stock exchanges) may impose certain mandatory measures for risk management purpose under extreme market circumstances. These measures may include limiting the size and number of the Sub-Fund's futures positions and/or mandatory liquidation of part or all of the Sub-Fund's futures positions without advance notice to the Manager. In response to such mandatory measures, the Manager may have to take corresponding actions in the best interest of the Sub-Fund's unitholders and in accordance with the Sub-Fund's constitutive documents, including suspension of creation of the Sub-Fund's Units and/or secondary market trading, implementing alternative investment and/or hedging strategies and termination of the Sub-Fund. These corresponding actions may have an adverse impact on the operation, secondary market trading, index-tracking ability and the NAV of the Sub-Fund. While the Manager will endeavour to provide advance notice to investors regarding these actions to the extent possible, such advance notice may not be possible in some circumstances.

# 5. Risk of material non-correlation with spot/current market price of iron ore

 As the Underlying Index is based upon DCE Iron Ore Futures Contracts but not on physical iron ore, the performance of the Underlying Index may substantially differ from the current market or spot price performance of the iron ore. Accordingly, the Sub-Fund may underperform a similar investment that is linked to the spot price of iron ore.

# 6. Position limits risk

The DCE has stipulated speculative position limits for DCE Iron Ore Futures Contracts. Based on the roll-over schedule, these speculative position limits are not currently expected by the Manager to affect the Sub-Fund, although the Manager cannot guarantee that the circumstances (such as rolling schedule, DCE Iron Ore Futures Contracts' expiry dates) will remain unchanged. If the Sub-Fund exceeds a speculative position limit, its ability to seek additional exposure by acquiring further DCE Iron Ore Futures Contracts as a result of new creations of Units could be impaired, the Sub-Fund's ability to achieve its investment objective could be affected and, as a result, the Manager could be required to suspend new creations of Units. This may result in divergence between the trading price of the Unit and the NAV per Unit. The investment exposure would also deviate from the target exposure which adds tracking error to the Sub-Fund. The position limit may have adverse impact to the Sub-Fund and may cause substantial loss to the Sub-Fund.

# 7. Government intervention and restriction

• There may be substantial government intervention in the economy, including restrictions on investment in companies or industries deemed sensitive to relevant national interests. Governments and regulators may also intervene in the financial markets, such as by the imposition of trading restrictions, a ban on "naked" short selling or the suspension of short selling for certain stocks. Such interventions may be unpredictable, affect the trading, operation and market making activities of the Sub-Fund and may also lead to an increased tracking error for the Sub-Fund. Furthermore, such market interventions may have a negative impact on the market sentiment which may in turn affect the performance of the Underlying Index and as a result the performance of the Sub-Fund. In worst case scenario, the investment objective of the Sub-Fund cannot be achieved.

# 8. Investment in other funds risk

The Sub-Fund may invest in money market funds. The Sub-Fund will be exposed to the risk of
investing in another management company's funds with all the related risks which attach to funds
generally and bear the fees and expenses of the underlying funds. These charges will be in addition
to the fees payable by the Sub-Fund.

# 9. Trading differences risk

As the DCE may be open when Units in the Sub-Fund are not priced, the value of any iron ore futures contracts in the Sub-Fund's portfolio may change substantially when investors will not be able to purchase or sell the Sub-Fund's Units. Further the price of DCE Iron Ore Futures Contracts listed on the DCE may not be available during part of or all of the SEHK trading sessions due to trading hour differences which may result in Units of the Sub-Fund being traded at a premium or discount of the Unit price to its NAV.

# **10.** Other currency distribution risk

Investors should note that all Units will receive distribution in USD only. In the event that the relevant unitholder has no USD account, the unitholder may have to bear the fees and charges associated with the conversion of such distribution from USD to HKD or other currency. The unitholder may also have to bear bank or financial institution fees and charges associated with the handling of the distribution payment. Unitholders are advised to check with their brokers regarding arrangements for distributions.

# 11. Emerging market risk

The Sub-Fund may invest in Mainland China. Investing in the Mainland China market is subject to the risks of investing in emerging markets which may involve increased risk and special considerations not typically associated with investment in more developed markets, such as liquidity risks, currency risks/control, political and economic uncertainties, legal and taxation risk, settlement risk, custody risk and the likelihood of a high degree of volatility.

## 12. Currency exchange risk

Assets of the Sub-Fund, such as monies in the margin account and settlement account, may be denominated in currencies other than USD and the underlying DCE Iron Ore Futures Contracts are denominated in RMB, whilst the Sub-Fund is denominated in USD. The Sub-Fund is subject to transaction costs in the exchange of such other currencies to USD. The performance, tracking difference, tracking error and the NAV of the Sub-Fund may therefore be affected unfavourably by movements in the exchange rate between USD and such other currencies and changes in exchange rate control policies.

