

# PRODUCT KEY FACTS

## Premia J.P. Morgan Asia Credit Investment Grade USD Bond ETF (Listed Distribution Units) (a sub-fund of Premia ETF Series)

Premia Partners Company Limited

4 May 2026

***This is an exchange traded fund.  
This statement provides you with key information about the Listed Distribution Units of  
Premia J.P. Morgan Asia Credit Investment Grade USD Bond ETF.  
This statement is a part of the Prospectus.  
You should not invest in this product based on this statement alone.***

### Quick facts

<b>Stock codes:</b>	9411 – USD counter (Listed Distribution Units) 3411 – HKD counter (Listed Distribution Units)
<b>Trading lot size:</b>	50 Units – USD counter 50 Units – HKD counter
<b>Manager:</b>	Premia Partners Company Limited
<b>Trustee:</b>	HSBC Institutional Trust Services (Asia) Limited
<b>Ongoing charges over a year*:</b>	Listed Distribution Units : 0.23%
<b>Annual tracking difference:</b>	Listed Distribution Units : -0.21%
<b>Underlying Index:</b>	J.P. Morgan Asia Credit Index - Investment Grade
<b>Base Currency:</b>	United States dollars (USD)
<b>Trading currency:</b>	United States dollars (USD) Hong Kong dollars (HKD)
<b>Financial year end of this fund:</b>	31 December
<b>Distribution policy:</b>	The Manager intends to pay distributions to Unitholders of the Listed Distribution Units quarterly (in February, May, August and November each year) at its discretion. <b>All Units of the Listed Distribution Units (whether USD or HKD traded) will receive distributions in the Base Currency (USD) only.**</b> Distributions may be made out of capital or effectively out of capital as well as income at the Manager's discretion. Where distributions are made out of capital or effectively out of capital, this may result in an immediate reduction in the Net Asset Value ("NAV") per Unit of the Listed Distribution Units.
<b>ETF website:</b>	<a href="http://www.premia-partners.com">www.premia-partners.com</a> ***

\* The ongoing charges figure is based on expenses for the year ended 31 December 2025. This figure may vary from year to year. As the Sub-Fund adopts a single management fee structure, the ongoing charges of the Sub-Fund will be equal to the amount of the single management fee which is capped at a maximum of 0.23% of the average Net Asset Value of the Sub-Fund. Any ongoing expenses exceeding 0.23% of the average Net Asset Value of the Sub-Fund will be borne by the Manager and will not be charged to the Sub-Fund. Please refer to "Ongoing fees payable by the Sub-Fund" below and the Prospectus for details.

\*\* All Units of the Listed Distribution Units will receive distributions 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 dividend from USD into HKD or any other currency. Unitholders are advised to check with their brokers regarding

*arrangements for distributions and to consider the risk factor entitled "Foreign exchange and other currency distributions risk" below.*

\*\*\* This website has not been reviewed by the SFC.

## What is this product?

Premia J.P. Morgan Asia Credit Investment Grade USD Bond ETF (the "**Sub-Fund**") is a sub-fund of Premia ETF Series, which is an umbrella unit trust established under Hong Kong law. The units of the Listed Distribution Units of the Sub-Fund ("**Units**") are listed on The Stock Exchange of Hong Kong Limited (the "**SEHK**"). These Units are traded on the SEHK like listed stocks. The Sub-Fund is a passively managed index tracking exchange traded fund under Chapter 8.6 of the Code on Unit Trusts and Mutual Funds (the "**Code**").

**The Sub-Fund offers the Listed Class of Units (Listed Distribution Units) and the Unlisted Class of Units (Unlisted Accumulation Units (USD Unhedged)). This statement contains information about the offering of the Listed Distribution Units as defined in the Prospectus. Investors should refer to a separate statement for the offering of the Unlisted Accumulation Units (USD Unhedged) also defined in the Prospectus.**

## Objective and investment strategy

### Objective

The investment objective of the Sub-Fund is to provide investment results that, before fees and expenses, closely correspond to the performance of the J.P. Morgan Asia Credit Index - Investment Grade (the "**Index**").

