Xtrackers ESG USD High Yield Corporate Bond UCITS ETF

Supplement to the Prospectus

This Supplement contains information in relation to Xtrackers ESG USD High Yield Corporate Bond 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 16 December 2022 (the "Prospectus")), and must be read in conjunction with, the Prospectus.

Xtrackers (IE) plc

Dated 13 January 2023

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.

TERMS OF THE SHARES REPRESENTING INTERESTS IN THE FUND

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 high yield, USD denominated corporate bonds that meet specific maturity, credit quality, liquidity, and environmental, social and governance ("**ESG**") criteria.

Investment Policy

In order to seek to achieve the investment objective, the Fund will adopt a Direct Investment Policy. There is no assurance that the investment objective of the Fund will actually be achieved.

The Fund will aim to replicate or track, before fees and expenses, the performance of the Bloomberg MSCI US High Yield Sustainable and SRI Index (the "**Reference Index**"), by holding a portfolio of fixed income securities that comprises all or a representation of the securities comprised in the Reference Index or unrelated transferable securities (the "**Underlying Securities**"). Further information on the Reference Index is contained under "General Description of the Underlying Asset".

The Fund is managed according to a passive approach and is an Optimised Replication Fund (as described in the Prospectus under the heading "Direct Investment Funds following a passive approach"). The optimised sample of securities determined will be selected with the aim of providing the most representative sample of the Reference Index based on its evaluation of the Underlying Securities against factors including, but not limited to, the correlation of the Underlying Securities to the Reference Index and the exposure, liquidity and risk of the Underlying Securities. Any unrelated transferable securities held by the Fund will typically be similar to the securities comprised in the Reference Index. 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"). Full disclosure on the composition of the Fund's portfolio will be available on a daily basis at www.Xtrackers.com.

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 that 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 Prospectus.

The value of the Fund's Shares is linked to the Reference Index (and, for Currency Hedged Share Classes, the relevant hedging arrangement, as described under "**Share Class Hedging**"), 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 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.

Share Class Hedging

The "2D – EUR Hedged" and "2C – GBP Hedged" Share Classes ("**Currency Hedged Share Classes**", as indicated under Description of the Shares below) are subject to currency hedging.

The Fund will seek to hedge against the currency exposures of the Underlying Securities in the portfolio which differ from the currency of the respective Currency Hedged Share Classes in accordance with the "**Share Class Currency Hedging Methodology**" set out in the Prospectus.

Investors should note that the Currency Hedged Share Classes will not completely eliminate currency risk, or provide a precise hedge, and as such, investors may have exposures to currencies other than the currency of the Currency Hedged Share Classes.

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 capital invested.

Currency Hedging Risk

In order to mitigate against the risk of movements in the currency of a Currency Hedged Share Class against the

currency of the portfolio constituents (where they are different to that of the relevant Currency Hedged Share Class currency), Share Class specific derivative transactions will be entered into for the purposes of acquiring currency hedges for each Currency Hedged Share Class. The return of the Share Class specific derivative transactions may not perfectly offset the actual fluctuations between the Currency Hedged Share Class currency and currency exposures of the securities that constitute the portion of the portfolio referable to the Currency Hedged Share Classes. No assurance can be given that such hedging activities will be entirely effective in achieving the purpose for which they have been entered into. While currency hedging reduces risks and losses in adverse market circumstances, it can also reduce and may completely offset gains in market circumstances that would otherwise have been beneficial had the position not been hedged. Consequently, the performance of a Currency Hedged Share Class may differ from that of the Underlying Asset as a result of the foreign exchange hedging transactions.

