

## **Xtrackers S&P 500 Market Leaders UCITS ETF**

### **Supplement to the Prospectus**

This Supplement contains information in relation to Xtrackers S&P 500 Market Leaders UCITS ETF (the “**Fund**”), a sub-fund of Xtrackers (IE) plc (the “**Company**”) an umbrella type open-ended investment company with segregated liability between sub-funds and with variable capital governed by the laws of Ireland and authorised by the Central Bank of Ireland (the “**Central Bank**”).

**This Supplement forms part of, may not be distributed unless accompanied by (other than to prior recipients of the prospectus of the Company dated 15 June 2023 (the “Prospectus”) and the first addendum to the Prospectus dated 1 December 2023 (the “Addendum”)), and must be read in conjunction with, the Prospectus and the Addendum.**

**Xtrackers (IE) plc**

**Dated 15 September 2025**

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**IMPORTANT INFORMATION**

**The Fund is an ETF. The Shares of this Fund are fully transferable to investors and will be listed for trading on one or more stock exchanges.**

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## TERMS OF THE SHARES REPRESENTING INTERESTS IN THE FUND

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### Investment Objective

The investment objective of the Fund is to track the performance before fees and expenses of an index which is designed to reflect the performance of large capitalisation US companies that are considered market leaders.

### Investment Policy

In order to seek to achieve the investment objective, the Fund will adopt a Direct Investment Policy and will aim to replicate or track, before fees and expenses, the performance of the S&P 500 Market Leaders Index (the "**Reference Index**"), by holding a portfolio of equity securities that comprises all, or a substantial number of, the securities comprised in the Reference Index (the "**Underlying Securities**"). Further information on the Reference Index is contained under "General Description of the Underlying Asset". The Investment Manager reserves the right to exclude from the portfolio of the Fund any securities from the Reference Index that do not comply with the Investment Manager's policies or standards (examples of which are described in the Prospectus under the heading "*Direct Investment Funds following a passive approach*").

The Fund is managed according to a passive approach and is a Full Replication Fund (as described in the Prospectus under the heading "*Direct Investment Funds following a passive approach*"). Full disclosure on the composition of the Fund's portfolio will be available on a daily basis at [www.Xtrackers.com](http://www.Xtrackers.com).

There is no assurance that the investment objective of the Fund will actually be achieved.

The Underlying Securities are listed or traded on markets and exchanges which are set out at Appendix I of the Prospectus, with the Underlying Securities being bought by the Fund from any broker or counterparty who trades on the markets and exchanges listed at Appendix I of the Prospectus.

As further described in the "Efficient Portfolio Management and Financial Derivative Instruments" section below and in the Prospectus, the Fund may also invest in securities which are not constituents of the Reference Index and/or financial derivative instruments ("**FDIs**") related to a constituent or constituents of the Reference Index, for efficient portfolio management purposes, where such securities and/or FDIs would achieve a risk and return profile similar to that of the Reference Index, a constituent of the Reference Index or a sub-set of constituents of the Reference Index.

The Fund may invest in ancillary liquid assets which will include secured and/or unsecured deposits, and/or units or shares of other UCITS or other collective investment schemes which pursue a money market/cash strategy or which are related to the Reference Index or constituents of the Reference Index.

The investments and liquid assets the Fund may hold on an ancillary basis will, together with any fees and expenses, be valued by the Administrator on each Valuation Day in order to determine the Net Asset Value of the Fund in accordance with the rules set out in the main part of the Prospectus.

The value of the Fund's Shares is linked to the Reference Index, the performance of which may rise or fall. Hence, investors should note that the value of their investment could fall as well as rise and they should accept that there is no guarantee that they will recover their initial investment. The return that the Shareholder may receive will be dependent on the performance of the Reference Index.

The Fund will have no Final Repurchase Date. However, the Directors may decide to terminate the Fund in accordance with the terms set out in the Prospectus and/or the Articles of Association.

### Efficient Portfolio Management and Financial Derivative Instruments

The Fund may employ techniques and instruments relating to transferable securities from time to time under the conditions and within the limits laid down by the Central Bank and the conditions set out in the Prospectus and this Supplement for efficient portfolio management purposes.

