

# JPMorgan Asset Management (Europe) S.à r.l. (JPMAME) Portfolio Holdings Disclosure Policy - JPMorgan ETFs (Ireland) ICAV (“ICAV”) January 2026

## Subject: Portfolio Holdings Disclosure Policy - JPMorgan ETFs (Ireland) ICAV (“ICAV”)

### Scope

The Management Company has adopted a Portfolio Holdings Disclosure Policy to govern the disclosure of the portfolio holdings of each sub-fund of the ICAV.

### Policy

“Portfolio holdings” means the securities held by the sub-fund (e.g. stocks, bonds, cash investments, derivatives, and any other investment positions). Sub-fund information may be made available to Shareholders, as detailed in the table below.

Type of disclosure	Disclosure period
Complete sub-fund holdings	Daily as of the end of the each business day

Details of each Sub-Fund’s holdings may be found at: [www.jpmorganassetmanagement.ie](http://www.jpmorganassetmanagement.ie). In case of technical difficulties with downloading the Sub-Fund’s holdings from the website, they can be obtained by contacting the Management Company at the following email address: [fundinfo@jpmorgan.com](mailto:fundinfo@jpmorgan.com). The Indicative Net Asset Value (“iNAV”) for each sub-fund is calculated at one second intervals throughout the trading day and is published on Bloomberg or Reuters.

Sub-fund information in the form of a portfolio composition file (PCF) will be made available to the below list of recipients.

Recipient	Frequency	Purpose
Authorised Participants	Daily	Creation of basket of securities and to facilitate accurate secondary market pricing
Select Data Vendors*	Daily	Facilitate data exchange between JPMAME and Authorised Participants
ICE Data Indices, LLC	Daily	iNAV calculator
Deutsche Boerse	Daily	Internal monitoring and surveillance
SIX Swiss Exchange	Daily	Internal monitoring and surveillance

\*The list of current vendors can be obtained by contacting the Management Company at the above mentioned email address.

### Effective date(s)

This policy document has been updated in January 2026.