Sub-Investment Grade (High Yield) Bonds

The Fund is exposed to the performance of bonds that are rated sub-investment grade, which may be more volatile than higher-rated bonds of similar maturity. High yield bonds may also be subject to greater levels of credit or default risk than higher rated bonds. The value of high yield bonds can be adversely affected by overall economic conditions, such as an economic downturn or a period of rising interest rates, and high yield bonds may be less liquid and more difficult to value or sell at an advantageous time or price than higher rated bonds. In particular, high yield bonds are often issued by smaller, less creditworthy companies or by highly leveraged (indebted) firms, which are generally less able than more financially stable firms to make scheduled payments of interest and principal. Potential investors in the Fund should consider the relative risks of investing in the Fund carefully and understand that high yield bonds are generally not meant for short-term investing. Prices for high yield bonds may be affected by a sudden lack of market liquidity, legislative and/or regulatory developments which could adversely affect the performance of the Fund.

Concentration of the Reference Index

The market which the Reference Index seeks to represent has a high concentration to one or more sectors. Therefore, investors should be aware that changes in the conditions affecting the concentrated sector or sectors 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.

Environmental, Social and Governance Standards

The Reference Index's environmental, social and governance standards limit the number of securities eligible for inclusion in the Reference Index. As a result, the Reference Index, and as such the Fund, may be more heavily weighted in securities, industry sectors or countries that 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.

Investors should note that the determination that the Fund is subject to the disclosure requirements of a financial product under Article 8(1) of SFDR is made solely on the basis that the Reference Index promotes environmental and social characteristics. The Company is relying on the activities conducted by and information provided by the Index Administrator or other data providers (as further described under the heading "General Description of the Underlying Asset", where applicable) to make this determination. Neither the Company, nor any of its service providers, makes any representation or otherwise as to the suitability of the Reference Index and the Fund in meeting an investor's criteria on minimum environmental, social and governance ("ESG") standards or otherwise. Investors are advised to carry out their own review as to whether the Reference Index and the Fund accords with their own ESG criteria. Information on how the Reference Index is consistent with environmental, social and governance characteristics is contained under "General Description of the Underlying Asset".

Investors should note that whilst the Fund and the Reference Index seek to ensure compliance with the criteria outlined under "General Description of the Underlying Asset" 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 Fund until it is possible and practicable to divest such positions.

Sustainability Data Risks

Investors should note that 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.

It should also be noted that analysis of companies' ESG performance may be based on models, estimates and assumptions. This analysis should not be taken as an indication or guarantee of current or future performance.

ESG information from third-party data providers may be incomplete, inaccurate or unavailable. As a result, there is a risk that the Index Administrator or other data providers (as applicable) may incorrectly assess a security or issuer, resulting in the incorrect inclusion or exclusion of a security in the Reference Index and therefore the portfolio of 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

Dividends may be declared and paid on the "1D" and "2D - EUR Hedged" Shares up to four times per annum. The Fund does not intend to make dividend payments on the "1C" and "2C – GBP Hedged" Shares.

General Information Relating to the Fund

| Base Currency | USD |
|-------------------------|---|
| Cut-off Time | Means 4.30 p.m. Dublin time on the relevant Transaction Day for the "1D", "1C", "2D – EUR Hedged" and "2C – GBP Hedged" Share Classes. |
| Initial Offer Period | The Initial Offer Period in respect of the "1D", "2D – EUR Hedged" and "2C – GBP Hedged" Shares shall be from 9:00 am on 16 January 2023 to 4.30 p.m. (Dublin time) on 14 July 2023 or such earlier or later date as the Directors may determine and notify periodically to the Central Bank. |
| Minimum Fund Size | USD 50,000,000 |
| Settlement Date | Means up to nine Business Days following the Transaction Day ¹ . |
| Transparency under SFDR | The Fund promotes, among other characteristics, environmental and social |

¹ In the case that a Significant Market is closed for trading or settlement on any Business 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.

characteristics and is subject to the disclosure requirements of a financial product under Article 8(1) of SFDR. Information on how the Reference Index is consistent with environmental, social and governance characteristics is contained under "General Description of the Reference Index". Please also refer to "Environmental, Social and Governance Standards" under "Specific Risk Warning" above, to the section entitled "Sustainability-related disclosures under SFDR and EU Taxonomy Regulation" set out in the Prospectus and the annex to this Supplement.

