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Publication pursuant to SFDR - Details

Xtrackers World Small Cap Green Tech Innovators UCITS ETF

This financial product promotes environmental and social characteristics and qualifies as a financial 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.

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. To ensure those sustainable investments do not cause significant harm to any environmental or social sustainable investment objective, the following processes are implemented:

DNSH Assessment

In accordance with Article 2 (17) SFDR, any such sustainable investments must not significantly harm any environmental or social objectives and such sustainable investment issuers must follow good governance practices. Any investment that fails to meet the do no significant harm ("DNSH") thresholds will not be considered towards the sustainable investment share of the financial product. Such DNSH thresholds will include, but not be 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.

Integration of adverse impacts on sustainability factors

As part of the DNSH assessment under article 2(17) SFDR, the sustainable investment assessment integrates certain metrics related to principal adverse indicators and the financial product includes criteria to reduce exposure to or to exclude securities which are negatively aligned with the following principal adverse indicators:

- Exposure to companies active in the fossil fuel sector (no. 4);
- Violation of UN Global Compact principles and OECD Guidelines for multinational enterprises (no. 10); and
- Exposure to controversial weapons (no. 14).

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

Any securities violating the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are ineligible for investment by the financial product.

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 through the screening of potential securities against an ESG database, where companies which breach the following ESG standards, among others, will be excluded from the investment universe:

- Are assigned an MSCI ESG Rating of 'CCC';
- Fail to comply with the United Nations Global Compact principles, have a MSCI Controversies Score of 0, or have an insufficient MSCI ESG Controversies Score related to certain environmental controversies;
- Have any involvement in controversial weapons;
- Are classified by MSCI as breaching certain revenue thresholds in weapon-related activities, including, but not limited to, civilian firearms, nuclear weapons, and conventional weapons;
- Are classified by MSCI as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco production, adult entertainment, gambling, alcohol, genetically modified organisms, and nuclear power; and
- Are classified by MSCI as breaching certain revenue thresholds in fossil fuel-related activities, including, but not limited to, fossil fuel reserves ownership, fossil fuel extraction, fossil fuel electricity generation, gaseous fuels, oil fuels, unconventional oil and gas, hard coal and lignite, and thermal coal power.

Such exclusions comprise the requirements as laid out in Article 12(1)(a) to (g) of the Commission Delegated Regulation (EU) 2020/1818 ("PAB Exclusions").

Please note that companies that are not assessed by MSCI ESG Research in the ESG Controversies and ESG Ratings assessments are also excluded.

The financial product utilises data from MSCI ESG Research LLC to apply certain ESG criteria using the following products: MSCI ESG Ratings, MSCI ESG Controversies, MSCI ESG Business Involvement Screening Research and MSCI Climate Change Metrics.

MSCI ESG Ratings

MSCI ESG Ratings provide research, data, analysis, and ratings of how well companies manage environmental, social and governance risks and opportunities. MSCI ESG Ratings provides an overall company ESG rating.

MSCI ESG Controversies

MSCI ESG Controversies provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services.

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research ("BISR") aims to enable institutional investors to manage ESG standards and restrictions.

MSCI Climate Change Metrics

MSCI Climate Change Metrics provides climate data & tools to support investors integrating climate risk & opportunities into their investment strategy and processes.

The financial product has not designated a reference benchmark for the purpose of attaining the environmental and/or social characteristics promoted.

Investment strategy

The investment objective of the financial product is to achieve a positive mid to long-term investment performance through investments in small capitalisation listed global equities which facilitate the development and application of green technologies.

The financial product will primarily be invested in assets that comply with certain standards in respect to environmental and social characteristics as well as good governance practices as described in the following sections.

ESG Assessment

The financial product screens potential securities against an ESG database, where companies which breach certain ESG standards will be excluded from the investment universe.

Policy to assess Good Governance

The financial product will not invest in 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 80% of its net assets in investments that are aligned with the promoted environmental and social characteristics. Within this category, at least 2% of the sub-fund's net assets qualify as sustainable investments in the sense of article 2(17) SFDR. Up to 20% of the investments are not aligned with these environmental or social characteristics (#2 Other). A more detailed description of the specific asset allocation of this financial product can be found in the Prospectus.

Financial derivative instruments ("FDIs") may be used for efficient portfolio management purposes. It is not intended to use FDIs for the attainment of the financial product's objective but rather as ancillary investments to, for example, invest cash balances pending portfolio rebalance to gain market exposure. Any exposures obtained through the use of FDIs for these ancillary purposes will be aligned with the investment objective of the financial product and would conform to ESG standards substantially similar to those of this financial product, or would fall within the quoted percentage of the investments that are not aligned with the promoted environmental and social characteristics.

