This Singapore prospectus dated 11 November 2025 is a replacement Singapore prospectus lodged with the Monetary Authority of Singapore (the "Authority") pursuant to Section 298 of the Securities and Futures Act 2001 of Singapore. It replaces the Singapore prospectus that was registered by the Authority on 19 June 2025 (which was replaced by the first replacement Singapore prospectus dated 21 July 2025 and the second replacement Singapore prospectus dated 18 August 2025).

Xtrackers

Xtrackers Vietnam Swap UCITS ETF
Xtrackers MSCI Indonesia Swap UCITS ETF
Xtrackers MSCI China UCITS ETF
Xtrackers MSCI Singapore UCITS ETF

(each a "Sub-Fund" and collectively, the "Sub-Funds")

Singapore Prospectus

This Singapore Prospectus incorporates and is not valid without the attached Luxembourg base prospectus dated 14 October 2025 relating to Xtrackers and the product annexes of the Sub-Funds attached therein. Xtrackers, an undertaking for collective investment registered in the Grand Duchy of Luxembourg and constituted outside Singapore, has appointed DWS Investments Singapore Limited as the Singapore representative and agent for service of process in Singapore. Details of the Singapore representative appear on page 14 of this Singapore Prospectus.

Applications were made to the Singapore Exchange Securities Trading Limited ("SGX-ST") for permission to list and deal in and quote the Singapore Shares (as defined in the "Important Information" section of this Singapore Prospectus) of the Sub-Funds (each a sub-fund of Xtrackers (the "Company")), which may be issued from time to time, on the SGX-ST. Such permission has been granted by the SGX-ST and the Singapore Shares have been admitted to the Official List of the SGX-ST. The SGX-ST assumes no responsibility for the correctness of any statements or opinions expressed or reports contained in this Singapore Prospectus. Admission to the Official List of the SGX-ST is not to be taken as an indication of the merits of the shares of the Sub-Funds, the Sub-Funds, the Company, the Management Company, the Investment Managers or the Sub-Portfolio Managers (if applicable).

If you are in any doubt about this Singapore Prospectus, you should consult your stockbroker, bank manager, solicitor, professional accountant or other professional adviser.

TABLE OF CONTENTS

Contents		Page
IMPORTANT INFORMATION		1
DIRECTORY		6
1.	The Management Structure	8
2.	Other Parties	14
3.	Investment Objective, Policy, Focus and Approach	19
4.	Fees and Expenses	28
5.	Risk Factors	28
6.	Subscription and Purchase of the Shares	47
7.	Redemption and Sale of the Shares	55
8.	Conversions of Shares	59
9.	Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions	59
10.	Obtaining Price Information	59
11.	Past Performance, Expense Ratios and Turnover Ratios	60
12.	Soft Dollar Commissions/Arrangements	60
13.	Conflicts of Interest	60
14.	Reports	61
15.	Certain Singapore Tax Considerations	61
16.	Queries and Complaints	62
17.	Other Material Information	62
APPENDIX 1		72
APPENDIX 2 – Sub-Funds of Xtrackers		73
Schedule 1 - Xtrackers Vietnam Swap UCITS ETF		74
Schedule 2 – Xtrackers MSCI Indonesia Swap UCITS ETF		83
Schedule 3 – Xtrackers MSCI China UCITS ETF		92
Schedule 4 – Xtrackers MSCI Singapore UCITS ETF		107

IMPORTANT INFORMATION

The following collective investment schemes are offered in this Singapore Prospectus:

No.	Name of Sub-Fund	Product Annex Number[1]
1.	Xtrackers Vietnam Swap UCITS ETF	40
2.	Xtrackers MSCI Indonesia Swap UCITS ETF	56
3.	Xtrackers MSCI China UCITS ETF	61
4.	Xtrackers MSCI Singapore UCITS ETF	69

(each a "**Sub-Fund**", collectively the "**Sub-Funds**")[2]

The Sub-Funds (each a sub-fund of the Company) are recognised schemes under the Securities and Futures Act 2001 of Singapore (the "**SFA**"). A copy of this Singapore Prospectus has been lodged with and registered by the Monetary Authority of Singapore (the "**Authority**"). The Authority assumes no responsibility for the contents of this Singapore Prospectus. The registration of this Singapore Prospectus by the Authority does not imply that the SFA or any other legal or regulatory requirements have been complied with. The Authority has not, in any way, considered the investment merits of the Sub-Funds.

This Singapore Prospectus dated 11 November 2025 is a replacement Singapore prospectus lodged with the Authority pursuant to Section 298 of the SFA. It replaces the Singapore prospectus that was registered by the Authority on 19 June 2025 (which was replaced by the first replacement Singapore prospectus dated 21 July 2025 and the second replacement Singapore prospectus dated 18 August 2025). This Singapore Prospectus shall be valid up to and including 18 June 2026 and shall expire on 19 June 2026.

This Singapore Prospectus incorporates and is not valid without the Luxembourg base prospectus dated 14 October 2025 relating to the Company and the product annexes of the Sub-Funds (each a "**Product Annex**", collectively the "**Product Annexes**") attached therein (together, the "**Prospectus**"). Unless the context otherwise requires, terms defined in the Prospectus shall have the same meaning when used in this Singapore Prospectus. **You should note that the Luxembourg base prospectus and the Product Annexes may be updated from time to time, and apart from the Product Annexes of the Sub-Funds, there are other product annexes relating to other sub-funds of the Company that are not offered for investment to the Singapore public pursuant to this Singapore Prospectus and are hence not attached to the Prospectus.**

The Company is an investment company incorporated under the laws of the Grand Duchy of Luxembourg as a *société d'investissement à capital variable* (SICAV) under the name "db x-trackers" on 2 October 2006 for an unlimited period. It changed its name to Xtrackers on 16 February 2018. The Company is registered in the Grand Duchy of Luxembourg as an undertaking for collective investment pursuant to Part I of the Luxembourg law of 17 December 2010 relating to undertakings

[1] Please refer to the product annexes of the Sub-Funds which are attached to the Luxembourg base prospectus dated 14 October 2025 relating to Xtrackers.

[2] Unless the context otherwise requires, references in this Singapore Prospectus to "Sub-Fund" shall be construed as references to any of the sub-funds listed in the table set out above and references to "Sub-Funds" shall be construed accordingly.

for collective investment, as may be amended, and qualifies as an undertaking for collective investment in transferable securities ("**UCITS**") under article 1(2) of the European Parliament and Council Directive 2009/65/EC of 13 July 2009 on the co-ordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities as may be amended (the "**UCITS Directive**") and may therefore be offered for sale in each member state of the European Union, subject to registration.

The Company is structured as an umbrella fund with a variety of sub-funds of which the performance may be linked partially or in full to the performance of an underlying asset.

Separate classes of Shares (as defined in the Prospectus) may from time to time be issued under each Sub-Fund (each a "**Class**" or a "**Share Class**", together the "**Classes**" or "**Share Classes**")[3]. The assets of the Share Classes will commonly be invested in accordance with the investment objective and policy of the respective Sub-Funds, but different fee structures, distribution policies or other specific features may apply to each Share Class. Please refer to the section headed "The Classes of Shares" under the "STRUCTURE" section of the Prospectus for more details.

Share Classes of the Sub-Funds offered in this Singapore Prospectus

This Singapore Prospectus describes and offers Shares of the following Share Classes of the Sub-Funds for subscription and purchase in Singapore:

No.	Name of Sub-Fund	Share Classes
1.	Xtrackers Vietnam Swap UCITS ETF	Class 1C (ISIN Code: LU0322252924)
2.	Xtrackers MSCI Indonesia Swap UCITS ETF	Class 1C (ISIN Code: LU0476289623)
3.	Xtrackers MSCI China UCITS ETF	Class 1C (ISIN Code: LU0514695690) *
4.	Xtrackers MSCI Singapore UCITS ETF	Class 1C (ISIN Code: LU0659578842) *

**** As at the date of this Singapore Prospectus, the Singapore Shares[4] of these Sub-Funds are prescribed capital markets products as defined in the Securities and Futures (Capital Markets Products) Regulations 2018 ("Regulations 2018") and Excluded Investment Products ("EIPs") as defined in the Notice SFA 04-N12: Notice on the Sale of Investment Products and the Notice FAA-N16: Notice on Recommendations on Investment Products issued by the Authority (the "Notices"). A Sub-Fund which has Shares classified as prescribed capital markets products and EIPs shall be referred to as an "EIP Sub-Fund". You should note that Shares of a Sub-Fund may be classified as prescribed capital markets products and EIPs as long as the Sub-Fund can comply with the applicable requirements in the Regulations 2018 and the Notices or such requirements as may from time to time be imposed by the Authority. For the avoidance of doubt, the Singapore Shares of the remaining Sub-Funds which are not classified as prescribed capital markets products and EIPs are capital markets products***

[3] Unless the context otherwise requires, references in this Singapore Prospectus to "Class" or "Share Class" shall be construed as references to the share class of the Sub-Funds which are offered in this Singapore Prospectus (as set out in the table under the heading "Share Classes of the Sub-Funds offered in this Singapore Prospectus" in the "IMPORTANT INFORMATION" section of this Singapore Prospectus) and references to "Classes" or "Share Classes" shall be construed accordingly.

[4] "**Singapore Shares**" means shares in the Share Classes of the Sub-Funds which are (to be) listed and traded on the SGX-ST, as set out in the table under the heading "Share Classes of the Sub-Funds offered in this Singapore Prospectus" in the "IMPORTANT INFORMATION" section of this Singapore Prospectus.

other than prescribed capital markets products as defined in the Regulations 2018 and Specified Investment Products ("SIPs") as defined in the Notices.

The purpose of the Company is for each of its sub-funds through having its shares listed on one or more stock exchanges to qualify as an exchange traded fund. Accordingly, application may be made to list certain sub-funds or Classes of shares in a sub-fund on any stock exchange which the Board of Directors of the Company (the "**Board of Directors**") may from time to time deem appropriate. Please refer to Section A of the relevant Schedule for the list of exchanges on which the relevant Share Classes of the Sub-Funds available for subscription and purchase in Singapore are listed as of the date of registration of this Singapore prospectus.

The Board of Directors reserves the right at its sole discretion and without prior notice to or approval of Shareholders (as defined in the Prospectus) of the Shares to seek listing of the Shares on additional exchanges, including the SGX-ST.

Applications were made to the SGX-ST for permission to list and deal in and for quotation of the Singapore Shares, which may be issued from time to time, on the SGX-ST. Such permission has been granted by the SGX-ST and the Singapore Shares have been admitted to the Official List of the SGX-ST. Admission to the SGX-ST is not to be taken as an indication of the merits of the Shares of the Sub-Funds, the Sub-Funds, the Company, the Management Company, the Investment Managers or the Sub-Portfolio Managers, and the SGX-ST assumes no responsibility for the correctness of any of the statements made or opinions expressed in this Singapore Prospectus. As long as the Singapore Shares of a Sub-Fund are listed on the SGX-ST, the Singapore Shares of that Sub-Fund deposited with The Central Depository (Pte) Limited ("**CDP**") will be traded on the SGX-ST at market prices throughout the trading day. Market prices for the Singapore Shares may, however, be different from their Net Asset Values[5] ("**NAV**"). You should note that the listing and quotation of the Singapore Shares on the SGX-ST does not guarantee a liquid market for the Singapore Shares.

You can inspect copies of the articles of incorporation of the Company (as amended) (the "**Articles of Incorporation**") free of charge, at the registered office of the Company at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg, or by contacting the Singapore Representative of the Sub-Funds, DWS Investments Singapore Limited, at One Raffles Quay, #17-10, Singapore 048583, during normal Singapore business hours.

The directors of the Company individually and collectively accept full responsibility for the accuracy of the information given in this Singapore Prospectus and confirm, having made all reasonable enquiries, that to the best of their knowledge and belief, this Singapore Prospectus constitutes full and true disclosure of all material facts about the Sub-Funds and the directors of the Company are not aware of any facts the omission of which would make any statement in this Singapore Prospectus misleading. Where information in this Singapore Prospectus has been extracted from published or otherwise publicly available sources or obtained from a named source, the sole responsibility of the directors of the Company has been to ensure that such information has been accurately and correctly extracted from those sources and/or reproduced in this Singapore Prospectus in its proper form and context.

[5] "**Net Asset Value**" means the net asset value of the Company, of a Sub-Fund or of a Class of Shares, as appropriate, calculated as described in the Prospectus.

You should seek professional advice to ascertain (a) the possible tax consequences, (b) the legal requirements and (c) any foreign exchange restrictions or exchange control requirements, which you may encounter under the laws of the country of your citizenship, residence or domicile, and which may be relevant to the subscription, holding or disposal of the Shares. If you have any doubt about the contents of this Singapore Prospectus, you should consult your broker, bank manager, legal adviser, accountant, tax or other financial adviser.

No person has been authorised to give any information or to make any representation in connection with the offering of the Shares other than those contained in this Singapore Prospectus, and the reports referred to under the heading "Marketing Rules" in the "INTRODUCTION" section of the Prospectus and, if given or made, such information or representation must not be relied upon as having been authorised by the Company. **To reflect material changes, this document may be updated from time to time and you should check whether any more recent Singapore Prospectus is available.**

This Singapore Prospectus does not constitute an offer or solicitation by anyone in any jurisdiction in which such offer or solicitation is not lawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such an offer or solicitation.

You should carefully consider the risk factors set out under the heading *"*RISK FACTORS*"* in the Prospectus, and to refer to paragraph 5 of this Singapore Prospectus. In particular, save in the case of an EIP Sub-Fund whose investments in financial derivatives are subject to the Notices and/or subject to the extent allowed by the Authority, you should note that the Sub-Funds may invest, as a part of their investment policy and for the purposes of hedging, efficient portfolio management and/or optimising returns, in financial derivative instruments such as swap transaction(s). You should refer to paragraph 17.3 of this Singapore Prospectus and (in the case of an EIP Sub-Fund) the Regulations 2018 and the Notices for further details.

Risk Gradings

You should note that the risk grading set out below and in the section "TYPOLOGY OF RISK PROFILES" of the Prospectus has been established by the Company for the sole purpose of comparison with other sub-funds offered to the public by the Company and has not been independently reviewed or assessed by any third party.

Sub-Funds with a high risk grading

An investment in the following Sub-Funds is suitable for you if you are able and willing to invest in a sub-fund with a high risk grading as further described in paragraph 5 of this Singapore Prospectus:

No.	Name of Sub-Fund
1.	Xtrackers Vietnam Swap UCITS ETF
2.	Xtrackers MSCI Indonesia Swap UCITS ETF
3.	Xtrackers MSCI China UCITS ETF
4.	Xtrackers MSCI Singapore UCITS ETF

You should also note that the Net Asset Value of a Sub-Fund with a high risk grading may have a high volatility because of its investment objective.

IMPORTANT: PLEASE READ AND RETAIN THIS SINGAPORE PROSPECTUS (AND THE ACCOMPANYING PROSPECTUS) FOR FUTURE REFERENCE

DIRECTORY

REGISTERED OFFICE
Xtrackers
49, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

BOARD OF DIRECTORS
Philippe Ah-Sun, Director
Simon Klein, Director
Alfred Francois Brausch, Independent Director
Stefan Kreuzkamp, External Director
Thilo Wendenburg, Independent Director

MANAGEMENT COMPANY
DWS Investment S.A.
2, boulevard Konrad Adenauer
L-1115 Luxembourg
Grand Duchy of Luxembourg

INVESTMENT MANAGERS AND SUB-PORTFOLIO MANAGERS (as specified under the heading "MANAGEMENT AND ADMINISTRATION OF THE COMPANY" in the Prospectus)
DWS Investment GmbH
Mainzer Landstrasse 11-17
60329 Frankfurt am Main
Germany

DWS Investments UK Limited
21 Moorfields
London, EC2Y 9DB
United Kingdom

DWS Investments Hong Kong Limited
60/F, International Commerce Centre
1 Austin Road West
Kowloon, Hong Kong

DEPOSITARY
State Street Bank International GmbH, Luxembourg Branch
49, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

THE ADMINISTRATIVE AGENT, PAYING AGENT, DOMICILIARY AGENT AND LISTING AGENT

State Street Bank International GmbH, Luxembourg Branch
49, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

THE REGISTRAR AND TRANSFER AGENT

State Street Bank International GmbH, Luxembourg Branch
49, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

AUDITOR OF THE COMPANY

KPMG Audit S.à r.l.
39, Avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

SINGAPORE REPRESENTATIVE

DWS Investments Singapore Limited
One Raffles Quay #17-10
Singapore 048583

1. The Management Structure

Full details on the management structure of the Company are set out under the heading *"*MANAGEMENT AND ADMINISTRATION OF THE COMPANY*"* in the Prospectus.

1.1 The Board of Directors of the Company

The Board of Directors of the Company has the broadest powers to perform all acts of administration and disposition in the Sub-Funds' interest.

The Board of Directors is responsible for the overall investment policy, objective, management and control of the Company and for its administration.

As far as the Company is aware, none of the directors of the Company nor any of its associates is or will become entitled to receive any part of any brokerage charged to the Sub-Funds or any part of any fees, allowances or benefits received on purchases charged to the Sub-Funds.

Full details on the Board of Directors of the Company are set out under the heading *"*MANAGEMENT AND ADMINISTRATION OF THE COMPANY*"* in the Prospectus.

1.2 The Management Company

The Management Company, DWS Investment S.A., has been appointed to act as the management company to the Company and will be responsible for providing investment management services, administration services and distribution and marketing services to the sub-funds of the Company (including the Sub-Funds), unless otherwise indicated in the Product Annex. The Management Company also exercises and coordinates the client communication function.

The Management Company Agreement between the Company and the Management Company is for an undetermined duration and may be terminated at any time by either party upon ninety (90) days' prior notice or unilaterally with immediate effect by the Company, in the case of negligence, wilful default, fraud or bad faith on the part of the Management Company.

The Management Company has been established under the laws of the Grand Duchy of Luxembourg in the form of a "Société Anonyme" on 15 April 1987. The Management Company is registered with the Luxembourg Trade and Companies' Register under number B-25.754. The Management Company is authorised as a UCITS management company under Chapter 15 of the Law (as defined in the Prospectus) and as alternative investment fund manager under Chapter 2 of the AIFM Law. The Management Company is authorised and subject to the supervision of the Commission de Surveillance du Secteur Financier of Luxembourg. The Management Company has been managing collective investment schemes or discretionary funds in Luxembourg since its incorporation in 1987. Pursuant to Article 5 of the Articles of Incorporation of the Management Company, the Management Company has a share capital of €30.677,400 divided into 30,000 class A shares and 30,000 class B shares with a nominal value of €511.29 per share.

The Management Company is part of the DWS Group.

The directors and key executives from the Management Company who are responsible for the management of the Sub-Funds as at the date of this Singapore Prospectus are set out below:

(a) Directors (Members of the management board)

Mrs Nathalie Bausch

Office address: 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Nathalie Bausch is Chief Executive Officer of DWS Luxembourg and Head of HR EMEA (ex. UK & Germany): Luxembourg.

She joined the Deutsche Bank Group in 2008 with 17 years of industry experience and joined DWS, the asset management arm of Deutsche Bank Group, in February 2018. Prior to her current role, Nathalie was the Country COO, Country Head of HR for Deutsche Bank Luxembourg and served as a Member of several Management and Supervisory Boards in DWS and Deutsche Bank. Before joining, she worked as Partner and Head of Compliance, Corporate Legal and HR at Banque Oehman Luxembourg. Prior to this, she was Head of HR for Luxembourg & Netherlands at Merrill Lynch and worked in international reinsurance and asset management at Allianz Group, Luxembourg. Nathalie began her career at S.A. des Minerais, where she held positions as Administration Manager and HR Business Partner.

Mrs. Bausch holds an MBA from Ecole de Commerce et de Gestion of Luxembourg.

Dr Stefan Junglen

Office address: 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Dr. Stefan Junglen is Head of Sustainability Risk of DWS group and Member of the Management Board of the Management Company responsible for Risk Management and Finance. Stefan is further responsible for the Investment Risk team EMEA ex. Germany in the DWS Group. Stefan joined the DWS Group in 2016 having been in the asset management industry since 2008. Before joining, Stefan served as senior manager at KPMG, where he was active across the value chain of asset management including risk management, valuation, reporting process and regulatory implementation projects.

Stefan has a Master of Business Mathematics (Diplom-Wirtschaftsmathematiker) and a PhD in Mathematics from University of Trier.

Mr Leif Bjurström

Office address: 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Leif Bjurström is Senior Portfolio Manager Multi Asset & Solutions and Member of the Management Board of the Management Company. In this role, Mr. Bjurström is responsible for a team of portfolio managers that manage certain locally domiciled funds.

Prior to his current role, Mr. Bjurström was conducting officer for DB Advisors SICAV, a self-managed Luxembourg entity assigned with the management of pension fund mandates. Before relocating to Luxembourg in 2009, he managed various fixed-income portfolios as senior portfolio manager for DWS Investment GmbH in Frankfurt. Mr. Bjurström joined Deutsche Bank AG in 1997 in its Global Markets Division as senior fixed income trader. He began his career in 1994 as a fixed-income trader for Salomon Brothers. He holds a BSc

degree in Finance and Computer Science from Linfield University, Portland, Oregon, United States.

Mr Michael Mohr

Office address: 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Michael Mohr is Global Head of Passive Product Specialists at DWS. Michael Mohr has been with the Deutsche Bank Group since 1998, and with DWS specifically since 2006. Michael Mohr has extensive experience in the structuring and management of UCITS funds, from strategy through to product development and management. Michael Mohr's current role covers exchange traded funds (UCITS and 40 Act), exchange traded commodities and Passive Institutional Mandates. Michael Mohr's early roles at the Deutsche Bank Group included product management for Structured Products and business development. In 2010, Michael Mohr joined the Global Markets Structuring Team to build up the ETC business and transferred to DWS's Indexing business in 2012. Michael Mohr studied at the Frankfurt School of Finance and Management and the National University of Singapore, and holds a Master's Degree in Banking & Finance from the Frankfurt School of Finance and Management.

(b) Key Executives

As at the date of this Singapore Prospectus, there are no key executives other than the members of the management board of the Management Company.

As far as the Company is aware, neither the Management Company nor any of its associates is or will become entitled to receive any part of any brokerage charged to the Sub-Funds or any part of any fees, allowances or benefits received on purchases charged to the Sub-Funds.

Please refer to Appendix 1 for a non-exhaustive list of the Singapore-recognised collective investment schemes managed by the Management Company and/or, where applicable, the Investment Managers or the Sub-Portfolio Managers as of the date of this Singapore Prospectus.

Further details on the Management Company are set out under the heading *"*MANAGEMENT AND ADMINISTRATION OF THE COMPANY - *The Management Company"* in the Prospectus.

Liquidity Risk Management

The Management Company has established a liquidity risk management policy which enables it to identify, monitor and manage the liquidity risks of the sub-funds of the Company (including the Sub-Funds) and to ensure that the liquidity profile of the investments of the sub-funds of the Company will facilitate compliance with their respective obligations to meet redemption requests. Such policy, combined with the liquidity management tools available (as mentioned below), also seeks to achieve fair treatment of Shareholders and safeguard the interests of remaining Shareholders in case of sizeable redemptions.

The Management Company's liquidity risk management policy takes into account the investment strategy and the liquidity profile of each of the sub-funds of the Company, the redemption policy and the dealing frequency of the Company and the Company's ability to enforce redemption limitations. These measures seek to ensure fair treatment and transparency for all investors.

The Management Company's liquidity risk management policy involves monitoring the profile of investments held by the sub-funds of the Company on an on-going basis to ensure that such investments are appropriate to the redemption policy. Further, the Management Company's liquidity risk management policy includes details on periodic stress testing carried out by the Management Company to manage the liquidity risk of the sub-funds of the Company under normal and exceptional market conditions.

The liquidity risk management of the sub-funds of the Company is performed by the Management Company's investment risk team which is functionally independent from the portfolio investment function of the Management Company. The investment risk team will work with the relevant Investment Manager and/or the Sub-Portfolio Manager (if applicable) to address any exceptions on liquidity risk related issues, or escalate such issues to the relevant board member of the Management Company responsible for risk management, where appropriate.

The following tools may be employed by the Management Company to manage liquidity risks:

- Limitation of Shares for redemption on a single Business Day (please refer to the section headed "The Primary Market" in the "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" section of the Prospectus and the section headed "Dealings in Kind and in Cash" in the "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" section of the Prospectus for further details on such limitation and the impact that it may have on Shareholders' redemption rights);
- In kind subscription or redemption of Shares (please refer to the section headed "Dealings in Kind and in Cash" in the "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" section of the Prospectus for further details on such in kind subscription or redemption and the impact that it may have on Shareholders' redemption rights);
- Dealing suspension under certain circumstances (please refer to the section headed "Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions" in the "ADMINISTRATION OF THE COMPANY" section of the Prospectus for further details on such dealing suspension and the impact that it may have on Shareholders' redemption rights); and
- Imposition of anti-dilution levies (please refer to the section headed "Anti-Dilution Levy/Duties" in the "ADMINISTRATION OF THE COMPANY" section of the Prospectus for further details on such imposition of anti-dilution levies and the impact that it may have on Shareholders' redemption rights).

1.3 The Investment Managers[6] and Sub-Portfolio Managers[7]

The Investment Managers may be appointed by the Management Company for the provision of risk management services to the Sub-Funds, as may be agreed between the relevant Investment Manager and the Management Company from time to time, and shall provide periodic reports to the Management Company (covering *amongst other things* new FDI trades entered into on behalf of the Sub-Funds, a review and confirmation of the Sub-Funds' performance in accordance with the relevant Reference Index over the period, the occurrence of any investment restriction breach, and any other information which the relevant Investment Manager considers relevant to the Sub-Funds or which is requested by the Management Company).

Each Investment Manager has been appointed pursuant to an Investment Management Agreement[8] to act as the investment manager of the Company (including the relevant Sub-Funds). The Investment Management Agreements were entered into for an indefinite period. In investing the assets of the Sub-Funds for which they have been appointed as Investment Manager, each Investment Manager is obligated to comply at all times with (i) the Investment Policy, (ii) the Investment Restrictions and (iii) the terms of the relevant Investment Management Agreement.

An Investment Manager may, with the approval of the Management Company and the regulatory authorities but under its own supervision and responsibility, appoint a Sub-Portfolio Manager to provide certain portfolio management and risk management services with respect to a Sub-Fund. Any of the entities mentioned under "The Investment Managers and Sub-Portfolio Managers" section of this Singapore Prospectus or any other entity may be appointed as a Sub-Portfolio Manager with respect to one or more Sub-Funds.

The Investment Managers and Sub-Portfolio Managers, details of which are set out below, have been appointed in respect of one or more Sub-Funds as specified below:

Direct Replication Funds[9]

Unless otherwise provided in the relevant Product Annex, the Management Company sub-delegates the day-to-day investment management with respect to Direct Replication Funds to DWS Investment GmbH.

DWS Investment GmbH was established in the Federal Republic of Germany as a private limited liability company (Gesellschaft mit beschränkter Haftung), having its registered office at Mainzer Landstraße 11-17, 60329 Frankfurt am Main, Germany and is authorized and regulated by the Federal Financial Supervisory Authority in Germany (Bundesanstalt für Finanzdienstleistungsaufsicht – BaFin).

It has been managing collective investment schemes or discretionary funds since 1956. The subscribed share capital of DWS Investment GmbH is EUR 115,000,000.

---

[6] "**Investment Manager**" means the entities referred to under the headings "MANAGEMENT & ADMINISTRATION" and "MANAGEMENT AND ADMINISTRATION OF THE COMPANY" in the Prospectus.
[7] **"Sub-Portfolio Manager"** means the entities referred to under the headings "MANAGEMENT & ADMINISTRATION" and "MANAGEMENT AND ADMINISTRATION OF THE COMPANY" in the Prospectus.
[8] "**Investment Management Agreement**" means the agreement between the Management Company and the relevant Investment Manager as further defined under "Management and Administration of the Company" section of the Prospectus.
[9] "**Direct Replication Fund**" means a Sub-Fund with a Direct Investment Policy as described in the main part of the of the Prospectus under "Investment Objectives and Policies".

DWS Investment GmbH may, from time to time, and in accordance with an agreed process, delegate all or part of its investment management responsibilities with respect to one or more Direct Replication Funds to DWS Investments UK Limited and/or DWS Investments Hong Kong Limited (each a "**Sub-Portfolio Manager**").

DWS Investments Hong Kong Limited is a limited liability company incorporated under the laws of Hong Kong on 13 September 1994 and having its principal place of business at 60/F, International Commerce Centre, 1 Austin Road West, Kowloon, Hong Kong. It is licensed to conduct, among others, type 9 (asset management) regulated activity by the Securities and Futures Commission of Hong Kong with the CE number ACJ870. It has been licensed to manage collective investment schemes and portfolios on a discretionary basis since 2003.

Indirect Replication Funds[10]

Unless otherwise provided in the relevant Product Annex, the Management Company sub-delegates the day-to-day investment management with respect to Indirect Replication Funds to DWS Investments UK Limited ("**DWS UK**").

DWS UK is a limited liability company incorporated under the laws of England and Wales on 16 September 2004 and having its registered office at 21 Moorfields, London, EC2Y 9DB, United Kingdom. It is authorised and regulated by the Financial Conduct Authority. It has been managing collective investment schemes or discretionary funds in the United Kingdom since 2004. The share capital of DWS UK is set out in the accounts of DWS UK available on the Companies House UK website.

The Management Company shall remunerate the Investment Managers out of the Management Company Fee, as agreed from time to time between the parties.

