# Xtrackers World Net Zero Pathway Paris Aligned UCITS ETF

## Supplement to the Prospectus

This Supplement contains information in relation to Xtrackers World Net Zero Pathway Paris Aligned 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 must be read in conjunction with, the Prospectus.**

**Xtrackers (IE) plc**

**Dated 15 June 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 the Underlying Asset, which is the Solactive ISS ESG Developed Markets Net Zero Pathway Index (the "**Reference Index**"). The Reference Index is designed to reflect the performance of large and medium capitalisation companies across global developed markets which are selected and weighted with the aim of seeking alignment with EU Paris-aligned Benchmark ("**EU PAB**") standards and certain net zero frameworks.

Further information on the Reference Index is contained under "General Description of the Underlying Asset".

### 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 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**"). 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*"). 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 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 each Share Class is linked to the Reference Index, the performance of which may rise or fall. The value of each Currency Hedged Share Class is linked to the Reference Index (and to the relevant hedging arrangement as described under "Share Class Currency Hedging Methodology"), 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.

### Share Class Hedging

The "2C – EUR Hedged Share Class ("**Currency Hedged Share Class**", as indicated under Description of the

Shares below) is 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 Class in accordance with the "**Share Class Currency Hedging Methodology**" set out in the Prospectus.

Investors should note that the Currency Hedged Share Class 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 Class.

**Efficient Portfolio Management and Financial Derivative Instruments**

The Fund may employ techniques and instruments relating to transferable securities under the conditions and within the limits laid down by the Central Bank from time to time 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 Class. 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 constituents of the Reference Index as a result of the foreign exchange hedging transactions.

*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 and carbon 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.

*EU PAB Compliance*

The Reference Index has been designed by the Index Administrator to meet the requirements set out for EU PAB in the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 of the European Parliament and European Council with regards to the minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (the "**PAB Regulation**") in order to be designated as an EU Paris-aligned Benchmark. Amongst other things, the PAB Regulation requires an EU Paris-aligned Benchmark to reduce its carbon intensity (measured by weighted average metric tonnes of $CO_2$ equivalent gas emissions of the index constituents over enterprise value including cash) by at least 7% year-on-year, and reduce carbon intensity by at least 50% against the Parent Index. However, investors should note that whilst the Reference Index seeks to ensure alignment with all relevant PAB Regulation requirements at each rebalance date, between these rebalances limits may be breached and relevant targets may not be reached.

Neither the Company, nor any of its service providers, makes any representation with respect to the accuracy, reliability, correctness of the way that any EU PAB standards are interpreted or implemented by the Index Administrator.

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**

| | |
|---|---|
| **Base Currency** | USD |
| **Cut-off Time** | Means 4.30 p.m. Dublin time on the Business Day before the relevant Transaction Day |
| **Initial Offer Period** | The Initial Offer Period in respect of the "2C – EUR Hedged" Shares shall be from 9:00 a.m. on 16 June 2023 to 4:30 p.m. (Irish time) on 15 December 2023 or such earlier or later date as the Directors may determine and notify in advance to the Central Bank. |
| **Fund Classification (InvStG)** | Equity Fund, target minimum percentage of 90%. |
| **Minimum Fund Size** | USD 50,000,000. |
| **Settlement Date** | Means up to nine Business Days following the Transaction Day[1]. |
| **Securities Lending** | No. |
| **Transparency under SFDR** | The Fund promotes, among other characteristics, environmental and social characteristics and is subject to the disclosure requirements of a financial product |

[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.

| | |
|---|---|
| | 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 Parent Index and 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. |
| **Significant Market** | Means a Direct Replication Significant Market. |