Securities Lending

No

Significant Market

Means a Direct Replication Significant Market.

Description of the Shares

| | "1D" | "1C" | "2D - EUR Hedged" | "2C – GBP Hedged" |
|---|--|--------------|--|--|
| ISIN Code | IE0008PLHDF4 | IE0006YM7D84 | IE0002G89SU6 | IE000WHO5BF2 |
| German Security Identification Number (WKN) | DBX0R9 | DBX0SF | DBX0SA | DBX0TN |
| Currency | USD | USD | EUR | GBP |
| Initial Issue Price | 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. | N/A | 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. | 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. |
| Launch Date | To be determined by the Board of Directors. The Launch Date will be available from the Administrator and via the website: <u>www.Xtrackers.com</u> | 6 July 2022 | To be determined by the Board of Directors. The Launch Date will be available from the Administrator and via the website: <u>www.Xtrackers.com</u> | To be determined by the Board of Directors. The Launch Date will be available from the Administrator and via the website: <u>www.Xtrackers.com</u> |
| Minimum Initial Investment Amount | USD 50,000 | USD 50,000 | EUR 50,000 | GBP 50,000 |
| Minimum Additional Investment Amount | USD 50,000 | USD 50,000 | EUR 50,000 | GBP 50,000 |
| Minimum Redemption Amount | USD 50,000 | USD 50,000 | EUR 50,000 | GBP 50,000 |
| Currency Hedged Share Class | No | No | Yes | Yes |

Fees and Expenses

| | "1D" | "1C" | "2D - EUR Hedged" | "2C – GBP Hedged" |
|-------------------------------------|------------------|-----------------|-------------------|----------------------|
| Management Company | Up to 0.15% per | Up to 0.15% per | Up to 0.20% per | Up to 0.20% per |
| Fee ² | annum | annum | annum | annum |
| Platform Fee | Up to 0.10 % per | Up to 0.10% per | Up to 0.10 % per | Up to 0.10 % per |
| | annum | annum | annum | annum |
| All-in Fee | Up to 0.25 % per | Up to 0.25% per | Up to 0.30% per | Up to 0.30% per |
| | annum | annum | annum | annum |
| Primary Market Transaction Costs | Applicable | Applicable | Applicable | Applicable |
| Transaction Costs | Applicable | Applicable | Applicable | Applicable |
| Anticipated Level of | Up to 1% | Up to 1% | Up to 1% | Up to 1% |

² The Management Company has partially waived its fee for 12 months from 19 May 2022 until 18 May 2023 inclusive. During this period the Management Company Fee will be charged at 0.05% per annum and consequently the All-Fee will be 0.15% per annum

| Tracking Error ³ | | | |
|-----------------------------|--|--|--|
|-----------------------------|--|--|--|

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

³ The anticipated tracking error displayed represents the tracking error of the unhedged Share Classes against the Fund's Reference Index (which is also unhedged).

GENERAL DESCRIPTION OF THE UNDERLYING ASSET

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 administered by Bloomberg Index Services Limited (the "Index Administrator", which expression shall include any successor in such capacity). The Reference Index is designed to reflect the performance of USD-denominated, high yield, fixed-rate corporate bonds, excluding bonds which do not fulfil specific ESG criteria. The Reference Index includes securities issued by industrial, utility and financial institutions that meet specific currency, sector, amount outstanding, credit quality, maturity, coupon, seniority of debt, market of issue, and security type criteria.

Specifically, for bonds to be eligible for inclusion in the Reference Index they must be rated high yield (Ba1/BB+/BB+ or below) using the middle rating of Moody's, Standard & Poor's, and Fitch. When a rating from only two agencies is available, the lower rating shall be used. When a rating from only one agency is available, that rating shall be used to determine eligibility for the Reference Index.

The Reference Index excludes 144A tranche securities which do not have an equivalent Regulation S tranche. As such the Reference Index may contain (and therefore the Fund may be invested in) eligible 144A securities.