The Fund may also invest in FDIs subject to the conditions and limits laid down by the Central Bank for efficient portfolio management purposes and as described in the Prospectus. For details of any FDIs the Fund may use, please refer to the section entitled "Use of Derivatives by Direct Investment Funds" set out in the Prospectus.

The Company employs a risk management process which enables it to accurately measure, monitor and manage at any time the risks attached to the Fund's FDI positions and their contribution to the overall risk profile of the portfolio of assets of the Fund. The Company will, on request, provide supplementary information to Shareholders relating to the risk management methods employed, including the quantitative limits that are applied and any recent developments in the risk and yield characteristics of the main categories of investments in respect of the relevant Fund.

### **Calculation of Global Exposure**

The Fund will employ the commitment approach to assess the Fund's global exposure and to ensure that the Fund's use of derivative instruments is within the limits specified by the Central Bank. Global exposure will be calculated daily. While the Fund may be leveraged through the use of the FDIs, any such leverage will not be in excess of 100% of the Fund's Net Asset Value.

### **Investment Restrictions**

The general investment restrictions set out under "Investment Restrictions" in the Prospectus apply to the Fund.

Further, the Fund will not invest more than 10% of its assets in units or shares of other UCITS or other collective investment schemes in order to be eligible for investment by UCITS governed by the UCITS directive.

The Directors may from time to time impose such further investment restrictions as shall be compatible with or in the interests of Shareholders, in order to comply with the laws and regulations of the countries where Shareholders are located. Such investment restrictions will be included in an updated Supplement.

### **Borrowing**

The Company may only borrow, for the account of the Fund, up to 10% of the Net Asset Value of the Fund provided that such borrowing is for temporary purposes. The assets of the Fund may be charged as security for any such borrowings.

### **Specific Risk Warning**

Investors should note that the Fund is not capital protected or guaranteed and that the capital invested is not protected or guaranteed and investors in this Fund should be prepared and able to sustain losses up to the total amount of capital invested.

#### *Concentration of the Reference Index*

The Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the portfolio of transferable securities and eligible assets held by the Fund.

Investors will also bear some other risks as described under the section "Risk Factors" in the Prospectus.

### **Profile of a Typical Investor**

Prospective investors in the Fund should ensure that they understand fully the nature of the Fund, as well as the extent of their exposure to risks associated with an investment in the Fund and should consider the suitability of an investment in the Fund.

Investment in the Fund may be appropriate for investors who have knowledge of, and investment experience in this type of financial product and understand and can evaluate the strategy and characteristics in order to make an informed investment decision. Further, they may have free and available cash for investment purposes and are looking to gain exposure to the securities making up the Reference Index. As the Net Asset Value per Share of the Fund will fluctuate and may fall in value, investment in the Fund should be viewed as suitable for investors who seek a return over the medium to long term. However, prospective investors should be prepared and able to sustain losses up to the total amount of capital invested.

The Prospectus sets out statements on taxation regarding the law and practice in force in the relevant jurisdiction at the date of the Prospectus. The statements are by way of a general guide to potential investors and

Shareholders only and do not constitute legal or tax advice to Shareholders or potential investors. Shareholders and potential investors are therefore advised to consult their professional advisers concerning any investment in the Fund particularly as the tax position of an investor and the rates of tax may change over time.

## Dividend Policy

The Fund does not intend to make dividend payments.

## General Information Relating to the Fund

<b>Base Currency</b>	USD.
<b>Cut-off Time</b>	Means 4.30 p.m. Dublin time on the relevant Transaction Day.
<b>Initial Offer Period</b>	The Initial Offer Period in respect of the "1C" Shares shall be from 9:00 a.m. on 16 September 2025 to 4:30 p.m. (Dublin time) on 13 March 2026 or such earlier or later date as the Directors may determine and notify in advance to the Central Bank.
<b>Fund Classification (InvStG)</b>	Equity Fund, target minimum percentage of 80%.
<b>Minimum Fund Size</b>	USD 50,000,000.
<b>Settlement Day</b>	Means up to nine Settlement Days following the Transaction Day <sup>1</sup> .
<b>Securities Lending</b>	No.
<b>Significant Market</b>	Means a Direct Replication Significant Market.