## Description of the Shares

| | **"1C"** | **"2C – EUR Hedged"** |
|---|---|---|
| **ISIN Code** | IE000UZCJS58 | IE000S3S9JV6 |
| **German Security Identification Number (WKN)** | DBX0RU | DBX0RV |
| **Currency** | USD | EUR |
| **Initial Issue Price** | 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. |
| **Launch Date** | 17 February 2022 | To be determined by the Board of Directors. The Launch Date will be available from the Administrator and via the website: www.Xtrackers.com |
| **Minimum Initial Investment Amount** | USD 50,000 | EUR 50,000 |
| **Minimum Additional Investment Amount** | USD 50,000 | EUR 50,000 |
| **Minimum Redemption Amount** | USD 50,000 | EUR 50,000 |
| **Currency Hedged Share Class** | No | Yes |

## Fees and Expenses

| | **"1C"** | **"2C – EUR Hedged"** |
|---|---|---|
| **Management Company Fee** | Up to 0.09% per annum | Up to 0.14% per annum |
| **Platform Fee** | 0.10% per annum | 0.10% per annum |

| | | |
|---|---|---|
| **All-in Fee** | Up to 0.19% per annum | Up to 0.24% per annum |
| **Primary Market Transaction Costs** | Applicable | Applicable |
| **Transaction Costs** | Applicable | Applicable |
| **Anticipated Level of Tracking Error**[2] | 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.

[2] *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 Parent Index and the Reference Index

The Reference Index is administered by Solactive AG (the "**Index Administrator**") and is based on the Solactive GBS Developed Markets Large & Mid Cap Index (the "**Parent Index**"). The Parent Index includes large and medium capitalisation companies across global developed markets, selected according to the Solactive country classification framework. Details on the classification of countries is available at http://www.solactive.com.

The Reference Index aims to comply with the regulations laid out for EU PAB in the PAB Regulation. The Reference Index also seeks to implement recommendations published by the Institutional Investors Group on Climate Change on their Net Zero Investment Framework which can be found on https://www.iigcc.org and https://parisalignedinvestment.org.

The Reference Index utilises ESG data from Institutional Shareholder Services Inc. ("**ISS**"). ISS provides expertise across a variety of sustainable and responsible investment issues, including climate change, sustainable development goal ("**SDG**") linked impacts, human rights, labour standards, corruption and controversial weapons.

Securities are removed from the Parent Index that do not meet certain ESG criteria, including those that are:

- Involved in severe and very severe controversies relating to the environment, human rights, corruption or labour rights;
- Have any involvement in controversial weapons, nuclear weapons, civilian firearm production or tobacco cultivation and production;
- Have involvement over a specific threshold in industries (as set out in the minimum standards for EU PAB) or in certain industries as determined by the Index Administrator to be industries with a high potential for negative environmental, health and/or social impact. These include, but are not limited to:
    - Coal mining and power generation;
    - Fossil fuel production, servicing, exploration, distribution or power generation;
    - Oil sands production;
    - Civilian firearms distribution;
    - Tobacco related products; and
    - Military weapons;
- Are assigned an ISS ESG rating below a certain threshold; and
- Have a significant negative impact on United Nations SDG 12 (Responsible Consumption & Production), SDG 13 (Climate Action), SDG 14 (Life Below Water), SDG 15 (Life on Land).

Please note that companies which cannot be evaluated on these criteria due to missing or insufficient data are also excluded.

Securities from the Parent Index that meet these ESG criteria are then assigned an initial weight in the Reference Index based on their market capitalisation, with each constituent's initial weight tilted based on a scoring process for each of the three pillars listed below (the "**Tilted Weights**"):

- Science-based targets relating to reducing carbon emissions;
- Climate disclosure standards; and
- Green revenue relating to SDG 13.

Additionally, constituent weights are further adjusted to align with the objectives of the EU PAB (including reducing the carbon intensity of the Reference Index. The carbon intensity of the Reference Index is capped at the minimum of the carbon intensity of the decarbonization trajectory on the selection day and 50% of the carbon intensity of the Parent Index on the selection day. The decarbonization trajectory is defined by an annual minimum carbon intensity reduction of 7% compared to the carbon intensity of the Reference Index on the base day in a geometric progression. Under this process, weightings are subject to capping of up to 5%, with individual weight deviations and sector weight deviation limits applied to the Tilted Weights to minimise, to the extent possible, the deviations against the Parent Index.