The Reference Index additionally excludes bonds which do not fulfil specific ESG criteria. In particular, bonds will be excluded from the Reference Index due to the following ESG considerations:

- Bonds rated below BB by MSCI ESG Research. MSCI ESG Ratings are designed to help identify the ESG risks and opportunities of investments. Companies are rated on a 7-point 'AAA' to 'CCC' scale according to their exposure to industry-specific ESG risks and their ability to manage those risks relative to peers.
- Issuers with a "red" MSCI ESG Controversies score (less than 1). MSCI ESG Controversies scores measures a company's involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, and performance with respect to these norms and principles. Each Controversy is attributed a 0-10 score and a flag colour depending on the severity of its ESG impact.
- Issuers that are classified by MSCI in their MSCI ESG Business Involvement Screening Research ("BISR") as breaching certain thresholds in controversial activities, including, but not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, nuclear power, civilian firearms, military weapons, and energy production from thermal coal, nuclear power or natural gas based power generation. BISR aims to enable institutional investors to manage ESG standards and restrictions.
- Issuers with any involvement in controversial weapons, nuclear weapons, or with any fossil fuel reserves.

The MSCI ESG Ratings, MSCI ESG Controversies scores and BISR are sourced from MSCI ESG Research LLC.

If having applied the above ESG exclusion criteria, less than 20% of the total number of issuers in the universe of eligible bonds (the "**Relevant Threshold**") are excluded, the remaining issuers are ranked according to MSCI ESG Ratings score and MSCI ESG Controversies score and those with the lowest ranking will be excluded from the Reference Index, until the number of excluded issuers is higher than the Relevant Threshold.

The composition of the Reference Index is rebalanced on a monthly basis, on the last business day of the month. The bonds included in the Reference Index are weighted on each rebalancing date according to the relative market value of each issuance, i.e., the product of bond price plus accrued interest and par amount outstanding of the respective debt security. Issuers with MSCI ESG Ratings of BBB or higher will be weighted in the Reference Index at 100% weight by market value while the weight of bonds from issuers with MSCI ESG Ratings of BB will be weighted in the Reference Index at a 50% weight by market value. The weighting of each issuer is limited to 3% in the Reference Index. The excess weighting of any such issuer based on its relative market value over the 3% cap will be redistributed on a pro rata basis to all other issuers' bonds in the index that are under the 3% cap. The process is repeated until no issuer exceeds the 3% limit.

The Reference Index is calculated by the Index Administrator on a daily basis. Bonds in the Reference Index are priced at bid price. New corporate issuances entering the Reference Index are priced on the offer side and are then priced at bid after the first month.

The Reference Index is calculated on a total return basis which means that the payments from coupons are reinvested in the Reference Index. Payments from coupons and scheduled partial and unscheduled full redemptions are held as cash until the next rebalancing, when the cash is reinvested in the Reference Index.

The Reference Index was created in June 2021 and the historical levels have been calculated from May 2019 (the Base Date).

Further Information

Additional information on the Reference Index can be found on the relevant Bloomberg website (<u>https://www.bloomberg.com/professional/product/indices/bloomberg-fixed-income-indices/#/index/I36427US</u>). Bloomberg Index Services Limited has been granted authorisation by the UK FCA as a UK administrator for this index under the UK Benchmark Regulation. Bloomberg Index Services Limited is listed on the FCA's register for administrators.

IMPORTANT

"Bloomberg®" and the Bloomberg MSCI US High Yield Sustainable and SRI Index are service marks of Bloomberg Finance L.P. and its affiliates, including Bloomberg Index Services Limited ("**BISL**"), the administrator of the index (collectively, "**Bloomberg**"), and have been licensed for use for certain purposes by the Company as the issuer of the Fund.