**Transparency under SFDR** The Fund does not promote environmental or social characteristics and does not have sustainable investment or the reduction of carbon emissions as its objective. Therefore, the Fund discloses under Article 6 of SFDR. Please refer to the section entitled "Sustainability-related disclosures under SFDR and EU Taxonomy Regulation" set out in the Prospectus for further information in relation to sustainability risks, their integration by the Management Company and their impact on the Fund.

## Description of the Shares

	"1C"
<b>ISIN Code</b>	IE000DVHJV46
<b>German Security Identification Number (WKN)</b>	DBX0XA
<b>Currency</b>	USD
<b>Initial Issue Price</b>	The Initial Issue Price will be calculated as corresponding to an appropriate fraction of the closing level of the Reference Index on the Launch Date. The Launch Date shall be the final day of the Initial Offer Period. The Initial Issue Price is available from the Administrator.
<b>Launch Date</b>	To be determined by the Board of Directors. The Launch Date will be available from the Administrator and via the website: <a href="http://www.Xtrackers.com">www.Xtrackers.com</a>
<b>Minimum Initial Investment Amount</b>	USD 50,000

<sup>1</sup> In the case that a Significant Market is closed for trading or settlement on any Settlement Day during the period between the relevant Transaction Day and the expected settlement date (inclusive), and/or settlement in the base currency of the Fund is not available on the expected settlement date, there may be corresponding delays to the settlement times indicated in this Supplement subject to the regulatory limit on settlement periods of 10 Business Days from the Cut-off Time. Earlier or later times may be determined by the Management Company at its discretion, whereby notice will be given on [www.Xtrackers.com](http://www.Xtrackers.com).

<b>Minimum Additional Investment Amount</b>	USD 50,000
<b>Minimum Redemption Amount</b>	USD 50,000
<b>Currency Hedged Share Class</b>	No

**Fees and Expenses**

<b>Class</b>	<b>"1C"</b>
<b>Management Company Fee</b>	Up to 0.13% per annum
<b>Platform Fee</b>	Up to 0.12% per annum
<b>All-in Fee</b>	Up to 0.25% per annum
<b>Primary Market Transaction Costs</b>	Applicable
<b>Transaction Costs</b>	Applicable
<b>Anticipated Level of Tracking Error</b>	Up to 1.00% per annum

This section headed "Fees and Expenses" should be read in conjunction with the section headed "Fees and Expenses" in the Prospectus.

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## GENERAL DESCRIPTION OF THE UNDERLYING ASSET

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This section is a brief overview of the Reference Index. It contains a summary of the principal features of the Reference Index and is not a complete description of the Reference Index. In case of inconsistency between the summary of the Reference Index in this section and the complete description of the Reference Index, the complete description of the Reference Index prevails. Information on the Reference Index appears on the website identified below in "Further Information". Such information may change from time to time and details of the changes will appear on that website.

### General Description of the Reference Index

The Reference Index is based on the S&P 500 Index (the "**Parent Index**"), which is administered by S&P Dow Jones Indices LLC (the "**Index Administrator**"). The Parent Index is designed to reflect the performance of shares of 500 companies representing major US industries.

The Reference Index aims to measure the performance of a target count of 50 companies from the Parent Index that are considered market leaders.

Companies from the Parent Index which meet certain eligibility criteria including but not limited to not being classified in certain sectors as per the Global Industry Classification Standard (GICS®) are eligible for inclusion in the Reference Index (as further described in the "Index Eligibility" section of the index methodology) (the "**Eligible Universe**"). Companies from the Eligible Universe are ranked by order of their "Market Leader Score" (which considers the following characteristics: sustained free cash flow margin, sustained return on invested capital, and market share) and the highest-ranking companies are selected for inclusion in the Reference Index until a target count of 50 companies is reached.