### Strategy

In seeking to achieve the Sub-Fund's investment objective, the Manager will primarily use an optimised representative sampling strategy by investing directly in a representative sample of USD denominated investment grade corporate debt securities issued by sovereign, quasi-sovereign<sup>1</sup> and corporate entities in the Asia ex-Japan region (the "**Securities**") from the Index that collectively reflects the investment characteristics of the Index. Some Asian markets in which the Sub-Fund may invest may be considered emerging market countries, the ratio of investments in these Securities is expected to be approximately 65% of the NAV of the Sub-Fund. The Sub-Fund may or may not hold all of the Securities that are included in the Index, and may hold Securities which are not included in the Index, provided that these collectively feature a high correlation with the Index and meet the criteria as described in the Prospectus. Investments in Securities which are not included in the Index are not anticipated to exceed 20% of the NAV of the Sub-Fund.

The Sub-Fund may invest up to 100% of its NAV directly in Securities which are rated investment grade, including Securities that are not included in the Index. For the purpose of this Sub-Fund, "investment grade" refers to securities rated higher than Ba1 of Moody's or BB+ of S&P and Fitch.<sup>2</sup> The Sub-Fund will not invest in securities that are not rated investment grade and will not invest in debt instruments with loss-absorption features.

The Sub-Fund may, in exceptional circumstances, invest up to 50% of the Sub-Fund's NAV in financial derivative instruments ("**FDIs**") for hedging and non-hedging (i.e. reducing tracking error) purposes. These include the use of instruments such as fully funded swaps to acquire exposure to the performance of the Index when liquidity in the market is low.

Currently, the Manager has no intention to enter into securities lending transactions, repurchase or reverse repurchase transactions and other similar over-the-counter transactions. The Manager will seek the prior approval of the SFC (to the extent required under applicable regulatory requirements) and provide at least one month's prior notice to Unitholders (or such shorter notice period as may be permitted under applicable regulatory requirements) before the Manager engages in any such investments.

The Sub-Fund may also invest in USD money market funds or other physical exchange traded funds ("**Other Physical ETFs**") that are either authorised by the SFC or eligible schemes as determined

<sup>1</sup> "Quasi-sovereign" refers to an entity that is 100% guaranteed or 100% owned by the government.

<sup>2</sup> For securities with multiple ratings, the middle rating of the Moody's, S&P and Fitch ratings will be considered or the lower rating when only two ratings are available.

by the SFC or USD cash deposits for cash management purposes and enhancing yields on cash positions although such investments are not anticipated to exceed 5% of the NAV of the Sub-Fund. Such Other Physical ETFs may include those which are managed by the Manager or its Connected Persons or other third parties.

The investment strategy of the Sub-Fund is subject to the investment and borrowing restrictions set out in the Prospectus.

### Index

The Index of the Sub-Fund is the J.P. Morgan Asia Credit Index - Investment Grade ("**JACI IG**") consisting of US-dollar denominated debt instruments that are rated investment grade and issued out of Asia ex Japan region by sovereigns, quasi-sovereigns and corporates entities. The JACI IG is compiled and published by JPMorgan Chase & Co (the "**Index Provider**"). The Manager and its connected persons are independent of the Index Provider.

The JACI IG shares the inclusion criteria and composition of the J.P. Morgan Asia Credit Index (JACI), which is an all inclusive benchmark tracking liquid, US-dollar denominated debt instruments issued out of the Asia ex-Japan region across both investment grade and high yield debt segments. The Investment Grade version restricts constituents to those that are rated investment grade.

The Index is a total return market capitalization weighted index. A total return index calculates the performance of the index constituents on the basis that any coupons or distributions are reinvested. The Index is denominated and quoted in USD.

As at 20 April 2026, the Index comprised 1,166 constituent securities with market capitalisation of approximately USD 777.24 billion. The Index was launched in July 2006 with a back dated base level of 100 as of 30 September 2005.

You can obtain the important news, most updated list of the constituents (with their respective weightings) of the Index from the website of the Index Provider at <https://www.jpmorgan.com/insights/global-research/index-research/composition> (which has not been reviewed or approved by the SFC). Performance data and last closing index level of the Index can be obtained from the website of the Manager at <https://www.premia-partners.com> (which has not been reviewed or approved by the SFC).

### Vendor codes

Bloomberg: JPEIJAIG Index

### Use of derivatives

The fund's net derivative exposure may be up to 50% of the fund's net asset value.

### What are the key risks?

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

#### 1. General 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. Valuation risk

- Valuation of the Sub-Fund's instruments may involve uncertainties and judgmental determinations. If such valuation turns out to be incorrect, this may affect the NAV of the Sub-Fund.