The Fund is not sponsored, endorsed, sold or promoted by Bloomberg. Bloomberg does not make any representation or warranty, express or implied, to the owners of or counterparties to the Fund or any member of the public regarding the advisability of investing in securities generally or in the Fund particularly. The only relationship of Bloomberg to the Company is the licensing of certain trademarks, trade names and service marks and of the Bloomberg MSCI US High Yield Sustainable and SRI Index, which is determined, composed and calculated by BISL without regard to the Company or the Fund. Bloomberg has no obligation to take the needs of the Company or the Fund into consideration in determining, composing or calculating the Bloomberg MSCI US High Yield Sustainable and SRI Index. Bloomberg is not responsible for and has not participated in the determination of the timing of, prices at, or quantities of the Fund to be issued. Bloomberg shall not have any obligation or liability, including, without limitation, to the Fund's customers, in connection with the administration, marketing or trading of the Fund.

BLOOMBERG DOES NOT GUARANTEE THE ACCURACY AND/OR THE COMPLETENESS OF THE BLOOMBERG MSCI USD HIGH YIELD SUSTAINABLE AND SRI BOND INDEX OR ANY DATA RELATED THERETO AND SHALL HAVE NO LIABILITY FOR ANY ERRORS, OMISSIONS OR INTERRUPTIONS THEREIN. BLOOMBERG DOES NOT MAKE ANY WARRANTY, EXPRESS OR IMPLIED, AS TO RESULTS TO BE OBTAINED BY THE COMPANY, OWNERS OF THE FUND OR ANY OTHER PERSON OR ENTITY FROM THE USE OF THE BLOOMBERG MSCI USD HIGH YIELD SUSTAINABLE AND SRI BOND INDEX OR ANY DATA RELATED THERETO. BLOOMBERG DOES NOT MAKE ANY EXPRESS OR IMPLIED WARRANTIES AND EXPRESSLY DISCLAIMS ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE BLOOMBERG MSCI USD HIGH YIELD SUSTAINABLE AND SRI BOND INDEX OR ANY DATA RELATED THERETO. WITHOUT LIMITING ANY OF THE FOREGOING, TO THE MAXIMUM EXTENT ALLOWED BY LAW, BLOOMBERG, ITS LICENSORS, AND ITS AND THEIR RESPECTIVE EMPLOYEES, CONTRACTORS, AGENTS, SUPPLIERS, AND VENDORS SHALL HAVE NO LIABILITY OR RESPONSIBILITY WHATSOEVER FOR ANY INJURY OR DAMAGES-WHETHER DIRECT, INDIRECT, CONSEQUENTIAL, INCIDENTAL, PUNITIVE OR OTHERWISE—ARISING IN CONNECTION WITH THE FUND OR THE BLOOMBERG MSCI USD HIGH YIELD SUSTAINABLE AND SRI BOND INDEX OR ANY DATA OR VALUES RELATING THERETO—WHETHER ARISING FROM THEIR NEGLIGENCE OR OTHERWISE, EVEN IF NOTIFIED OF THE POSSIBILITY THEREOF.

ANNEX

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Xtrackers ESG USD High Yield Corporate Bond UCITS ETF

Legal entity identifier: 254900AN6N7D4N3AT454 an investment in an economic activity **Environmental and/or social characteristics** that contributes to an environmental or social objective, provided that the investment does not Does this financial product have a sustainable investment objective? significantly harm Yes × No any environmental or social objective It will make a minimum of It promotes Environmental/Social (E/S) and that the × investee companies characteristics and while it does not have as sustainable investments with an follow good its objective a sustainable investment, it will environmental objective: ___% governance have a minimum proportion of 5% of practices. in economic activities that sustainable investments qualify as environmentally The **EU Taxonomy** is with an environmental objective in economic sustainable under the EU a classification activities that qualify as environmentally Taxonomy system laid down in sustainable under the EU Taxonomy Regulation (EU) in economic activities that do 2020/852, with an environmental objective in not qualify as environmentally × establishing a list of economic activities that do not qualify as sustainable under the EU environmentally environmentally sustainable under the EU Taxonomy sustainable Taxonomy economic activities. That Regulation does with a social objective × not lay down a list of socially sustainable It will make a minimum of It promotes E/S characteristics, but **will not** economic activities. sustainable investments with a make any sustainable investments Sustainable investments with an social objective: % environmental



objective might be aligned with the Taxonomy or not.