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.

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 an end of day basis.

**Further Information**

Solactive AG has been granted authorisation as a benchmark administrator for the Solactive ISS ESG Developed Markets Net Zero Pathway Index and is included in the register of administrators and benchmarks maintained by ESMA pursuant to the Benchmark Regulation. Additional information on the Reference Index, its composition, calculation and rules for periodical review and rebalancing and on the general methodology behind the Reference Index can be found on www.solactive.com.

**IMPORTANT**

This document contains a summary of the underlying principles and regulations regarding the structure and operating of the Reference Index. Solactive AG does not offer any explicit or tacit guarantee or assurance, neither pertaining to the results from the use of the Reference Index nor the Reference Index value at any certain point in time nor in any other respect. The Reference Index is merely calculated and published by Solactive AG and it strives to the best of its ability to ensure the correctness of the calculation. There is no obligation for Solactive AG – irrespective of possible obligations to issuers – to advise third parties, including investors and/or financial intermediaries, of any errors in the Reference Index. The publication of the Reference Index by Solactive AG is no recommendation for capital investment and does not contain any assurance or opinion of Solactive AG regarding a possible investment in a financial instrument based on this Reference Index.

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**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name: Xtrackers World Net Zero Pathway Paris Aligned UCITS ETF**
**Legal entity identifier: 254900HPXE8UO093JP04**

## Environmental and/or social characteristics

**Does this financial product have a sustainable investment objective?**

| ☐ **Yes** | ☒ **No** |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective:** ___% <br><br> ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy <br><br> ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | ☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments <br><br> ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <br><br> ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <br><br> ☒ with a social objective |
| ☐ It will make a minimum of **sustainable investments with a social objective:** ___% | ☐ It promotes E/S characteristics, but **will not make any sustainable investments** |

### 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 equity securities that comprises all, or a substantial number of, the securities comprised in the Reference Index. The Reference Index is designed to reflect the performance of large and medium capitalisation companies across global developed markets which are selected and weighted with the aim of seeking alignment with EU Paris-aligned Benchmark ("EU

PAB") standards and certain net zero frameworks. The Reference Index is based on the Parent Index (as defined below).

The Reference Index aims to comply with the regulations laid out for EU PAB in the PAB Regulation. The Reference Index also seeks to implement recommendations published by the Institutional Investors Group on Climate Change on their Net Zero Investment Framework which can be found on https://www.iigcc.org and https://parisalignedinvestment.org.

The Reference Index utilises ESG data from Institutional Shareholder Services Inc. ("ISS"). ISS provides expertise across a variety of sustainable and responsible investment issues, including climate change, sustainable development goal ("SDG") linked impacts, human rights, labour standards, corruption and controversial weapons.

Securities are removed from the Parent Index that do not meet certain ESG criteria, including those that are:

- Involved in severe and very severe controversies relating to the environment, human rights, corruption or labour rights;
- Have any involvement in controversial weapons, nuclear weapons, civilian firearm production or tobacco cultivation and production;
- Have involvement over a specific threshold in industries (as set out in the minimum standards for EU PAB) or in certain industries as determined by the Index Administrator to be industries with a high potential for negative environmental, health and/or social impact. These include, but are not limited to:
    - Coal mining and power generation;
    - Fossil fuel production, servicing, exploration, distribution, or power generation;
    - Oil sands production;
    - Civilian firearms distribution;
    - Tobacco related products; and
    - Military weapons;
- Are assigned an ISS ESG rating of D- or below; and
- Have a significant negative impact on United Nations SDG 12 (Responsible Consumption & Production), SDG 13 (Climate Action), SDG 14 (Life Below Water), SDG 15 (Life on Land).

Please note that companies which cannot be evaluated on these criteria due to missing or insufficient data are also excluded.