Monitoring of environmental or social characteristics

For the purpose of the investment guideline monitoring, a coding process is established in which the investment policy as described in the prospectus and the investment limits contained therein are coded in accordance into the investment management system. This applies in particular to the respective ESG investment limits. The investment limits are monitored daily pre- and post-trade in the investment management system to ensure compliance with the investment guidelines. In pre-trade monitoring, it is ensured that the investment limits are complied with before trading. However, if a breach has been detected, the breach will be investigated for its cause and scope, addressed and corrected in accordance with legal/regulatory requirements and guidelines.

The Proposed Allocation will be provided by the Allocation Agent on each Asset Selection Date or at other times where the Allocation Agent wishes to update the Proposed Allocation based on economic and/or other indicators. While the financial product seeks to ensure compliance with the above ESG standards at each Asset Selection Date or review date, between these dates, securities which no longer meet these criteria may remain included in 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:** The percentage of the financial product's portfolio's market value exposed to companies facing one or

more Very Severe controversies related to the environment, customers, human rights, labour rights and governance as determined by MSCI, including violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

- **Exposure to Worst-in-Class issuers:** The percentage of the financial product's portfolio's market value exposed to companies with a rating of "CCC" as determined by MSCI.
- **Controversial Weapons Involvement:** The percentage of the financial product's portfolio's market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.
- **Exposure to Fossil Fuels:** The percentage of the financial product's portfolio's market value exposed to companies flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

Data sources and processing

The financial product screens potential securities against an ESG database, where companies which breach certain ESG standards will be excluded from the investment universe.

The financial product utilises data from MSCI ESG Research LLC to apply certain ESG criteria using the following products: MSCI ESG Ratings, MSCI ESG Controversies, MSCI ESG Business Involvement Screening Research and MSCI Climate Change Metrics.

MSCI ESG Ratings

MSCI ESG Ratings provide research, data, analysis, and ratings of how well companies manage environmental, social and governance risks and opportunities. MSCI ESG Ratings provides an overall company ESG rating.

MSCI ESG Controversies

MSCI ESG Controversies provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services.

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research ("BISR") aims to enable institutional investors to manage ESG standards and restrictions.

MSCI Climate Change Metrics

MSCI Climate Change Metrics provides climate data & tools to support investors integrating climate risk & opportunities into their investment strategy and processes.

Limitations to methodologies and data

DWS bases its ESG assessments on external vendor data, which includes both quantitative (e.g. carbon intensities or share of sustainable activity) and qualitative data (e.g. ESG assessments or assessment of possible violations of international norms). However, potential expert-based subjectivity is more significant in qualitative measures than in quantitative ones. For instance, qualitative measures like general purpose ESG assessments may inherently carry subjectivity, while quantitative measures may involve estimations or be based on certain assumption (e.g. determining the share of revenues from the share of produced energy). The prevalence of potential subjectivity poses a limitation that may need proper mitigation.

Furthermore, there is a risk associated with ESG investments, as they may underperform the broad market. As ESG information obtained from third-party data providers may be incomplete, inaccurate, or unavailable, there is a risk that the Investment Manager may incorrectly assess a security or issuer, leading to the incorrect inclusion or exclusion of a security in the portfolio of the Sub-Fund.

Due diligence

The financial product's ESG criteria are determined in accordance with relevant internal policies, key operating documents and handbooks. Security-level due diligence is based on the availability of ESG data which the Investment Manager sources from external ESG data vendors.

Engagement policies

Active engagement with our investee issuers to drive change for the benefit of clients is a key part of DWS Group's approach to sustainable investment. DWS applies the following engagement policies.

Engagement Policy

The Engagement Policy establishes inter alia the engagement framework for DWS on how to engage with its investee issuers in relation to both equity as well as debt investments.

This policy sets out types and methods of engagement, escalation strategies and expectations regarding communication with inter alia DWS as an investor and DWS on behalf of its clients on a number of topics, including ESG.

Corporate Governance & Proxy Voting Policy

This policy details DWS's engagement framework in relation to its equity investments. It contains the core governance understanding, governance values and expectations including ESG relating to investee companies in line with the framework and principles as set out in the Engagement Policy as well as proxy voting guidelines. It includes guidelines on how to vote in relation to ESG topics such as ESG-related shareholder proposals.

Designated reference benchmark

The financial product has not designated a reference benchmark to determine whether it is aligned with the environmental and/or social characteristics that it promotes.

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Version history according to Art. 12 of Regulation (EU) 2019/2088

Date	Explanation of changes
14 May 2025	Change to the name of the financial product
19 November 2024	Initial disclosure according to Art. 10 of Regulation (EU) 2019/2088 in conjunction with Art. 25 - 36 of the Comission Delegated Regulation (EU) 2022/1288