Sustainable

investment means

What environmental and/or social characteristics are promoted by this 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 holds a portfolio of securities that comprises all or a representation of the securities comprised in the Reference Index or unrelated transferable securities or other eligible assets. The Reference Index is designed to reflect the performance of high yield, USD denominated corporate bonds that meet specific maturity, credit quality, liquidity, and environmental, social and governance ("ESG") criteria.

The Reference Index excludes bonds which do not fulfil specific ESG criteria. In particular, bonds will be excluded from the Reference Index due to the following ESG considerations:

- Bonds rated below BB by MSCI ESG Research. MSCI ESG Ratings are designed to help identify the ESG risks and opportunities of investments. Companies are rated on a 7-point 'AAA' to 'CCC' scale according to their exposure to industry-specific ESG risks and their ability to manage those risks relative to peers.
- Issuers with a "red" MSCI ESG Controversies score (less than 1). MSCI ESG Controversies scores measures a company's involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, and performance with respect to these norms and principles. Each Controversy is attributed a 0-10 score and a flag colour depending on the severity of its ESG impact.
- Issuers that are classified by MSCI in their MSCI ESG Business Involvement Screening Research ("BISR") as breaching certain thresholds in controversial activities, including, but not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, nuclear power, civilian firearms, military weapons, and energy production from thermal coal, nuclear power or natural gas based power generation. BISR aims to enable institutional investors to manage ESG standards and restrictions.
- Issuers with any involvement in controversial weapons, nuclear weapons, or with any fossil fuel reserves.

The MSCI ESG Ratings, MSCI ESG Controversies scores and BISR are sourced from MSCI ESG Research LLC.

If having applied the above ESG exclusion criteria, less than 20% of the total number of issuers in the universe of eligible bonds (the "Relevant Threshold") are excluded, the remaining issuers are ranked according to MSCI ESG Ratings score and MSCI ESG Controversies score and those with the lowest ranking will be excluded from the Reference Index, until the number of excluded issuers is higher than the Relevant Threshold.

Issuers with an MSCI ESG Rating of BBB or higher will be weighted in the Reference Index at 100% weight by market value while the weight of bonds from issuers with an MSCI ESG Rating of BB will be weighted in the Reference Index at a 50% weight by market value.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

- 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 /

Sustainability

indicators measure how the environmental or social characteristics promoted by the financial product are attained. chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Tobacco involvement**: The percentage of the financial product's portfolio's market value exposed to companies flagged for involvement in tobacco as determined by MSCI, and includes all tobacco producers as well as tobacco distributors, suppliers, and retailers with a combined revenue in these areas of more than, or equal to, 5%.

• What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

While the financial product does not have sustainable investment as its objective, it will invest a minimum proportion of its assets in sustainable investments as defined by Article 2 (17) SFDR.

At least 5% of the financial product's net assets will be invested in sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2 (17) SFDR. Sustainable economic activities refer to the proportion of an issuer's economic activities that contribute to an environmental objective and/or a social objective, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

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.

How have the indicators for adverse impacts on sustainability factors been taken into account?

As part of the DNSH assessment under article 2(17) SFDR, the sustainable investment assessment integrates certain metrics related to principle adverse indicators and the Reference Index of 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).

How are the sustainable investments aligned 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 excluded by the financial product's Reference Index.

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

- Yes, the financial product considers the following principle adverse impacts on sustainability factors from Annex I of the draft Commission Delegated Regulation supplementing the SFDR (C(2022) 1931 final):
 - 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).

No



The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

What investment strategy does this financial product follow?

The investment objective of the financial product is to track the performance before fees and expenses of the "Reference Index", which is the Bloomberg MSCI US High Yield Sustainable and SRI Index, which is designed to reflect the performance of high yield, USD denominated corporate bonds that meet specific maturity, credit quality, liquidity, and environmental, social and governance ("ESG") criteria.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The investment objective of the financial product is to track the performance before fees and expenses of the Reference Index.