Securities from the Parent Index that meet these ESG criteria are then assigned an initial weight in the Reference Index based on their market capitalisation, with each constituent's initial weight tilted based on a scoring process for each of the three pillars listed below (the "Tilted Weights"):

- Science-based targets relating to reducing carbon emissions;

- Climate disclosure standards; and
- Green revenue relating to SDG 13.

Additionally, constituent weights are further adjusted to align with the objectives of the EU PAB (including reducing the carbon intensity of the Reference Index). The carbon intensity of the Reference Index is capped at the minimum of the carbon intensity of the decarbonization trajectory on the selection day and 50% of the carbon intensity of the Parent Index on the selection day. The decarbonization trajectory is defined by an annual minimum carbon intensity reduction of 7% compared to the carbon intensity of the Reference Index on the base day in a geometric progression. Under this process, weightings are subject to capping of up to 5%, with individual weight deviations and sector weight deviation limits applied to the Tilted Weights to minimise, to the extent possible, the deviations against the Parent Index.

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

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

  - **Greenhouse Gas Intensity**: The financial product's portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue) , as determined by either MSCI or ISS. Details on the provider used are available upon request.
  - **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, including violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, as determined by either MSCI or ISS. Details on the provider used are available upon request.
  - **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" or "D-" or below, as determined by either MSCI or ISS. Details on the provider used are available upon request.
  - **Exposure to Fossil Fuels:** The percentage of the financial product's portfolio's market value exposed to companies flagged for involvement in fossil fuels, which 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, as determined by either MSCI or ISS. Details on the provider used are available upon request.

- ***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 10% 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. The sustainability investment assessment uses data from one or multiple data providers and/or public sources to determine if an activity is sustainable. The environmental and/or social objectives are identified by activities that contribute positively to the United Nations Sustainable Development Goals ("UN SDGs"), which may include, but is not limited to, (i) Goal 1: No poverty, (ii) Goal 2: Zero hunger, (iii) Goal 3: Good health and well-being, (iv) Goal 4: Quality education, (v) Goal 5: Gender equality, (vi) Goal 6: Clean water and Sanitation, (vii) Goal 7: Affordable and clean energy, (viii) Goal 10: Reduced inequality, (ix) Goal 11: Sustainable cities and communities, (x) Goal 12: Responsible consumption, (xi) Goal 13: Climate action, (xii) Goal 14: Life below water, and (xiii) Goal 15: Life on land, are measured in terms of revenues, capital expenditure (CapEx) and/or operational expenditure (OpEx). The extent of contribution to individual UN SDGs will vary based on the actual investments in the portfolio.

**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, anti-corruption and anti-bribery matters.

***How do the su stainable 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:

- Carbon footprint (no. 2);
- GHG intensity of investee companies (no. 3);
- Exposure to companies active in the fossil fuel sector (no. 4);
- Share of non-renewable energy consumption and production (no. 5);
- Activities negatively affecting biodiversity-sensitive areas (no. 7);

- 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):

- Carbon footprint (no. 2);
- GHG intensity of investee companies (no. 3);
- Exposure to companies active in the fossil fuel sector (no. 4);
- Share of non-renewable energy consumption and production (no. 5);
- Activities negatively affecting biodiversity-sensitive areas (no. 7);
- 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 Solactive ISS ESG Developed Markets Net Zero Pathway Index, which is designed to reflect the performance of large and medium capitalisation companies across global developed markets which are selected and weighted with the aim of seeking alignment with EU Paris-aligned Benchmark ("EU PAB") standards and certain net zero frameworks. The Reference Index is based on the Solactive GBS Developed Markets Large & Mid Cap Index (the "Parent Index"). The Parent Index includes large and medium capitalisation companies across global developed markets, selected according to the Solactive country classification framework. Details on the classification of countries is available at http://www.solactive.com.

- ***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 aims to comply with the regulations laid out for EU PAB in the PAB Regulation. The Reference Index also seeks to implement recommendations published by the Institutional Investors Group on Climate Change on their Net Zero Investment Framework which can be found on https://www.iigcc.org and https://parisalignedinvestment.org.