Each Investment Manager shall remunerate out of the applicable Investment Management Fee any appointed Sub-Portfolio Manager, as agreed from time to time between the parties.

As far as the Company is aware, neither the Investment Managers and/or the Sub-Portfolio Managers nor any of their associates is or will become entitled to receive any part of any brokerage charged to the Sub-Funds or any part of any fees, allowances or benefits received on purchases charged to the Sub-Funds.

Please refer to Appendix 1 for a non-exhaustive list of Singapore-recognised collective investment schemes managed by the Management Company and/or, where applicable, the Investment Managers or the Sub-Portfolio Managers as of the date of this Singapore Prospectus.

Further details on the Investment Managers and the Sub-Portfolio Managers are set out under the headings "MANAGEMENT AND ADMINISTRATION OF THE COMPANY - The Investment Managers and Sub-Portfolio Managers", "INVESTMENT RESTRICTIONS – Risk Management Policy for FDI – General", "INVESTMENT RESTRICTIONS – Risk Management Policy for FDI – Control Management" and "RISK FACTORS – General Risk Factors – Operations" in the Prospectus.

[10] "**Indirect Replication Fund**" means a Sub-Fund with an Indirect Investment Policy as described in the main part of the Prospectus under "Investment Objectives and Policies".

2. Other Parties

2.1 The Singapore Representative

2.1.1 DWS Investments Singapore Limited has been appointed by the Company as the representative for the Sub-Funds in Singapore (the "**Singapore Representative**") to provide and maintain certain administrative and other facilities, services or functions in respect of the Sub-Funds.

2.1.2 The Singapore Representative shall carry out or procure the carrying out of the following functions:

(i) facilitate the issue and redemption of the Shares in Singapore, including (without limitation) the following:

(a) receive from the Singapore distributors and/or on behalf of the Company (and each Sub-Fund), and send immediately upon receipt to the Company or the Registrar and Transfer Agent, applications for the issue or switching of the Shares and requests for the redemption of the Shares and keep the records thereof;

(b) receive on behalf of the Company (and each Sub-Fund), and remit to the Company or the Registrar and Transfer Agent in such manner as the Company may direct in writing, subscription moneys in respect of applications for the issue of the Shares, and issue to applicants receipts in respect of such moneys;

(ii) facilitate the publishing of the most recent Net Asset Value per Share or sale and purchase prices of Shares in the Sub-Funds in the language of the Singapore Prospectus;

(iii) facilitate the sending of reports relating to the Sub-Funds or the Company to the relevant shareholders with the reports prepared in the language of the Singapore Prospectus, except in relation to any shareholder who has consented to being sent a report in a language other than the language of the Singapore Prospectus;

(iv) facilitate the furnishing of such books relating to the sale and redemption of the Shares in Singapore as the Authority may require;

(v) facilitate the inspection of instruments constituting the Sub-Funds or the Company and if such instruments are not in the language of the Singapore Prospectus, an accurate translation of the instruments in the language of the Singapore Prospectus shall be made available to a shareholder for inspection, unless the shareholder has consented to the making available to him for inspection of the instrument in a language other than the language of the Singapore Prospectus;

(vi) either maintain for inspection by shareholders in Singapore (at the registered address of the Singapore Representative at One Raffles Quay, #17-10, Singapore 048583) a subsidiary register of the shareholders who

subscribed for or purchased the Shares of the Sub-Funds in Singapore[11] or any facility that enables the inspection of or extraction of the equivalent information, and if such a subsidiary register or equivalent information is not in the language of the Singapore Prospectus, an accurate translation of the subsidiary register or equivalent information in the language of the Singapore Prospectus shall be made available to a shareholder for inspection or extraction, unless the shareholder has consented to the making available to him for inspection or extraction of the subsidiary register or equivalent information in a language other than the language of the Singapore Prospectus;

(vii) give notice in writing of any change in the particulars of the Singapore Representative and such other information as may be prescribed under the SFA or by the Authority, to the Authority within fourteen (14) days of such change (or within such other period as may be prescribed under the SFA or by the Authority;

(viii) furnish such information or record regarding the Sub-Funds as the Authority may, at any time, require for the proper administration of the SFA;

(ix) receive all enquiries in relation to the Sub-Funds from shareholders and/or applicants and forward the same to the Administrative Agent (or such other persons as the Company may from time to time direct);

(x) make available at the Singapore Representative's office for public inspection free of charge, and offering copies free of charge to shareholders and/or applicants, of the Articles of Incorporation and the Prospectus together with the latest audited annual report and semi-annual report (if available) of the Company and such other documents required under the SFA, the Code on Collective Investment Schemes issued by the Authority ("**Code**") or by the Authority to be made available or such other documents as may from time to time be agreed upon by the Company and the Singapore Representative;

(xi) accept on behalf of the Company service of all notices and other documents addressed to the Company (or a Sub-Fund) by any shareholder and immediately despatch the same to the Company;

(xii) in consultation with the Company, perform on behalf of the Company all acts and things in Singapore which are necessary to comply with the provisions of the SFA, the Securities and Futures (Offers of Investments) (Collective Investment Schemes) Regulations 2005 and the Code and for maintaining the status of each Sub-Fund as a recognised scheme under Section 287 of the SFA;

[11] For so long as the Singapore Shares of a Sub-Fund are listed and traded on the SGX-ST, the Singapore Shares of that Sub-Fund will be held in the name of the CDP or its nominee and held by the CDP for and on behalf of persons who maintain, either directly or through depository agents, securities accounts with the CDP. Persons named as direct securities account holders and depository agents in the depository register maintained by the CDP will be treated as beneficial Shareholders in respect of the number of the Singapore Shares of that Sub-Fund credited to their respective securities accounts.

(xiii) on receiving written instructions from the Company or from a party duly appointed and notified in writing by the Company to the Singapore Representative, pay the appointed Singapore distributors the commissions and other payments due from the Company to such distributors in respect of the Sub-Funds;

(xiv) act as the agent in Singapore to accept service of process on behalf of the Company or the Sub-Funds;

(xv) such other duties and obligations as may be agreed in writing between the Company and the Singapore Representative from time to time; and

(xvi) such other functions as the Authority may prescribe or require.

2.1.3 DWS Investments Singapore Limited bears the registration number 198701485N and has its registered address at One Raffles Quay, #17-10, Singapore 048583.

2.2 The Depositary

State Street Bank International GmbH, Luxembourg Branch has been appointed to act as the depositary bank for (i) the safekeeping of the Company's assets, (ii) the cash monitoring, (iii) the oversight functions and (iv) such other services as agreed from time to time and reflected in the Depositary Agreement by which State Street Bank International GmbH, Luxembourg Branch has been appointed as depositary of the Company. The Depositary has been appointed for an undetermined duration. The Depositary may not be removed by the Company unless a new depositary is appointed within two (2) months and the duties of the Depositary shall continue after its removal for such period as may be necessary to allow the transfer of all assets of the Company to the succeeding depositary.

The Depositary is State Street Bank International GmbH, Luxembourg Branch. State Street Bank International GmbH is a limited liability company organised under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. It is a credit institution supervised by the European Central Bank, the Federal Financial Supervisory Authority in Germany (*Bundesanstalt für Finanzdienstleistungsaufsicht* – BaFin) and the *Deutsche Bundesbank* in Germany. State Street Bank International GmbH, Luxembourg Branch is authorised by the CSSF in Luxembourg to act as depositary and is specialised in depositary, fund administration, and related services. State Street Bank International GmbH, Luxembourg Branch is registered in the Luxembourg Commercial and Companies' Register under number B 148 186. State Street Bank International GmbH is a member of the State Street group of companies having as their ultimate parent State Street Corporation, a US publicly listed company.

In line with its commitment to ensure that assets of a Sub-Fund are at all times subject to at least the level of care and protection generally available in the relevant market, the Depositary will appoint sub-custodian(s) in respect of the assets of the Sub-Fund in markets where the Depositary believes it is in the best interests for the Sub-Fund.

The Depositary considers many factors when assessing potential sub-custodians. Each prospective sub-custodian should have securities processing and local market expertise, and be able to satisfy the Depositary's operating requirements in terms of structure, communications, asset servicing activities, and reporting. Key areas of focus include the prospective sub-custodian's:

(1) practices, procedures, and internal controls,

(2) method of keeping custodial records,

(3) security and data protection practices,

(4) financial strength,

(5) reputation and standing in the local market,

(6) ability to influence and effectively manage market changes,

(7) commitment to local market advocacy on behalf of its investors,

(8) use of technology and automation,

(9) ability to leverage resulting efficiencies to enhance service offerings, and

(10) qualifications and suitability in comparison to alternative service providers.

Potential conflicts that may arise in the Depositary's use of sub-custodians include four broad categories:

(i) conflicts from sub-custodian selection and asset allocation among multiple sub-custodians influenced by (a) cost factors, including lowest fees charged, fee rebates or similar incentives and (b) broad two-way commercial relationships in which the Depositary may act based on the economic value of the broader relationship, in addition to objective evaluation criteria;

(ii) sub-custodians, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests;

(iii) sub-custodians, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depositary as its counterparty, which might create incentive for the Depositary to act in its self-interest, or other clients' interests to the detriment of clients; and

(iv) sub-custodians may have market-based creditors' rights against client assets that they have an interest in enforcing if not paid for securities transactions.

The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the depository issues to be properly identified, managed and monitored. Additionally, in the context of the Depositary's use of sub-custodians, the Depositary imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-custodians to ensure a high level of client service by those agents. The Depositary further provides frequent reporting on clients' activity and holdings, with the underlying functions subject to internal and external control audits. Finally, the Depositary internally separates the performance of its custodial tasks

from its proprietary activity and follows a standard of conduct that requires employees to act ethically, fairly and transparently with clients.

You can find further details on the Depositary under the heading "MANAGEMENT AND ADMINISTRATION OF THE COMPANY – *The Depositary*" and "RISK FACTORS – General Risk Factors – Depositary" in the Prospectus.

2.3 The Administrative Agent, Paying Agent, Domiciliary Agent and Listing Agent

State Street Bank International GmbH, Luxembourg Branch has been appointed as the Company's administrative agent, paying agent, domiciliary agent and listing agent pursuant to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement dated 20 October 2006. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than 90 days' prior written notice. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of a material clause of the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement may be terminated by the Management Company with immediate effect if this is deemed by the Management Company to be in the interest of the investors. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement contains provisions exempting the Administrative Agent from liability and indemnifying the Administrative Agent in certain circumstances. However, the liability of the Administrative Agent towards the Management Company and the Company will not be affected by any delegation of functions by the Administrative Agent.

The Administrative Agent is State Street Bank International GmbH, Luxembourg Branch. State Street Bank International GmbH is a limited liability company organised under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872.

You can find further details on the administrative agent, paying agent, domiciliary agent and listing agent under the heading "MANAGEMENT AND ADMINISTRATION OF THE COMPANY – *The Administrative Agent, Paying Agent, Domiciliary Agent and Listing Agent*" in the Prospectus.

2.4 The Registrar and Transfer Agent

The Company has appointed State Street Bank International GmbH, Luxembourg Branch as its Registrar and Transfer Agent in Luxembourg to administer the issue, conversion and redemption of the Shares, the maintenance of records and other related administrative functions.

As long as the Singapore Shares of a Sub-Fund are listed, quoted and traded on the SGX-ST, the CDP will be the share depository for the Singapore Shares of that Sub-Fund listed and traded on the SGX-ST. The persons named as the depositors in the depository register shall, for such period as the book-entry Singapore Shares of that Sub-Fund are entered

against their names in the depository register, be deemed to be the beneficial Shareholders of the amount of the book-entry Singapore Shares of that Sub-Fund entered against their respective names in the depository register of the CDP. Accordingly, if you own Singapore Shares of that Sub-Fund in the CDP, you are the beneficial owner of the Singapore Shares of that Sub-Fund as shown on the records of the CDP.

You can find further details on the Registrar and Transfer Agent under the heading "MANAGEMENT AND ADMINISTRATION OF THE COMPANY – *The Registrar, Transfer Agent and Listing Agent*" in the Prospectus.

2.5 Auditor of the Company

The auditor of the Company is KPMG Audit S.à r.l.

2.6 Others

In accordance with and subject to the terms of the Management Company Agreement (as defined in the Prospectus) and under its own supervision, responsibility and expense, the Management Company may delegate its advisory duties and functions. Any such delegation is subject to the prior approval of the Company and, to the extent required by applicable law, any regulatory authorities.

In addition, any Investment Manager and/or Sub-Portfolio Manager may at its own costs and expenses obtain administrative and operational support services from agents (including DWS Affiliates, as defined in the Prospectus) for the Sub-Funds for which it has been appointed as Investment Manager or Sub-Portfolio Manager. Any agents appointed by an Investment Manager and/or Sub-Portfolio Manager to provide them with administrative or operational support or any other services shall be remunerated by such Investment Manager or Sub-Portfolio Manager, respectively.

You can find further details of such delegations under the headings "MANAGEMENT AND ADMINISTRATION OF THE COMPANY – The Management Company" and "MANAGEMENT AND ADMINISTRATION OF THE COMPANY - The Investment Managers" in the Prospectus.

3. Investment Objective, Policy, Focus and Approach

3.1 Investment objective

Index Tracking Funds[12]

The Investment Objective[13] of Index Tracking Funds is to provide investors, via various investment techniques, with a return linked to a Reference Index.[14]

[12] "**Index Tracking Fund**" means a Sub-Fund the Investment Objective of which is to reflect the performance of a Reference Index through an Indirect Investment Policy (in the case of Indirect Replication Funds), a Direct Investment Policy (in the case of Direct Replication Funds) or a Hybrid Investment Policy (in the case of Hybrid Replication Funds).
[13] "**Investment Objective**" means the predefined investment objective of the Sub-Funds as specified in the relevant Product Annex.
[14] "**Reference Index**" means the index of securities or other assets whose performance an Index Tracking Fund will aim to reflect, pursuant to its investment objective and in accordance with its investment policies, as specified in the relevant Product Annex. The "Reference Index" could comprise several indices, and references to "Reference Index" shall be read accordingly. Please refer to Section A of the relevant Schedule for the Reference Index of each Sub-Fund.

Please refer to Section B of the relevant Schedule and the “INVESTMENT OBJECTIVES AND POLICIES” section of the Prospectus for details on the investment objective of each Sub-Fund.

In such case the value of a Sub-Fund's Shares is linked to the Reference Index, which performance may rise or fall. Hence, you should note that the value of your investment could fall as well as rise and you should accept that there is no guarantee that you will recover your initial investment. The Reference Index may have an Index Administrator or other agents and if so, it will be specified in the relevant Product Annex.

You should note that the Index Administrator may make changes to the Reference Index description (as set out in the “General Description of the Reference Index” section of the relevant Product Annex) with a view to dealing with technical adjustments necessary for the good maintenance of the Reference Index. If such changes do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com. You should consult the website of the Index Administrator as set out in Section M of the relevant Schedule regularly.

3.2 Investment Policy

An Index Tracking Fund may carry out its Investment Objective via an Indirect Investment Policy (as defined in the Prospectus) or a Direct Investment Policy (as defined in the Prospectus) as more fully described in the following paragraphs and the “INVESTMENT OBJECTIVES AND POLICIES” section of the Prospectus.

Please also refer to Sections A and B of the relevant Schedule for details on the investment policy of each Sub-Fund.

3.3 Index Tracking Funds with a Direct Investment Policy

Index Tracking Funds with a Direct Investment Policy (“**Direct Replication Funds**”) may carry out their investment objective by investing in a portfolio of transferable securities or other eligible assets that may comprise either:

(i) all, or a substantial number of, the constituents of the Reference Index (such Sub-Fund a "**Full Replication Fund**"), or

(ii) an optimised sample of the constituents of the Reference Index, or unrelated transferable securities or other eligible assets (such Sub-Fund an "**Optimised Replication Fund**").

Optimised Replication Funds may not hold every constituent or the exact weighting of a constituent in the Reference Index but will seek to provide a return similar to that of its Reference Index by (i) investing either in a sub-set of the constituents of the Reference Index, (ii) seeking to gain exposure to the Reference Index by utilising optimisation techniques and/or (iii) by investing in securities that are not part of that Reference Index. Use of these investment techniques, the implementation of which is subject to a number of constraints detailed in the “INVESTMENT RESTRICTIONS” section of the Prospectus, may not produce the intended results.

Full Replication Funds may from time to time not contain all of the constituents of the Reference Index, and accordingly such Sub-Funds may hold other transferable securities or other eligible assets in accordance with the Investment Restrictions (as defined in the Prospectus and as set out in the "INVESTMENT RESTRICTIONS" section of the Prospectus). The extent to which a Full Replication Fund does not contain all of the constituents of the Reference Index will vary, and will be dependent on a number of factors which may include, but are not limited to; the nature and number of the constituents of the Reference Index (for example, where a Reference Index comprises a large number of securities, contains a number of illiquid securities or where the availability of constituent securities for purchase is limited), legal or regulatory restrictions, the size of the Sub-Fund, and the utilisation of efficient portfolio management techniques.

Direct Replication Funds provide for the possibility to enter into securities lending agreements but do not currently provide for the possibility to enter into margin lending transactions or repurchase agreements (and/or reverse repurchase agreements), buy-sell or sell-buy back transactions or total return swaps as covered by Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 (the "**SFTR Regulation**"). Should the Board of Directors decide to provide for such possibility, the Prospectus will be updated prior to the entry into force of such decision in order for the Company to comply with the relevant disclosure requirements of the SFTR Regulation for these Sub-Funds.

The types of securities in which Direct Replication Funds may invest include American depositary receipts, global depositary receipts, and/or non-voting depositary receipts. Such Sub-Funds may also invest in bank deposits, Money Market Instruments (as defined in the Prospectus) and money market funds to carry out their investment objective and/or for treasury purposes. Such Sub-Funds may also receive income in respect of the securities held by them. Taxes may be imposed on income received from securities held by a Sub-Fund.

Direct Replication Funds may from time to time invest temporary cash balances (such as subscription proceeds which are pending investment or any other temporary cash balances) in FDIs to gain market exposure and to seek to reduce Tracking Error (as defined in the Prospectus).

The Investment Manager may exclude from the portfolios of the Sub-Funds certain securities as further outlined in the section "Sustainability-Related Disclosures Under SFDR And EU Taxonomy Regulation" of the Prospectus. In addition, the Investment Manager reserves the right to exclude from the portfolios of the Sub-Funds any securities which do not comply with the Investment Manager's policies.

Prescribed capital markets products or Excluded Investment Products

You should note that Shares of a Sub-Fund may be classified as prescribed capital markets products and EIPs as long as the Sub-Fund can comply with the applicable requirements in the Regulations 2018 and the Notices or such requirements as may from time to time be imposed by the Authority. As at the date of this Singapore Prospectus, the Singapore Shares of the following Sub-Funds are prescribed capital markets products and EIPs:

No.	Name of Sub-Fund	Share Classes
1.	Xtrackers MSCI China UCITS ETF	Class 1C (ISIN Code: LU0514695690)
2.	Xtrackers MSCI Singapore UCITS ETF	Class 1C (ISIN Code: LU0659578842)

For the avoidance of doubt, the Singapore Shares of the remaining Sub-Funds which are not classified as prescribed capital markets products and EIPs are capital markets products other than prescribed capital markets products and SIPs.

In accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products or EIPs, the EIP Sub-Fund does not and will not invest in any product, or engage in any transaction, which will cause its Shares not to be regarded as prescribed capital markets products or EIPs.

In this connection, you should note that the Authority has, in the case of an EIP Sub-Fund where there is or will be a proposed change to its investment objective, investment focus or investment approach of the EIP Sub-Fund (referred hereto as the "**intended change**") which will cause the Shares of such EIP Sub-Fund to be classified as SIPs, granted the Company an exemption from the requirements in paragraph 29B of the Notice SFA 04-N12: Notice on the Sale of Investment Products[15] pursuant to section 337(3) of the SFA. In granting the exemption, the Authority imposed the following conditions pursuant to section 337(4) of the SFA:

(i) the Singapore prospectus in respect of each relevant EIP Sub-Fund shall expressly state that the Company has been granted the said exemption on conditions specified in sub-paragraph (ii);

(ii) the Company shall make available on its website www.Xtrackers.com (or any successor thereto) a written notice of the intended change and cause the same notice to be made available on the SGXNET[16], at least one (1) calendar month prior to effecting the intended change and such written notice shall contain the following information:

(A) a description of the intended change and the date on which the intended change will be effected;

(B) an explanation that the intended change will cause the Shares in the relevant EIP Sub-Fund to be classified as SIPs;

(C) a warning that the intended change will alter the features and risks of the relevant EIP Sub-Fund and shareholders of the relevant EIP Sub-Fund should consider whether the relevant EIP Sub-Fund remains suitable for them and seek financial advice if in doubt; and

[15] Please refer to paragraph 29B of the Notice SFA 04-N12: Notice on the Sale of Investment Products for further details.
[16] "**SGXNET**" means the Singapore Exchange Network, a system network used by listed companies in sending information and announcements to the SGX-ST or any other system networks presented by the SGX-ST.

(D) an explanation that with the Shares in the relevant EIP Sub-Fund classified as SIPs, the relevant shareholders may hold on to or reduce existing positions in the relevant EIP Sub-Fund but will need to undergo a Customer Account Review[17] with a licensed person or exempt financial institution to open a SIP trading account (if the relevant shareholder does not already have one) to further transact[18] in the relevant EIP Sub-Fund.

(iii) if there is an intended change to an EIP Sub-Fund, the Company shall notify the SGX-ST in writing of the date from which the Shares in the relevant EIP Sub-Fund will be classified as SIPs at least five (5) business days prior to effecting the intended change.

Securities Lending

Types, purpose, limits and conditions

Except for an EIP Sub-Fund which shall not engage in securities lending transactions except where such securities lending transaction is carried out solely for the purpose of efficient portfolio management and does not amount to more than 50% of the net asset value of the relevant EIP Sub-Fund, a Direct Replication Fund may enter into temporary sale and transfer transactions in regard to securities in its portfolio (i.e. securities lending) for up to 50% of its assets and without distinction per asset classes ("**Securities Lending Transactions**") to generate additional income and therewith offset part or all of its costs. The expected portion of assets of Direct Replication Funds which should be subject to Securities Lending Transactions is specified in the relevant Product Annex. Such transactions are strictly regulated and must, amongst other things, be able to be terminated at any time at the initiative of the Sub-Fund. Securities Lending Transactions nonetheless give rise to certain risks including valuation and operational risks and market and counterparty risks. Depending on the value of the Securities Lending Transactions and its chosen policy, a Sub-Fund may be at any time fully or partially exposed to one or more counterparties. If so, the Sub-Fund will take/implement appropriate collateral or other counterparty risk mitigation arrangements compliant with the Regulations (as defined in the Prospectus) and/or will receive payment from the Securities Lending Transactions counterparties so that the percentage of the counterparty risk exposure remains within the limits set out in the Regulations.

For further information, please refer to the Notices, the sections headed "Securities Lending and Repurchase Transactions" and "Mitigation of Counterparty Risk Exposure" in the "INVESTMENT RESTRICTIONS" section, the sections headed "Efficient Portfolio Management" and "OTC Derivative Transactions entered into on behalf of Indirect Replication Funds and Direct Replication Funds" in the "INVESTMENT OBJECTIVES AND POLICIES" section and the "COLLATERAL ARRANGEMENTS IN RESPECT OF SECURITIES LENDING TRANSACTION(S)" section of the Prospectus, and *where applicable* the "General Information" table (specifically, "Securities Lending", "Securities

[17] "**Customer Account Review**" is as defined and described in the Notice SFA 04-N12: Notice on the Sale of Investment Products.
[18] "**transact**" as defined in the Notice SFA 04-N12: Notice on the Sale of Investment Products, means (a) the purchase of any SIP other than in connection with the creation of a short positions or (b) the sale of any SIP in connection with the creation of short positions. Please see paragraph 4 (Definitions) of the Notice SFA 04-N12: Notice on the Sale of Investment Products for further details.

Lending limit" and "Securities Lending revenue/costs policy" thereunder) of the relevant Product Annex.

Risks

Please refer to the "RISK FACTORS – Specific Risks in relation to Direct Replication Funds" section of the Prospectus and the heading "Specific risks in relation to Direct Replication Funds" in paragraph 5 of this Singapore Prospectus.

Repurchase transactions

The Direct Replication Funds may from time to time participate in repurchase transactions as described in the Prospectus. In accordance with the Notices, Direct Replication Funds which are EIP Sub-Funds shall not engage in repurchase transactions except where such repurchase transaction is carried out solely for the purpose of efficient portfolio management and does not amount to more than 50% of the net asset value of the relevant EIP Sub-Fund.

The Management Company may from time to time lend the securities of the Sub-Funds to its related corporations. Where applicable, DWS Affiliates may act as securities lending agents in the Securities Lending Transactions or as counterparties to the repurchase transactions entered into by Direct Replication Funds. Please refer to paragraph 5.8 of this Singapore Prospectus for information on potential conflicts of interest in this respect.

3.4 Indirect Investment Policy

The Sub-Funds with an Indirect Investment Policy include the reference "Swap" in their name.

Sub-Funds which adopt an Indirect Investment Policy (the "**Indirect Replication Funds**") may not invest directly in the constituents of the Reference Index. Instead, the exposure to the performance of the Reference Index will be achieved by way of derivative transactions and/or instruments (the "**Derivative Transaction(s)**"). In particular, an Indirect Replication Fund will conclude OTC swap transactions negotiated at arm's length with one or more Swap Counterparties[19] (the "**OTC Swap Transaction(s)**"). For the avoidance of doubt, the OTC Swap Transactions would qualify as total return swaps within the meaning of the SFTR Regulation.

Indirect Replication Funds may enter into OTC Swap Transactions with one or more approved Swap Counterparties. The approved Swap Counterparties to each Indirect Replication Fund may vary from time to time. The list of the approved Swap Counterparties is available on the website www.Xtrackers.com.

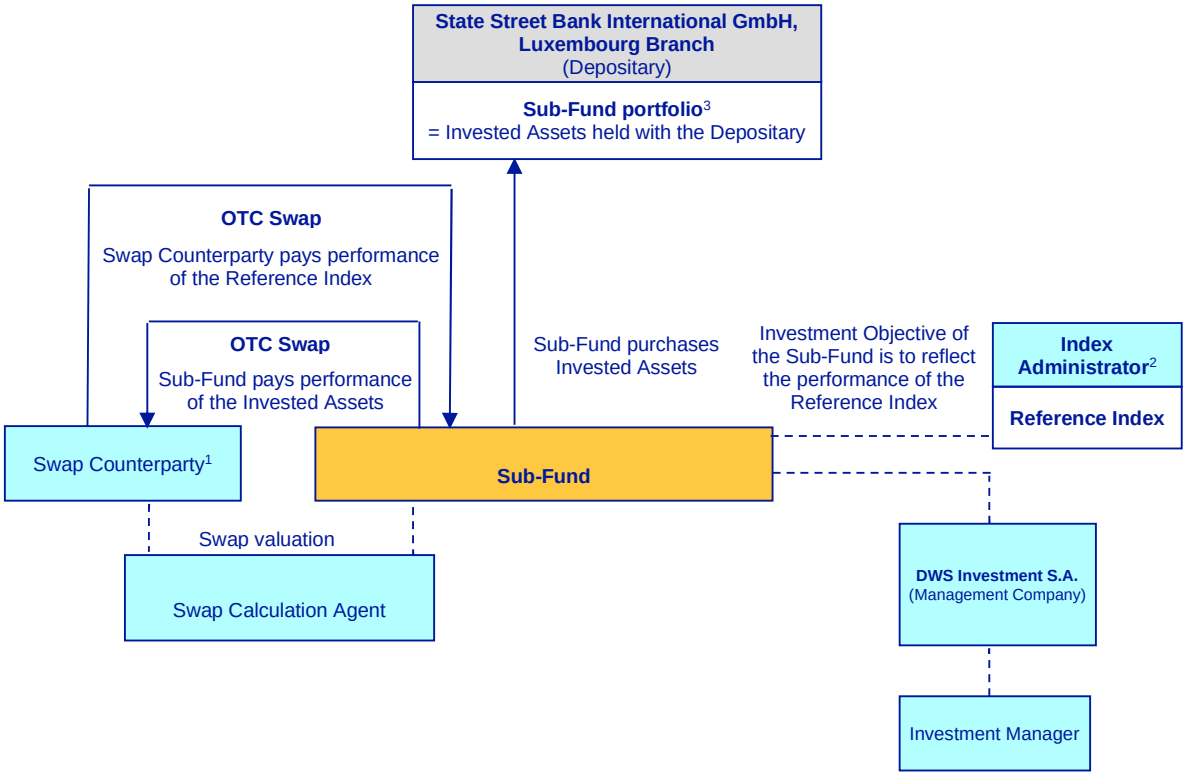
Indirect Replication Funds do not currently provide for the possibility to enter into securities lending agreements, buy-sell or sell-buy back transactions, margin lending transactions or repurchase agreements (and/or reverse repurchase agreements), as covered by the SFTR Regulation. Should the Board of Directors decide to provide for such possibility, the Prospectus will be updated prior to the entry into force of such decision in order for the Company to comply with the relevant disclosure requirements of the SFTR Regulation for these Indirect Replication Funds.

[19] "**Swap Counterparty**" means any entity or entities with whom the Company or the Management Company will conclude OTC Swap Transactions in respect of one or more Sub-Funds as described under "The Swap Counterparties" under "Management and Administration of the Company" sections of the Prospectus.