The Reference Index utilises market share data from Syntax LLC. Syntax Market Share Scores use company classification data, drawing primarily from audited annual reports and secondarily from unaudited documents (e.g., news articles, company websites) to allow granular groupings and comparisons of companies by the characteristics of their various product lines.

The Reference Index is reviewed and rebalanced on a semi-annual basis and may also be rebalanced at other times in order to reflect corporate activity such as mergers and acquisitions. At each rebalancing, the Reference Index weights constituents by float-adjusted market capitalisation, subject to certain security weight constraints.

The Reference Index is a total return net index. A total return net index calculates the performance of the index constituents on the basis that any dividends or distributions are reinvested net of applicable withholding tax.

The Reference Index is calculated in US Dollars on a real-time basis.

### Further Information

Additional information on the Reference Index, calculation and rules for periodical review and rebalancing and on the general methodology behind the S&P indices can be found on <https://www.spglobal.com/en> and the index composition can be found on <https://www.spglobal.com/spdji/en/supplemental-data/europe/>.

S&P Dow Jones Indices LLC has been granted authorisation as a benchmark administrator for the Index and is included in the register of administrators and benchmarks maintained by ESMA pursuant to the Benchmark Regulations.

## IMPORTANT

The "S&P 500 Market Leaders Index" is a product of S&P Dow Jones Indices LLC or its affiliates ("SPDJI"), and has been licensed for use by Xtrackers S&P 500 Market Leaders UCITS ETF. S&P®, S&P 500®, US 500, The 500, iBoxx®, iTraxx® and CDX® are trademarks of S&P Global, Inc. or its affiliates ("S&P"); Dow Jones® is a registered trademark of Dow Jones Trademark Holdings LLC ("Dow Jones") and these trademarks have been licensed for use by SPDJI and sublicensed for certain purposes by Xtrackers S&P 500 Market Leaders UCITS ETF. It is not possible to invest directly in an index. Xtrackers S&P 500 Market Leaders UCITS ETF is not sponsored, endorsed, sold or promoted by SPDJI, Dow Jones, S&P, any of their respective affiliates (collectively, "S&P Dow Jones Indices"). S&P Dow Jones Indices do not make any representation or warranty, express or implied, to the owners of Xtrackers S&P 500 Market Leaders UCITS ETF or any member of the public regarding the advisability of investing in securities generally or in Xtrackers S&P 500 Market Leaders UCITS ETF particularly or the ability of the S&P 500 Market Leaders Index to track general market performance. Past performance of an index is not an indication or guarantee of future results. S&P Dow Jones Indices' only relationship to Xtrackers S&P 500 Market Leaders UCITS ETF with respect to the S&P 500 Market Leaders Index is the licensing of the index and certain trademarks, service marks and/or trade names of S&P Dow Jones Indices and/or its licensors. The S&P 500 Market Leaders Index is determined, composed and calculated by S&P Dow Jones Indices without regard to Xtrackers S&P 500 Market Leaders UCITS ETF. S&P Dow Jones Indices have no obligation to take the needs of Xtrackers S&P 500 Market Leaders UCITS ETF or the owners of Xtrackers S&P 500 Market Leaders UCITS ETF into consideration in determining, composing or calculating the S&P 500 Market Leaders Index. S&P Dow Jones Indices have no obligation or liability in connection with the administration, marketing or trading of Xtrackers S&P 500 Market Leaders UCITS ETF. There is no assurance that investment products based on the S&P 500 Market Leaders Index will accurately track index performance or provide positive investment returns. S&P Dow Jones Indices LLC is not an investment adviser, commodity trading advisory, commodity pool operator, broker dealer, fiduciary, "promoter" (as defined in the Investment Company Act of 1940, as amended), "expert" as enumerated within 15 U.S.C. § 77k(a) or tax advisor. Inclusion of a security, commodity, crypto currency or other asset within an index is not a recommendation by S&P Dow Jones Indices to buy, sell, or hold such security, commodity, crypto currency or other asset nor is it considered to be investment advice or commodity trading advice.

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