The Reference Index utilises ESG data from Institutional Shareholder Services Inc. ("ISS"). ISS provides expertise across a variety of sustainable and responsible investment issues, including climate change, sustainable development goal ("SDG") linked impacts, human rights, labour standards, corruption and controversial weapons.

Securities are removed from the Parent Index that do not meet certain ESG criteria, including those that are:

- Involved in severe and very severe controversies relating to the environment, human rights, corruption or labour rights;
- Have any involvement in controversial weapons, nuclear weapons, civilian firearm production or tobacco cultivation and production;
- Have involvement over a specific threshold in industries (as set out in the minimum standards for EU PAB) or in certain industries as determined by the Index Administrator to be industries with a high potential for negative environmental, health and/or social impact. These include, but are not limited to:
  - Coal mining and power generation;
  - Fossil fuel production, servicing, exploration, distribution, or power generation;
  - Oil sands production;
  - Civilian firearms distribution;
  - Tobacco related products; and

- Military weapons;

- Are assigned an ISS ESG rating of D- or below; and

- Have a significant negative impact on United Nations SDG 12 (Responsible Consumption & Production), SDG 13 (Climate Action), SDG 14 (Life Below Water), SDG 15 (Life on Land).

Please note that companies which cannot be evaluated on these criteria due to missing or insufficient data are also excluded.

Securities from the Parent Index that meet these ESG criteria are then assigned an initial weight in the Reference Index based on their market capitalisation, with each constituent's initial weight tilted based on a scoring process for each of the three pillars listed below (the "Tilted Weights"):

- Science-based targets relating to reducing carbon emissions;

- Climate disclosure standards; and

- Green revenue relating to SDG 13.

Additionally, constituent weights are further adjusted to align with the objectives of the EU PAB (including reducing the carbon intensity of the Reference Index). The carbon intensity of the Reference Index is capped at the minimum of the carbon intensity of the decarbonization trajectory on the selection day and 50% of the carbon intensity of the Parent Index on the selection day. The decarbonization trajectory is defined by an annual minimum carbon intensity reduction of 7% compared to the carbon intensity of the Reference Index on the base day in a geometric progression. Under this process, weightings are subject to capping of up to 5%, with individual weight deviations and sector weight deviation limits applied to the Tilted Weights to minimise, to the extent possible, the deviations against the Parent Index.

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.

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

- ***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 verified failure to respect established norms as well as severe or very severe controversies (including governance controversies) using the ISS Norm-Based Research, and companies that have an ISS ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an ISS ESG Rating.

**Asset allocation** describes the share of investments in specific assets.

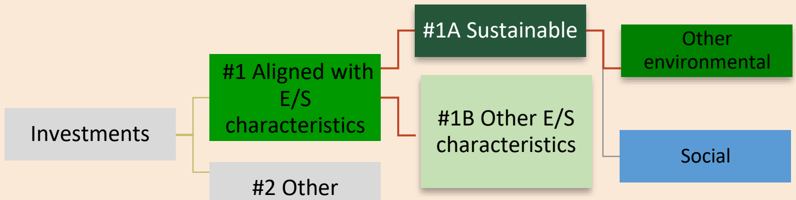
## What is the asset allocation planned for this financial product?

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 10% 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).

Taxonomy-aligned activities are expressed as a share of:

- **turnover** 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.




**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the 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 qualified 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

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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 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.

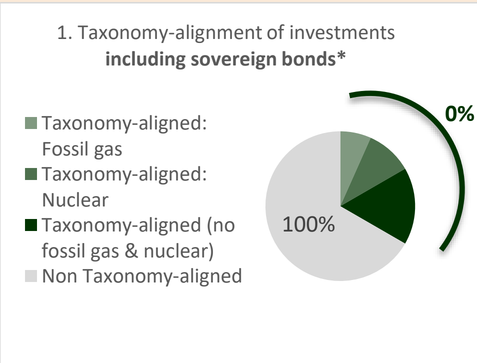
- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[3]?**