An Indirect Replication Fund or each Share Class of an Indirect Replication Fund (as the case may be) may adopt the following investment strategies in order to achieve its investment objective and in accordance with the Investment Restrictions:

Investment strategy (i)

An Indirect Replication Fund or each Share Class of an Indirect Replication Fund (as the case may be) adopting investment strategy (i) may at any time invest part or all of the net proceeds of any issue of its Shares in Invested Assets[20] and use one or more OTC Swap Transactions the purpose of which is to exchange all or part of the performance and/or income of such Invested Assets to gain exposure to the Reference Index (an "**Unfunded Swap**").



1. The approved Swap Counterparties to each Indirect Replication Fund may vary from time to time. The list of the approved Swap Counterparties is available on the website www.Xtrackers.com.

2. The Index Administrator of the Reference Index may be an independent index provider or an entity belonging to the DWS Group.

3. Collateral arrangements may be put in place to ensure the net counterparty risk exposure is maintained at or below 10% of the Sub-Fund's Net Asset Value at all times. However in practice the Company, the relevant Investment Manager and/or the Sub-Portfolio Manager will usually require that the Swap Counterparty proceed to a restrike of existing swap transactions.

[20] "**Invested Assets**" means certain assets in which a Sub-Fund is invested, as set forth in the Luxembourg base prospectus under "Investment Objectives and Policies" and/or in the relevant Product Annex.

Criteria for selection of the Invested Assets (when investment strategy (i) is adopted)

The Invested Assets held by the Indirect Replication Funds may consist of transferable securities, including:

(a) shares of issuers listed or traded on an official stock exchange of an OECD Member State (as defined in the Prospectus) unless otherwise specified in the relevant Product Annex; or

(b) a basket of bonds with minimum investment grade credit rating and/or secured and/or unsecured cash deposits.

The Investment Manager will exclude from the universe of eligible Invested Assets certain securities as further outlined in the section headed "Sustainability-Related Disclosures Under SFDR And EU Taxonomy Regulation" of the Prospectus.

Other than the above, there is no fixed set of criteria for the selection of Invested Assets which an Indirect Replication Fund may invest in.

Investment strategy (ii)

An Indirect Replication Fund or each Share Class of an Indirect Replication Fund (as the case may be) adopting investment strategy (ii) may invest part or all of the net proceeds of any issue of its Shares in one or more OTC Swap Transactions the purpose of which is to exchange all or part of the invested proceeds to gain exposure to the Reference Index (a "**Funded Swap**").

Requirements applicable to collateral pursuant to the Regulations

As of the date of registration of this Singapore prospectus, the Regulations provide a set of high-level principles which are intended to ensure, amongst others, that the collateral is sufficiently liquid, that the issuer of the collateral has sufficient credit quality, that the collateral is capable of being valued on at least a daily basis, that correlation between the OTC counterparty and the collateral is avoided and that the collateral is sufficiently diversified to prevent high concentration in one issue, sector or country. In addition, the Regulations require that the collateral must be held by a third party custodian subject to prudential supervision, that appropriate systems are in place to deal with the operational and legal risks of the use of collateral and the collateral must be fully enforceable at any time. As of the date of this Singapore Prospectus, the Regulations, in particular CSSF Circular 11/512, generally provide that the collateral can take the form of:

(i) liquid assets including, amongst others, cash and short term bank certificates and certain money market instruments;

(ii) bonds issued or guaranteed by an OECD Member State or by their local public authorities or by supranational institutions and undertakings with EU (as defined in the Prospectus), regional or world-wide scope;

(iii) shares or units issued by money market undertakings for collective investment calculating a daily net asset value and being assigned a rating of AAA or its equivalent;

(iv) shares or units issued by UCITS investing mainly in bonds/shares mentioned in (v) and (vi) below;

(v) bonds issued or guaranteed by first class issuers offering an adequate liquidity; or

(vi) shares admitted to or dealt in on a regulated market of a EU Member State (as defined in the Prospectus) or on a stock exchange of a OECD Member State on the condition that these shares are included in a main index.

Please refer to paragraph 17.3 of this Singapore Prospectus for further details on the exposure to counterparty risk in the OTC Swap Transaction(s).

Net Asset Value subject to Derivative Transactions

For Funded Swaps, the maximum proportion of Net Asset Value that is subject to OTC Swap Transactions is 110% excluding the impact of fees and foreign exchange ("**FX**") hedging arrangements, as applicable; whilst the expected proportion of Net Asset Value that is subject to OTC Swap Transactions is 100% of the Net Asset Value, excluding the impact of fees and FX hedging arrangements, as applicable, unless otherwise specified in the relevant Product Annex.

For Unfunded Swaps, the maximum proportion of the Net Asset Value that is subject to OTC Swap Transactions in relation to the Reference Index is 110% of the Net Asset Value excluding the impact of fees and FX hedging arrangements, as applicable; whilst the expected proportion of the Net Asset Value that is subject to OTC Swap Transactions in relation to the Reference Index is 100% of the Net Asset Value, excluding the impact of fees and FX hedging arrangements, as applicable, unless otherwise specified in the relevant Product Annex.

For Unfunded Swaps, the maximum and expected proportion of the Net Asset Value that is subject to Derivative Transactions in relation to Invested Assets is the same proportion as the proportion of the value of Invested Assets to the Net Asset Value of the relevant Sub-Fund.

Switch of investment strategies

An Indirect Replication Fund may, with due regard to the best interest of its Shareholders and subject to any conditions set forth in each specific Product Annex, decide from time to time to switch partially or totally from a Funded Swap to an Unfunded Swap, and vice versa, in which case: (a) the cost of such a switch (if any) will not be borne by the Shareholders; and (b) not less than two (2) weeks' prior notice will be given to Shareholders before the change becomes effective through the website www.Xtrackers.com (or any successor thereto) and the SGXNET. Please refer to Section B of the relevant Schedule for details on the investment strategy currently adopted by each Indirect Replication Fund. The investment strategy adopted by each Indirect Replication Fund from time to time will be published on the following website: www.Xtrackers.com.

3.5 Benchmark Regulation

In accordance with the provisions of Regulation (EU) 2016/1011 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the "**Benchmark Regulation**"), supervised entities (such as UCITS management companies) may use benchmarks in the EU if the benchmark is provided by an administrator which is included in the register of administrators and benchmarks maintained by ESMA pursuant to the Benchmark Regulation (the "**Register**").

Benchmark administrators located in a third country whose indices are used by the Company benefit from the transitional arrangements afforded under the Benchmark Regulation and accordingly may not appear on the Register.

A list of the benchmark administrators whose indices are used by the Company and which, as at the date of the Prospectus, are inscribed in the Register is disclosed in Annex II of the Prospectus.

The Management Company maintains a written plan setting out the actions that will be taken in the event that a Reference Index materially changes or ceases to be provided and which is available free of charge at the registered office of the Management Company. Such actions include ascertaining whether the administrator of that Reference Index has published an alternative fallback benchmark (in which case such benchmark will be used); and whether there is a benchmark which meets the Management Company's parameters for substitution and is suitable and appropriate for the target market (in which case, subject to certain other criteria in the written plan, such benchmark will be used). If the latter is not the case, the Management Company will find an alternative benchmark that meets its criteria, restructure the investment objective of the relevant Sub-Fund or cease offering that Sub-Fund. For further information please refer to the section headed "Change of Reference Index" in the "INVESTMENT OBJECTIVES AND POLICIES" section of the Prospectus.

3.6 Other provisions

The swaps of the Indirect Replication Funds will be unlisted instruments. Each Sub-Fund does not currently intend to invest directly in options, warrants, commodities, futures contracts and precious metals.

You can find the method and frequency of determining the Net Asset Value and the general valuation rules for each Sub-Fund in paragraph 17.5 of this Singapore Prospectus and further details in the "ADMINISTRATION OF THE COMPANY - Determination of the Net Asset Value" section of the Prospectus.

As far as the Company is aware, there are currently no restrictions on the convertibility of the relevant Denomination Currency (as defined in the Prospectus) as at the date of registration of this Singapore prospectus. You should note however that foreign exchange controls or similar restrictions may in future be imposed from time to time and may be of relevance to a Sub-Fund or its investment policy or objectives. Further details are set out in paragraph 5 below. Please refer to the relevant Product Annex comprised within the Prospectus and the "INVESTMENT OBJECTIVES AND POLICIES" and "INVESTMENT RESTRICTIONS" sections of the Prospectus for further details on the investment objective, policy, focus and approach of each Sub-Fund.

4. Fees and Expenses

Please refer to Section C of the relevant Schedule for details on the fees and expenses applicable to each Sub-Fund.

5. Risk Factors

You should consider and satisfy yourself as to the risks of investing in a Sub-Fund.

Each Sub-Fund is a complex product where you are expected to be informed and, for certain Sub-Funds, to have a good knowledge of derivatives instruments. Generally speaking, you are expected to be willing to adopt capital and income risk.

A low risk grading applies to sub-funds which are exposed to limited capital losses. The low expectation of capital losses is the result of the low intrinsic volatility of the asset classes to which the sub-funds are exposed and/or the implementation of strategies to reduce the risk that you may not get back your original investment or capital.

A medium risk grading applies to sub-funds which are exposed to capital losses either because the asset classes to which the sub-funds are exposed have a medium intrinsic volatility and/or because some strategies are implemented to ensure that you will get back your original investment or capital.

A high risk grading applies to sub-funds which provide an exposure to asset classes with a high intrinsic volatility and/or limited liquidity and where no strategies are implemented to ensure that you will get back your original investment or capital.

Please refer to "Risk Gradings" in the "IMPORTANT INFORMATION" section of this Singapore Prospectus for the risk grading of the relevant Sub-Fund. Please also refer to the "TYPOLOGY OF RISK PROFILES" section of the Prospectus.

Each of the above gradings indicates the level of risk associated with a Sub-Fund and is not supposed to be a guarantee of likely returns. It should only be used for comparison purposes with other sub-funds offered to the public by the Company. If you are in any doubt as to the level of risk that you should take, you should seek independent advice from your personal investment adviser.

An investment in a Sub-Fund is meant to produce return over the investment period of such Sub-Fund. You should not expect to obtain short-term gains from such investment. You should note that the value of the relevant Shares, and the income accruing to the relevant Shares, may fall or rise and that you may not get back your original investment.

A discussion of the general risk factors applicable to the Sub-Funds is contained under the heading "General Risk Factors" in the "RISK FACTORS" section of the Prospectus. In particular, you should refer to the discussion on "Valuation of the Reference Index and the Sub-Fund's assets", "Exchange Rates", "Interest Rate", "Volatility", "Credit", "Correlation", "Share Subscriptions and Redemptions", "Liquidity", "Reference Index Calculation and Substitution" and "No investigation or review of the Reference Index" for more details.

You should also refer to the risks under the heading "Specific Risk Warning" (if applicable) in the relevant Product Annex of the Sub-Funds for more details. You should note that investments of certain Sub-Funds may be concentrated in a particular market or sector and should refer to *amongst others* the relevant market or sector risks under the heading "Specific Risk Warning" (if applicable) in the relevant Product Annex of the Sub-Funds for more details.

In addition to the above, your attention is drawn to the risks in respect of the Sub-Funds as set out in paragraphs 5.1 to 5.39 below, the risks associated with the use of financial derivative instruments referred to in paragraph 17.3 of this Singapore Prospectus, and the specific risks in respect of each Sub-Fund as set out in Section D of the relevant Schedule.

General risks in relation to all Sub-Funds

5.1 Foreign exchange risks

You should be aware that an investment in the Shares may involve exchange rate risks such as (i) the exposure of a Sub-Fund (i.e. the constituents of the Reference Index) and/or the actual investments (such as transferable securities and bonds) and any liquid assets (such as deposits) which a Sub-Fund may hold on an ancillary basis may be denominated in a currency other than the Denomination Currency[21]; and/or (ii) the Denomination Currency may be different from the currency(ies) in which the Singapore Shares of a Sub-Fund are listed, quoted and traded on the SGX-ST ("**Trading Currency(ies)**[22]").

If you buy and sell the Singapore Shares on the SGX-ST, you should note that the Singapore Shares are traded in the Trading Currency(ies) on the SGX-ST and the Management Company does not intend to hedge against currency fluctuations between the Trading Currency(ies) of the Singapore Shares and the currency(ies) of the constituents of the Reference Index, where applicable.

In addition, if the Trading Currency(ies) of the Singapore Shares is/are different from the currency of your home jurisdiction, you may be exposed to the foreign currency exchange rate movements between your home currency and the currency(ies) of the constituents of the Reference Index. For example, if you wish to buy and sell the Singapore Shares of a Sub-Fund on the SGX-ST and your home currency is the Singapore dollar ("SGD"), you may be exposed to the foreign currency exchange rate movements between the SGD and the currency(ies) of the constituents of the Reference Index.

Exchange rates between currencies are determined by factors of supply and demand in the international currency markets, which are influenced by macro economic factors (such as the economic development in the different currency areas, interest rates and international capital movements), speculation and central bank and government intervention (including the imposition of currency controls and restrictions). Fluctuations in exchange rates may affect the value of the Shares.

Further, some currencies of emerging markets are controlled. You should note the risks of limited liquidity in certain foreign exchange markets.

The Management Company may hedge the foreign currency exposure of the Sub-Funds (if any), and would adopt a passive hedging policy in doing so.

5.2 Lack of discretion of the Management Company to adapt to market changes

Sub-Funds following a passive investment strategy are not "actively managed". Accordingly, the Management Company will not adjust the composition of such a Sub-Fund's portfolio except (where relevant) in order to seek to closely correspond to the duration and total return of the relevant Reference Index. The Sub-Funds do not try to "beat" the market they reflect and do not seek temporary defensive positions when markets decline or are judged to be overvalued. Accordingly, a fall in the relevant Reference Index or a decrease in performance

[21] Please refer to Section A of the relevant Schedule for the Denomination Currency of the Share Class(es) of each Sub-Fund.
[22] Please refer to Section A of the relevant Schedule for the Trading Currency(ies) of the Share Class(es) of each Sub-Fund.

in the Reference Index (as applicable) may result in a corresponding fall in the value of the Shares of the relevant Sub-Fund.

5.3 Derivatives

A Sub-Fund may use derivatives to achieve its Investment Objective. While the prudent use of such derivatives can be beneficial, derivatives also involve risks which, in certain cases, can be greater than the risks presented by more traditional investments. There may be transaction costs associated with the use of derivatives.

Notwithstanding anything in this Singapore Prospectus, in accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products and EIPs, the EIP Sub-Fund does not and will not invest in any product, or engage in any transaction, which will cause its Shares not to be regarded as prescribed capital markets products or EIPs.

5.4 Counterparty risk related to derivative transactions

Each Sub-Fund may enter into transactions in over-the-counter markets, which will expose it to the credit risk of the counterparties to such transactions and their ability to satisfy the terms of such transactions. For example, a Sub-Fund may enter into swap arrangements or employ other derivative techniques, each of which exposes the relevant Sub-Fund to the risk that the counterparty may default on its obligations to perform under the relevant transaction or become insolvent. If a counterparty is bankrupt or insolvent, the relevant Sub-Fund could experience delays in liquidating the positions taken and may incur significant losses, including declines in the value of its investment during the period in which the relevant Sub-Fund seeks to enforce its rights, inability to realise any gains on its investment during such period and fees and expenses incurred in enforcing its rights. There is also a possibility that the above transactions and derivative techniques may be terminated because of certain events, such as bankruptcy, supervening illegality or change in the tax or accounting laws relative to those in force at the time the transactions were entered into. You should note that counterparty risk may increase in the current market conditions and if the risk materialises, the Net Asset Value per Share of the relevant Sub-Fund may be adversely affected and you may sustain a loss on your investment in that Sub-Fund.

5.5 Risks in relation to the tracking of indices

There is no assurance that a Sub-Fund will be able to fully track the performance of the relevant Reference Index. You should be aware and understand that Sub-Funds are subject to tracking error risks which may result in the value and performance of the Shares varying from those of the Reference Index. Reference Indices such as financial indices may be theoretical constructions which are based on certain assumptions and Sub-Funds aiming to reflect such financial indices may be subject to constraints and circumstances which may differ from the assumptions in the relevant Reference Index. Factors that are likely to affect the ability of a Sub-Fund to track the performance of the relevant Reference Index include:

- the composition of a Sub-Fund's portfolio deviating from time to time from the composition of the Reference Index, especially in case not all components of the Reference Index can be held and/or traded by the relevant Sub-Fund;
- investment, regulatory and/or tax constraints (including Investment Restrictions) affecting the Company but not the Reference Index;

- investments in assets other than the Reference Index giving rise to delays or additional costs / taxes compared to an investment in the Reference Index;
- constraints linked to income reinvestment;
- constraints linked to the timing of rebalancing of the Sub-Fund's portfolio;
- transaction costs and other fees and expenses to be borne by the Sub-Funds (including costs, fees and expenses to be borne in relation to the use of financial techniques and instruments);
- adjustments to OTC Swap Transaction(s) to reflect index replication costs; and/or
- the possible existence of idle (non invested) cash or cash assimilated positions held by a Sub-Fund and, as the case may be, cash or cash assimilated positions beyond what it requires to reflect the Reference Indices (also known as "cash drag").

The anticipated level of tracking error[23], in normal market conditions, will be disclosed for each Share Class in the Product Annexes (under the "General Description of Share Classes" section of the relevant Product Annex) once available. *You should note that these figures are only estimates of the tracking error level in normal market conditions and are not strict limits.*

A Tracking Error may be impacted as a result of the Investment Manager seeking to ensure compliance with the CW Statement and any other policies (ESG related or otherwise).

Direct Replication Funds may from time to time invest temporary cash balances (such as subscription proceeds which are pending investment or any other temporary cash balances) in FDIs to gain market exposure and to seek to reduce Tracking Error.

5.6 Licence to use the relevant Reference Index may be terminated

Each Sub-Fund has been granted a licence by the relevant Index Administrator to use the relevant Reference Index in order to create the Sub-Fund based on the relevant Reference Index and to use certain trademarks and any copyright in the relevant Reference Index. A Sub-Fund may not be able to fulfil its investment objective and may be terminated if the licence agreement between the Sub-Fund and the relevant Index Administrator is terminated. A Sub-Fund may also be terminated if the relevant Reference Index ceases to be compiled or published and there is no replacement index using the same or substantially similar formula for the method of calculation as used in calculating the relevant Reference Index.

5.7 Past and future performance

The performance of each Sub-Fund or each Share Class of a Sub-Fund (as the case may be) is dependent upon several factors including, but not limited to, the relevant Reference Index's performance, the performance of any currency hedging activities, as applicable, as well as fees and expenses, tax and administration duties, certain amounts (such as Enhancements (as defined in the Prospectus) resulting from swap hedging policy), etc. which will or may have actually been charged, applied and/or discounted. These elements generally vary during any performance period, and that when comparing performance

[23] Calculated by measuring the performance of the adjusted NAV with reference to the total return net version of the relevant Reference Index, unless otherwise disclosed in the relevant Product Annex. Please refer to 'Tracking Error' in the section headed "INVESTMENT OBJECTIVE AND POLICY" of the Prospectus for further details.

periods, some may appear to have enhanced or reduced performance when compared to similar performance periods, because of the application (or reduction) of some or all of the factors set out above. Past performance is not a guarantee of, and should not be used as a guide to, future returns.

5.8 Conflicts of interest

The following discussion enumerates certain potential divergences and conflicts of interest that may exist or arise in relation to the Directors (as defined in the Prospectus), Shareholders, Management Company, and any other service provider (including their affiliates and respective potential investors, partners, members, directors, officers, employees, consultants, agents and representatives) (each a "**Service Provider**"), for all or part of the Sub-Funds (collectively the "**Connected Persons**" and each a "**Connected Person**").

This section is not an exhaustive list or a complete explanation of all the potential divergences and conflicts of interest.

- Each Connected Person may be deemed to have a fiduciary relationship with a Sub-Fund in certain circumstances and consequently the responsibility for dealing fairly with the Company and the relevant Sub-Fund(s). However, the Connected Persons may engage in activities that may diverge from or conflict with the interests of the Company, one or several sub-funds of the Company (including the Sub-Funds) or potential investors. They may for instance:
  - contract or enter into any financial, banking or other transactions or arrangements with one another or with the Company including, without limitation, investment by the Company in securities or investment by any Connected Persons in any company or body any of whose investments form part of the assets of the Company or be interested in any such contracts or transactions;
  - invest in and deal with shares issued by the Company, securities, assets or any property of the kind included in the property of the Company for their respective individual accounts or for the account of a third party; and
  - deal as agent or principal in the sale or purchase of securities and other investments to or from the Company through or with any Investment Manager, Sub-Portfolio Manager, investment adviser or the Depositary or any subsidiary, affiliate, associate, agent or delegate of such Investment Manager, Sub-Portfolio Manager, investment adviser or the Depositary.

  Any assets of the Company in the form of cash or securities may be deposited with any Connected Person. Any assets of the Company in the form of cash may be invested in certificates of deposit or banking investments issued by any Connected Person. Banking or similar transactions may also be undertaken with or through a Connected Person.
- Entities within, and/or employees, agents, affiliates or subsidiaries of members of, DWS Group (collectively, "**DWS Affiliates**") may act as Service Providers. DWS Affiliates may for instance act as counterparties to the derivatives transactions or contracts entered into by the Company (for the purposes hereof, the

"**Counterparty**" or "**Counterparties**"), Director, distributor, index administrator[24], securities lending agent, authorised participant, market maker, management company, investment manager, sub-portfolio manager, investment adviser and provide sub-custodian services to the Company, all in accordance with the relevant agreements which are in place. In addition, in many cases the Counterparty may be required to provide valuations of such derivative transactions or contracts. These valuations may form the basis upon which the value of certain assets of the Company is calculated.

The Board of Directors acknowledges that, by virtue of the functions which DWS Affiliates will perform in connection with the Company, potential conflicts of interest are likely to arise. In such circumstances, each DWS Affiliate has undertaken to use its or his reasonable endeavours to resolve any such conflicts of interest fairly (having regard to its or his respective obligations and duties) and to ensure that the interests of the Company and the Shareholders are not unfairly prejudiced.

You should note that, subject always to their legal and regulatory obligations in performing each or any of the above roles:

- DWS Affiliates will pursue actions and take steps that it deems appropriate to protect their interests;
- DWS Affiliates may act in their own interests in such capacities and need not have regard to the interests of any Shareholder;
- DWS Affiliates may have economic interests adverse to those of the Shareholders. DWS Affiliates shall not be required to disclose any such interests to any Shareholder or to account for or disclose any profit, charge, commission or other remuneration arising in respect of such interests and may continue to pursue its business interests and activities without specific prior disclosure to any Shareholder;
- DWS Affiliates do not act on behalf of, or accept any duty of care or any fiduciary duty to any investors or any other person;
- DWS Affiliates shall be entitled to receive fees or other payments and to exercise all rights, including rights of termination or resignation, which they may have, even though so doing may have a detrimental effect on investors; and
- DWS Affiliates may be in possession of information which may not be available to investors. There is no obligation on any DWS Affiliate to disclose to any investor any such information.

Notwithstanding the above, the Board of Directors believes that these divergences or conflicts can be adequately managed, and expect that the Counterparty will be suitable and competent to provide such services and will do so at no further cost to the Company which would be the case if the services of a third party were engaged to provide such services.

[24] The relevant index administrator in respect of the Reference Index of each Sub-Fund is set out in the relevant schedule of each Sub-Fund. Save where the index administrator of a relevant Sub-Fund is a DWS Affiliate, the index administrator and the Management Company are not related. Where the index administrator of a relevant Sub-Fund is a DWS Affiliate, potential conflicts of interest are managed in the manner as set out in Paragraph 5.8 of this Singapore Prospectus.

5.9 Listing and trading of the Singapore Shares on the SGX-ST

Although the Singapore Shares are listed on the SGX-ST, you should be aware that there may not always be a liquid trading market for the Singapore Shares. There is no assurance that an active trading market for the Singapore Shares will develop, nor is there a certain basis for predicting the actual price levels at, or sizes in, which the Singapore Shares may trade.

In particular, the trading of the Singapore Shares of a Sub-Fund on the SGX-ST may be suspended if the SGX-ST determines that it is appropriate in the interests of a fair and orderly market to protect investors, and you will not be able to purchase or sell the Singapore Shares of that Sub-Fund on the SGX-ST during any period that the SGX-ST suspends trading in the Singapore Shares of that Sub-Fund. The subscription and redemption of the Shares of a Sub-Fund via the Singapore Authorised Participant(s) (as defined in paragraph 6.1 of this Singapore Prospectus) (if applicable) may also be suspended if the trading of the Singapore Shares of that Sub-Fund on the SGX-ST is suspended.

Further, as the SGX-ST imposes certain requirements for the continued listing of securities, including the Singapore Shares, on the SGX-ST, there can be no assurance that a Sub-Fund will continue to meet the requirements necessary to maintain the listing of the Singapore Shares of that Sub-Fund on the SGX-ST or that the SGX-ST will not change the listing requirements or continued listing requirements. There is also no assurance that the CDP, being the depository for the Singapore Shares listed and traded on the SGX-ST, will continue to act in this capacity or that its operation will not be disrupted in any way. If the Singapore Shares of a Sub-Fund are delisted from the SGX-ST or if the CDP is no longer able to act as the depository for the Singapore Shares of a Sub-Fund listed on the SGX-ST for whatever reasons, the Singapore Shares of that Sub-Fund in your securities account with the CDP or held by the CDP may be repurchased (compulsorily or otherwise): (i) by the Designated Market Maker(s) (as defined in paragraph 6.2 of this Singapore Prospectus) at a price calculated by reference to the Net Asset Value of the relevant Sub-Fund; or (ii) in such other manner as the Company may consider appropriate, taking into consideration any applicable requirements of the SGX-ST and the CDP.

5.10 Reliance on the Singapore Authorised Participant(s)

The subscription and redemption of Shares may only be effected through the Singapore Authorised Participant(s) (as defined in paragraph 6.1 of this Singapore Prospectus). The number of Singapore Authorised Participant(s) at any given time will be limited. The Singapore Authorised Participant(s) are under no obligation to accept instructions to subscribe or redeem Shares of any Sub-Fund on your behalf, and may charge a fee for providing this service. The Singapore Authorised Participant(s) will not be able to subscribe or redeem Shares of a Sub-Fund during any period when, amongst other things, dealings on the SGX-ST are restricted or suspended, settlement or clearing of securities through the CDP is disrupted or the relevant Reference Index is not compiled or published. In addition, the Singapore Authorised Participant(s) will not be able to subscribe or redeem Shares of a Sub-Fund if some other event occurs which impedes the calculation of the Net Asset Value of that Sub-Fund or disposal of that Sub-Fund's investments cannot be effected.

5.11 Operations

The Company's operations (including investment management, distribution and collateral management) are carried out by several service providers some of whom are described in the section headed "MANAGEMENT AND ADMINISTRATION OF THE COMPANY" of the Prospectus. The Company follows a rigorous due diligence process in selecting service providers; nevertheless operational risk can occur and have a negative effect on the Company's operations, and it can manifest itself in various ways, including business interruption, poor performance, information systems malfunctions or failures, regulatory or contractual breaches, human error, negligent execution, employee misconduct, fraud or other criminal acts. If a service provider is bankrupt or insolvent, you could experience delays (for example, delays in the processing of subscriptions, conversions and redemption of the Shares) or other disruptions.

5.12 Depositary

A substantial part of the Company's assets as well as the assets provided to the Company as collateral are held in custody by the Depositary or, as the case may be, third party custodians and sub-custodians. This exposes the Company to custody risk. You should note that under Luxembourg law, assets held in custody (excluding cash) by the Depositary or, as the case may be, third party custodians and sub-custodians located within the EU are unavailable for distribution among, or realisation for the benefit of, creditors of the Depositary, third party custodians or sub-custodians and, subject to certain exceptions, the Depositary is required to return to the Company assets of identical type or the corresponding amount where assets held in its custody are lost by the Depositary or its sub-custodians. The Company however remains exposed to the risk of loss of assets as a result of, negligence or fraudulent trading by the Depositary, its sub-custodians and third parties, and particularly in respect of cash, as well as the insolvency of third party custodians located in non-EU jurisdictions.

Where the Company's assets as well as the assets provided to the Company as collateral are held by the Depositary or third party custodians and sub-custodians in emerging and/or frontier market jurisdictions, the Company is exposed to greater custody risk due to the fact that emerging and/or frontier markets are by definition "in transformation" and are therefore exposed to the risk of swift political change and economic downturn. In recent years, many emerging and/or frontier market countries have undergone significant political, economic and social change. In many cases, political concerns have resulted in significant economic and social tensions and in some cases both political and economic instability has occurred. Political or economic instability may adversely affect the safe custody of the Company's assets.

5.13 DWS Affiliates significant holdings

You should be aware that DWS Affiliates may from time to time own interests in any individual Sub-Fund which may represent a significant amount or proportion of the overall investor holdings in the relevant Sub-Fund. You should consider what possible impact such holdings by DWS Affiliates may have on you. For example, DWS Affiliates may like any other Shareholder ask for the redemption of all or part of their Shares of any Class of the relevant Sub-Fund in accordance with the provisions of the Prospectus which could result in (a) a reduction in the Net Asset Value of the relevant Sub-Fund to below the Minimum Net Asset Value which might result in the Board of Directors deciding to close the Sub-Fund

and compulsorily redeem all the Shares relating to the Sub-Fund or (b) an increase in the holding proportion of the other Shareholders in the Sub-Fund beyond those allowed by laws or internal guidelines applicable to such Shareholder.