#### 3. Fixed Income Credit risk

- Fixed income securities are subject to credit risk. Credit risk refers to the possibility that the issuer of a security will not make timely interest payments or repay the principal of the debt issued (i.e., default on its obligations). A default on securities held by the Sub-Fund could adversely affect the Sub-Fund's performance. Generally, the longer the maturity and the lower the credit quality of a security, the more sensitive it is to credit risk.

#### 4. Interest rate risk

- Interest rate risk is the risk that fixed income securities will decline in value because of an increase in interest rates. Funds with higher durations generally are subject to greater interest rate risk.

#### **5. Credit rating and downgrading risk**

- Credit ratings assigned by rating agencies are subject to limitations and do not always guarantee the creditworthiness of the security and/or issuer. The credit rating of a debt instrument or its issuer may subsequently be downgraded. In the event of such downgrading, the value of the Sub-Fund may be adversely affected. The Manager may or may not be able to dispose of the debt instruments that are being downgraded.

#### **6. Volatility and liquidity risk**

- Some Asian bond markets are under development and may be subject to higher volatility. The instability in prices will cause fluctuation in the NAV of the Sub-Fund.
- Some Asian bond markets can be illiquid and inefficient. Trading costs may be relatively high in such markets. The potentially wide bid-ask spread due to thin trading may cause difficulties in achieving fair pricing. The inability to transact at advantageous times or prices may result in a reduction in the Sub-Fund's returns and a disruption in desired asset allocation.

#### **7. Over-the-counter Market Risk**

- OTC markets such as the USD Corporate Bond market are subject to less governmental regulation and supervision of transactions than organized exchanges. In addition, many of the protections afforded to participants on some organized exchanges, such as the performance guarantee of an exchange clearing house, may not be available in connection with transactions on OTC markets. Therefore, by entering into transactions on OTC markets, the Sub-Fund will be subject to the risk that its direct counterparty may not perform its obligations under the transactions and that the Sub-Fund may sustain losses.

#### **8. PRC market risks**

- The Sub-Fund and the Index are both focused on Asian bond markets, but as a consequence of current market conditions, there may be a higher exposure to Securities that are materially associated with the PRC (such as bonds issued by PRC companies). The value of the Sub-Fund may be more volatile than that of a fund having a more diverse portfolio of investments. The value of the Sub-Fund may be more susceptible to adverse economic, political, policy, foreign exchange, liquidity, tax, legal or regulatory event affecting the PRC market.

#### **9. Sovereign and quasi-sovereign debt risk**

- The Sub-Fund's investment in Securities issued or guaranteed by governments and quasi-sovereign issuers may be exposed to political, social and economic risks. In adverse situations, the sovereign issuers and quasi-sovereign issuers may not be able or willing to repay the principal and/or interest when due or may request the Sub-Fund to participate in restructuring such debts. The Sub-Fund may suffer significant losses when there is a default of sovereign and quasi-sovereign debt issuers.

#### **10. Emerging market risk**

- Some overseas markets in which a Sub-Fund may invest are considered emerging market countries. The economies of many emerging markets are still in the early stages of modern development and subject to abrupt and unexpected change. In many cases, governments retain a high degree of direct control over the economy and may take actions that have a sudden and widespread effect. Also, many less developed market and emerging market economies have a high degree of dependence on a small group of markets or even a single market that can render such economies more susceptible to the adverse impact of internal and external shocks.

#### **11. Foreign exchange and other currency distributions risk**

- The Sub-Fund's Base Currency is in USD but has Units traded in HKD (in addition to USD). Secondary market investors may be subject to additional costs or losses associated with fluctuations in the exchange rates between HKD and the Base Currency and by changes in exchange rate controls when trading the Listed Distribution Units in the secondary market.
- Investors should note that all the Listed Distribution Units will receive distributions in the Base Currency (USD) only. In the event that the relevant Unitholder has no USD account,

the Unitholder may have to bear the fees and charges and/or suffer the foreign exchange losses associated with the conversion of such distribution from USD to HKD or any other currency. The relevant Unitholder may also have to bear bank or financial institution fees and charges associated with the handling of the distribution payment. Relevant unitholders are advised to check with their brokers regarding arrangements for distributions.

#### **12. Distributions out of or effectively out of capital risk**

- Payment of dividends out of capital or effectively out of capital amounts to a return or withdrawal of part of an investor's original investment or from any capital gains attributable to that original investment. Any such distributions may result in an immediate reduction in the NAV per Unit of the Listed Distribution Units of the Sub-Fund.