## 13. Dual counter trading risk

- If there is a suspension of the inter-counter transfer of Units between the counters and/or any limitation on the level of services by brokers and CCASS participants, unitholders will only be able to trade their Units in the relevant counter on the SEHK, which may inhibit or delay an investor dealing.
- The market price on the SEHK of Units traded in USD and of units traded in HKD may deviate significantly. As such investors may pay more or receive less when buying or selling Units traded in USD on the SEHK than in respect of Units traded in HKD and vice versa.

#### 14. Reliance on market makers risk

Although the Manager ensures that at least one market maker will maintain a market for the Units traded in each counter and that at least one market maker to each counter gives not less than 90 days prior written notice to terminating market making arrangement, under the relevant market maker agreement, liquidity in the market for the Units may be adversely affected if there is no or only one market maker for the USD or HKD traded Units. There is also no guarantee that any market making activity will be effective.

#### 15. Tracking error risk

The Sub-Fund may be subject to tracking error risk, which is the risk that its performance may not track that of the Underlying Index exactly. Factors such as the fees and expenses of the Sub-Fund, inability to rebalance the Sub-Fund's holdings of Futures Contracts to track the Underlying Index, rounding of the Futures Contracts' prices, and changes to the regulatory policies may affect this tracking error. The Manager will monitor and seek to manage such risk minimising tracking error. There can be no assurance of exact or identical replication at any time of the performance of the Underlying Index.

#### 16. Trading risks

- The trading price of the Units on the SEHK is driven by market factors such as the demand and supply of the Units. Therefore, the Units may trade at a substantial premium or discount to the Sub-Fund's NAV.
- As investors will pay certain charges (e.g. trading fees and brokerage fees) to buy or sell Units on the SEHK, investors may pay more than the NAV per Unit when buying Units on the SEHK, and may receive less than the NAV per Unit when selling Units on the SEHK.

#### 17. Termination risks

• The Sub-Fund may be terminated early under certain circumstances, for example, where the Underlying Index is no longer available for benchmarking or if the size of the Sub-Fund falls below USD 10 million. Investors may not be able to recover their investments and suffer a loss when the Sub-Fund is terminated.

#### 18. Passive investment risk

The Sub-Fund is passively managed and under normal market circumstances, the Manager will not
have the discretion to adapt to market changes due to the inherent investment nature of the SubFund. Falls in the Underlying Index are expected to result in corresponding falls in the value of the
Sub-Fund. Under extreme market circumstances, the Manager will adopt temporary defensive
position for protection of the Sub-Fund.

# 19. PRC tax risk

- There are risks and uncertainties associated with the current PRC tax laws, regulations and practice in respect of the trading of DCE Iron Ore Futures Contracts (which may have retrospective effect). Any increased tax liabilities on the Sub-Fund may adversely affect the Sub-Fund's value.
- Based on professional and independent tax advice, the Manager does not intend to make any PRC tax provision on the trading of DCE Iron Ore Futures Contracts.

#### 20. Derivative instrument risk

 Risks associated with FDI include counterparty / credit risk, liquidity risk, valuation risk, volatility risk and over-the-counter transaction risk. The leverage element / component of an FDI can result in a loss significantly greater than the amount invested in the FDI by the Sub-Fund. Exposure to FDI may lead to a high risk of significant loss by the Sub-Fund.

### 21. Hedging risk

The Manager is permitted, but not obliged, to use hedging techniques such as using futures, options and/or forward contracts to attempt to offset market and currency risks. There is no guarantee that hedging techniques will fully and effectively achieve their desired result and hedging may become inefficient or ineffective. This may have adverse impact on the Sub-Fund, including its NAV, tracking difference and tracking error, and its investors.

# 22. Risk relating to distributions paid out of capital

Payment of distributions out of or effectively out of capital represents a return or a withdrawal of
part of the amount they originally invested or capital gain attributable to that amount. Any such
distributions may result in an immediate reduction of the NAV per Unit of the Sub-Fund.



# How has the fund performed?

- Past performance information is not indicative of future performance. Investors may not get back the full amount invested.
- The computation basis of the performance of the Sub-Fund is based on the calendar year end, NAV-To-NAV, with dividend reinvested.
- These figures show by how much the Sub-Fund increased or decreased in value during the calendar year being shown. Performance of the Sub-Fund has been calculated in USD including ongoing charges and excluding your subscription fee and redemption fee you might have to pay.
- Where no past performance is shown, there was insufficient data available in that year to provide performance.
- The benchmark of the Sub-Fund is the Underlying Index, DCE Iron Ore Futures Price Index.
- Sub-Fund launch date: 26 March 2020

# Is there any guarantee?

The Sub-Fund does not have any guarantees. You may not get back the amount of money you invest.