5.14 Shares may trade at prices other than Net Asset Value

The Net Asset Value of a Sub-Fund represents the price for subscribing or redeeming Shares of that Sub-Fund. The market price of Shares may sometimes trade above or below this Net Asset Value. Thus, there is a risk that you may not be able to buy or sell at a price close to this Net Asset Value. The deviation from the Net Asset Value depends on a number of factors, but is accentuated when there is a large imbalance between market supply and demand for underlying securities. The "bid/ask" spread of the Shares (being the difference between the prices being bid by potential purchasers and the prices being asked by potential sellers) is another source of deviation from the Net Asset Value. The bid/ask spread can widen during periods of market volatility or market uncertainty, thus increasing the deviation from the Net Asset Value.

5.15 Taxes on transactions (Financial transaction tax)

A number of jurisdictions have implemented, or are considering implementing, certain taxes on the sale, purchase or transfer of financial instruments (including derivatives), such tax commonly known as the "Financial Transaction Tax" ("**FTT**"). For example, the EU Commission adopted a proposal on 14 February 2013 for a common Financial Transaction Tax which will, subject to certain exemptions, affect: (i) financial transactions to which a financial institution established in any of the participating EU Member States (as defined in the Prospectus) is a party; and (ii) financial transactions in financial instruments issued in a participating EU Member State regardless of where they are traded. It is currently unclear as to when the EU Financial Transaction Tax will apply from. In addition, certain countries such as France and Italy have implemented their own financial transaction tax provisions at a domestic level already and others, including both EU and non-EU countries, may do so in the future.

The imposition of any such taxes may impact Sub-Funds in a number of ways. For example:

- where Sub-Funds enter directly into transactions for the sale, purchase or transfer of financial instruments, FTT may be payable by the Sub-Fund and the Net Asset Value of such Sub-Funds may be adversely impacted;
- similarly, the imposition of FTT on transactions relating to the underlying securities of an Underlying Asset may have an adverse effect on the value of such Underlying Asset and hence the Net Asset Value of any Sub-Fund that references such Underlying Asset;
- the Net Asset Value of Sub-Funds may be adversely impacted by any adjustments to the valuation of OTC Swap Transaction(s) made as a result of costs associated with any FTT suffered by the relevant Swap Counterparty in relation to its hedging activities. Please refer to the "RISK FACTORS – Specific Risks in relation to Indirect Replication Funds" section of the Prospectus for further details;
- subscriptions, transfers and redemptions of Shares may be affected by FTT.

5.16 Changes made to the Reference Index by the Index Administrator

You should note that the Index Administrator has the complete discretion to decide on and amend the features of the relevant Reference Index for which it acts as administrator and that the composition of such Reference Index may change. Depending on the terms of the relevant licence agreement, an Index Administrator may have no obligation to provide the licence holders who use the relevant Reference Index (including the Company) with adequate prior notice of any changes which are made to such Reference Index. Thus, the Company shall not necessarily be able to inform the Shareholders of the Sub-Fund in advance of any such changes made by the relevant Index Administrator to the features of the relevant Reference Index. For those changes made to a Reference Index which require a prior notice and the right for Shareholders to redeem their shares free of charge, the Company will accord such rights to the relevant Shareholders as soon as possible; however, this will not necessarily take place prior to the effective date of those changes made to the features of the relevant Reference Index. Once becoming aware of such changes, the Company shall inform those Shareholders affected by any such changes as soon as practically possible, through a notice on the website www.Xtrackers.com or any successors thereto. To the extent that changes made to a Reference Index do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com. The Shareholders are consequently invited to consult the website of the relevant Index Administrator on a regular basis.

5.17 Large Shareholder Risk

Certain account holders may from time to time own or control a significant percentage of a Sub-Fund's Shares. A Sub-Fund is subject to the risk that a redemption by large Shareholders of all or a portion of their Shares or a purchase of Shares in large amounts and/or on a frequent basis will adversely affect a Sub-Fund's performance if it is forced to sell portfolio securities or invest cash when the Investment Managers would not otherwise choose to do so. This risk will be particularly pronounced if one Shareholder owns a substantial portion of a Sub-Fund. Redemptions of a large number of Shares may affect the liquidity of a Sub-Fund's portfolio, increase a Sub-Fund's transaction costs and/or lead to the liquidation of a Sub-Fund.

5.18 Brexit

Since 31 January 2020, the United Kingdom no longer is a member state of the European Union. Depending on the outcome of the EU's negotiations with the United Kingdom, there may be a need to amend the structure of the Company or the Sub-Funds or replace certain service providers.

5.19 Calculation of the Reference Indices

The accuracy and completeness of the calculation of the Reference Indices may be affected by, without limitation, the availability and accuracy of prices for their constituent securities, market factors and errors in their compilation. In this connection, you should note that none of the Company, any Investment Manager or Sub-Portfolio Manager or each of their affiliates has performed or will perform any investigation or review of the Reference Index on behalf of any prospective investor in the Shares. Any investigation or review made by or on behalf of the Company, any Investment Manager, Sub-Portfolio Manager or any of their affiliates is or shall be for their own proprietary investment purposes only.

5.20 Sustainability

Please refer to the section headed "Sustainability-Related Disclosures Under SFDR And EU Taxonomy Regulation" of the Prospectus for more details.

5.21 Inaction by the Common Depositary and/or an International Central Securities Depositary

Investors who settle or clear through an International Central Securities Depositary[25] will not be a registered Shareholder in the Company, but will hold an indirect beneficial interest in such Shares, if such investors are Participants[26], their rights will be governed by their agreement with the relevant International Central Securities Depositary, if such investors are not Participants, then their rights will be governed by the direct or indirect arrangement with the relevant Participant of the International Central Securities Depositary (who may be their nominee, broker or Central Securities Depositaries[27], as the case may be).

Under the current arrangement, the Company will issue any notices and associated documentation to the registered holder of the Global Share Certificate[28], the Common Depositary Nominee[29], with such notice as is given by the Company in the ordinary course of business. It is the Directors' understanding that (i) the Common Depositary will be subject to a contractual obligation to relay such notices and associated documentation issued by the Company to the Common Depositary Nominee, which will further be obliged to pass on such notices and documentation to the ICSDs; (ii) the relevant ICSD will in turn relay such notices and associated documentation received from the Common Depositary to the Participants in accordance with its rules and procedures; (iii) the Common Depositary is contractually bound to collate all votes received from the relevant International Central Securities Depositaries (which reflects votes received by the relevant International Central Securities Depositary from its Participants) and that the Common Depositary Nominee should vote in accordance with such instructions. Nonetheless, the Company is not empowered to compel the Common Depositary to relay any notices or voting instructions in accordance with the instructions from the International Central Securities Depositaries.

5.22 Failure to Settle through International Central Securities Depositary

If an Authorised Participant submits a dealing request and subsequently fails or is unable to settle and complete the dealing request, as the Authorised Participant is not a registered Shareholder of the Company, the Company will have no recourse to the Authorised Participant other than its contractual right to recover such costs. In the event that no

---

[25] "**International Central Securities Depositaries**" or "**ICSDs**" means the International Central Securities Depositary (ICSD) settlement system through which shares of the Company may be settled, which is an international settlement system connected to multiple national markets. As of the date of this Singapore Prospectus, the International Central Securities Depositaries for the Company are Euroclear Bank S.A./N.V. and Clearstream Banking, Socíeté Anonyme, Luxembourg.

[26] "**Participants**" means account holders in an International Central Securities Depositary, which may include, amongst others, Authorised Participants, their nominees or agents and who hold their interest in Shares settled and/or cleared through the applicable International Central Securities Depositary.

[27] **"Central Securities Depositary**" means a clearing system which is a national settlement system for individual national markets.

[28] "**Global Share Certificate(s)**" means the certificate(s) evidencing entitlement to the Shares issued pursuant to the Articles of Incorporation and the Prospectus as described in further details under the "Global Clearing and Settlement, International Central Securities Depositary and Common Depositary" section of the Prospectus.

[29] "**Common Depositary Nominee**" means an entity appointed as nominee for the Common Depositary and being the registered holder of the Shares of the Company. "Common Depositary" means the entity appointed as a depositary for the International Central Securities Depositaries. As of the date of this Singapore Prospectus, Citibank Europe plc is acting as Common Depositary.

recovery can be made from the Authorised Participant, any costs incurred as a result of the failure to settle will be borne by the relevant Sub-Fund and its investors.

5.23 Voting Rights and Arrangements

The Company cannot accept voting instructions from any persons, other than the registered Shareholder which is the Common Depositary Nominee. You are advised to consult with your relevant Participant, broker or nominee regarding their ability, or not, as the case may be, to exercise voting or other rights and how these are relayed to the Common Depositary.

5.24 Sector Concentration

Investments or the constituents of a Reference Index may be exposed to risks relating to particular sectors. If a Sub-Fund invests in a narrow range of sectors, the performance of the Sub-Fund may not reflect changes in broad markets. Furthermore, the Sub-Fund is likely to be more susceptible to greater price volatility when compared to more diverse funds as it only has exposure to a limited number of sectors. This could lead to a greater risk of loss to the value of Shareholders' investments.

5.25 Region Concentration

Investments or the constituents of a Reference Index may be exposed to risks relating to particular regions or countries. If a Sub-Fund invests in a narrow range of regions or countries, the performance of the Sub-Fund may not reflect changes in broad markets. Furthermore, the Sub-Fund is likely to be more susceptible to greater price volatility when compared to more diverse funds as it only has exposure to a limited number of regions or countries. This could lead to a greater risk of loss to the value of Shareholders' investments.

5.26 Counterparty

A Sub-Fund may not invest directly in the components of the Reference Index and its returns will be dependent on the performance of the shares and/or cash deposits and the performance of the derivatives used. A Sub-Fund may enter into one or more derivatives with one or more counterparties. If any of the counterparties fails to make payments (for example, it becomes insolvent) this may result in Shareholders' investments suffering a loss. For further risks relating to counterparty performance, please refer to the section "Securities lending, buy-sell or sell-buy back transactions and repurchase and reverse repurchase agreement transactions" under the chapter "Risk Factors" in the Prospectus.

5.27 Disruption / Adjustment Events

A Reference Index may be subject to disruption or adjustment events which may prevent its calculation or lead to adjustments to the rules of the index which may cause Shareholders' investments to suffer losses. Further matters which may affect a Reference Index are outlined at the section "Political Factors, Emerging and/or Frontier Market and Non-OECD Member State Assets" under the chapter "Risk Factors" in the Prospectus.

5.28 Rules Based Index

A Reference Index may be rules-based and may not be capable of being adjusted to take into account changing market circumstances. As a result Shareholders may be negatively affected by, or may not benefit from, the lack of such adjustments in changing market circumstances. A Reference Index may also be subject to disruption or adjustment events

which may prevent their calculation or lead to adjustments to the rules of the index which may cause Shareholders' investments to suffer losses.

5.29 Small and Mid-sized Companies

Exposure to small and mid-sized companies potentially involves greater risks compared to investing in larger companies. The shares may have less liquidity and could experience more price swings (or volatility) which could adversely affect the value of your investment.

5.30 Country Risk China

A Sub-Fund may be exposed to liquidity, operational, clearing, settlement and custody risks linked to investments in PRC, the RQFII system and/or China Bond Connect. In addition there may be risks relating to taxes on PRC Investments which may result in the Sub-Fund making certain provisions or payments as described in the section titled "Tax (Emerging Markets)" under the chapter "Risk Factors" in the Prospectus. For example, certain Sub-Funds make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. Any such provision may be excessive or inadequate. Investors may be advantaged or disadvantaged depending on the time they subscribed and/or redeemed their Shares. For further information please consult the specific risk factors set out in the Product Annex of the relevant Sub-Fund with PRC Investments.

5.31 Tax (Emerging Markets)

There may be exposure to jurisdictions where the tax regime is not fully developed or is not sufficiently certain, and as such changes to the tax policies may be implemented without any prior notice and may also apply retrospectively. Any changes in tax policies may reduce the after-taxation returns of the Sub-Funds' investments. For example, certain Sub-Funds make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. Any such provision may be excessive or inadequate. Investors may be advantaged or disadvantaged depending on the time they subscribed and/or redeemed their shares. For further information relating to this risk factor, please refer to the section titled "Risk Factors – Taxes on Transactions (Financial Transaction Taxes)" and "Lack of Discretion of the Company to Adapt to Market Changes" under the chapter 'Risk Factors' in the Prospectus. Please also refer to the "General Taxation" section in the Prospectus.

5.32 Exceptional Circumstances

Exceptional circumstances may arise, such as, but not limited to, disruptive market conditions, additional costs/taxes or extremely volatile markets, which may cause the Sub-Funds' performance to be substantially different from the performance of the Reference Index. Please refer to the "Volatility" and "Disruption / Adjustment Event" sections under the chapter "Risk Factors" in the Prospectus for more information.

5.33 Settlement Risk

The settlement risk is the risk of loss resulting from a party's failure to deliver the terms of a contract at the time of settlement. The acquisition and transfer of holdings in certain investments may involve considerable delays and transactions may need to be carried out

at unfavourable prices as clearing, settlement and registration systems may not be well organised in some markets.

5.34 FATCA and CRS

Rules under FATCA and CRS (as defined in the base Luxembourg prospectus) are particularly complex and although the Company will attempt to satisfy any obligations imposed on it to avoid the imposition of the thirty percent (30%) withholding tax under FATCA or a penalty or fine under FATCA and CRS, no assurance can be given that the Company will be able to satisfy these obligations. If the Company becomes subject to a withholding tax as a result of FATCA or a penalty or fine under FATCA or CRS, the value of units held by all investors may be materially affected. The Company and/or its investors may also be indirectly affected by the fact that a non-U.S. financial institution does not comply with FATCA regulations even if the Company satisfies its own FATCA obligations.

Prospective investors are encouraged to carefully read the Sections "FATCA" and "EU Tax Considerations" which are stated in the Section "General Taxation" in the base Luxembourg prospectus.

Each prospective investor should consult its own tax advisor about how FATCA and CRS might affect such prospective investor**.**

5.35 OECD'S BEPS Action Points

The Organization for Economic Co-operation and Development ("**OECD**") together with the G20 countries have committed to addressing abusive global tax avoidance, referred to as base erosion and profit shifting ("**BEPS**") through 15 actions detailed in reports released on 5 October 2015.

As part of the BEPS project, new rules dealing inter alia with double tax treaties abuse, the definition of permanent establishments, controlled foreign companies and hybrid mismatch arrangements, are being introduced into respective domestic law of BEPS member states including via EU directives and a multilateral instrument.

The European Council has adopted two Anti-Tax Avoidance Directives (Council Directive (EU) 2016/1164 of 12 July 2016) laying down rules against tax avoidance practices that directly affect the functioning of the internal market ("**ATAD I**") and Directive 2017/952/EU of 29 May 2017 amending ATAD I as regards hybrid mismatches with third countries ("**ATAD II**") that address many of the above-mentioned issues. The measures included in ATAD I and ATAD II have been implemented into Luxembourg law respectively on 21 December 2018 (the "**ATAD I Law**") and on 20 December 2019 (the "**ATAD II Law**") and all of them are gradually applicable as of 1 January 2019, 1 January 2020 and 1 January 2022 (depending on the measure). The ATAD I Law as well as the ATAD II Law may have a material impact on how returns to investors are taxed.

The effect of BEPS, MLI, ATAD I and ATAD II could lead to additional taxes being imposed on the Company, intermediate entities or portfolio entities which may adversely affect the value of the investments held by investors in the Company. In addition, certain information may be requested from investors to enable the Company to comply with these requirements.

At the international level, the "Multilateral Convention to Implement Tax Treaty Related Measures to prevent Base Erosion and Profit Shifting" ("**MLI**") was published by the OECD on 24 November 2016. The aim of the MLI is to update international tax rules and lessen the opportunity for tax avoidance by transposing the results from the BEPS project into more than 2,000 double tax treaties worldwide. A number of jurisdictions (including Luxembourg) have signed the MLI. The ratification process in Luxembourg has been achieved through the law of 7 March 2019 and the deposit of the ratification instrument with the OECD on 9 April 2019. As a consequence, the MLI entered into force on 1 August 2019. Its application per double tax treaty concluded with Luxembourg will depend on the ratification by the other contracting state and on the type of tax concerned. Subsequent changes in tax treaties negotiated by Luxembourg incurred by the MLI could adversely affect the returns from the Company to its investors.

Specific risks in relation to Indirect Replication Funds

5.36 Adjustment to OTC Swap Transaction(s) to reflect certain transaction costs ("OTC Swap Transaction Costs")

Each of the Swap Counterparties may enter into hedging transactions in respect of the OTC Swap Transaction(s). According to the OTC Swap Transaction(s) entered into between a Sub-Fund or a Share Class of a Sub-Fund (as the case may be) and each Swap Counterparty, that Sub-Fund or that Share Class (as the case may be) shall receive the performance of the relevant Reference Index adjusted to reflect (a) certain index replication costs; (b) taxes that may be payable by the Swap Counterparty in relation to such OTC Swap Transaction(s); and (c) any other transaction costs or charges incurred by the Swap Counterparty in relation to the OTC Swap Transaction. These costs may include, amongst others, costs, taxes or other duties associated with the buying, selling, custody, holding or any other transactions relating to investments in transferable securities and/or OTC Swap Transactions and/or collateral.

In extreme market conditions and exceptional circumstances, particularly in connection with less developed markets and emerging markets, such costs may increase significantly and as a result the OTC Swap Transaction Costs may increase. Please refer to the risk factor "Adjustment to OTC Swap Transactions to reflect index replication costs" under the section headed "Risk Factors" of the Prospectus for more information in this regard. The Shareholders will therefore bear indirectly the OTC Swap Transaction Costs which may be passed on to certain Indirect Replication Funds by the Swap Counterparty. Where the Reference Index is "long", the index replication costs will be associated with (i) the buying and selling by the Swap Counterparty of the constituents of the relevant Reference Index in order to reflect the performance of that Reference Index; or (ii) custody or other related costs incurred by the Swap Counterparty in relation to holding the constituents of the relevant Reference Index; or (iii) taxes or other duties imposed on the buying or selling of the constituents of the relevant Reference Index; or (iv) taxes imposed on any income derived from the constituents of the relevant Reference Index; or (v) any other transactions performed by the Swap Counterparty in relation to the constituents of the relevant Reference Index.

These OTC Swap Transaction Costs may affect the ability of a Sub-Fund or a Share Class of a Sub-Fund (as the case may be) to achieve its Investment Objective, and may differ depending on the Reference Index whose performance the Sub-Fund aims to reflect. The OTC Swap Transaction Costs may also vary from time to time depending on actual market conditions. Thus, you should note that (x) the Net Asset Value of a Sub-Fund or a Share Class of a Sub-Fund (as the case may be) may be adversely impacted by any such adjustments to the valuation of the OTC Swap Transaction(s) and may result in a higher Tracking Error; (y) the potential negative impact on the performance of a Sub-Fund or a Share Class of a Sub-Fund (as the case may be) that you may suffer as a result of any such adjustments could depend on the timing of your investment in and/or divestment from that Sub-Fund or that Share Class (as the case may be); and (z) the magnitude of such potential negative impact on the performance of a Sub-Fund or a Share Class of a Sub-Fund (as the case may be) may not correspond to the profit or loss arising out of your holding in that Sub-Fund or that Share Class (as the case may be) as a result of the potential retroactive effect of any such costs, including those arising from changes in taxation in certain jurisdictions.

5.37 Risk of swap transactions

Swap transactions are subject to the risk that the Swap Counterparty may default on its obligations or become insolvent. If such a default occurs, the relevant Sub-Fund would, however, have contractual remedies pursuant to the relevant OTC Swap Transaction(s) including but not limited to realising the collateral (if any). You should be aware that such remedies may be subject to bankruptcy and insolvency laws which could affect the relevant Sub-Fund's rights as a creditor and, thus, the relevant Sub-Fund may for example not receive the net amount of payments that it contractually is entitled to receive on termination of the OTC Swap Transaction(s) where the Swap Counterparty is insolvent or otherwise unable to pay the amount due. Please refer to the section headed "RISK FACTORS – General Risk Factors – Risk of Swap Counterparty" of the Prospectus for further details. The relevant Sub-Fund may also enter into new swap transactions with one or more replacement swap counterparty(ies). If there is no suitable replacement swap counterparty, that Sub-Fund may be terminated.

Sub-Funds with an Indirect Investment Policy may in such case be at any time fully or partially exposed to one or more OTC Swap Transaction(s). However, collateral arrangements will be taken in relation to these OTC Swap Transaction(s) so that the percentage of the counterparty risk exposure referred to under paragraph 2.3 of the sub-section "Risk Diversification" in the section headed "INVESTMENT RESTRICTIONS" of the Prospectus is substantially reduced. Alternatively, the relevant Investment Manager and/or the Sub-Portfolio Manager may require that the Swap Counterparty proceed to a restrike of existing swap transactions. Please refer to paragraph 17.3 below for further details on the risk management policy implemented by the Management Company and the relevant Investment Manager in relation to the use of financial derivative instruments by a Sub-Fund for investment purposes and how the counterparty risk exposure may be mitigated in such instance. In the very unlikely event Deutsche Bank AG rejects a Sub-Fund's request to enter into such a transaction, and the Management Company does not find any other counterparties to enter into such a transaction, the Sub-Fund may be terminated.

Although the Regulations require each Sub-Fund entering into one of the aforementioned transactions to receive sufficient collateral to reduce its counterparty exposure, the Regulations do not however require that such counterparty exposure be fully covered by collateral. This leaves room for each Sub-Fund to be exposed to a net counterparty risk and you should be aware of the possible resulting loss in case of default or insolvency of the relevant counterparty.

The net counterparty risk exposure each Sub-Fund may have with respect to a single Swap Counterparty, expressed as a percentage (the "**Percentage Exposure**") (i) is calculated by reference to this Sub-Fund's Net Asset Value, (ii) may take into account certain mitigating techniques (such as remittance of collateral in accordance with the Regulations and EMIR) and (iii) cannot exceed 5% or 10% depending on the status of the Swap Counterparty, in accordance with and pursuant to the Regulations. You should nevertheless be aware that the actual loss suffered as a result of a Swap Counterparty's default may exceed the amount equal to the product of the Percentage Exposure multiplied by the Net Asset Value, even where arrangements have been taken to reduce the Percentage Exposure to nil. As a matter of illustration, there is a risk that the realised value of collateral received by a Sub-Fund may prove less than the value of the same collateral which was taken into account as an element to calculate the Percentage Exposure, whether because of inaccurate pricing of the collateral, adverse market movements, a deterioration in the credit rating of issuers of the collateral or the illiquidity of the market in which the collateral is traded. Prior to investing in the Shares, you should therefore understand and evaluate the Swap Counterparty credit risk prior to making any investment.

For information on the credit ratings of the approved Swap Counterparties for Indirect Replication Funds, you can contact the Singapore Representative at the telephone number set out at paragraph 16 below.

5.38 Cash Collateral Related Costs

Posting or receiving cash collateral may entail additional costs for a Sub-Fund as a result of the differential between bank charges and interest rates applicable to this collateral.

Specific risks in relation to Direct Replication Funds

5.39 Securities lending, buy-sell or sell-buy back transactions and repurchase and reverse repurchase agreement transactions

Use of the techniques and instruments involves certain risks, some of which are listed in the following paragraphs, and there can be no assurance that the objective sought to be obtained from such use will be achieved.

Although Regulations require each Sub-Fund entering into one of the aforementioned transactions to receive sufficient collateral to reduce its counterparty exposure, the Regulations do however not require that such counterparty exposure be fully covered by collateral. This leaves room for the Sub-Funds to be exposed to a net counterparty risk and you should be aware of the possible resulting loss in case of default or insolvency of the relevant counterparty.

In relation to reverse repurchase transactions and buy-sell or sell-buy back transactions in which a Sub-Fund acts as purchaser and if the counterparty from whom securities have been purchased fails, you should note that (A) there is the risk that the value of the securities purchased may yield less than the cash originally paid, whether because of inaccurate pricing of such securities, an adverse market value evolution, a deterioration in the credit rating of the issuers of such securities, or the illiquidity of the market in which these are traded; and (B) (i) locking cash in transactions of excessive size or duration, and/or (ii) delays in recovering cash at maturity may restrict the ability of the Sub-Fund to meet redemption requests, security purchases or, more generally, reinvestment.

In relation to repurchase transactions and buy-sell or sell-buy back transactions in which a Sub-Fund acts as seller and if the counterparty to which securities have been sold fails, you should note that (A) there is the risk that the value of the securities sold to the counterparty is higher than the cash originally received, whether because of a market appreciation of the value of such securities or an improvement in the credit rating of their issuer; and (B) (i) locking investment positions in transactions of excessive size or duration, and/or (ii) delays in recovering, at maturity, the securities sold, may restrict the ability of the Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

In relation to securities lending transactions, you should note that (A) if the borrower of securities lent by a Sub-Fund fails to return these, there is a risk that the collateral received may be realised at a value lower than the value of the securities lent, whether because of inaccurate pricing of the collateral, adverse market movements in the value of the collateral, a deterioration in the credit rating of the collateral issuer, or the illiquidity of the market in which the collateral is traded; (B) in case of reinvestment of cash collateral, such reinvestment is subject to all risks associated with a normal investment and may also (i) create leverage with corresponding risks and risk of losses and volatility, (ii) introduce market exposures inconsistent with the objectives of the Sub-Fund, or (iii) yield a sum less than the amount of collateral to be returned; and (C) delays in the return of securities on loans may restrict the ability of a Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

In addition, you should note that due to exceptional circumstances, such as, but not limited to, disruptive market conditions or extremely volatile markets, instances may arise which cause a Direct Replication Fund's tracking accuracy to diverge substantially from the Reference Index. You should consult the section headed “RISK FACTORS” in the Prospectus, and refer to paragraph 5 of this Singapore Prospectus.

Notwithstanding anything in this Singapore Prospectus, in accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products and EIPs, the EIP Sub-Fund shall not engage in securities lending or repurchase transactions except where such securities lending or repurchase transaction are carried out solely for the purpose of efficient portfolio management and do not amount to more than 50% of the net asset value of the relevant EIP Sub-Fund.

You should note that the risk factors as described in this Singapore Prospectus, the Prospectus and the Product Annexes are not intended to be exhaustive and there may be other considerations that should be taken into account in relation to an investment. You should consult your own independent adviser before considering an investment in the Shares of any Sub-Fund.

6. Subscription and Purchase of the Shares

You can acquire the Shares which are offered in this Singapore Prospectus in Singapore in two (2) ways.

The Shares which are offered in this Singapore Prospectus may either be subscribed in accordance with paragraph 6.1 below or be purchased via the SGX-ST in accordance with paragraph 6.2 below. Most of the trading activity in respect of such Shares in Singapore is expected to occur on the SGX-ST.

Please refer to "Share Classes of the Sub-Funds offered in this Singapore Prospectus" in the "IMPORTANT INFORMATION" section of this Singapore Prospectus for the Share Classes of the Sub-Funds which are offered in this Singapore Prospectus.

6.1 Subscription via the Singapore Authorised Participant(s)

Applications for the Shares of a Sub-Fund in Singapore may be made through the relevant Authorised Participant(s)[30] for such Sub-Fund ("**Singapore Authorised Participant(s)**"). You may obtain information on the identity and contact details of the current Singapore Authorised Participant(s) from the Singapore Representative.

Where requests for subscriptions are received by the Singapore Authorised Participant(s) on or before 4.00 p.m. (Singapore time) on a Singapore Business Day[31], the Singapore Authorised Participant(s) will endeavour to forward the subscription request to the Registrar and Transfer Agent before the Cut-off Time for a Transaction Day as set out in the relevant Schedule[32] being coincident with or immediately following the relevant Singapore Business

[30] "**Authorised Participant**" means an institutional investor, market maker or broker entity authorised by the Company for the purposes of directly subscribing and/or redeeming Shares in a Sub-Fund with the Company.

[31] "**Singapore Business Day**" means a day (other than a Saturday) on which banks in Singapore are open for normal banking business.

[32] "**Cut-off Time**" means the latest time by which an order for a subscription or redemption can be received for a Transaction Day, as further set out in the relevant Product Annex. "**Transaction Day**" means a day for which subscriptions for, conversions from and redemptions of Shares can be made in order to be dealt with by the Registrar and Transfer Agent as described under "CONVERSION OF SHARES" and "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" in the Prospectus. In general, each Business Day will be a Transaction Day. However, some Business Days will not be Transaction Days where Significant Markets are closed and/or such other days as the Management Company may from time to time determine provided that there is at least one Transaction Day per fortnight. Any applications received by the Registrar and Transfer Agent after the Cut-off Time for a Transaction Day will be deferred to the next Transaction Day and processed on the basis of the Net Asset Value per Share calculated for such deferred Transaction Day. The Management Company may declare that a Business Day is a Transaction Day when a Significant Market is closed, in its discretion, where it believes it to be more appropriate. The Transaction Day for each Sub-Fund is available from the Investment Manager and/or Sub-Portfolio Manager. "**Significant Market**" means either a Direct Replication Significant Market or an Indirect Replication Significant Market. "**Direct Replication Significant Market**" means any market and/or exchange or combination of markets and/or exchanges where the value of the Sub-Fund's investments in those markets and/or exchanges exceeds 30% of the Net Asset Value of the Sub-Fund, calculated on a quarterly basis and recorded in the Company's financial statements. The Management Company may determine that a different percentage of Net Asset Value and/or date may apply at their discretion where they believe it is more appropriate. "**Indirect Replication Significant Market**" means any market and/or exchange on which constituents of the Reference Index are traded, unless otherwise set out in the relevant Product Annex.

Day (or such other time on such other day(s) as may be determined by the Company) (the "**Dealing Deadline**").