#### **13. Trading hours differences risks**

- As the trading platforms on which the Index constituents are traded may be open when the Listed Distribution Units in the Sub-Fund are not priced, the value of the Securities in the Sub-Fund's portfolio may change on days when investors will not be able to purchase or sell the Sub-Fund's Listed Distribution Units. Furthermore, the market price of underlying Securities traded on the above trading platforms which are established outside Hong Kong may not be available during part or all of the SEHK trading sessions due to trading hour differences which may result in the trading price of the Sub-Fund deviating away from the NAV.
- Shares traded on certain trading platforms may be subject to trading bands which restrict increases and decreases in the trading price. Units traded on the SEHK are not. The prices quoted by the SEHK market maker would therefore be adjusted to take into account any accrued market risk that arises from such unavailability of the Index level and as a result, the level of premium or discount of the Unit price of the Listed Distribution Units of the Sub-Fund to its NAV may be higher.

#### **14. Passive investments risk**

- The Sub-Fund is passively managed and the Manager will not have the discretion to adapt to market changes due to the inherent investment nature of the Sub-Fund. Falls in the Index are expected to result in corresponding falls in the value of the Sub-Fund.

#### **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 Index exactly. This tracking error may result from the investment strategy used and/or fees and expenses. The Manager will monitor and seek to manage such risk and minimise tracking error. There can be no assurance of exact or identical replication at any time of the performance of the Index.

#### **16. Trading risks**

- The trading price of the Listed Distribution Units on the SEHK is driven by market factors such as the demand and supply of the Listed Distribution Units. Therefore, the Listed Distribution 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 the Listed Distribution Units on the SEHK, investors may pay more than the NAV per Unit when buying the Listed Distribution Units on the SEHK, and may receive less than the NAV per Unit when selling Units on the SEHK.

#### **17. Multi-counter risks**

- 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 Listed Distribution Units in one counter only, which may inhibit or delay an investor dealing. The market price of the Listed Distribution Units traded in each counter may deviate significantly. As such, the Sub-Fund's investors may pay more or receive less when buying or selling the Listed Distribution Units traded in HKD on the SEHK than in respect of the Listed Distribution Units traded in USD or other currencies and vice versa.

#### **18. Differences in dealing arrangements between Listed Class of Units and Unlisted Class of Units Risk**

- Investors of the Listed Class of Units and the Unlisted Class of Units are subject to different pricing and dealing arrangements. The Net Asset Value per Unit of each of the Listed Class

of Units and Unlisted Class of Units may be different due to the different fees and cost applicable to each class.

- The Listed Class of Units are traded on the stock exchange in the secondary market on an intraday basis at the prevailing market price (which may diverge from the corresponding Net Asset Value), while Unlisted Class of Units are sold through intermediaries based on the Dealing Day-end Net Asset Value and are dealt at a single valuation point with no access to intraday liquidity in an open market. Depending on market conditions, investors of the Listed Class of Units may be at an advantage or disadvantage compared to investors of the Unlisted Class of Units.
- In a stressed market scenario, investors of the Unlisted Class of Units could redeem their Units at Net Asset Value while investors of the Listed Class of Units in the secondary market could only sell at the prevailing market price (which may diverge from the corresponding Net Asset Value) and may have to exit the Sub-Fund at a significant discount. On the other hand, investors of the Listed Class of Units could sell their Units on the secondary market during the day thereby crystallising their positions while investors of the Unlisted Class of Units could not do so in a timely manner until the end of the day.

#### **19. Difference in fee and cost arrangements between Listed Class of Units and Unlisted Class of Units Risk**

- The levels and types of fees and costs applicable to each of the Listed Class of Units and the Unlisted Class of Units may differ. As such, the Net Asset Value per Unit of each of the Listed Class of Units and Unlisted Class of Units may also be different.
- For the Listed Class of Units, the Transaction Fee may be payable by the Participating Dealer in respect of creation and redemption applications. In relation to cash creation and redemption applications by Participating Dealers, the Manager reserves the right to require the relevant Participating Dealer to pay an additional sum on the creation amount or deduct from the redemption proceeds such sum representing the Duties and Charges for the purpose of compensating or reimbursing the relevant Sub-Fund. Investors in the secondary market will not be subject to the foregoing, but may incur SEHK-related fees such as brokerage fees, transaction levy, trading fee, and inter-counter transfer fee.
- For the Unlisted Class of Units, Unitholders may be subject to a Subscription Fee and/or a Redemption Fee in respect of subscription and redemption respectively. For subscription and redemption applications in cash, the Manager may, in good faith and in the best interest of Unitholders, make adjustments to the Net Asset Value per Unit in determining the Subscription Price or Redemption Price per Unit (as the case may be) which it considers to be an appropriate allowance to account for the impact of the related costs.