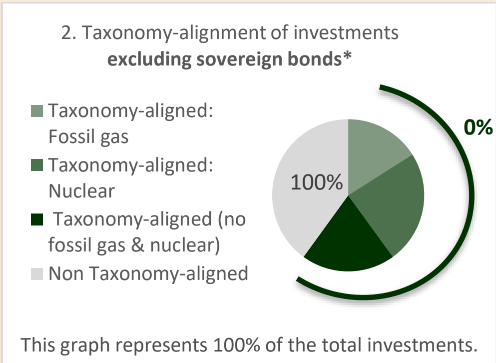
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No. However, there is a lack of reliable data in relation to fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. On this basis, although it is considered that no relevant investments are made, it is possible the financial product may make some investments in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy.

***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.***




* ***For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures***

- ***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.

[3] *Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under 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 10%.

### 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 10%.

### 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 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.

## 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?

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

Yes. The financial product has designated the Solactive ISS ESG Developed Markets Net Zero Pathway 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 selecting and weighting the constituents with the aim of seeking alignment with EU Paris-aligned Benchmark (“EU PAB”) standards and certain net zero frameworks and removing securities from the Parent Index that do not meet certain ESG criteria as 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 replicate or track, before fees and expenses, the performance of 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.

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

The Reference Index is based on the Parent Index, which is designed to reflect the performance of large and medium capitalisation companies across global developed markets, selected according to the Solactive country classification framework. The Reference Index aims to comply with the regulations laid out for EU PAB in the PAB Regulation. The Reference Index also seeks to implement recommendations published by the Institutional Investors Group on Climate Change on their Net Zero Investment Framework which can be found on https://www.iigcc.org and https://parisalignedinvestment.org.

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Securities are removed from the Parent Index that do not meet certain ESG criteria, including those that are:

- Involved in severe and very severe controversies relating to the environment, human rights, corruption or labour rights;
- Have any involvement in controversial weapons, nuclear weapons, civilian firearm production or tobacco cultivation and production;
- Have involvement over a specific threshold in industries (as set out in the minimum standards for EU PAB) or in certain industries as determined by the Index Administrator to be industries with a high potential for negative environmental, health and/or social impact. These include, but are not limited to:
    - Coal mining and power generation;
    - Fossil fuel production, servicing, exploration, distribution, or power generation;
    - Oil sands production;
    - Civilian firearms distribution;
    - Tobacco related products; and
    - Military weapons;
- Are assigned an ISS ESG rating of D- or below; and
- Have a significant negative impact on United Nations SDG 12 (Responsible Consumption & Production), SDG 13 (Climate Action), SDG 14 (Life Below Water), SDG 15 (Life on Land).

Please note that companies which cannot be evaluated on these criteria due to missing or insufficient data are also excluded.

Securities from the Parent Index that meet these ESG criteria are then assigned an initial weight in the Reference Index based on their market capitalisation, with each constituent's initial weight tilted based on a scoring process for each of the three pillars listed below (the "Tilted Weights"):

- Science-based targets relating to reducing carbon emissions;
- Climate disclosure standards; and
- Green revenue relating to SDG 13.

Additionally, constituent weights are further adjusted to align with the objectives of the EU PAB (including reducing the carbon intensity of the Reference Index). The carbon intensity of the Reference Index is capped at the minimum of the carbon intensity of the decarbonization trajectory on the selection day and 50% of the carbon intensity of the Parent Index on the selection day. The decarbonization trajectory is defined by an annual minimum carbon intensity reduction of 7% compared to the carbon intensity of the Reference Index on the base day in a geometric progression. Under this process, weightings are subject to capping of up to 5%, with individual weight deviations and sector weight deviation limits applied to the Tilted Weights to minimise, to the extent possible, the deviations against the Parent Index.

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

Additional information on the Reference Index, its composition, calculation and rules for periodical review and rebalancing and on the general methodology behind the Reference Index can be found on www.solactive.com.

## Where can I find more product specific information online?

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