You should note that the subscription of Shares via the Singapore Authorised Participant(s) will be subject to the Singapore Authorised Participant(s) being open for business, and also to the subscription procedures and dealing deadlines of the Singapore Authorised Participant(s). You should also note that the Singapore Authorised Participant(s) may impose an earlier dealing or payment cut-off time than that specified in this Singapore Prospectus. You should therefore check with the Singapore Authorised Participant(s) for further details.

Applications received and accepted by the Registrar and Transfer Agent by the Dealing Deadline will be effected on the basis of the Net Asset Value per Share calculated on the Valuation Day[33] that corresponds to the relevant Transaction Day. Any applications received by the Registrar and Transfer Agent after the Dealing Deadline for a Transaction Day will be deferred to the next Transaction Day and processed on the basis of the Net Asset Value per Share calculated for such deferred Transaction Day.

The Company may accept subscriptions either in kind or in cash (or a combination of both cash and in kind). Settlement of subscriptions will normally be no later than five (5) Settlement Days[34] following the relevant Transaction Day, unless otherwise specified in the Product Annex(es) of the relevant Sub-Fund(s) (please refer to the "General Information" table of the relevant Product Annex(es), where applicable). *Payment for subscription proceeds and the settlement procedure may be subject to the manner as may from time to time be prescribed by the Singapore Authorised Participant(s). You should check with the Singapore Authorised Participant(s) for further details.*

A confirmation note detailing the investment amount and the number of the Shares allotted will normally be sent within five (5) Business Days following the relevant Valuation Day.

[33] "**Valuation Day**" means (unless otherwise defined in the relevant Product Annex) the first day (other than a Saturday and a Sunday, 1 January, 2 January (if 1 January falls on a Sunday), 3 January (if 1 January falls on a Saturday), Good Friday, Easter Monday, 25 December, 26 December, 27 December (if 25 December falls on a Saturday or a Sunday) and 28 December (if 25 December falls on a Friday or a Saturday)) following a NAV Date. A Valuation Day is the day on which the Net Asset Value in respect of a Sub-Fund is calculated and published. "**Business Day**" means (unless otherwise provided in the relevant Product Annex) a day which is: (i) a Luxembourg Banking Day; and (ii) a London Banking Day. "**NAV Date**" means (unless otherwise provided in the relevant Product Annex) a day which other than a Saturday and a Sunday, 1 January, 2 January (if 1 January falls on a Sunday), 3 January (if 1 January falls on a Saturday), Good Friday, Easter Monday, 25 December, 26 December, 27 December (if 25 December falls on a Saturday or a Sunday) and 28 December (if 25 December falls on a Friday or a Saturday). A NAV Date is the day as of which the assets and liabilities of the Sub-Fund are valued in accordance with the section "DETERMINATION OF THE NET ASSET VALUE" of the Prospectus. Each Transaction Day will also be a NAV Date. "**Luxembourg Banking Day**" means a day (other than a Saturday or a Sunday) on which commercial banks are open and settle payments in Luxembourg, excluding days on which such commercial banks are open for only half a day. "**London Banking Day**" means a day on which commercial banks are open and settle payments in London, excluding days on which such commercial banks are open for only half a day.

[34] "**Settlement Day**" means a day other than a Saturday and a Sunday, 1 January, Good Friday, Easter Monday, 25 December, and 26 December. A Settlement Day is the day on which the subscription proceeds or Redemption Proceeds are paid. For further information, please refer to the "Subscriptions and Redemptions of Shares (Primary Market)" section of the Prospectus as well as the relevant Product Annex for each of the Sub-Funds. "**Redemption Proceeds**" means the Redemption Price less any charges, costs, expenses or taxes, as described under the "Subscriptions and Redemptions of Shares (Primary Market)" section of the Prospectus. "**Redemption Price**" means the price at which Shares are redeemed (before deduction of any charges, costs, expenses or taxes), as described under the "Subscriptions and Redemptions of Shares (Primary Market)" section of the Prospectus. "**Shares**" means the Shares with no par value in the Company, issued in such form as described in the relevant Product Annex.

You should note that the Company has absolute discretion to accept or reject in whole or in part any subscription for Shares without assigning any reason thereto. If a Singapore Authorised Participant(s) fails to deliver (i) the required Investments (as defined in the Prospectus) and Cash Component (as defined in the Prospectus) in relation to an in kind subscription; or (ii) cash in relation to a cash subscription in the stated settlement times for the Sub-Funds (as set out in the relevant Product Annex) the Company reserves the right to cancel the relevant subscription order and the Singapore Authorised Participant(s) shall indemnify the Company for any loss suffered by the Company as a result of a failure by the Shareholder to deliver the required Investments and Cash Component or cash in a timely fashion. The Company reserves the right to cancel the provisional allotment of the relevant Shares in those circumstances.

6.1.1 Form of Shares

Registered Shares

Shares are only issued in registered form and ownership of Shares will be evidenced by entry in the Shareholders' register. No temporary documents of title or share certificates will be issued, other than the Global Share Certificate required for the International Central Securities Depositary. No fractions of Shares will be issued.

Please refer to the "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" section of the Prospectus for further details on the subscription terms and procedure.

6.1.2 Minimum Initial Subscription Amount and Minimum Subsequent Subscription Amount for Singapore Offer

Minimum Initial Subscription Amounts and Minimum Subsequent Subscription Amounts are unrelated to the sizes of the Portfolio Composition Files ("**PCFs**"). For Authorised Participants, the Minimum Initial Subscription Amounts and Minimum Subsequent Subscription Amounts may be higher than the amounts disclosed herein. Minimum PCF sizes, Minimum Initial Subscription Amounts and Minimum Subsequent Subscription Amounts will be available upon request from the Registrar and Transfer Agent and available via the website: www.Xtrackers.com. If you are not an Authorised Participant, the Minimum Initial Subscription Amounts and Minimum Subsequent Subscription Amounts will remain as stated in each relevant Product Annex, together with any applicable Upfront Subscription Sales Charge.

Please refer to Section E of the relevant Schedule for details on the Minimum Initial Subscription Amount and the Minimum Subsequent Subscription Amount applicable to each Sub-Fund.

You should note that the Authorised Participant(s) may impose higher minimum subscription requirements than that specified in this Singapore Prospectus. You should therefore check with the Authorised Participant(s) for further details.

6.1.3 Issue Price

The Shares will be available for subscription on any Transaction Day.

The issue price per Share ("**Issue Price**") is calculated on a forward pricing basis. The Shares may be subscribed for on each Transaction Day at the Net Asset Value thereof plus any applicable Upfront Subscription Sales Charges (as defined in the Prospectus). In respect of the Direct Replication Funds, Primary Market Transaction Costs (as defined in the Prospectus) may be chargeable in relation to such subscription as well.

You should note that the Singapore Authorised Participant(s) may make an over-the-counter market in the Shares in Singapore. You should note that your subscription orders placed through the Singapore Authorised Participant(s) may not be filled at a price equal to the Net Asset Value per Share but at a price based on the Net Asset Value per Share plus any bid-ask spread that the Singapore Authorised Participant(s) may take for such Share. The Singapore Authorised Participant(s) has no obligation to fill subscription orders for the Shares at prices equal to their Net Asset Values although it may at its sole discretion choose to do so upon specific requests by investors. You should check with the Singapore Authorised Participant(s) for further details.

6.1.4 Numerical Example of How Shares are Allotted

Please refer to Section F of the relevant Schedule for the numerical examples of how Shares are allotted for each Sub-Fund.

6.1.5 Minimum Net Asset Value

If the Net Asset Value of a Sub-Fund or Share Class on a given Valuation Day shall become less than the Minimum Net Asset Value (as defined in the Prospectus), the Company may in its discretion, redeem all of the relevant Shares then outstanding (as described in full detail under the heading "Termination of Sub-Funds" in the "GENERAL INFORMATION ON THE COMPANY AND THE SHARES - The Company" section of the Prospectus).

Please refer to Section G of the relevant Schedule for the Minimum Net Asset Value for each Sub-Fund.

6.1.6 Return of Contributions

The Company has absolute discretion to accept or reject in whole or in part any subscription for Shares without assigning any reason thereto.

For example, the Board of Directors reserves the right not to issue the Shares and to return the application monies received (without interest) to you within fourteen (14) Business Days from the day on which such application monies are received, if the Net Asset Value of the Sub-Fund or any Class of Shares on a given Valuation Day shall become less than the Minimum Net Asset Value or the Board of Directors is of the opinion that it is not in the interests of investors or not commercially viable to proceed with the Sub-Fund or issue of the Shares.

No interest will be payable on such amount prior to their return to you.

You can find further details on subscription of the Shares under the heading "SUBSCRIPTIONS AND REDEMPTION OF SHARES (PRIMARY MARKET)" in the Prospectus.

6.2 Purchase via the SGX-ST

The Singapore Shares will be created in Europe before being transferred to the securities account of the Designated Market Maker(s) prior to and for purpose of listing on the SGX-ST.

The market maker

A market maker referred to in this Singapore Prospectus is a broker or a dealer registered by the SGX-ST as a designated market maker to act as such by making a market for the Singapore Shares in the secondary market on the SGX-ST. The current market maker appointed by the Company or its delegate(s) in respect of the Singapore Shares of the Sub-Funds on the SGX-ST is Flow Traders Asia Pte. Ltd. The obligations of Flow Traders Asia Pte. Ltd (or such other market maker(s) for the Singapore Shares on the SGX-ST as may be appointed by the Company or its delegate(s) from time to time) (the "**Designated Market Maker(s)**") include quoting, on a continuous basis or in such manner as SGX-ST prescribes, bid prices to potential sellers and offer prices to potential buyers for the Singapore Shares on the SGX-ST, all within the maximum spread and for not less than the minimum quantity as may be agreed from time to time between the SGX-ST and the Designated Market Maker(s). The Designated Market Maker(s) accordingly aims to facilitate the efficient trading of the Singapore Shares by providing liquidity in the secondary market when it is required in accordance with the market making requirements of the SGX-ST.

As long as the Singapore Shares of a Sub-Fund are listed, quoted and traded on the SGX-ST, the Company shall ensure that at least one (1) Designated Market Maker(s) who is approved and registered by the SGX-ST as a designated market maker is appointed at all times in respect of that Sub-Fund (or, where dual currency trading is available for that Sub-Fund, in respect of each available counter). The Designated Market Maker(s) appointed by the Company or its delegate(s) to act as market maker(s) for the Singapore Shares of the Sub-Funds on the SGX-ST may change from time to time and you should contact the Company for an updated list of Designated Market Maker(s). Any change to the Designated Market Maker(s) of a Sub-Fund appointed by the Company or its delegate(s) will be announced on the SGXNET as soon as practicable. In addition, an announcement will be released via the SGXNET as soon as practicable if there is no market maker to provide for an adequately liquid market for the Singapore Shares of a Sub-Fund (or, where dual currency trading is available, for an available counter) on the SGX-ST in accordance with the market making requirements of the SGX-ST from time to time. You should refer to paragraph 7.2 of this Singapore Prospectus for more details relating to the Designated Market Maker(s) in connection with the Sub-Funds.

You should note that there may from time to time without notice be market maker(s) who are not appointed by the Company or its delegate(s) making a market for the Singapore Shares of the Sub-Funds on the SGX-ST.

The Company or its delegate(s) shall not be liable for anything done or omitted or any loss suffered or incurred whatsoever by any person if any market maker (including any Designated Market Maker(s)) is not fulfilling its duties to provide for an adequately liquid market for the Singapore Shares of any Sub-Fund (or, where dual currency trading is available, for any available counter) in accordance with the market making requirements of the SGX-ST.

Buying and Selling of the Singapore Shares on the SGX-ST

You may buy and sell the Singapore Shares of a Sub-Fund on the SGX-ST during normal trading hours on any trading day on which the SGX-ST is open for trading.

The Singapore Shares traded on the SGX-ST will be transacted on the SGX-ST on a willing-buyer-willing-seller basis at market prices throughout the trading day of the SGX-ST. **You should note that market prices for the Singapore Shares of a Sub-Fund may be different from their Net Asset Values. The price of any Singapore Share traded on the SGX-ST will depend, *amongst others*, on market supply and demand, movements in the value of the relevant Reference Index as well as other factors such as prevailing financial market, corporate, economic and political conditions.**

The clearing and settlement of the Singapore Shares will be in accordance with the CDP's rules governing the clearing and settlement of trades in securities. In particular, the Singapore Shares will be deposited, cleared and settled by the depository, namely the CDP. Therefore, if you wish to purchase or trade the Singapore Shares on the SGX-ST, you must (if you have not already done so) open an account with the CDP or a sub-account with any CDP depository agent which may be a member company of the SGX-ST, bank, merchant bank or trust company, and have the Singapore Shares deposited in your securities account with the CDP. **The Singapore Shares will be held in book-entry form which means that no share certificates will be issued.**

The persons named as the depositors in the depository register shall, for such period as the book-entry Singapore Shares are entered against their names in the depository register, be deemed to be the beneficial Shareholders of the amount of the book-entry Singapore Shares entered against their respective names in the depository register of the CDP. Accordingly, if you own such Singapore Shares in the CDP, you are the beneficial owner of such Singapore Shares as shown on the records of the CDP.

The Minimum Initial Subscription Amount and Minimum Subsequent Subscription Amount are not applicable to the trading of the Singapore Shares on the SGX-ST. The Singapore Shares quoted and traded on the SGX-ST will generally be purchased in board lots. Please refer to Section A of the relevant Schedule for the board lot size of the Share Classes of each Sub-Fund for the purpose of trading on the SGX-ST.

The Singapore Shares will be traded on the SGX-ST in the relevant Trading Currency(ies). Please refer to Section A of the relevant Schedule for the Trading Currency(ies) of the Share Classes of each Sub-Fund.

Unless otherwise provided in the Product Annex of a Sub-Fund, any purchase of the Singapore Shares on the SGX-ST will take place in cash. The Company does not charge any subscription fee for purchases of the Singapore Shares on the SGX-ST.

Orders to buy the Singapore Shares through the SGX-ST can be placed via a stockbroker in the same way as you may buy shares in companies listed on the SGX-ST. *Such orders to buy the Singapore Shares and/or transfers of the Singapore Shares to your CDP account may incur costs or be subject to such fees or charges as may from time to time be imposed by the relevant stockbroker and/or the CDP over which the Company has no control.*

Compulsory Repurchase

You should note that if the Singapore Shares of a Sub-Fund are delisted from the SGX-ST or if the CDP is no longer able to act as the depository for the Singapore Shares of a Sub-Fund listed on the SGX-ST for whatever reasons, the Singapore Shares of that Sub-Fund in your securities account with the CDP or held by the CDP may be repurchased (compulsorily or otherwise) by the Designated Market Maker(s). Please refer to paragraph 5.9 of this Singapore Prospectus for further details.

6.2.1 Clearance and Settlement

Introduction

The Singapore Shares will be cleared and settled under the electronic book-entry clearance and settlement system of the CDP. All dealings in and transactions of the Singapore Shares through the SGX-ST will be effected in accordance with the terms and conditions for the operation of securities accounts and the terms and conditions for the CDP to act as depository for foreign securities, as amended from time to time.

The CDP, a wholly-owned subsidiary of Singapore Exchange Limited, is incorporated under the laws of Singapore and acts as a depository and clearing organisation. The CDP holds securities for its account holders and facilitates the clearance and settlement of securities transactions between account holders through electronic book-entry changes in the securities accounts maintained by such account holders with the CDP.

It is expected that the Singapore Shares will be credited or debited into your securities account within two (2) market days (or such number of days as may be determined by the SGX-ST) after the transaction date on which the Singapore Shares are purchased or sold by you through the SGX-ST.

Clearance and Settlement under the Depository System

The Singapore Shares will be held by the CDP for and on behalf of persons who maintain, either directly or through depository agents, securities accounts with the CDP. Persons named as direct securities account holders and depository agents in the depository register maintained by the CDP will be treated as beneficial Shareholders in respect of the number of the Singapore Shares credited to their respective securities accounts. **You should note that the Singapore Shares purchased via the SGX-ST may not be withdrawn from the CDP and no share certificates will be issued or available to you.**

Transactions in the Singapore Shares of a Sub-Fund under the book-entry settlement system will be reflected by the seller's securities account being debited with the number of the Singapore Shares of that Sub-Fund sold and the buyer's securities account being credited with the number of the Singapore Shares of that Sub-Fund acquired and no transfer stamp duty is currently payable for the transfer of the Singapore Shares that are settled on a book-entry basis.

The Singapore Shares credited to a securities account may be traded on the SGX-ST on the basis of a price between a willing buyer and a willing seller. The Singapore Shares credited into a securities account may be transferred to any other securities account with the CDP, subject to the terms and conditions for the operation of securities accounts and a transfer fee payable to the CDP. If you trade in the Singapore Shares through the SGX-ST, you should ensure that the relevant Singapore Shares have been credited into your

securities account before you trade in such Singapore Shares, since no assurance can be given that the Singapore Shares can be credited into the securities account in time for settlement following a dealing. In particular, if a subscription and redemption occur on the same trading day, it may not be possible to determine whether the Singapore Shares have been credited into a securities account before debiting the securities account. If the Singapore Shares have not been credited into the securities account by the due date for the settlement of the trade, the buy-in procedures of the CDP will be implemented.

Clearing Fees

Unless waived, a clearing fee for the trading of the Singapore Shares on the SGX-ST is payable at the rate of 0.0325% of the contract value. The clearing fee, fees relating to instruments of transfer, deposit fee and unit withdrawal fee (as applicable) may be subject to goods and services tax (GST) (currently 9.0%).

Dealings in the Singapore Shares will be carried out in the relevant Trading Currency(ies) and will be effected for settlement in the CDP on a scripless basis. Settlement of trades on a normal "ready" basis on the SGX-ST generally takes place on the second market day following the transaction date. The CDP holds securities on behalf of investors in securities accounts. You may open a direct account with the CDP or a sub-account with any CDP depository agent. A CDP depository agent may be a member company of the SGX-ST, bank, merchant bank or trust company.

Dual Currency Trading

The Singapore Shares of the following Sub-Fund(s) may be traded in two different currency denominations on the SGX-ST:

No.	Name of Sub-Fund	Currency denomination available for trading	Counter Name	Stock Code	Traded Currency
1.	Xtrackers MSCI China UCITS ETF	Primary currency counter	XT MSCHINA US$	LG9	USD
		Secondary currency counter	XT MSCHINA S$	TID	SGD

In respect of each Sub-Fund, the Singapore Shares of each available counter will be consolidated in an investor's CDP account so that the total number of Singapore Shares in each Sub-Fund can be viewed at a glance – for example, 1,000 USD-denominated Singapore Shares of a Sub-Fund and 2,000 SGD-denominated Singapore Shares of the same Sub-Fund will be reflected as 3,000 Singapore Shares of the relevant Sub-Fund in an investor's CDP account.

As the Singapore Shares of the Sub-Fund(s) are custodised in a consolidated pool at the CDP, an investor can buy one currency counter and sell in the other currency counter. However, contra trade between the two currency counters is not possible as they are listed as separate trading counters.

Please refer to sections A and D of the relevant Schedule and the SGX-ST website at https://www2.sgx.com/securities/trading#Dual%20Currency%20Trading for further details on dual currency trading.

7. Redemption and Sale of the Shares

You can dispose of the Shares which are offered in this Singapore Prospectus in Singapore in two (2) ways.

The Shares which are offered in this Singapore Prospectus may either be redeemed in accordance with paragraph 7.1 below or be sold via the SGX-ST in accordance with paragraph 7.2 below. Most of the trading activity in respect of such Shares in Singapore is expected to occur on the SGX-ST.

Please refer to "Share Classes of the Sub-Funds offered in this Singapore Prospectus" in the "IMPORTANT INFORMATION" section of this Singapore Prospectus for the Share Classes of the Sub-Funds which are offered in this Singapore Prospectus.

7.1 Redemption via the Singapore Authorised Participant(s)

If you wish to have all or part of your Shares of a Sub-Fund redeemed by the Company, you may apply to the Singapore Authorised Participant(s) for redemption on any Transaction Day. No fractions of Shares can be redeemed.

Where requests for redemption are received by the Singapore Authorised Participant(s) on or before 4.00 p.m. (Singapore time) on a Singapore Business Day, the Singapore Authorised Participant(s) will endeavour (in each case, without responsibility to any Shareholder) to forward the redemption request to the Registrar and Transfer Agent before the Dealing Deadline as set out in paragraph 6.1 of this Singapore Prospectus.

You should note that redemption of Shares via the Singapore Authorised Participant(s) will be subject to the Singapore Authorised Participant(s) being open for business, and also to the redemption procedures and dealing deadlines of the Singapore Authorised Participant(s). You should also note that the Singapore Authorised Participant(s) may impose an earlier dealing cut-off time than that specified in this Singapore Prospectus. You should therefore check with the Singapore Authorised Participant(s) for further details.

Any applications received by the Registrar and Transfer Agent after the Dealing Deadline for a Transaction Day will be deferred to the next Transaction Day and processed on the basis of the Net Asset Value per Share calculated for such deferred Transaction Day.

Prices of the Shares are calculated on a forward pricing basis. Shares may be redeemed on each Transaction Day at the Net Asset Value of such Shares less any applicable Redemption Charge (as defined in the Prospectus) in relation to such redemption. For Direct Replication Funds, Primary Market Transaction Costs may be chargeable in relation to such redemption as well.

Redemptions will be made in cash unless otherwise specified in the Product Annex. *Redemption proceeds will be paid to* you *in Singapore in the manner as may from time to time be prescribed by the Singapore Authorised Participant(s).* You *should check with the Singapore Authorised Participant(s) for further details.*

You should note that the Singapore Authorised Participant(s) may make an over-the-counter market in the Shares in Singapore. You should note that your redemption orders placed through the Singapore Authorised Participant(s) may not be filled at a price equal to the Net Asset Value per Share but at a price based on the Net Asset Value per Share minus any bid-ask spread that the Singapore Authorised Participant(s) may take for such Share. The Singapore Authorised Participant(s) has

no obligation to fill redemption orders for the Shares at prices equal to their Net Asset Values although it may at its sole discretion choose to do so upon specific requests by investors. You should check with the Singapore Authorised Participant(s) for further details.

7.1.1 Minimum Holding Requirement and Minimum Redemption Amount

Minimum Redemption Amounts are unrelated to the sizes of the PCFs. For Authorised Participants, the Minimum Redemption Amounts may be higher than the amounts disclosed herein. Minimum Redemption Amounts will be available upon request from the Registrar and Transfer Agent and available via the website: www.Xtrackers.com. If you are not an Authorised Participant, the Minimum Redemption Amounts will remain as stated in each relevant Product Annex, together with any applicable Redemption Charge.

Please refer to Section H of the relevant Schedule for details on the Minimum Holding Requirement and the Minimum Redemption Amount applicable to each Sub-Fund.

If: (1) for any reason, the value of the total net assets of a Sub-Fund or Share Class declines to, or fails to reach, at any time, the relevant Minimum Net Asset Value; (2) the Board of Directors deems it appropriate, because of changes in the economic, regulatory or political situation relating to a Sub-Fund or Share Class; (3) the Board of Directors deems it appropriate to rationalize a Sub-Fund or Share Class; or (4) the Board of Directors deems it appropriate because it is in the best interest of the Shareholders of a Sub-Fund or Share Class, the Board of Directors may redeem all (but not some) of the outstanding Shares of the relevant Sub-Fund or Share Class at the Net Asset Value per Share (taking into account actual realisation prices of investments and realisation expenses), calculated on the Valuation Day specified as the effective date for such redemption. A notice regarding the compulsory redemption, to the extent required by applicable laws and regulations or otherwise deemed appropriate by the Board of Directors, will be published in the newspaper(s) determined by the Board of Directors, and/or sent to the Shareholders of the relevant Sub-Fund or Share Class and/or communicated via other means prior to the effective date for the compulsory redemption.

If it shall come to the Company's attention that the Shares are beneficially owned by a Prohibited Person or U.S. Person (each as defined in the Prospectus), the Company may also in its discretion compulsorily redeem such Shares. Please also refer to the "INTRODUCTION - *Selling and Transfer Restrictions*" section and the "STRUCTURE" section of the Prospectus for further details.

Please refer to "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" and "The Company - *Termination of Sub-Funds*" under "GENERAL INFORMATION ON THE COMPANY AND THE SHARES" in the Prospectus for further details.

7.1.2 Numerical Example of Calculation of Redemption Proceeds

Please refer to Section I of the relevant Schedule for the numerical examples of calculation of redemption proceeds for each Sub-Fund.

7.1.3 Payment of Redemption Proceeds

Redemption Proceeds will normally be paid no later than five (5) Settlement Days (or such other period as may be determined by the Company in accordance with the applicable laws) following the Transaction Day, unless otherwise specified in the Product Annex(es) of the relevant Sub-Fund(s) (please refer to the "General Information" table of the relevant Product Annex(es), where applicable) or unless the redemption of the Shares has been suspended, provided however that, in certain circumstances (for example, where settlement in a particular currency is not possible on a given Settlement Day(s) or in the case that a Significant Market is closed for trading or settlement on a given Settlement Day), such payment or settlement may be delayed by up to five (5) further Settlement Days. Please refer to the section "Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions" in the Prospectus.

Notwithstanding the foregoing, the payment of the Redemption Proceeds may be delayed if there are any specific local statutory provisions or events of force majeure which are beyond the Company's control which makes it impossible to transfer the Redemption Proceeds or to proceed to such payment within the normal delay. This payment shall be made as soon as reasonably practicable then but without interest.

Further details on redemption of the Shares are set out under the sections headed "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" and "THE SECONDARY MARKET" in the Prospectus and the section headed "Payments through International Central Securities Depositary" in the "GLOBAL CLEARING AND SETTLEMENT, INTERNATIONAL CENTRAL SECURITIES DEPOSITARY AND COMMON DEPOSITARY" section of the Prospectus.

7.2 Sale via the SGX-ST

You may sell your Singapore Shares on the SGX-ST during normal trading hours on any trading day on which the SGX-ST is open for trading.

The Singapore Shares traded on the SGX-ST will be transacted on the SGX-ST on a willing-buyer-willing-seller basis at market prices throughout the trading day of the SGX-ST. ***You should note that market prices for the Singapore Shares may be different from their Net Asset Values. The price of any Singapore Share traded on the SGX-ST will depend, amongst others, on market supply and demand, movements in the value of the relevant Reference Index as well as other factors such as prevailing financial market, corporate, economic and political conditions****.*

The clearing and settlement of the Singapore Shares will be in accordance with the CDP's rules governing the clearing and settlement of trades in securities. Please refer to paragraph 6.2.1 above for information on clearance and settlement of trades in securities.

For Singapore Shares of the Sub-Fund(s) which are traded in two different currency denominations on the SGX-ST, you can sell the Singapore Shares of such Sub-Fund(s) in either of the currency counter, regardless of the currency in which the Singapore Shares of the relevant Sub-Fund were first purchased by you through the SGX-ST.

The Minimum Holding Requirement and the Minimum Redemption Amount are not applicable to the trading of the Singapore Shares on the SGX-ST. The Singapore Shares quoted and traded on the SGX-ST will generally be sold in board lots. Please refer to Section A of the relevant Schedule for the board lot size of the Share Classes of each Sub-Fund for the purpose of trading on the SGX-ST.

The Company does not charge any redemption fee for sales of the Singapore Shares on the secondary market on the SGX-ST.

Orders to sell the Singapore Shares through the SGX-ST can similarly be placed via a member firm or stockbroker. *Such orders to sell the Singapore Shares may incur costs over which the Company has no control.*

Redemption of Shares by Secondary Market Investors

Shares purchased on the secondary market cannot usually be sold directly back to the Company. You can only purchase and sell your Shares on the secondary market with the assistance of an intermediary (e.g. a market maker or a stock broker) and may incur fees for doing so as further described under the "THE SECONDARY MARKET" section of the Prospectus. In addition, you may pay more than the current Net Asset Value when buying Shares on the secondary market and may receive less than the current Net Asset Value when selling them on the secondary market.

If on a Business Day the stock exchange value of the Shares significantly varies from the Net Asset Value due to, for example market disruption caused by the absence of market makers (as described under the heading "Listing on a Stock Exchange" in the "THE SECONDARY MARKET" section of the Prospectus), and if you are not an Authorised Participant, you may apply directly to the Company for the redemption of your Shares via the depositary or financial intermediary through which you hold the Shares, such that the Administrative Agent is able to confirm your identity, the number of Shares and the details of the relevant Sub-Fund and Share Class held by you. In such situations, information shall be communicated to the Relevant Stock Exchange indicating that such direct redemption procedure is available to investors on the secondary market. Applications for redemption shall be made in accordance with the procedure described in the "SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)" section of the Prospectus, and the redemption fees disclosed in the relevant Product Annex in respect of each Sub-Fund shall apply.

You should note that there can be no assurance that a liquid secondary market on the SGX-ST will exist for the Singapore Shares. The trading prices of the Singapore Shares on the SGX-ST may differ in varying degrees from their daily Net Asset Values and can be affected by market forces such as supply and demand, economic conditions and other factors. As long as the Singapore Shares of a Sub-Fund are listed, quoted and traded on the SGX-ST, the Company shall ensure that at least one (1) Designated Market Maker(s) is appointed at all times to provide for an adequately liquid market for the Singapore Shares of that Sub-Fund on the SGX-ST in accordance with the market making requirements of the SGX-ST from time to time. However, there is no guarantee or assurance as to the price at which a market will be made. The market makers may realise profits or sustain losses in the amount of any differences between the prices at which they buy the Singapore Shares and the prices at which they sell the Singapore Shares. Any profit made by the market makers may be retained by them for

their absolute benefit and they shall not be liable to account to the Sub-Funds in respect of such profits.