#### **20. Difference in Distribution Policies**

- The Manager will pay distributions to Unitholders of the Listed Distribution Units but not to Unitholders of the Unlisted Accumulation Units (USD Unhedged). Distributions made in respect of the Listed Distribution Units may result in an immediate reduction in the Net Asset Value per Unit of such units. All income and capital gain received in the Unlisted Accumulation Units (USD Unhedged) will be reinvested and reflected in its Net Asset Value per Unit. The difference in the distribution policies of the Listed Distribution Units and Unlisted Accumulation Units (USD Unhedged) will lead to difference in the Net Asset Value between them.

#### **21. Termination risks**

- The Sub-Fund may be terminated early under certain circumstances, for example, where the Index is no longer available for benchmarking or if the size of the Sub-Fund falls below HKD100 million. Investors may not be able to recover their investments and suffer a loss when the Sub-Fund is terminated.

#### **22. Reliance on market maker and liquidity risks**

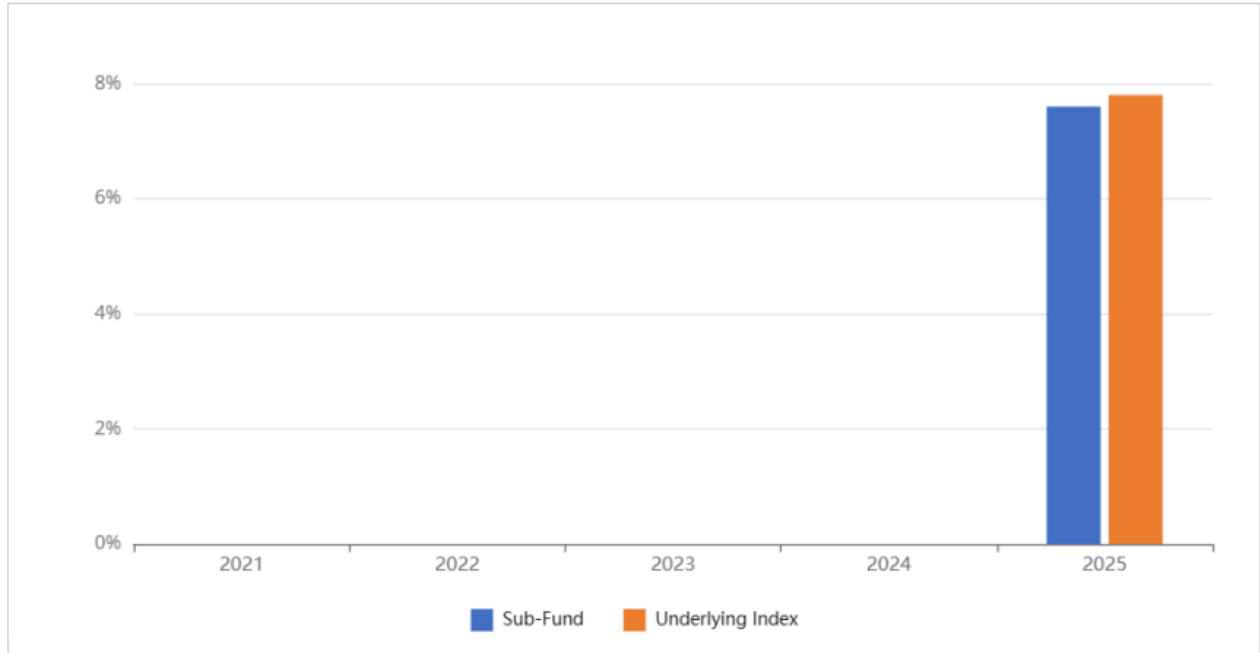
- Although the Manager will ensure that at least one Market Maker will maintain a market for the Listed Distribution Units in each counter, and that at least one Market Maker in each counter gives not less than 3 months' notice prior to terminating the relevant market maker agreement, liquidity in the market for the Listed Distribution Units may be adversely affected

if there is no or only one Market Maker for the Listed Distribution Units. There is no guarantee that any market making activity will be effective.