The Reference Index excludes bonds which do not fulfil specific ESG criteria. In particular, bonds will be excluded from the Reference Index due to the following ESG considerations:

 Bonds rated below BB by MSCI ESG Research. MSCI ESG Ratings are designed to help identify the ESG risks and opportunities of investments. Companies are rated on a 7-point 'AAA' to

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters. 'CCC' scale according to their exposure to industry-specific ESG risks and their ability to manage those risks relative to peers.

- Issuers with a "red" MSCI ESG Controversies score (less than 1). MSCI ESG Controversies scores measures a company's involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, and performance with respect to these norms and principles. Each Controversy is attributed a 0-10 score and a flag colour depending on the severity of its ESG impact.
- Issuers that are classified by MSCI in their MSCI ESG Business Involvement Screening Research ("BISR") as breaching certain thresholds in controversial activities, including, but not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, nuclear power, civilian firearms, military weapons, and energy production from thermal coal, nuclear power or natural gas based power generation. BISR aims to enable institutional investors to manage ESG standards and restrictions.
- Issuers with any involvement in controversial weapons, nuclear weapons, or with any fossil fuel reserves.

The MSCI ESG Ratings, MSCI ESG Controversies scores and BISR are sourced from MSCI ESG Research LLC.

If having applied the above ESG exclusion criteria, less than 20% of the total number of issuers in the universe of eligible bonds (the "Relevant Threshold") are excluded, the remaining issuers are ranked according to MSCI ESG Ratings score and MSCI ESG Controversies score and those with the lowest ranking will be excluded from the Reference Index, until the number of excluded issuers is higher than the Relevant Threshold.

Issuers with an MSCI ESG Rating of BBB or higher will be weighted in the Reference Index at 100% weight by market value while the weight of bonds from issuers with an MSCI ESG Rating of BB will be weighted in the Reference Index at a 50% weight by market value.

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.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The financial product does not pursue a committed minimum rate to reduce the scope of investments considered prior to the application of the investment strategy.

What is the policy to assess good governance practices of the investee companies?

The investment objective of the financial product is to track the performance before fees and expenses of the Reference Index which 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

Good governance

practices include sound management structures, employee relations, remuneration of staff and tax compliance.

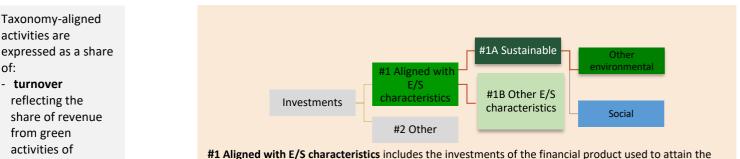


manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

This financial product invests at least 90% of its net assets in investments that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 5% of the financial product's assets qualify as sustainable investments (#1A Sustainable).

Up to 10% of the investments are not aligned with these characteristics (#2 Other).



environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are gualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

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 rebalance or investment in constituents of the Reference Index. 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 the Reference Index, or would fall within the quoted percentage of the investments that are not aligned with the promoted environmental and social characteristics (#2 Other).



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

While the financial product promotes environmental characteristics, it is not intended that its underlying investments take into account the EU Taxonomy Regulation criteria for the environmentally sustainable economic activities of climate change mitigation and/or climate change adaptation (the only two of the six environmental objectives under the EU Taxonomy Regulation for

Taxonomy-aligned activities are

Asset allocation

describes the share of

investments in

specific assets.

of:

reflecting the share of revenue from green activities of investee companies

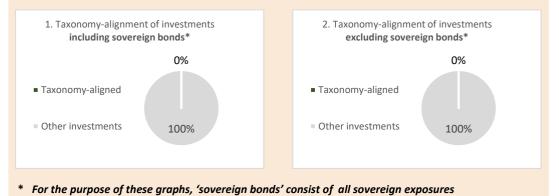
capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- operational expenditure (OpEx) reflecting green operational activities of investee companies.

which technical screening criteria have been defined through delegated acts). As a result, the financial product does not intend to make investments within the scope of the EU Taxonomy Regulation.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



What is the minimum share of investments in transitional and enabling activities?

