

9 December 2025

Publication pursuant to SFDR - Summary

Xtrackers MSCI USA Positioning Screened UCITS ETF

This financial product promotes environmental and social characteristics and qualifies as product in accordance with Article 8(1) of Regulation (EU) 2019/2088.

Capitalised terms used in this document shall have the same meaning ascribed to them in the latest version of the prospectus of the Company (the "Prospectus"), unless the context otherwise requires. This disclosure document is provided in summary form, for more detailed information please see the Prospectus or the document titled "Publication pursuant to SFDR – Details", available on the financial product's webpage on www.Xtrackers.com.

No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

The financial product commits to partially invest in sustainable investments. Investments that fail to meet DWS' do no significant harm ("DNSH") thresholds will not be considered towards the sustainable investment share of the financial product, which includes, but is not limited to, involvement in harmful business activities, violation of international norms or involvement in very severe controversies, and violation of certain principal adverse indicator thresholds.

As part of the DNSH assessment, the Reference Index of the financial product (as defined below) includes criteria to reduce exposure to or to exclude securities which are negatively aligned with certain principal adverse indicators, as defined in the pre-contractual disclosure for the financial product.

Any securities violating the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are excluded by the financial product's Reference Index.

Environmental or social characteristics of the financial product

The financial product promotes environmental and social characteristics and qualifies as a financial product subject to Article 8(1) SFDR by tracking the Reference Index (as defined below) which includes environmental and/or social considerations. The financial product specifically promotes the environmental characteristics of: a reduction in oil sands extraction; and the social characteristics of: a reduction in human and labour rights controversy occurrences, a reduction in controversial weapon production, and a reduction in tobacco production. Securities from the Parent Index which pass the ESG Exclusion Criteria, as disclosed in the prospectus and/or supplement, will constitute the eligible universe (the "Eligible Universe"). Securities from the Parent Index (as defined below) which pass certain ESG exclusion criteria, as disclosed in the prospectus and/or supplement, will constitute the eligible universe (Eligible Universe). Each security in the Eligible Universe is assigned an intensity score based on certain criteria: (i) Greenhouse Gas (GHG) Intensity relative to sector peers, (ii) either having an approved SBTi, published emissions targets or a decreasing GHG emissions track record; and (iii) a Climate Risk Management Weighted Average Score and/or Green Business Revenue relative to sector peers. Securities within the Eligible Universe are then ranked based on their free float-adjusted market capitalization and Intensity Score relative to sector peers, with the index targeting a certain percentage of the number of securities within each sector.

Investment strategy

The investment objective of the financial product is to track the performance before fees and expenses of the "Reference Index", which is the MSCI USA Climate Action Select Index, which is designed to reflect the performance of the shares of large and medium-capitalisations companies in the USA which are assessed as sector group leaders in terms of their positioning and action relative to a climate transition and which meet certain minimum environmental, social and governance ("ESG") criteria. The Reference Index is based on the MSCI USA Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and medium-capitalisation companies in the USA. The Reference Index excludes companies from the Parent Index which do not meet certain minimum ESG criteria.

The Reference Index excludes companies from the Parent Index which do not fulfil certain ESG (environmental, social and governance) criteria. To assess good governance practices of investee companies, the Reference Index excludes companies with very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

Proportion of investments

This financial product invests at least 90% of its net assets in investments that are aligned with the promoted environmental and social characteristics. Within this category, at least 1% of the financial product's assets qualify as sustainable investments in the sense of article 2(17) SFDR. Up to 10% of the investments are not aligned with these environmental or social characteristics. A more detailed description of the specific asset allocation of this financial product can be found in the Prospectus. Financial derivative instruments may be used for efficient portfolio management purposes as ancillary investments.

Monitoring of environmental or social characteristics

The Reference Index applies the ESG criteria outlined above. DWS performs a regular independent verification of the ESG credentials of the Reference Index, incorporating two key elements: (i) that the composition of the financial product's portfolio is closely aligned with the ESG standards of the Reference Index, and (ii) that the Reference Index is correctly applying the stated ESG criteria.

Investors should note that whilst the financial product and the Reference Index seek to ensure compliance with such criteria at each

rebalance or review date, between these reviews or rebalances, securities which no longer meet these criteria may remain included in (i) the Reference Index until they are removed at the subsequent rebalance or review or, (ii) the portfolio of the financial product until it is possible and practicable to divest such positions.

Methodologies

The attainment of the promoted environmental and social characteristics promoted by the financial product is measured using the following sustainability indicators:

- Exposure to Very Severe Controversies
- Exposure to Worst-in-Class issuers
- Controversial Weapons Involvement
- Oil Sands Extraction

More details on these sustainability indicators are available in the Prospectus.

Data sources and processing

The Reference Index uses data from various products provided by MSCI ESG Research LLC. These products include MSCI ESG Ratings, MSCI ESG BISR, MSCI ESG Controversies Scores and MSCI Climate Change Metrics.

Limitations to methodologies and data

The Reference Index's ESG standards limit the number of securities eligible for inclusion in the Reference Index. As a result, the Reference Index, and as such the financial product, may be more concentrated and underperform the market as a whole or underperform other funds screened for environmental, social and governance standards, or which do not screen for such standards.

The Reference Index solely relies on analysis from the Index Administrator or other data providers (as applicable) in relation to sustainability considerations. Neither the Company, nor any of its service providers, makes any representation with respect to the accuracy, reliability, correctness of the sustainability related data or the way that these are implemented.

Due Diligence

With regards to the selection of any new reference indices for Xtrackers ETFs, DWS will conduct a due diligence process that includes the assessment of sustainability risks, and endeavour to work in conjunction with benchmark providers to embed certain sustainability risks into the construction of new indexes for both new financial products and also reference indexes considered as a potential reference index in case of substitution for an existing financial product. As part of this process, minimum ESG standards will be applied.

Engagement policies

Active engagement with our investee issuers, using proxy voting and engagement to drive change for the benefit of clients is a key part of DWS Group's approach to sustainable investment. DWS applies an Engagement Policy and Corporate Governance & Proxy Voting Policy.

Designated reference benchmark

The financial product has designated the MSCI USA Climate Action Select Index as the reference benchmark. Additional information on the Reference Index can be found on <http://www.msci.com>.

Important Information

The MSCI indices are the exclusive property of MSCI Inc. and its subsidiaries (MSCI) and may not be reproduced or extracted and used for any other purpose without MSCI's consent. The fund is not sponsored, endorsed, or promoted by MSCI, and MSCI bears no liability with respect to the fund or any index on which such fund is based. The MSCI indices are provided without any warranties of any kind.

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