**23. Risks of investing in FDIs**

- Risks associated with FDI include counterparty / credit risk, liquidity risk, valuation risk, volatility risk and over-the-counter transaction risk. Exposure to FDI may lead to a higher risk of loss by the Sub-Fund. The Sub-fund may suffer losses if a counterparty of the derivative contract defaults or fails to perform its obligations.

**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 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 data has been calculated in USD including ongoing charges and excluding your trading costs on SEHK.
- Fund launch date: 23 September 2024

**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 Expenses” 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
Trading fee	0.00565% <sup>2</sup> of the trading price
Accounting and Financial Reporting Council transaction levy	0.00015% <sup>3</sup> of the trading price

Stamp duty

Nil

<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> Trading fee of 0.00565% of the trading price of the Units, payable by each of the buyer and the seller.

<sup>3</sup> Accounting and Financial Reporting Council transaction levy of 0.00015% of the trading price of the Units, payable by each of the buyer and the seller from 1 January 2022.

### 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*	0.23%
Trustee fee	Included in the management fee
Performance fee	Nil
Administration and custody fees	Included in the management fee

\* The management fee is a single flat fee to cover all of the Sub-Fund's fees, costs and expenses (and its due proportion of any costs and expenses of the Trust allocated to it). The ongoing charges of the Sub-Fund is equal to the amount of the single management fee which is capped at a maximum of 0.23% of the average NAV of the Sub-Fund. Any increase or removal of the cap is subject to the prior approval of the SFC and one month's prior notice to Unitholders. Please refer to the Prospectus for details.

### Other fees

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

### Additional information

You can find the following information relating to the Sub-Fund (in English and in Chinese) at the following website [www.premia-partners.com](http://www.premia-partners.com) (which has not been reviewed or approved by the SFC):

- The Prospectus including the Product Key Facts Statement (as revised from time to time)
- The latest annual audited accounts and interim half yearly unaudited report of the Sub-Fund (in English only)
- Any notices relating to material changes to the Sub-Fund which may have an impact on its investors such as material alterations or additions to the Prospectus including the Product Key Facts Statement or the constitutive documents of the Trust and/or the Sub-Fund
- Any public announcements made by the Manager in respect of the Sub-Fund, including information with regard to the Sub-Fund and the Index, the suspension of creations and redemptions of Units, the suspension of the calculation of its NAV, changes in its fees and the suspension and resumption of trading in its Units
- The near real time estimated NAV per Unit of the Listed Distribution Units of the Sub-Fund (updated every 15 seconds throughout each dealing day) in USD and in HKD
- The last closing NAV of the Listed Distribution Units of the Sub-Fund in USD only and the last closing NAV per Unit of the Listed Distribution Units Sub-Fund in USD and HKD
- The past performance information of the other classes Sub-Fund
- The annual tracking difference and tracking error of the Sub-Fund
- The composition of the Sub-Fund (updated on a daily basis)
- The latest list of the Participating Dealers and Market Makers of the Sub-Fund
- The composition of distributions (i.e. the relative amounts paid out of (i) net distributable income, and (ii) capital), if any, for a 12-month rolling period

The near real time estimated NAV per Unit of the Listed Distribution Units in HKD is indicative and for reference only and is updated every 15 seconds during SEHK trading hours and is calculated

by Interactive Data (Hong Kong) Limited using the near real time estimated NAV per Unit of the Listed Distribution Units in USD multiplied by near real time USD:HKD foreign exchange rates quoted by Reuters. Since the estimated NAV per Unit of the Listed Distribution Units in USD will not be updated when the underlying share markets are closed, the change in the estimated NAV per Unit of the Listed Distribution Units in HKD during such period is solely due to the change in the near real time foreign exchange rate.

The last closing NAV per Unit of the Listed Distribution Units in HKD is indicative and for reference only and is calculated by the Trustee using the official last closing NAV per Unit of the Listed Distribution Units in USD multiplied by an assumed foreign exchange rate (i.e. not a real time exchange rate) being the fixing exchange rate for USD:HKD provided by WM/Reuters at 4 pm (London time) as of the same dealing day. Similarly, the last closing NAV per Unit of the Listed Distribution Units in HKD will remain unchanged when the underlying share markets are closed for normal trading. Please refer to the Prospectus for details.

### **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.