8. Conversions of Shares

You are currently not entitled to convert all or part of your Shares in any Sub-Fund into shares relating to other sub-funds of the Company or Classes of Shares of the same Sub-Fund.

9. Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions

The Company may suspend the calculation of the Net Asset Value of the Sub-Funds, the Shares and/or Classes of Shares and, in respect of the primary market, the issue, redemption and conversion of the Shares during certain circumstances. Details of such temporary suspension are set out under the headings "ADMINISTRATION OF THE COMPANY – *Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions*" in the Prospectus.

As long as the Singapore Shares of a Sub-Fund are listed on the SGX-ST, the Company may suspend the issue and redemption of the Shares of that Sub-Fund during *amongst others*:

(a) any period when the SGX-ST is closed (otherwise than for ordinary holidays);

(b) any period when dealings of the Singapore Shares of that Sub-Fund on the SGX-ST are restricted or suspended; or

(c) any period when settlement or clearing of securities in the CDP is disrupted.

10. Obtaining Price Information

As long as the Singapore Shares of a Sub-Fund are listed on the SGX-ST, the daily Net Asset Value of that Sub-Fund and the Net Asset Value per Share of that Sub-Fund will normally be displayed on the website www.Xtrackers.com within the next two (2) Transaction Days. The current indicative Net Asset Value per Share will also be displayed on the abovementioned website as far as it is practicable and on a best effort basis, which will be updated continuously throughout the trading period of the Singapore Shares of that Sub-Fund on the SGX-ST of each Singapore Business Day. Please refer to the heading "Intra-Day Net Asset Value ("iNAV")" of the "THE SECONDARY MARKET" section of the Prospectus for more information.

You should note that the current indicative Net Asset Value per Share set out in the abovementioned website is merely indicative in nature and may be different from the actual Net Asset Value per Share.

The trading (or the bid and ask) prices of the Singapore Shares will be quoted on the SGX-ST in the relevant Trading Currency(ies), and if available, will be obtainable from the website of the SGX-ST at www.sgx.com, Bloomberg and Reuters. Please refer to Section A of the relevant Schedule for the Trading Currency(ies) of the Share Classes of each Sub-Fund.

You should note that the frequency of the publication of the prices in the relevant publications is dependent on the publication policies of such publications and their publisher. In addition, the Management Company, the Sub-Funds and the Singapore Representative do not accept any responsibility for any errors, delays, omissions or unavailability of such Net Asset Value in such publications or on the website, because of any technical or third parties' fault or such other factors beyond their control, or any errors in the prices published in the newspapers, or for any non-publication or late publication of prices and shall incur no liability in respect of any action taken or loss suffered by you in reliance upon such publications.

11. Past Performance, Expense Ratios and Turnover Ratios

11.1 Past performance of the Share Classes of each Sub-Fund and the Sub-Fund's benchmark

Please refer to Section J of the relevant Schedule for the past performance of the Share Classes of each Sub-Fund and the Sub-Fund's benchmark.

You should note that past performance is not necessarily indicative of the future performance.

11.2 Expense ratio(s)

Please refer to Section K of the relevant Schedule for the expense ratio(s)[35] of the Share Classes of each Sub-Fund.

11.3 Turnover ratio

Please refer to Section L of the relevant Schedule for the turnover ratio[36] of each Sub-Fund.

12. Soft Dollar Commissions/Arrangements

The Management Company and the Investment Managers and (where applicable) the Sub-Portfolio Managers do not currently intend to receive soft dollar or cash commissions or other rebates from brokers or dealers in respect of transactions for the account of each Sub-Fund.

13. Conflicts of Interest

You should note that in addition to Deutsche Bank AG (please refer to the "RISK FACTORS – *Potential Conflicts of Interest*" in the Prospectus for details on the potential conflicts of interest in respect of Deutsche Bank AG in relation to each of the Sub-Funds), it is also possible that the Management Company, the Investment Managers, Sub-Portfolio

[35] The expense ratios are calculated in accordance with the guidelines on disclosure of expense ratios issued by the Investment Management Association of Singapore (**IMAS**). The expense ratios are calculated based on figures in the Sub-Funds' latest audited accounts. The following expenses (where applicable) are excluded from the calculation of the expense ratios:

(a) interest expense;
(b) brokerage and other transaction costs associated with the purchase and sale of investments (such as registrar charges and remittance fees, if applicable);
(c) foreign exchange gains and losses of the relevant Share Class of a Sub-Fund, whether realised or unrealised;
(d) tax deducted at source or arising from income received, including withholding tax;
(e) where applicable, performance or performance-related fees;
(f) front-end loads, back-end loads and other costs arising from the purchase or sale of a fund; and
(g) dividends and other distributions paid to Shareholders.

[36] Turnover ratio means a ratio of the number of times per year that a dollar of assets is reinvested. It is calculated based on the lesser of purchases or sales of underlying investments of a scheme expressed as a percentage of daily average NAV.

Managers (where applicable) and the Depositary and any of their connected persons and the directors of the Company may hold Shares of a Sub-Fund from time to time. In such event, each of them may vote its own Shares at, or being part of a quorum for, any meeting to approve any matter which it has a material interest in the business to be conducted in relation to the relevant Sub-Fund. While this may give rise to potential or actual conflicts of interests, the relevant parties shall endeavour to resolve any such conflicts promptly and fairly, having regard, among other things, to the best interest of the Shareholders of the relevant Sub-Fund.

14. Reports

The Company's financial year ends on 31 December each year. Audited annual accounts and reports and unaudited semi-annual accounts and reports in euro will generally be made available on the website www.Xtrackers.com within 4 months from the financial year end and within 2 months from the financial half year end (as the case may be).

Once issued, the accounts will be made available for inspection at the Singapore Representative's office free of charge during normal Singapore business hours.

Further details on reports are set out under the heading *"*GENERAL INFORMATION ON THE COMPANY AND THE SHARES – *The Company: Annual, Semi-Annual and Quarterly Reports"* in the Prospectus.

15. Certain Singapore Tax Considerations

The following discussion is a summary of the material Singapore income tax consequences of the purchase, ownership, disposal and redemption of the Shares to a holder of such Shares who is a tax resident in Singapore. This discussion is not a comprehensive description of all of the Singapore tax considerations that may be relevant to a decision to purchase, own or dispose of the Shares and does not deal with the Singapore tax consequences applicable to all categories of investors, some of which (such as dealers in securities) may be subject to special rules. Prior to investing in the Shares, you should consult your own tax advisers as to the Singapore or other tax consequences of the purchase, ownership or disposal of the Shares including, in particular, the effect of any foreign, state or local tax laws to which you are subject. Prior to investing in the Shares, you should inform yourself of, and where appropriate take advice on, the taxes applicable to the acquisition, holding and redemption of the Shares by you under the laws of the places in which you are subject to tax. The Company does not accept responsibility for any tax effects or liabilities resulting from the acquisition, holding or disposal of the Shares.

Under present Singapore tax law and practice as of the date of registration of this Singapore prospectus:-

Dividend distributions

Individuals resident in Singapore will be exempt from Singapore tax on all foreign-sourced income received in Singapore on or after 1 January 2004, other than income received through a partnership in Singapore. Accordingly, individual investors should generally be exempt from Singapore tax on dividend distributions received from the relevant Sub-Fund.

Tax exemption may be available to Singapore resident entities (not being individuals) on foreign-sourced dividends received by them, subject to certain conditions being met. Generally, for the tax exemption to apply, the foreign-sourced dividends, or the underlying profits of the company from which the dividends are paid, must be subject to tax in the country from which the dividends are paid and the headline tax rate in that country must be at least 15%. If the conditions for tax exemption are not met, Singapore income tax at 17% is payable on the foreign-sourced dividends received in Singapore by the Singapore resident entity.

Sale or redemption of the Shares

Singapore does not generally impose tax on capital gains. However, there are no specific laws or regulations which deal with the characterisation of gains. In general, gains from the disposal or redemption of the Shares may be construed to be of an income nature and subject to Singapore income tax if they arise from activities which the Inland Revenue Authority of Singapore regards as the carrying on of a trade or business in Singapore.

Pursuant to Section 10L of the Income Tax Act 1947 of Singapore ("**ITA**"), gains received or deemed to be received in Singapore by an entity of a relevant group from the sale or disposal of any movable or immovable property outside Singapore will be treated as income chargeable to Singapore income tax, subject to certain exclusions. Shareholders who may be subject to the tax treatment under Section 10L of the ITA should consult their own professional tax advisers regarding the Singapore income tax consequences of their sale or disposal of the Shares.

In addition, if you apply, or are required to apply, the Singapore Financial Reporting Standard ("**FRS**") 109 or Singapore Financial Reporting Standard (International) 9 ("**SFRS(I) 9**") for the purposes of Singapore income tax, you may be required to recognise gains or losses (not being gains or losses in the nature of capital) in accordance with the provisions of FRS 109 or SFRS(I) 9 (as the case may be) (as modified by the applicable provisions of Singapore income tax law) even though no sale, disposal or redemption of the Shares is made.

Further details on the taxation on the Company and on the Shareholders are set out under *"*GENERAL TAXATION*"* in the Prospectus.

16. Queries and Complaints

You may email Xtrackers@dws.com or contact the Singapore Representative of the Sub-Funds at telephone number (65) 6538 5550 to seek any clarification regarding any of the Sub-Funds.

17. Other Material Information

17.1 Borrowings

The Company may borrow for the account of a Sub-Fund, up to 10% of the Net Asset Value of such Sub-Fund provided that such borrowing is on a temporary basis.

The Company may borrow for investment purposes. The Sub-Fund in question may therefore be subject to shortfall risk, as further detailed under the "RISK FACTORS – General Risk Factors" section of the Prospectus.

17.2 The Reference Index

Please refer to Section M of the relevant Schedule for details of the Reference Index of each Sub-Fund.

17.3 Financial Derivative Instruments

Each Indirect Replication Fund or each Share Class of an Indirect Replication Fund (as the case may be) may invest in over-the-counter derivative transactions as part of its investment policy to achieve its investment objective. In particular, to provide the Shareholders with a return linked to the performance of the relevant Reference Index, each Indirect Replication Fund or each Share Class of an Indirect Replication Fund (as the case may be) intends to invest in one or more over-the-counter swap transaction(s) with the Swap Counterparty, as further described in the relevant Product Annex.

Direct Replication Funds may use FDIs and/or transferable securities which relate to the Reference Index or constituents of the Reference Index, which may include FDIs which are expected to generate 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 FDIs which each Direct Replication Fund may invest in include futures, options, swaps, credit default swaps, contracts for differences, forwards including non-deliverable forwards. A Direct Replication Fund may also invest in depositary receipts, certificates, ETFs, UCITS or other eligible collective investment undertakings or P-notes, and money market instruments.

Each Sub-Fund may invest up to 100% of its Net Asset Value in financial derivative instrument(s) in accordance with the UCITS Directive and for the purposes of hedging, efficient portfolio management and/or optimising returns. However, each Sub-Fund is subject to a maximum single counterparty risk exposure of 10% of the Net Asset Value of a Sub-Fund in relation to that Sub-Fund's OTC Swap Transaction(s) and/or efficient portfolio management transactions. The Company may reduce such counterparty risk as further elaborated below.

The Management Company will apply the commitment approach for the purposes of calculating the Global Exposure resulting from the use of FDIs (which can be defined as the sum of the counterparty risk and the market risk to which a Sub-Fund is exposed), as described in CSSF regulation No. 10-4 transposing Commission Directive 2010/43/EU of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council and in accordance with the Regulations and based on the principle that the FDIs entered into by a Sub-Fund are structured to reflect the performance of the Reference Index.

The Management Company will ensure that the risk management and compliance procedures are adequate and have been or will be implemented and that the Management Company has the necessary expertise to manage the risk relating to the use of financial derivatives instruments.

Notwithstanding anything in this Singapore Prospectus, in accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products and EIPs, the EIP Sub-Fund does not and will not invest in any product, or engage in any transaction, which will cause its Shares not to be regarded as prescribed capital markets products or EIPs. You should refer to the Notices for further details.

Mitigation of Counterparty Risk Exposure

When applying the limits specified in sections 2.3 and 2.4 of the chapter “Investment Restrictions” in the Prospectus to the OTC Swap Transaction(s), reference must be made to the net counterparty risk exposure as determined pursuant to the Regulations and EMIR. In order to reduce its net counterparty risk exposure, the Company may in relation to any of its Sub-Funds use risk mitigation techniques such as netting and financial collateral techniques which are or would become authorised by the Regulations and EMIR.

The Company may notably reduce the overall counterparty risk of each Sub-Fund's OTC Swap Transaction(s) by causing the relevant Swap Counterparty to deliver to the Depositary or to a third party bank collateral in the form of eligible financial assets and given in accordance with the Regulations. If the Swap Counterparty defaults on its obligations under the swap, such collateral will be enforceable by the Company at all times and will be marked to market on a daily basis. The amount of collateral to be delivered will be at least equal to the value by which the overall exposure limit as determined pursuant to the Regulations and EMIR has been exceeded.

In this context, the Company may notably cause the relevant Swap Counterparty to pledge certain of its assets, or certain accounts on which these assets are held, in favour of the Company in accordance with the provisions of appropriate collateral contractual documentation. These accounts may be opened in the books of, and the assets held thereon maintained by, one or more financial institutions which do not necessarily belong to the group of the Depositary and which are hence acting as sub-custodian.

The Company may also organise relevant collateral arrangements via any of the pooling techniques which are or would become authorised by the Regulations and/or The Commission de Surveillance du Secteur Financier of Luxembourg and which are compliant with the ring fencing principles among sub-funds as required by the Law. Such a collateral arrangement may in particular be organised through a global account opened in the name of the relevant Swap Counterparty, which account would be pledged in favour of the Company acting on behalf of all or part of its Sub-Funds and the financial assets of which would be allocated among the Sub-Funds concerned so that each of the latter would be able to identify the specific financial assets held on such account which are pledged in its favour. The amount of collateral to be delivered under such arrangements will be such that the exposure to the Swap Counterparty is at least fully collateralised on a daily basis.

The Company may also reduce the overall counterparty risk of a Sub-Fund’s OTC Swap Transaction(s) by resetting the OTC Swap Transaction(s). The effect of resetting the OTC Swap Transaction(s) is to reduce the marked to market of the OTC Swap Transaction(s) and, thereby, reduce the net counterparty exposure to a percentage below the applicable rate. The relevant Investment Manager and/or the Sub-Portfolio Manager may require that the Swap Counterparty proceed to a restrike of existing swap transactions to the current level of the relevant Reference Index and/or foreign exchange rate which, by fully resetting the mark-to-market value of these transactions to zero (or partially resetting it to a lower value), will result in the payment of an amount in cash to the Sub-Fund which, at the discretion of the relevant Investment Manager and/or the Sub-Portfolio Manager, will be used in the general cash management of the Sub-Fund (e.g. to finance pending redemptions), or will be reinvested into a new swap transaction entered into at the current level of the relevant Reference Index.

Please refer to the sections headed “Management of collateral for OTC financial derivative transactions and efficient portfolio management techniques”, “Risk Management Policy for FDI” and “Mitigation of Counterparty Risk Exposure” in the “INVESTMENT RESTRICTIONS” section of the Prospectus for more details. The collateral arrangement applicable to each Sub-Fund may vary from time to time. You may obtain information in relation to the outstanding collateral arrangement applicable to any specific Sub-Fund at the registered office of the Company.

You can find general policies of the Company on the use of financial derivative instruments and details of the risks associated with the use of financial derivative instruments in the sections headed “INVESTMENT RESTRICTIONS - *Risk management and limits with regard to derivative instruments and the use of techniques and instruments*”, “RISK FACTORS - *Valuation of the Reference Index and the Sub-Fund’s assets*”, “RISK FACTORS - *Credit Risk*”, “RISK FACTORS - *Liquidity Risk*” and “RISK FACTORS – *Use of Derivatives*” in the Prospectus. You can find a summary of the risk management policy and procedures implemented by the Management Company, the Investment Managers and/or the Sub-Portfolio Managers (as applicable) in relation to the use of financial derivative instruments for investment purposes in the section headed “INVESTMENT RESTRICTIONS - *Risk Management Policy for FDI*”. **You may obtain supplementary information relating to the risk management methods employed by the Management Company from the Company or the Singapore Representative.**

17.4 Dividend Policy

Please refer to Section N of the relevant Schedule for details of the dividend policy of each Sub-Fund.

You can find details on the general dividend policy of the Company in the section headed “GENERAL INFORMATION ON THE COMPANY AND THE SHARES - *The Shares: Dividend policy*” in the Prospectus.

17.5 Determination of the Net Asset Value

General Valuation Rules

The Net Asset Value of the Company is at any time equal to the total of the Net Asset Values of its sub-funds.

The Articles of Incorporation provide that the Board of Directors shall establish a portfolio of assets for each sub-fund of the Company (including the Sub-Funds) as follows:

(i) the proceeds from the issue of each Share are to be applied in the books of the relevant sub-fund to the pool of assets established for such sub-fund and the assets and liabilities and incomes and expenditures attributable thereto are applied to such portfolio subject to the provisions set forth hereafter;

(ii) where any asset is derived from another asset, such asset will be applied in the books of the relevant sub-fund from which such asset was derived, meaning that on each revaluation of such asset, any increase or diminution in value of such asset will be applied to the relevant portfolio;

(iii) where the Company incurs a liability which relates to any asset of a particular portfolio or to any action taken in connection with an asset of a particular portfolio, such liability will be allocated to the relevant portfolio;

(iv) where any asset or liability of the Company cannot be considered as being attributable to a particular portfolio, such asset or liability will be allocated to all the sub-funds of the Company pro rata to the sub-funds' respective Net Asset Value at their respective Launch Dates[37];

(v) upon the payment of dividends to the Shareholders in any sub-fund, the Net Asset Value of such sub-fund shall be reduced by the gross amount of such dividends.

The liabilities of each Sub-Fund shall be segregated from other sub-funds of the Company with third party creditors having recourse only to the assets of the relevant Sub-Fund.

Any assets held in a Sub-Fund not expressed in the Reference Currency (as defined in the Prospectus) will be translated into the Reference Currency at the last available rate of exchange prevailing in a recognised market on the NAV Date immediately preceding the Valuation Day.

The Net Asset Value per Share of a specific Class of Shares of a Sub-Fund will be determined by dividing the value of the total assets of the relevant Sub-Fund which are attributable to such Class of Shares less the liabilities of such Sub-Fund which are attributable to such Class of Shares by the total number of Shares of such Class of Shares outstanding on the relevant Transaction Day.

For the determination of the Net Asset Value of a Class of Shares, the rules sub (i) to (v) above shall apply with the necessary modifications. The Net Asset Value per Share of each Class in a Sub-Fund will be calculated by the Administrative Agent in the Reference Currency of the relevant Class of Shares and, as the case may be, in the Denomination Currency as specified in the relevant Product Annex by applying the relevant market conversion rate prevailing on each Valuation Day.

The assets and liabilities of each Sub-Fund are valued periodically as specified in the Prospectus and/or in the relevant Product Annex of that Sub-Fund.

The Net Asset Value per Share is or will be calculated on each Valuation Day. The Net Asset Value for each Sub-Fund will be determined on the basis of the last available closing prices on the NAV Date immediately preceding the Valuation Day or the last available prices from the market(s) on which the investments of the relevant Sub-Fund are principally traded.

The Net Asset Value per Share of the different Classes of Shares can differ within each Sub-Fund as a result of the declaration/payment of dividends, differing fee and cost structure for each Class of Shares. In calculating the Net Asset Value, income and expenditure are treated as accruing on a day to day basis.

The Company intends to declare dividends for the Distribution Shares (as defined in the Prospectus) only.

Shareholders owning Distribution Shares are entitled to dividends, which will be determined in accordance with the provisions set out in the Product Annex.

[37] "**Launch Date**" means the date on which the Company issues shares relating to a Sub-Fund for the first time in exchange for the subscription proceeds. Please refer to Section A of the relevant Schedule for the Launch Date of the Share Class(es) of each Sub-Fund.

Specific Valuation Rules

The Net Asset Value of each Sub-Fund shall be determined in accordance with the following rules:

(i) the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued and not yet received is deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof shall be determined after making such discount as may be considered appropriate in such case to reflect the true value thereof;

(ii) the value of all securities which are listed or traded on an official stock exchange or traded on any other Regulated Market (as defined in the Prospectus) will be valued on the basis of the last available prices on the NAV Date immediately preceding the Valuation Day or on the basis of the last available prices on the main market on which the investments of the relevant Sub-Fund are principally traded. The Board of Directors will approve a pricing service which will supply the above prices. If, in the opinion of the Board of Directors, such prices do not truly reflect the fair market value of the relevant securities, the value of such securities will be determined in good faith by the Board of Directors either by reference to any other publicly available source or by reference to such other sources as it deems in its discretion appropriate;

(iii) securities not listed or traded on a stock exchange or a Regulated Market will be valued on the basis of the probable sales price determined prudently and in good faith by the Board of Directors;

(iv) securities issued by open-ended investment funds shall be valued at their last available net asset value or in accordance with item (ii) above where such securities are listed;

(v) the liquidating value of futures, forward or options contracts that are not traded on exchanges or on other organised markets shall be determined pursuant to the policies established by the Board of Directors, on a basis consistently applied. The liquidating value of futures, forward or options contracts traded on exchanges or on other organised markets shall be based upon the last available settlement prices of these contracts on exchanges and organised markets on which the particular futures, forward or options contracts are traded; provided that if a futures, forward or options contract could not be liquidated on such Business Day for which a Net Asset Value is being determined, then the basis for determining the liquidating value of such contract shall be such value as the Board of Directors may deem fair and reasonable;

(vi) liquid assets and money market instruments may be valued at nominal value plus any accrued interest or using an amortised cost method; this amortised cost method may result in periods during which the value deviates from the price the relevant Sub-Fund would receive if it sold the investment. The Management Company may, from time to time, assess this method of valuation and recommend changes, where necessary, to ensure that such assets will be valued at their fair value as determined in good faith pursuant to procedures established by the Board of Directors. If the Board of Directors believes that a deviation from the amortised cost per Share may

result in material dilution or other unfair results to Shareholders, the Board of Directors shall take such corrective action, if any, as it deems appropriate, to eliminate or reduce, to the extent reasonably practicable, the dilution or unfair results;

(vii) the total return swap transactions will be consistently valued based on a calculation of the net present value of their expected cash flows, TRS (as defined in the Prospectus) are marked to market at each NAV Date;

(viii) all other securities and other permissible assets as well as any of the above mentioned assets for which the valuation in accordance with the above sub-paragraphs would not be possible or practicable, or would not be representative of their fair value, will be valued at fair market value, as determined in good faith pursuant to procedures established by the Board of Directors.

The Management Company has adopted within its governance framework appropriate policies and procedures to ensure integrity of the valuation process and to determine the fair value of the assets under management.

The valuation of assets is ultimately governed by the Management Company's governing body, which established pricing committees that assume valuation responsibility. This includes the definition, approval and regular review of pricing methods, the monitoring and control of the valuation process and the handling of pricing issues. In the exceptional case that a pricing committee cannot reach a decision, the issue may be escalated to the board of the Management Company or the Board of Directors for ultimate decision. The functions involved in the valuation process are hierarchically and functionally independent from the portfolio management function.

The valuation results are further monitored and checked for consistency as part of the price determination process and the calculation of the net asset value by the responsible internal teams and the involved service providers.

17.6 Termination of a Sub-Fund and the Company

Each Sub-Fund may be terminated in the circumstances described in the section headed "GENERAL INFORMATION ON THE COMPANY AND THE SHARES - *The Company: Termination of Sub-Funds*" in the Prospectus.

You should also refer to the section headed "GENERAL INFORMATION ON THE COMPANY AND THE SHARES - *The Company: Dissolution and Liquidation of the Company*" in the Prospectus for the circumstances in which the Company may be dissolved and liquidated.

17.7 Notices to Shareholders in General

The Company will issue any notices and associated documentation to the registered holder of the Global Share Certificate, the Common Depositary Nominee, with such notice as is given by the Company in the ordinary course of business. Each Participant shall look solely to its International Central Securities Depositary and the rules and procedures of the relevant International Central Securities Depositary governing delivery of such notices. The Common Depositary Nominee has a contractual obligation to promptly notify the Common Depositary of any notices issued by the Company and to relay any associated documentation issued by the Company to the Common Depositary, which, in turn, has a

contractual obligation to relay any such notices and documentation to the relevant International Central Securities Depositary. Each International Central Securities Depositary will, in turn, relay notices received from the Common Depositary to its Participants in accordance with its rules and procedures.

You would need to rely on your broker-dealer, nominee, custodian bank or other intermediary which is a Participant, or which has an arrangement with a Participant, in the relevant International Central Securities Depositary to receive such notices. Please refer to the section headed "Distribution of notices through the International Central Securities Depositaries" in the "GLOBAL CLEARING AND SETTLEMENT, INTERNATIONAL CENTRAL SECURITIES DEPOSITARY AND COMMON DEPOSITARY" section of the Prospectus for further details.

Notwithstanding the foregoing, unless otherwise specified or required in accordance with the applicable laws and regulations or required by the relevant regulator(s), you will generally be notified of any developments concerning your investment in the Company through the website www.Xtrackers.com or any successors thereto. *You should consult this website regularly.*

17.8 Notice of Meetings and the Exercise of Voting Rights through the International Central Securities Depositaries

The Company will issue notices of general meetings and associated documentation to the registered holder of the Global Share Certificate, the Common Depositary Nominee. Each Participant shall look solely to its International Central Securities Depositary and the rules and procedures of the relevant International Central Securities Depositary governing delivery of such notices and exercising voting rights.

The Common Depositary Nominee has a contractual obligation to promptly notify the Common Depositary of any Shareholder meetings of the Company and to relay any associated documentation issued by the Company to the Common Depositary, which, in turn, has a contractual obligation to relay any such notices and documentation to the relevant International Central Securities Depositary. Each International Central Securities Depositary will, in turn, relay notices received from the Common Depositary to its Participants in accordance with its rules and procedures. In accordance with their respective rules and procedures, each International Central Securities Depositary is contractually bound to collate and transfer all votes received from its Participants to the Common Depositary and the Common Depositary is, in turn, contractually bound to collate and transfer all votes received from each International Central Securities Depositary to the Common Depositary Nominee, which is obligated to vote in accordance with the Common Depositary's voting instructions.

You would need to rely on your broker-dealer, nominee, custodian bank or other intermediary which is a Participant, or which has an arrangement with a Participant, in the relevant ICSD to provide voting instructions.

17.9 Luxembourg Register of Beneficial Owners

The Luxembourg Law of 13 January 2019 creating a Register of Beneficial Owners (the "**Law of 13 January 2019**") entered into force on the 1st of March 2019 (with a 6 month grandfathering period). The Law of 13 January 2019 requires all companies registered on the Luxembourg Company Register, including the Company, to obtain and hold information on their beneficial owners ("Beneficial Owners") at their registered office. The Company must register Beneficial Owner-related information with the Luxembourg Register of beneficial owners, which is established under the authority of the Luxembourg Ministry of Justice.

The Law of 13 January 2019 broadly defines a Beneficial Owner, in the case of corporate entities such as the Company, as any natural person(s) who ultimately owns or controls the Company through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in the Company, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with European Union law or subject to equivalent international standards which ensure adequate transparency of ownership information.

A shareholding of 25% plus one share or an ownership interest of more than 25% in the Company held by a natural person shall be an indication of direct ownership. A shareholding of 25% plus one share or an ownership interest of more than 25% in the Company held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership.

In case the aforementioned Beneficial Owner criteria are fulfilled by an investor with regard to the Company, this investor is obliged by law to inform the Company in due course and to provide the required supporting documentation and information which is necessary for the Company to fulfil its obligation under the Law of 13 January 2019. Failure by the Company and the relevant Beneficial Owners to comply with their respective obligations deriving from the Law of 13 January 2019 will be subject to criminal fines. Should you be unable to verify whether you qualify as a Beneficial Owner, you may approach the Company for clarification at dws-lux-compliance@list.db.com.

17.10 Beneficial Ownership Requirements of the Securities and Exchange Board of India

Where a sub-fund of the Company invests in Indian securities, it is required to open a securities account and to comply with the disclosure requirements for foreign portfolio investors ("**FPIs**") in relation to their beneficial owner(s) and senior managing official(s) pursuant to the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 (the "**Regulation**").

Accordingly, where an end investor (the ultimate beneficial owner) in a sub-fund of the Company holds 10% or more of the outstanding Shares of (i) the Company as a whole or (ii) any of the sub-funds of the Company, it is imperative that the Company is informed, thereby enabling the Company to comply with its disclosure requirements as an FPI under the Regulation.

Ultimate beneficial owners holding 10% or more of Shares in the Company as a whole, or any of the sub-funds of the Company, should inform the Company, as soon as possible and on an ongoing basis, by providing the following information via email to Xtrackers@dws.com:

1. Name of beneficial owner;
2. Number of Shares held as of the relevant date you are providing the information;
3. Percentage of Shares held as of such date;
4. Details of any entity or natural person which has control over the beneficial owner by virtue of for example holding a 10% or more shareholding in the beneficial owner or having control over management or policy decisions including by virtue of their shareholding or management rights or shareholders agreements or voting agreements; and
5. Any entity or person that has control over such entity referred to at 4 above by virtue of any such similar arrangements until the end entity or person in the chain has been determined.

If at any time the information provided to the Company materially changes, or if any entity or person becomes in scope of the requirements of the Regulation, the Company should be informed as soon as possible on an ongoing basis, in line with the above.