# What are the fees and charges?

Please refer to the section entitled "Fees and Charges" of the Prospectus for details of other fees and expenses.

## Charges incurred when trading the Sub-Fund on the SEHK

Fees	What you pay
Brokerage fee	Market rates
Transaction levy	0.0027% <sup>1</sup> of the trading price
AFRC Transaction levy	0.00015% <sup>2</sup> of the trading price
Trading fee	0.00565% <sup>3</sup> of the trading price
Stamp duty	Nil
Inter-counter transfer	HKD5⁴

<sup>1</sup> Transaction levy of 0.0027% of the trading price of the Units, payable by each of the buyer and the seller.

- <sup>2</sup> AFRC Transaction levy of 0.00015% of the trading price of the Units, payable by each of the buyer and the seller.
- <sup>3</sup> Trading fee of 0.00565% of the trading price of the Units, payable by each of the buyer and the seller.
- <sup>4</sup> HKSCC will charge each CCASS participant a fee of HKD5 per instruction for effecting an intercounter transfer from one counter to another counter. Investors should check with their brokers regarding any additional fees.

# Ongoing fees payable by the Sub-Fund

The following expenses will be paid out of the Sub-Fund. They affect you because they reduce the NAV of the Sub-Fund which may affect the trading price.

Fees	Annual rate (as a % of the Sub-Fund's value)
Management fee*	1.2% per annum
Trustee and Registrar fee*	0.10% per annum for the first USD50 million of the NAV and 0.08% per annum for the remaining balance of the NAV, subject to a monthly minimum of USD10,000
Performance fee	Nil
Administration fee	Nil

\* Please note that some fees may be increased up to a permitted maximum on giving 1 month's notice to unitholders. Please refer to the section of the Prospectus entitled "Fees and Charges" for further details of the fees and charges payable and the permitted maximum of such fees allowed as well as other ongoing expenses that may be borne by the Sub-Fund.

#### Other fees

You may have to pay other fees when dealing in the Units of the Sub-Fund.

# Additional information

The Manager will publish important news and information in respect of the Sub-Fund (including in respect of the Underlying Index), in both English and Chinese languages (unless otherwise specified) at the following website <a href="http://am.ssif.com.hk">http://am.ssif.com.hk</a>, including:

- the Prospectus and this Product Key Facts Statement of the Sub-Fund (as amended and supplemented from time to time);
- the latest audited annual and unaudited interim financial reports of the Sub-Fund in English;
- any public announcements made by the Sub-Fund, including information in relation to the Sub-Fund and the Underlying Index, notices of the suspension of the calculation of NAV, changes in fees and charges and the suspension and resumption of trading of Units and notices relating to material changes to the Sub-Fund that may have an impact on its investors, including notices for material alterations or additions to the Prospectus or the Sub-Fund's Product Key Facts Statement or constitutive documents;
- the near real-time indicative NAV per Unit of the Sub-Fund (updated every 15 seconds throughout each Dealing Day in the base currency of the Sub-Fund and in each trading currency) during normal trading hours on the SEHK;
- the last NAV in the base currency and last NAV per Unit of the Sub-Fund in the base currency and in each trading currency (updated on a daily basis);
- the full composition of the Sub-Fund (updated on a daily basis)
- the composition of dividends for the Sub-Fund for a rolling 12-month period (i.e. the relative amounts paid out of (i) net distributable income, and (ii) capital (if any));
- the annual tracking difference and tracking error of the Sub-Fund;
- the ongoing charges figure and past performance information of the Sub-Fund;
- the latest list of participating dealers and market makers; and
- a "performance simulator" of the Sub-Fund, which allows investors to select a historical time period and simulate the performance of the Sub-Fund vis-à-vis the spot price of iron ore during that period based upon historical data.

The near real time estimated NAV per Unit in HKD referred to above is indicative and for reference only. This is updated every 15 seconds during SEHK trading hours and is calculated using the near real-time indicative NAV per Unit in USD multiplied by a real-time USD:HKD foreign exchange rate provided by Wind Information (HK) Company Limited when the SEHK is opened for trading.

# Important

If you are in doubt, you should seek professional advice.

The SFC takes no responsibility for the contents of this statement and makes no representation as to its accuracy or completeness.