The financial product does not have a minimum share of investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investments aligned with the EU Taxonomy.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The financial product does not intend to make a minimum allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investments will in total be at least 5%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investments will in total be at least 5%.

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

The financial product predominantly promotes asset allocation in investments that are aligned with environmental and social characteristics (#1 Aligned with E/S characteristics).

Those investments included under "#2 Other", may include ancillary liquid assets for the purpose of efficient portfolio management, which may include, secured and/or unsecured deposits and/or units or shares of other UCITS or other collective investment schemes which pursue a money market or cash strategy, or financial derivative instruments. It may also include securities which



sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy. have been recently downgraded by the relevant ESG data provider but will not be removed from the Reference Index until the next Reference Index rebalance and may therefore not be removed from the portfolio until that time.



Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Yes. The financial product has designated the Bloomberg MSCI US High Yield Sustainable and SRI Index as the reference benchmark.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

The Reference Index promotes environmental and social characteristics by excluding companies which do not fulfil the specific ESG criteria outlined above, as of each Reference Index rebalance.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

In order to seek to achieve the investment objective, the financial product will adopt a "Direct Investment Policy" which means that the financial product will aim to track, before fees and expenses, the performance of the Reference Index by holding a portfolio that comprises all or a representation of the securities comprised in the Reference Index or unrelated transferable securities. Any unrelated transferable securities held by the financial product will typically be similar to the securities comprised in the Reference Index.

• How does the designated index differ from a relevant broad market index?

The Reference Index differs from a broad market index representing the performance of high yield, USD denominated corporate bonds by excluding bonds which do not fulfil specific ESG criteria. In particular, bonds will be excluded from the Reference Index due to the following ESG considerations:

- Bonds rated below BB by MSCI ESG Research. MSCI ESG Ratings are designed to help identify the ESG risks and opportunities of investments. Companies are rated on a 7-point 'AAA' to 'CCC' scale according to their exposure to industry-specific ESG risks and their ability to manage those risks relative to peers.
- Issuers with a "red" MSCI ESG Controversies score (less than 1). MSCI ESG Controversies scores measures a company's involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, and performance with respect to these norms and principles. Each Controversy is attributed a 0-10 score and a flag colour depending on the severity of its ESG impact.
- Issuers that are classified by MSCI in their MSCI ESG Business Involvement Screening Research ("BISR") as breaching certain thresholds in controversial activities, including, but not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, nuclear power, civilian firearms, military weapons, and energy production from

thermal coal, nuclear power or natural gas based power generation. BISR aims to enable institutional investors to manage ESG standards and restrictions.

• Issuers with any involvement in controversial weapons, nuclear weapons, or with any fossil fuel reserves.

The MSCI ESG Ratings, MSCI ESG Controversies scores and BISR are sourced from MSCI ESG Research LLC.

If having applied the above ESG exclusion criteria, less than 20% of the total number of issuers in the universe of eligible bonds (the "Relevant Threshold") are excluded, the remaining issuers are ranked according to MSCI ESG Ratings score and MSCI ESG Controversies score and those with the lowest ranking will be excluded from the Reference Index, until the number of excluded issuers is higher than the Relevant Threshold.

Issuers with an MSCI ESG Rating of BBB or higher will be weighted in the Reference Index at 100% weight by market value while the weight of bonds from issuers with an MSCI ESG Rating of BB will be weighted in the Reference Index at a 50% weight by market value.

• Where can the methodology used for the calculation of the designated index be found?

Full information on the Reference Index can be found on the relevant Bloomberg website (<u>https://www.bloombergindices.com</u>).



Where can I find more product specific information online?

More product-specific information can be found on the website: <u>www.xtrackers.com</u> as well as on your local country website.