17.11 Global Clearing and Settlement, International Central Securities Depositary and Common Depositary

Please refer to the section headed "GLOBAL CLEARING AND SETTLEMENT, INTERNATIONAL CENTRAL SECURITIES DEPOSITARY AND COMMON DEPOSITARY" of the Prospectus for details on the International Central Securities Depositary model of settlement (including, but not limited to, legal title to the Shares, requests for information that may be made by the Company or its duly authorised agent from investors and the International Central Securities Depositaries and how shareholder notifications, voting instructions and payments will be relayed through the International Central Securities Depositary).

APPENDIX 1

The following is a non-exhaustive list of Singapore-recognised collective investment schemes managed by DWS Investment S.A. (as management company) and/or, where applicable, DWS Investment GmbH and/or DWS Investments UK Limited and/or DWS Investments Hong Kong Limited (each as investment manager or sub-portfolio manager) as of the date of this Singapore Prospectus. ***You should note that the list may be subject to change from time to time.***

Xtrackers

- Xtrackers Vietnam Swap UCITS ETF
- Xtrackers MSCI Indonesia Swap UCITS ETF
- Xtrackers MSCI China UCITS ETF
- Xtrackers MSCI Singapore UCITS ETF

Xtrackers II

- Xtrackers II Singapore Government Bond UCITS ETF

DWS Invest SICAV

- DWS Invest Global Infrastructure
- DWS Invest Top Dividend
- DWS Invest Multi Opportunities
- DWS Invest Global Agribusiness

APPENDIX 2 – Sub-Funds of Xtrackers

Schedule 1 - Xtrackers Vietnam Swap UCITS ETF

A. GENERAL INFORMATION

Please refer to Product Annex 40 for more details on this Sub-Fund.

SGX-ST counter name (SGX-ST stock code)	XT Vietnam US$X@ (HD9)
SGX-ST Listing Date	25 March 2009
Reference Index	STOXX Vietnam Total Market Liquid Index
Investment Policy	The Sub-Fund is passively managed in accordance with an Indirect Investment Policy
Investment Manager	DWS Investments UK Limited
Index Administrator	STOXX Ltd.
Swap Counterparty	As of the date of this Singapore Prospectus, each of the following is an approved Swap Counterparty of this Sub-Fund: • Deutsche Bank AG • HSBC Bank plc • Barclays Bank PLC • Goldman Sachs International • Goldman Sachs Bank Europe SE • J.P. Morgan Securities plc • Société Générale • BNP Paribas • Merrill Lynch International • Citigroup Global Markets Limited This Sub-Fund may enter into Unfunded Swaps with one or more approved Swap Counterparties. The list of the approved Swap Counterparties to this Sub-Fund is available on the website www.Xtrackers.com. The approved Swap Counterparties to this Sub-Fund may vary from time to time.
List of exchanges on which the relevant Share Class of this Sub-Fund offered in this Singapore Prospectus is listed as of the date of registration of this Singapore prospectus	Xetra, Borsa Italiana, SIX Swiss Exchange, London Stock Exchange, Stuttgart Stock Exchange, Hong Kong Stock Exchange and SGX-ST

Share Classes of this Sub-Fund offered in this Singapore Prospectus	Class 1C (ISIN Code: LU0322252924)
Launch Date	Class 1C: 15 January 2008
Significant Market	Indirect Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
Denomination Currency	Class 1C: USD
Currency(ies) in which the Singapore Shares are traded on the SGX-ST (i.e. Trading Currency(ies))	Class 1C: USD
Board lot size	1 Singapore Share
Product Suitability*	The Sub-Fund is only suitable for you, if you: • want capital growth rather than regular income; • believe that the STOXX Vietnam Total Market Liquid Index will increase in value over your planned investment holding period; • are prepared to lose some or all of the total capital invested; • are able and willing to invest in a fund: (1) where the Net Asset Value may have a high volatility; (2) which has a high risk grading; and (3) that may invest in financial derivative instruments such as index swap transaction(s); and • are comfortable with investing in a fund which exposes you to asset classes with high volatility and/or limited liquidity, where no strategies are implemented to ensure that you will get back your original investment or capital.

** Please refer to the "IMPORTANT INFORMATION" and the "Risk Factors" sections of this Singapore Prospectus and the "TYPOLOGY OF RISK PROFILES" section of the Prospectus for more information.*

B. INVESTMENT OBJECTIVE, POLICY, FOCUS AND APPROACH

The investment objective of this Sub-Fund is to reflect the performance of the STOXX Vietnam Total Market Liquid Index (the "**Reference Index**").

Please refer to Section M of this Schedule for more information on the Reference Index.

As of the date of this Singapore Prospectus, this Sub-Fund currently carries out its Investment Objective via an Indirect Investment Policy (as described in paragraph 3.4 of this Singapore Prospectus).

As of the date of this Singapore Prospectus, investment strategy (i) (as described in paragraph 3.4 of this Singapore Prospectus) is currently adopted by this Sub-Fund.

Please refer to the "Investment Objective" and "Investment Policy" sections of Product Annex 40 for more details.

For the avoidance of doubt, you should note that this Sub-Fund is not an EIP Sub-Fund. The Singapore Shares of a Sub-Fund which are not classified as prescribed capital markets products and EIPs are capital markets products other than prescribed capital markets products and SIPs.

C. FEES AND EXPENSES

Fees and expenses payable by a Shareholder	
	Class 1C
Conversion Charge	Not applicable
Primary Market Transaction Costs	Applicable
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil
Fees and expenses payable by each Class	
	Class 1C
Management Company Fee[38]	Up to 0.65% p.a.
Fixed Fee[39]	0.20% p.a.
All-In Fee (the sum of the Fixed Fee and the Management Company Fee)	Up to 0.85% p.a.
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it

[38] The Management Company Fee is currently 0.65% p.a. for Share Class 1C. The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Share Class.

[39] Please refer to "Fixed Fee" under the "FEES AND EXPENSES - *Fees and Expenses Payable by the Company*" section of the Prospectus for details.

Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil*

** Some indirect costs may be borne by this Sub-Fund. Please also refer to the "Indirect costs borne by this Sub-Fund" section below.*

The Fixed Fee covers the Depositary Fee, the Administrative Agent Fee and the Registrar, Transfer Agent and Listing Agent Fee and certain Other Administrative Expenses. No establishment costs have been paid out of this Sub-Fund or are currently amortised.

Indirect costs borne by this Sub-Fund

The adjustments to the index performance received by this Sub-Fund under the OTC Swap Transaction(s) in order to account for OTC Swap Transaction Costs may from time to time exceed 0.1% per annum of the Net Asset Value of the relevant Class of Shares. The applicable OTC Swap Transaction Costs with respect to this Sub-Fund are disclosed in the Annual and Semi-annual Reports of the Company. Please also refer to the risk factor "Adjustment to OTC Swap Transaction(s) to reflect certain transaction costs ("**OTC Swap Transaction Costs**")" in paragraph 5 of this Singapore Prospectus for more details.

Full details of the fees and expenses in respect of the Shares of this Sub-Fund are set out in Product Annex 40 and under the heading "FEES AND EXPENSES" in the Prospectus.

D. SPECIFIC RISK FACTORS

The risks set out below are in addition to the risk factors described in paragraph 5 of this Singapore Prospectus.

(1) No guarantee

You should note that this Sub-Fund is not guaranteed and that the capital invested or its respective amount is not guaranteed. If you invest in this Sub-Fund, you should be prepared and be able to sustain losses up to the total capital invested.

(2) Concentration of the Reference Index

You should note that the Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the Net Asset Value of this Sub-Fund.

(3) Additional risks associated with investment in Vietnam

If you invest in this Sub-Fund, you should be aware of the following risks associated with investment in Vietnam:

(a) *Vietnam Market Risk*: Investments in Vietnam are currently exposed to risks pertaining to the Vietnamese market. These include risks brought about by current investment ceiling limits where foreign investors are subject to certain holding limits; potential change of the current market mechanism which may involve the conversion of the existing two securities trading centres and the depository centre from a state agency to a business-oriented legal entity; and constraints currently imposed on trading of listed securities where a registered foreign investor may only maintain a trading

account with one licensed securities company in Vietnam. These may contribute to the illiquidity of the Vietnamese securities market, create inflexibility and uncertainty on the trading environment.

(b) *Legal Risk*: The economy of Vietnam is substantially less developed than those of other geographic regions such as the United States and Europe. The laws and regulations affecting the economy are also in a relatively early stage of development and are not as well established as the laws and regulations of developed countries. Vietnamese securities laws and regulations are still in their development stage and not drafted in a very concise manner which may be subject to interpretation. If there is a securities related dispute involving a foreign party, the laws of Vietnam shall apply (unless an applicable international treaty provides otherwise). The Vietnamese court system is not as transparent and effective as court systems in more developed countries and there can be no assurance of obtaining effective enforcement of rights through legal proceedings in Vietnam and generally the judgements of foreign courts are not recognised.

(c) *Regulatory Risk*: Foreign investment in Vietnam's primary and secondary securities markets is still relatively new and much of Vietnam's existing securities laws are ambiguous and/or have been developed to regulate direct investment by foreigners rather than portfolio investment. You should note that because of a lack of precedent, securities market laws and the regulatory environment for primary and secondary market investments by foreign investors are in the early stages of development, and remain untested. The regulatory framework of the Vietnam primary and secondary securities markets is still in the development stage compared to many of the world's leading stock markets, and accordingly there may be a lower level of regulatory monitoring of the activities of the Vietnam primary and secondary securities markets.

(d) *Foreign Exchange Risk:* The Vietnamese Dong ("**VND**") is a controlled currency, with an official USD/VND reference exchange rate set by the State Bank of Vietnam ("**SBV**") on a daily basis. Interbank rates are allowed to fluctuate within a specified band which may be higher or lower than the SBV's published official rate. You should note the risks of limited liquidity in the Vietnam foreign exchange market.

(e) *Trading Volumes and Volatility:* The Ho Chi Minh Stock Exchange has lower trading volumes and shorter trading hours than most OECD exchanges and the market capitalisations of listed companies are small compared to those on more developed exchanges in developed markets. The listed equity securities of many companies in Vietnam are accordingly materially less liquid, subject to greater dealer spreads and experience materially greater volatility than those of OECD countries. The Ho Chi Minh Stock Exchange has in the past experienced substantial price volatility and no assurance can be given that such volatility will not occur in the future. The above factors could negatively affect the Net Asset Value of this Sub-Fund.

(f) *Level of Premium/Discount of the Share Price of this Sub-Fund to its Net Asset Value:* Similar to other ETFs with overseas investment exposure, it is expected that the level of premium or discount of the Share price of this Sub-Fund to its Net Asset Value may be higher than average, primarily because of exchange rate fluctuations relating to the VND, the differences in trading hours between the Ho Chi Minh Stock Exchange and the SGX-ST and the differences in the settlement cycles between the Ho Chi Minh Stock Exchange and the SGX-ST. Another factor increasing the premium/discount is that this Sub-Fund's investment exposure to Vietnam is subject to some specific market restrictions, including but not limited to the trading limit imposed by the Ho Chi Minh Stock Exchange (please refer to the section headed "Trading limit imposed by the Ho Chi Minh Stock Exchange" below for further details), sub-optimal market liquidity and foreign ownership limits.

(g) *Trading limit imposed by the Ho Chi Minh Stock Exchange:* The Ho Chi Minh Stock Exchange imposes certain daily up/down trading limits from the previous closing price of each listed share. Such trading limits may increase the level of premium or discount of the Share price of this Sub-Fund to its Net Asset Value.

E. MINIMUM INITIAL SUBSCRIPTION AMOUNT AND MINIMUM SUBSEQUENT SUBSCRIPTION AMOUNT

	Class 1C
Minimum initial subscription amount	USD 100,000
Minimum subsequent subscription amount	USD 100,000

F. NUMERICAL EXAMPLE OF HOW SHARES ARE ALLOTTED

Class 1C

The number of Shares allotted based on an investment amount of USD 100,000 at the Net Asset Value per Share of USD 30 is calculated as follows:

e.g.	**USD 100,000**	***/***	**USD 30**	**=**	**3,333.333 Shares**
	Investment amount		Net Asset Value per Share (= Issue Price per Share)		Number of Shares allotted^

^ You should note that no fractions of Shares will be issued and. the Company will only accept subscriptions based on whole number of Shares.

You should note that the Issue Price per Share will vary in line with the Net Asset Value of this Sub-Fund. You should note that the above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the number of Shares to be allotted based on the above investment amount and Issue Price per Share will be calculated.

G. MINIMUM NET ASSET VALUE

The Minimum Net Asset Value of this Sub-Fund is USD 50,000,000.

H. MINIMUM HOLDING REQUIREMENT AND MINIMUM REDEMPTION AMOUNT

	Class 1C
Minimum Holding Requirement	1 Share
Minimum Redemption Amount	1 Share

I. NUMERICAL EXAMPLE OF CALCULATION OF REDEMPTION PROCEEDS

Class 1C

Based on a hypothetical redemption of 1,000 Shares at a Net Asset Value of USD 30 per Share, the redemption proceeds payable to you will be calculated as follows:

e.g.	**1,000 Shares**	**x**	**USD 30**	**=**	**USD 30,000**
	Shares redeemed		Net Asset Value per Share (= redemption price per Share)		Redemption proceeds

You should note that the actual redemption price will vary in line with the Net Asset Value of this Sub-Fund. The above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the redemption proceeds will be calculated.

J. PAST PERFORMANCE OF THE CLASSES OF THIS SUB-FUND AND THIS SUB-FUND'S BENCHMARK

Past performance of the Classes of this Sub-Fund and this Sub-Fund's benchmark as of 30 April 2025:

Classes and benchmark	**Returns over the last one (1) year**	**Returns over the last three (3) years**	**Returns over the last five (5) years**	**Returns over the last ten (10) years**	**Returns since inception** [40]
		(Average annual compounded return)			
Class 1C[41]	-3.56%	-13.68%	0.73%	0.25%	-6.78%

[40] Performance is measured from the inception of Class 1C on 15 January 2008.

[41] Performance is calculated in USD on a Bid to Bid basis. Performance figures over the last one (1) year, the last three (3) years, the last five (5) years, the last ten (10) years and since inception show the percentage change (with net dividends or distributions reinvested, if any, and based on the assumption that investors subscribed on 30 April 2024, 29 April 2022, 30 April 2020, 30 April 2015 or 15 January 2008 (as the case may be) and redeemed on 30 April 2024) taking into account the Upfront Subscription Sales Charge and Redemption Charge (if applicable). For the avoidance of doubt, no Upfront Subscription Sales Charge or Redemption Charge is applicable to this Sub-Fund as at the date of this Singapore Prospectus.

Classes and benchmark	Returns over the last one (1) year	Returns over the last three (3) years	Returns over the last five (5) years	Returns over the last ten (10) years	Returns since inception [40]
		(Average annual compounded return)			
FTSE Vietnam Index	-2.33%	-12.65%	-2.06%	1.70%	-5.55%

Source: DWS Investments Singapore Limited and Bloomberg.

As at 30 April 2025, the benchmark against which the performance of this Sub-Fund was measured was the FTSE Vietnam Index. With effect from 14 October 2025, the benchmark against which the performance of this Sub-Fund is measured has been changed to the STOXX Vietnam Total Market Liquid Index due to the greater liquidity of the new benchmark.

You should note that past performance is not necessarily indicative of the future performance.

K. EXPENSE RATIO(S)

The expense ratio for Class 1C for the year ended 31 December 2024 is as follows:

Class	Expense ratio
Class 1C	0.85%

L. TURNOVER RATIO

The turnover ratio of this Sub-Fund for the year ended 31 December 2024 is 1238.48%.

M. INFORMATION ON THE REFERENCE INDEX

Reference Index

The Reference Index is based on the STOXX Vietnam Total Market Index (the "**Parent Index**"), which aims to represent the Vietnamese listed equity market. The Reference Index excludes companies from the Parent Index which do not fulfil specific liquidity criteria, including but not limited to, minimum thresholds in relation to market capitalisation, average daily traded value, foreign ownership availability, and annualised turnover ratio (the median value of the daily traded volume to free-float shares ratio over a specific period).

You can find details on the Reference Index under the heading “General Description of the Reference Index” in Product Annex 40.

You can find further / the latest available information on the Reference Index from www.stoxx.com. An English language version of the methodology for the Reference Index is available to you upon request at the Company’s registered office.

The top ten components (by weight) of the Reference Index as of 20 October 2025 are set out below:

No.	Name	Weighting (% of the Reference Index)
1.	VINHOMES	12.41%
2.	SAI GON THUONG TIN COMMERCIAL JOINT STOCK BANK	11.75%
3.	HOA PHAT GROUP	8.16%
4.	MASAN GROUP CORP	7.76%
5.	VINGROUP	6.70%
6.	VIX SECURITIES	6.44%
7.	SSI SECURITIES CORP	6.23%
8.	SAIGON - HANOI COMMERCIAL JOINT STOCK BANK	4.46%
9.	GELEX GROUP	4.34%
10.	VINCOM RETAIL	3.19%

N. DIVIDEND POLICY

This Sub-Fund does not currently intend to make any dividend payments for the Shares of Class 1C.

Schedule 2 – Xtrackers MSCI Indonesia Swap UCITS ETF

A. GENERAL INFORMATION

Please refer to Product Annex 56 for more details on this Sub-Fund.

SGX-ST counter name (SGX-ST stock code)	XT MSINDO US$X@ (KJ7)
SGX-ST Listing Date	8 March 2010
Reference Index	MSCI Indonesia TRN Index
Investment Policy	The Sub-Fund is passively managed in accordance with an Indirect Investment Policy
Investment Manager	DWS Investments UK Limited
Index Administrator	MSCI Inc. and its subsidiaries (which include MSCI Limited)
Swap Counterparty	As of the date of this Singapore Prospectus, each of the following is an approved Swap Counterparty of this Sub-Fund: • Deutsche Bank AG • HSBC Bank plc • Barclays Bank PLC • Goldman Sachs International • J.P. Morgan Securities plc • Société Générale • BNP Paribas • Merrill Lynch International • Citigroup Global Markets Limited • Goldman Sachs Bank Europe SE This Sub-Fund may enter into Unfunded Swaps with one or more approved Swap Counterparties. The list of the approved Swap Counterparties to this Sub-Fund is available on the website www.Xtrackers.com. The approved Swap Counterparties to this Sub-Fund may vary from time to time.

List of exchanges on which the relevant Share Class of this Sub-Fund offered in this Singapore Prospectus is listed as of the date of registration of this Singapore Prospectus	London Stock Exchange, Luxembourg Stock Exchange, Borsa Italiana, Xetra and SGX-ST
Share Classes of this Sub-Fund offered in this Singapore Prospectus	Class 1C (ISIN Code: LU0476289623)
Launch Date	Class 1C: 2 March 2010
Significant Market	Indirect Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
Denomination Currency	Class 1C: USD
Currency(ies) in which the Singapore Shares are traded on the SGX-ST (i.e. Trading Currency(ies))	Class 1C: USD
Board lot size	1 Singapore Share
Product Suitability*	The Sub-Fund is <u>only</u> suitable for you, if you: • want capital growth rather than regular income; • believe that the MSCI Indonesia TRN Index will increase in value over your planned investment holding period; • are prepared to lose some or all of the total capital invested; • are able and willing to invest in a fund: (1) where the Net Asset Value may have a high volatility; (2) which has a high risk grading; and (3) that may invest in financial derivative instruments such as index swap transaction(s); and • are comfortable with investing in a fund which exposes you to asset classes with high volatility and/or limited liquidity, where no strategies are implemented to ensure that you will get back your original investment or capital.

** Please refer to the "IMPORTANT INFORMATION" and the "Risk Factors" sections of this Singapore Prospectus and the "TYPOLOGY OF RISK PROFILES" section of the Prospectus for more information.*

B. INVESTMENT OBJECTIVE, POLICY, FOCUS AND APPROACH

The investment objective of this Sub-Fund is to reflect the performance of the MSCI Indonesia TRN Index (the "**Reference Index**"). Please refer to Section M of this Schedule for more information on the Reference Index.

As of the date of this Singapore Prospectus, this Sub-Fund currently carries out its Investment Objective via an Indirect Investment Policy (as described in paragraph 3.4 of this Singapore Prospectus).

As of the date of this Singapore Prospectus, investment strategy (i) (as described in paragraph 3.4 of this Singapore Prospectus) is currently adopted by this Sub-Fund.

Please refer to the "Investment Objective" and "Investment Policy" sections of Product Annex 56 for more details.

For the avoidance of doubt, you should note that this Sub-Fund is not an EIP Sub-Fund. The Singapore Shares of a Sub-Fund which are not classified as prescribed capital markets products and EIPs are capital markets products other than prescribed capital markets products and SIPs.

C. FEES AND EXPENSES

Fees and expenses payable by a Shareholder	
	Class 1C
Conversion Charge	Not applicable
Primary Market Transaction Costs	Applicable
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil
Fees and expenses payable by each Class	
	Class 1C
Management Company Fee[42]	Up to 0.45% p.a.
Fixed Fee[43]	0.20% p.a.
All-In Fee (the sum of the Fixed Fee and the Management Company Fee)	Up to 0.65% p.a.

[42] The Management Company Fee is currently 0.45% p.a. for Share Class 1C. The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Share Class.

[43] Please refer to "Fixed Fee" under the "FEES AND EXPENSES - *Fees and Expenses Payable by the Company*" section of the Prospectus for details.

Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil*

** Some indirect costs may be borne by this Sub-Fund. Please also refer to the "Indirect costs borne by this Sub-Fund" section below.*

The Fixed Fee covers the Depositary Fee, the Administrative Agent Fee and the Registrar, Transfer Agent and Listing Agent Fee and certain Other Administrative Expenses. No establishment costs have been paid out of this Sub-Fund or are currently amortised.

Indirect costs borne by this Sub-Fund

The adjustments to the index performance received by this Sub-Fund under the OTC Swap Transaction(s) in order to account for OTC Swap Transaction Costs may from time to time exceed 0.1% per annum of the Net Asset Value of the relevant Class of Shares. The applicable OTC Swap Transaction Costs with respect to this Sub-Fund are disclosed in the Annual and Semi-annual Reports of the Company. Please also refer to the risk factor "Adjustment to OTC Swap Transaction(s) to reflect certain transaction costs ("**OTC Swap Transaction Costs**")" in paragraph 5 of this Singapore Prospectus for more details.

Full details of the fees and expenses in respect of the Shares of this Sub-Fund are set out in Product Annex 56 and under the heading "FEES AND EXPENSES" in the Prospectus.

D. SPECIFIC RISK FACTORS

The risks set out below are in addition to the risk factors described in paragraph 5 of this Singapore Prospectus.

(1) No guarantee

You should note that this Sub-Fund is not guaranteed and that the capital invested or its respective amount is not guaranteed. If you invest in this Sub-Fund, you should be prepared and be able to sustain losses up to the total capital invested.

(2) Concentration of the Reference Index

You should note that the Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the Net Asset Value of this Sub-Fund.

(3) Additional risks associated with investment in Emerging Markets

If you invest in this Sub-Fund, you should be aware of the following risks associated with an investment in emerging markets:

(a) *Emerging Market Risk*: Investments in the market to which the Reference Index relates are currently exposed to risks pertaining to emerging markets generally. These include risks brought about by investment ceiling limits where foreign investors are subject to certain holding limits and constraints

imposed on trading of listed securities where a registered foreign investor may only maintain a trading account with one licensed securities company in the relevant market. These may contribute to the illiquidity of the relevant securities market, as well as create inflexibility and uncertainty as to the trading environment.

(b) *Legal Risk*: The economies of most emerging markets are often substantially less developed than those of other geographic regions such as the United States and Europe. The laws and regulations affecting these economies are also in a relatively early stage of development and are not as well established as the laws and regulations of developed countries. Such countries' securities laws and regulations may still be in their development stages and not drafted in a very concise manner which may be subject to interpretation. If there is a securities related dispute involving a foreign party, the laws of these countries would typically apply (unless an applicable international treaty provides otherwise). The court systems of these nations are not as transparent and effective as court systems in more developed countries or territories and there can be no assurance of obtaining effective enforcement of rights through legal proceedings and generally the judgements of foreign courts are often not recognised.

(c) *Regulatory Risk*: Foreign investment in emerging economies' primary and secondary securities markets is often still relatively new and much of the relevant securities laws may be ambiguous and/or have been developed to regulate direct investment by foreigners rather than portfolio investment. You should note that because of a lack of precedent, securities market laws and the regulatory environment for primary and secondary market investments by foreign investors can be in the early stages of development, and may, in some jurisdictions, remain untested. The regulatory framework of the emerging economies' primary and secondary securities markets is often in the development stage compared to many of the world's leading stock markets, and accordingly there may be a lower level of regulatory monitoring of the activities of the emerging economies' primary and secondary securities markets.

(d) *Foreign Exchange Risk*: Some currencies of emerging markets are controlled. You should note the risks of limited liquidity in certain foreign exchange market€(e) *Trading Volumes and Volatility*: Often emerging market stock exchanges are smaller and have lower trading volumes and shorter trading hours than most OECD exchanges and the market capitalisations of listed companies are small compared to those on more developed exchanges in developed markets. The listed equity securities of many companies on such exchanges are accordingly materially less liquid, subject to greater dealer spreads and experience materially greater volatility than those of OECD countries. Many such exchanges have, in the past, experienced substantial price volatility and no assurance can be given that such volatility will not occur in the future. The above factors could negatively affect the Net Asset Value of this Sub-Fund.

(e) *Level of Premium/Discount of the Share Price of this Sub-Fund to its Net Asset Value*: Similar to other ETFs with overseas investment exposure, it is expected that the level of premium or discount of the Share price of this Sub-Fund to its Net Asset Value may be higher than average, primarily because of exchange rate fluctuations relating to the relevant currencies, the differences in trading hours between the relevant exchanges and the SGX-ST and the differences in the settlement cycles between the relevant exchanges and the SGX-ST. Another factor increasing the premium/discount is that this Su'-Fund's investment exposure to certain emerging markets are subject to some specific market restrictions, including but not limited to trading limits, sub-optimal market liquidity and foreign ownership limits.

E. MINIMUM INITIAL SUBSCRIPTION AMOUNT AND MINIMUM SUBSEQUENT SUBSCRIPTION AMOUNT

	Class 1C
Minimum initial subscription amount	USD 100,000
Minimum subsequent subscription amount	USD 100,000

F. NUMERICAL EXAMPLE OF HOW SHARES ARE ALLOTTED

Class 1C

The number of Shares allotted based on an investment amount of USD 100,000 at the Net Asset Value per Share of USD 10 is calculated as follows:

e.g.	**USD 100,000**	**/**	**USD 10**	**=**	**10,000 Shares**
	Investment amount		Net Asset Value per Share (= Issue Price per Share)		Number of Shares allotted^

^ You should note that no fractions of Shares will be issued and the Company will only accept subscriptions based on whole number of Shares.

You should note that the Issue Price per Share will vary in line with the Net Asset Value of this Sub-Fund. You should note that the above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the number of Shares to be allotted based on the above investment amount and Issue Price per Share will be calculated.

G. MINIMUM NET ASSET VALUE

The Minimum Net Asset Value of this Sub-Fund is USD 50,000,000.

H. MINIMUM HOLDING REQUIREMENT AND MINIMUM REDEMPTION AMOUNT

	Class 1C
Minimum Holding Requirement	1 Share
Minimum Redemption Amount	1 Share

I. NUMERICAL EXAMPLE OF CALCULATION OF REDEMPTION PROCEEDS

Class 1C

Based on a hypothetical redemption of 10,000 Shares at a Net Asset Value of USD 10 per Share, the redemption proceeds payable to you will be calculated as follows:

e.g.	**10,000 Shares**	**x**	**USD 10**	**=**	**USD 100,000**
	Shares redeemed		Net Asset Value per Share (= redemption price per Share)		Redemption proceeds

You should note that the actual redemption price will vary in line with the Net Asset Value of this Sub-Fund. The above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the redemption proceeds will be calculated.

J. PAST PERFORMANCE OF THE CLASSES OF THIS SUB-FUND AND THIS SUB-FUND'S BENCHMARK

Past performance of the Classes of this Sub-Fund and this Sub-Fund's benchmark as of 30 April 2025:

Classes and benchmark	**Returns over the last one (1) year**	**Returns over the last three (3) years**	**Returns over the last five (5) years**	**Returns over the last ten (10) years**	**Returns since inception [44]**
		(Average annual compounded return)			
Class 1C[45]	-15.14%	-8.92%	4.72%	-0.58%	1.34%
MSCI Indonesia TRN Index	-14.69%	-8.33%	5.53%	0.18%	2.10%

[44] Performance is measured from the inception of Class 1C on 2 March 2010.
[45] Performance is calculated in USD on a Bid to Bid basis. Performance figures over the last one (1) year, the last three (3) years, the last five (5) years, the last ten (10) years and since inception show the percentage change (with net dividends or distributions reinvested, if any, and based on the assumption that investors subscribed on 30 April 2024, 29 April 2022, 30 April 2020, 30 April 2015 or 2 March 2010 (as the case may be) and redeemed on 30 Apr 2024) taking into account the Upfront Subscription Sales Charge and Redemption Charge (if applicable). For the avoidance of doubt, no Upfront Subscription Sales Charge or Redemption Charge is applicable to this Sub-Fund as at the date of this Singapore Prospectus.

Classes and benchmark	Returns over the last one (1) year	Returns over the last three (3) years	Returns over the last five (5) years	Returns over the last ten (10) years	Returns since inception [44]

Source: DWS Investments Singapore Limited and Bloomberg.

The benchmark against which the performance of this Sub-Fund is measured is the MSCI Indonesia TRN Index.

You should note that past performance is not necessarily indicative of the future performance.

K. EXPENSE RATIO(S)

The expense ratio for Class 1C for the year ended 31 December 2024 is as follows:

Class	Expense ratio
Class 1C	0.65%

L. TURNOVER RATIO

The turnover ratio of this Sub-Fund for the year ended 31 December 2024 is 1180.20%.

M. INFORMATION ON THE REFERENCE INDEX

The Reference Index is a free float-adjusted market capitalisation weighted index reflecting the performance of listed equity securities of large and mid-capitalisation companies of Indonesia. The Reference Index is a total return net index which calculates the performance of the index constituents on the basis that any dividends or distributions are reinvested after the deduction of any taxes that may apply.

You can find details on the Reference Index under the heading “General Description of the Reference Index” in Product Annex 56.

You can find further / the latest available information on the Reference Index from www.msci.com. An English language version of the methodology for the Reference Index is available to you upon request at the Company’s registered office.

The top ten components (by weight) of the Reference Index as of 20 October 2025 are set out below:

No.	Name	Weighting (% of the Reference Index)
1.	BANK CENTRAL ASIA	27.13%
2.	BANK RAKYAT INDONESIA	16.24%
3.	BANK MANDIRI	10.60%
4.	TELKOM INDONESIA	9.15%

5.	ASTRA INTERNATIONAL	6.42%
6.	CHANDRA ASRI PACIFIC	4.42%
7.	BANK NEGARA INDONESIA	3.79%
8.	AMMAN MINERAL INTERNASIONAL	3.18%
9.	BARITO PACIFIC	3.16%
10.	GOTO GOJEK TOKOPEDIA	3.13%

N. DIVIDEND POLICY

This Sub-Fund does not currently intend to make any dividend payments for the Shares of Class 1C.

Schedule 3 – Xtrackers MSCI China UCITS ETF

A. GENERAL INFORMATION

Please refer to Product Annex 61 for more details on this Sub-Fund.

SGX-ST counter name (SGX-ST stock code)	XT MSCHINA US$ (LG9) XT MSCHINA S$ (TID)
SGX-ST Listing Date	30 June 2010
Reference Index	MSCI China TRN Index
Investment Policy	The Sub-Fund is passively managed in accordance with a Direct Investment Policy and is a Full Replication Fund
Investment Manager	DWS Investment GmbH
Sub-Portfolio Manager	DWS Investments UK Limited DWS Investments Hong Kong Limited (Internal sub-delegation, at the discretion of the Investment Manager)
Index Administrator	MSCI Inc. and its subsidiaries (which include MSCI Limited)
List of exchanges on which the relevant Share Class of this Sub-Fund offered in this Singapore Prospectus is listed as of the date of registration of this Singapore prospectus	Borsa Italiana, London Stock Exchange, Xetra, SIX Swiss Exchange, Luxembourg Stock Exchange, Mexican Stock Exchange and SGX-ST
Share Classes of this Sub-Fund offered in this Singapore Prospectus	Class 1C (ISIN Code: LU0514695690)
Launch Date	Class 1C: 24 June 2010
Significant Market	Direct Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
Denomination Currency	Class 1C: USD
Currency(ies) in which the Singapore Shares are traded on the SGX-ST (i.e. Trading Currency(ies))	Class 1C: USD (primary currency) Class 1C: SGD (secondary currency)
Board lot size	1 Singapore Share
Product Suitability*	The Sub-Fund is only suitable for you, if you:

	• want capital growth rather than regular income; • believe that the MSCI China TRN Index will increase in value over your planned investment holding period; • are prepared to lose some or all of the total capital invested; • are able and willing to invest in a fund: (1) where the Net Asset Value may have a high volatility; and (2) which has a high risk grading; and • are comfortable with investing in a fund which exposes you to asset classes with high volatility and/or limited liquidity, where no strategies are implemented to ensure that you will get back your original investment or capital.

** Please refer to the "IMPORTANT INFORMATION" and the "Risk Factors" sections of this Singapore Prospectus and the "TYPOLOGY OF RISK PROFILES" section of the Prospectus for more information.*

B. INVESTMENT OBJECTIVE, POLICY, FOCUS AND APPROACH

The investment objective of this Sub-Fund is to reflect the performance of the MSCI China TRN Index (the "**Reference Index**"). Please refer to Section M of this Schedule for more information on the Reference Index.

As at the date of this Singapore Prospectus, this Sub-Fund carries out its Investment Objective via a Direct Investment Policy and adopts the investment policy as described in the relevant Product Annex and paragraph 3.3 of this Singapore Prospectus.

This Sub-Fund may directly trade A-shares through Stock Connect.

Under Stock Connect, overseas investors (including this Sub-Fund) may be allowed, subject to rules and regulations issued/amended from time to time, to directly trade certain eligible A-shares through the so-called Northbound Trading Links (see below).

Stock Connect currently comprises the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect. The Shanghai-Hong Kong Stock Connect is a securities trading and clearing links program developed by Hong Kong Exchanges and Clearing Limited ("**HKEx**"), China Securities Depository and Clearing Corporation Limited ("**ChinaClear**") and the Shanghai Stock Exchange ("**SSE**"), with an aim to achieve mutual stock market access between Shanghai and Hong Kong. Similarly, the Shenzhen-Hong Kong Stock Connect is a securities trading clearing links program developed by HKEx, ChinaClear and the Shenzhen Stock Exchange ("**SZSE**"), with an aim to achieve mutual stock market access between Shenzhen and Hong Kong.

Stock Connect comprises two Northbound Trading Links (for investment in A-shares), one between SSE and The Stock Exchange of Hong Kong Limited ("**SEHK**"), and the other between SZSE and SEHK. Investors may place orders to trade eligible A-shares listed on SSE (such securities, "**SSE Securities**") or on SZSE (such securities, "**SZSE Securities**", and SSE Securities and SZSE Securities collectively, "**Stock Connect Securities**") through their Hong Kong brokers, and such orders will be routed by the relevant securities trading service company established by the SEHK to the relevant trading platform of SSE or SZSE, as the case may be, for matching and execution on SSE or SZSE, as the case may be.

The SSE Securities include all the constituent stocks of the SSE 180 Index and the SSE 380 Index, and all the SSE-listed A-shares that are not included as constituent stocks of the relevant indices but which have corresponding H-Shares listed on SEHK, except (i) those SSE-listed shares which are not traded in Renminbi ("**RMB**") and (ii) those SSE-listed shares which are under "risk alert".

The SZSE Securities include all the constituent stocks of the SZSE Component Index and the SZSE Small/Mid Cap Innovation Index which have a market capitalisation of not less than RMB 6 billion and all the SZSE-listed A-shares which have corresponding H-Shares listed on SEHK, except (i) those SZSE-listed shares which are not traded in Renminbi and (ii) those SZSE-listed shares which are under "risk alert".

The list of eligible securities may be changed subject to the review and approval by the relevant regulators in the People's Republic of China ("**PRC**") from time to time.

Further information about Stock Connect is available online at the website: http://www.hkex.com.hk/eng/market/sec_tradinfra/chinaconnect/chinaconnect.htm.

Please refer to the "Investment Objective" and "Investment Policy" sections of Product Annex 61 for more details.

You should note that this Sub-Fund is an EIP Sub-Fund. In accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products and EIPs, the EIP Sub-Fund does not and will not invest in any product, or engage in any transaction, which will cause its Shares not to be regarded as prescribed capital markets products or EIPs.

C. FEES AND EXPENSES

Fees and expenses payable by a Shareholder	
	Class 1C
Conversion Charge	Not applicable
Primary Market Transaction Costs	Applicable
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil
Fees and expenses payable by each Class	
	Class 1C

Management Company Fee[46]	Up to 0.40% p.a.
Fixed Fee[47]	0.25% p.a.
All-In Fee (the sum of the Fixed Fee and the Management Company Fee)	Up to 0.65% p.a.
Transaction Costs[48]	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil

The Fixed Fee covers the Depositary Fee, the Administrative Agent Fee and the Registrar, Transfer Agent and Listing Agent Fee and certain Other Administrative Expenses. No establishment costs have been paid out of this Sub-Fund or are currently amortised.

Full details of the fees and expenses in respect of the Shares of this Sub-Fund are set out in Product Annex 61 and under the heading "FEES AND EXPENSES" in the Prospectus.

D. SPECIFIC RISK FACTORS

The risks set out below are in addition to the risk factors described in paragraph 5 of this Singapore Prospectus.

(1) No guarantee

You should note that this Sub-Fund is not guaranteed and that the capital invested or its respective amount is not guaranteed. If you invest in this Sub-Fund, you should be prepared and be able to sustain losses up to the total capital invested.

(2) Concentration of the Reference Index

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

(3) Additional risks associated with an investment in the PRC

If you invest in this Sub-Fund, you should be aware of the following risks associated with investment in the People's Republic of China ("**PRC**" for purpose of this Schedule):

[46] The Management Company Fee is currently 0.40% p.a. for Share Class 1C. The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Share Class.
[47] Please refer to "Fixed Fee" under the "FEES AND EXPENSES - *Fees and Expenses Payable by the Company*" section of the Prospectus for details.
[48] Transaction Costs means any costs and expenses incurred in respect of the buying and selling of portfolio securities and financial instruments, brokerage fees and commissions, interest or taxes payable in respect of such purchase and sale transactions, as may be more fully described in the Product Annex.

(a) *Political, Economic and Social Risks*: Any political changes, social instability and unfavourable diplomatic developments which may take place in or in relation to the PRC could result in the imposition of additional governmental restrictions including expropriation of assets, confiscatory taxes or nationalisation of some of the constituents of the Reference Index. You should also note that any change in the policies of the PRC may impose an adverse impact on the securities markets in such place as well as the performance of this Sub-Fund.

(b) *PRC Economic Risks:* The economy in the PRC has experienced rapid growth in recent years. However, such growth may or may not continue, and may not apply evenly across different sectors of the PRC economy. The PRC government has also implemented various measures from time to time to prevent overheating of the economy. Furthermore, the transformation of the PRC from a socialist economy to a more market-oriented economy has led to various economic and social disruptions in the PRC and there can be no assurance that such a transformation will be continued or be successful. All these may have an adverse impact upon the performance of this Sub-Fund.

(c) *Legal System of the PRC:* The legal system of the PRC is based on written laws and regulations. However, many of these laws and regulations are still untested and the enforceability of such laws and regulations remains unclear. China is still developing the legal framework required to support a market economy. Fundamental civil, criminal, tax, administrative, property and commercial laws in China are frequently amended. Risk factors relating to the legal system of the China markets that create uncertainties with respect to the investment and investment-related decisions that the Sub-Fund may make include: inconsistencies among governmental, ministerial and local orders, decisions, resolutions and other acts; inefficient administrative regulatory environment; the lack of judicial and administrative guidance on interpreting legislation; substantial gaps in the regulatory structure due to delay or absence of implementing legislation; a high degree of discretion on the part of governmental authorities. Such regulations also empower the China Securities Regulatory Commission and the State Administration of Foreign Exchange to exercise discretion in their respective interpretation of the regulations, which may result in uncertainties in their application.

(d) *Taxation in the PRC:* Various tax reforms and policies have been implemented by the PRC government authorities in recent years, and existing tax laws and regulations may be revised or amended in the future. Any changes in tax policies may reduce the after-taxation profits of the companies in the PRC and detrimentally impact the performance of the Reference Index, to which this Sub-Fund is linked.

This Sub-Fund will gain economic exposure to the constituents of the Reference Index. This Sub-Fund shall bear any costs and liability including transaction costs, taxes or liabilities relating to the purchase or sale of the relevant securities. Such costs, taxes or liabilities (which may be imposed presently or in the future) may affect the Net Asset Value of this Sub-Fund.

(e) *PRC taxation on capital gains*

H-shares[49] and other overseas listed shares: in the absence of any specific PRC tax laws, capital gains derived by non-PRC resident enterprise investors from the disposal of H-shares and other overseas listed shares issued by PRC companies are subject to withholding income tax at the rate of 10% based on the general principles of the PRC Enterprise Income Tax Law and its Implementation Rules, unless such tax is reduced or eliminated by an applicable double taxation treaty or special tax rules to be issued by the PRC Ministry of Finance ("**MOF**") and/or the State Taxation Administration ("**STA**") in the future. There are uncertainties as to the interpretation and application of such general principles of PRC tax laws. These uncertainties include whether and how withholding income tax on capital gains realised by non-PRC resident enterprise investors upon the disposal of such equity interests shall be collected by the PRC tax authorities and to date, such withholding income tax has not been enforced by the PRC tax authorities on capital gains realised by non-PRC resident enterprise investors where the purchase and subsequent disposal have been concluded on an exchange. If there is any such withholding income tax liability arising from the sale or other disposal of H-shares and other overseas listed shares, this Sub-Fund shall be exposed to the economic risks of such tax.

A-shares: On 14 November 2014, MOF, STA and CSRC jointly issued a notice in relation to the taxation rule on Shanghai-Hong Kong Stock Connect under Caishui [2014] No.81 ("Notice No.81"). Moreover, on 23 March, 2016, MOF and STA jointly issued a notice in relation to levying value-added tax to replace business tax under Caishui [2016] No.36 ("Notice No. 36"). In addition, on 1 December 2016, MOF, STA and CSRC jointly issued a notice in relation to the taxation rule on Shenzhen-Hong Kong Stock Connect under Caishui [2016] No.127 ("Notice No. 127"). Under Notice No.81, corporate income tax, individual income tax and business tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including this Sub-Fund) on the trading of A-shares through Shanghai-Hong Kong Stock Connect with effect from 17 November 2014. Under Notice No. 36, all business tax taxpayers shall be required to pay value-added tax instead of business tax, and value-added tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including the Sub-Fund) on the trading of A-shares through Shanghai-Hong Kong Stock Connect with effect from 1 May 2016. Under

[49] H-shares are securities of companies incorporated in the PRC and nominated by the Central Government for listing and trading on the Hong Kong stock exchange. They are quoted and traded in Hong Kong and U.S. dollars. Like other securities trading on the Hong Kong stock exchange, there are no restrictions on who can trade H-shares.

Notice No. 127, corporate income tax, individual income tax and value-added tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including this Sub-Fund) on the trading of A-shares under the Shenzhen Hong Kong Stock Connect Program with effect from 5 December 2016.

(f) *PRC withholding income tax on dividends and bonuses*

H-shares and other overseas listed shares: PRC issuers of H-shares and other overseas listed shares are currently required to withhold income tax at a rate of 10% on dividend and bonus payments distributed to non-PRC resident enterprise investors. If non-PRC resident enterprise investors are eligible to a lower withholding income tax rate according to the applicable double tax treaty, they may apply for a refund of the overpaid withholding income tax with the PRC tax authority.

A-shares: However, under both Notice No.81 and Notice No.127, Hong Kong and overseas investors are required to pay income tax on dividends and/or bonus shares at the rate of 10 percent. which will be withheld and paid to the relevant tax authority by the listed companies. If the Hong Kong and overseas investors such as this Sub-Fund are eligible for treaty relief on dividends, the Hong Kong and overseas investors can apply for the entitlement of treaty relief and refund of the overpaid tax with the PRC tax authority having jurisdiction over the A-share issuing company.

The Board of Directors intends to make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. There is a possibility of the rules being changed and taxes being applied retrospectively. As such, any provision for taxation made by the Board of Directors may be excessive or inadequate to meet final PRC tax liabilities.

Consequently, Shareholders may be advantaged or disadvantaged depending upon the final tax liabilities, the level of provision and when they subscribed and/or redeemed their Shares. If the actual applicable tax rate levied by STA is higher or more widely applicable than that provided for by the Board of Directors so that there is a shortfall in the tax provision amount, you should note that the Net Asset Value of this Sub-Fund may suffer more than the tax provision amount as this Sub-Fund will ultimately have to bear the additional tax liabilities. In this case, the then existing and new Shareholders will be disadvantaged.

On the other hand, if the actual applicable tax rate levied by STA is lower or less widely applicable than that provided for by the Board of Directors so that there is an excess in the tax provision amount, Shareholders who have redeemed their Shares before STA's ruling, decision or guidance (or before any such ruling, decision or guidance is considered final) in this respect will be disadvantaged as they would have borne the loss from the Board of Directors' overprovision. In this case, the then existing and new Shareholders may benefit if the difference between the tax provision and the actual taxation liability under that lower tax rate can be returned to the

account of this Sub-Fund as assets thereof. Notwithstanding the above provisions, Shareholders who have already redeemed their Shares in this Sub-Fund before the return of any overprovision to the account of this Sub-Fund will not be entitled or have any right to claim any part of such overprovision.

The above summary of PRC taxation is of a general nature, for information purposes only, and is not intended to be an exhaustive list of all of the tax considerations that may be relevant to a decision to purchase, own, redeem or otherwise dispose of Shares. This summary does not constitute legal or tax advice and does not purport to deal with the tax consequences applicable to all categories of investors. Prior to investing in the Shares, you should consult your own independent professional advisers as to the implications of your subscribing for, purchasing, holding, redeeming or disposing of Shares both under the laws and practice of the PRC and the laws and practice of your jurisdiction. The relevant laws, rules and practice relating to tax are subject to change and amendment. As such, there can be no guarantee that the summary provided above will continue to be applicable after the date of this Singapore Prospectus.

(g) *Accounting and Reporting Standards:* Accounting, auditing and financial reporting standards and practices applicable to companies in some parts of the PRC may differ from those in countries that have more developed financial markets. These differences may lie in areas such as different valuation methods of the properties and assets, and the requirements for disclosure of information to investors.

(h) *Stock Connect risks*

Quota limitations risk

Stock Connect is subject to daily quota limitations on investment, which may restrict this Sub-Fund's ability to invest in A-shares through Stock Connect on a timely basis, and this Sub-Fund may not be able to effectively pursue its investment policies.

Suspension risk

SEHK, SSE and SZSE reserve the right to suspend trading if necessary for ensuring an orderly and fair market and managing risks prudently which would adversely affect this Sub-Fund's ability to access the PRC market.

Differences in trading day

Stock Connect operates on days when both the relevant PRC market and the Hong Kong market are open for trading and when banks in the relevant PRC market and the Hong Kong market are open on the corresponding settlement days. It is possible that there are occasions when it is a normal trading day for the relevant PRC market but Hong Kong and overseas investors (such as this Sub-Fund) cannot carry out any A-shares trading via Stock Connect. As a result, this Sub-Fund may be subject to a risk of price fluctuations in A-shares during the time when Stock Connect is not trading.

Restrictions on selling imposed by front-end monitoring

PRC regulations require that before an investor sells any share, there should be sufficient shares in the account; otherwise SSE or SZSE (as the case may be) will reject the sell order concerned. SEHK will carry out pre-trade checking on A-shares sell orders of its participants (i.e. the stock brokers) to ensure there is no over-selling.

Clearing, settlement and custody risks

The Hong Kong Securities Clearing Company Limited (the "**HKSCC**", which is a wholly-owned subsidiary of HKEx) and ChinaClear establish the clearing links and each is a participant of each other to facilitate clearing and settlement of cross-boundary trades. As the national central counterparty of the PRC's securities market, ChinaClear operates a comprehensive network of clearing, settlement and stock holding infrastructure. ChinaClear has established a risk management framework and measures that are approved and supervised by the CSRC. The chances of a ChinaClear default are considered to be remote.

Should the remote event of a ChinaClear default occur and ChinaClear be declared as a defaulter, HKSCC will in good faith, seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or through ChinaClear's liquidation. In that event, this Sub-Fund may suffer delay in the recovery process or may not be able to fully recover its losses from ChinaClear.

A-shares are issued in scripless form, so there will be no physical certificates of title representing the interests of this Sub-Fund in any A-shares. Hong Kong and overseas investors, such as this Sub-Fund, who have acquired Stock Connect Securities through Northbound Trading Links should maintain Stock Connect Securities with their brokers' or custodians' stock accounts with the Central Clearing and Settlement System operated by HKSCC for the clearing securities listed or traded on SEHK. Further information on the custody set-up relating to Stock Connect is available upon request at the registered office of the Management Company.

Operational risk

Stock Connect provides a channel for investors from Hong Kong and overseas, such as this Sub-Fund, to access the China stock market directly. The securities regimes and legal systems of the two markets differ significantly and in order for the platform to operate, market participants may need to address issues arising from the differences on an on-going basis.

Stock Connect is premised on the functioning of the operational systems of the relevant market participants. Market participants are able to participate in this program subject to meeting certain information technology capability, risk management and other requirements as may be specified by the relevant exchange and/or clearing house.

Further, the "connectivity" in Stock Connect program requires routing of orders across the border. This requires the development of new information technology systems on the part of the SEHK and exchange participants (i.e. an order routing system ("**China Stock Connect System**") set up by SEHK to which exchange participants need to connect). There is no assurance that the systems of the SEHK and market participants will function properly or will continue to be adapted to changes and developments in both markets. In the event that the relevant systems fail to function properly, trading in both markets through the program could be disrupted. This Sub-Fund's ability to access the A-share market (and hence to pursue its investment strategy) will be adversely affected.

Nominee arrangements in holding A-shares

HKSCC is the "nominee holder" of the Stock Connect Securities acquired by overseas investors (including this Sub-Fund) through Stock Connect. The CSRC Stock Connect Rules expressly provide that investors enjoy the rights and benefits of the Stock Connect Securities acquired through Stock Connect in accordance with applicable laws. CSRC has also made statements dated 15 May 2015 and 30 September 2016 that overseas investors that hold Stock Connect Securities through HKSCC are entitled to proprietary interests in such securities as shareholders. However, it is still possible that the courts in the PRC may consider that any nominee or custodian as registered holder of Stock Connect Securities would have full ownership thereof, and that even if the concept of beneficial ownership is recognized under PRC law those Stock Connect Securities would form part of the pool of assets of such entity available for distribution to creditors of such entities and/or that a beneficial owner may have no rights whatsoever in respect thereof. Consequently, this Sub-Fund and the Depositary cannot ensure that this Sub-Fund's ownership of these securities or title thereto is assured in all circumstances.

Under the rules of the Central Clearing and Settlement System operated by HKSCC for the clearing of securities listed or traded on SEHK, HKSCC as nominee holder shall have no obligation to take any legal action or court proceeding to enforce any rights on behalf of the investors in respect of the Stock Connect Securities in the PRC or elsewhere. Therefore, although the relevant Sub-Fund's ownership may be ultimately recognised, the Sub-Fund may suffer difficulties or delays in enforcing its rights in A-shares.

To the extent that HKSCC is deemed to be performing safekeeping functions with respect to assets held through it, it should be noted that the Depositary and this Sub-Fund will have no legal relationship with HKSCC and no direct legal recourse against HKSCC in the event that this Sub-Fund suffers losses resulting from the performance or insolvency of HKSCC.

Investor compensation

Investments of this Sub-Fund through Stock Connect will not be covered by Hong Kong's Investor Compensation Fund. Hong Kong's Investor Compensation Fund is established to pay compensation to investors of any nationality who suffer pecuniary losses as a result of default of a licensed intermediary or authorised financial institution in relation to exchange-traded products in Hong Kong.

Since Northbound trading via Stock Connect does not involve products listed or traded in SEHK or Hong Kong Futures Exchange Limited, such trading will not be covered by the Investor Compensation Fund. On the other hand, since this Sub-Fund is carrying out Northbound trading through securities brokers in Hong Kong but not PRC brokers, it is not protected by the China Securities Investor Protection Fund in the PRC.

Trading costs

In addition to paying trading fees and stamp duties in connection with A-share trading, this Sub-Fund may be subject to new portfolio fees, dividend tax and tax concerned with income arising from stock trades which are yet to be determined by the relevant authorities.

Regulatory risk

Stock Connect is relatively novel in nature, and is subject to regulations promulgated by regulatory authorities and implementation rules made by the stock exchanges in the PRC and Hong Kong. Further, new regulations may be promulgated from time to time by the regulators in connection with operations and cross-border legal enforcement in connection with cross-border trades under Stock Connect.

The regulations are subject to change. There can be no assurance that Stock Connect will not be abolished. This Sub-Fund which may invest in the PRC markets through Stock Connect may be adversely affected as a result of such changes.

(i) *Dependence upon Trading Market for A-shares*:

The existence of a liquid trading market for the A-shares may depend on whether there is supply of, and demand for, A-shares. Investors should note that SSE and SZSE on which A-shares are traded are undergoing development and the market capitalisation of, and trading volumes on, those exchanges may be lower than those in more developed financial markets. Market volatility and settlement difficulties in the A-share markets may result in significant fluctuation in the prices of the securities traded on such markets and thereby changes in the Net Asset Value of this Sub-Fund.

(j) *Restricted markets risk*

This Sub-Fund may invest in securities in respect of which the PRC imposes limitations or restrictions on foreign ownership or holdings. Such legal and regulatory restrictions or limitations may have adverse effects on the liquidity and performance of the Sub-Fund holdings as compared to the performance of the Reference Index. This may increase the risk of tracking error and, at the worst, this Sub-Fund may not be able to achieve its investment objective and/or this Sub-Fund may have to be closed for further subscriptions.

(k) *A-share market trading hours difference risk*

Differences in trading hours between foreign stock exchanges (e.g. SSE and SZSE) and the relevant stock exchange may increase the level of premium/discount of the Share price to its Net Asset Value because if a PRC stock exchange is closed while the relevant stock exchange is open, the Reference Index level may not be available.

The prices quoted by the relevant stock exchange market maker would therefore be adjusted to take into account any accrued market risk that arises from such unavailability of the Reference Index level and as a result, the level of premium or discount of the Share price of the relevant Share Class to its Net Asset Value may be higher.

(l) *A-share market suspension risk*

A-shares may only be bought or sold when the relevant A-shares are traded on SSE or SZSE, as appropriate. Given that the A-share market is considered volatile and unstable (with the risk of suspension of a particular stock and/or the whole market, whether as a result of government intervention or otherwise), the subscription and redemption of Shares may also be disrupted. An Authorised Participant may be less likely to redeem or subscribe Shares if it considers that A-shares may not be available.

(4) Dual currency trading risk

You should note that the Singapore Shares of this Sub-Fund are traded in two different currency denominations on the SGX-ST (i.e. USD and SGD). There is a risk that the market price on the SGX-ST of the Singapore Shares traded in one counter may deviate significantly from the market price on the SGX-ST of the Singapore Shares traded in another counter due to different factors such as market liquidity, supply or demand in each counter and exchange rate fluctuations. The trading price of the Singapore Shares in each counter is determined by market forces (such as investor demand for the Singapore Shares in each counter). Accordingly, when selling or purchasing Singapore Shares or buying Singapore Shares traded in one counter, an investor may receive less or pay more than the equivalent amount in the currency of another counter if the trade of the relevant Singapore Shares took place on such other counter. There can be no assurance that the price of Singapore Shares in each counter will be equivalent.

E. MINIMUM INITIAL SUBSCRIPTION AMOUNT AND MINIMUM SUBSEQUENT SUBSCRIPTION AMOUNT

	Class 1C
Minimum initial subscription amount	85,000 Shares
Minimum subsequent subscription amount	85,000 Shares

F. NUMERICAL EXAMPLE OF HOW SHARES ARE ALLOTTED

Class 1C

The number of Shares allotted based on an investment amount of USD 850,000 at the Net Asset Value per Share of USD 10 is calculated as follows:

e.g.	**USD 850,000**	**/**	**USD 10**	**=**	**85,000 Shares**
	Investment amount		Net Asset Value per Share (= Issue Price per Share)		Number of Shares allotted^

^ You should note that no fractions of Shares will be issued and the Company will only accept subscriptions based on whole number of Shares.

You should note that the Issue Price per Share will vary in line with the Net Asset Value of this Sub-Fund. You should note that the above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the number of Shares to be allotted based on the above investment amount and Issue Price per Share will be calculated.

G. MINIMUM NET ASSET VALUE

The Minimum Net Asset Value of this Sub-Fund is USD 50,000,000.

H. MINIMUM HOLDING REQUIREMENT AND MINIMUM REDEMPTION AMOUNT

	Class 1C
Minimum Holding Requirement	1 Share
Minimum Redemption Amount	85,000 Shares

I. NUMERICAL EXAMPLE OF CALCULATION OF REDEMPTION PROCEEDS

Class 1C

Based on a hypothetical redemption of 85,000 Shares at a Net Asset Value of USD 10 per Share, the redemption proceeds payable to you will be calculated as follows:

e.g.	**85,000 Shares**	**x**	**USD 10**	**=**	**USD 850,000**
	Shares redeemed		Net Asset Value per Share (= redemption price per Share)		Redemption proceeds

You should note that the actual redemption price will vary in line with the Net Asset Value of this Sub-Fund. The above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the redemption proceeds will be calculated.

J. PAST PERFORMANCE OF THE CLASSES OF THIS SUB-FUND AND THIS SUB-FUND'S BENCHMARK

Past performance of the Classes of this Sub-Fund and this Sub-Fund's benchmark as of 30 April 2025:

Classes and benchmark	Returns over the last one (1) year	Returns over the last three (3) years	Returns over the last five (5) years	Returns over the last ten (10) years	Returns since inception [50]
		(Average annual compounded return)			
Class 1C[51]	24.65%	4.67%	-1.14%	-0.31%	2.56%
MSCI China TRN Index	25.37%	5.29%	-0.56%	0.28%	3.22%

Source: DWS Investments Singapore Limited and Bloomberg.

The benchmark against which the performance of this Sub-Fund is measured is the MSCI China TRN Index.

You should note that past performance is not necessarily indicative of the future performance.

K. EXPENSE RATIO(S)

The expense ratio for Class 1C for the year ended 31 December 2024 is as follows:

Class	Expense ratio
Class 1C	0.65%

L. TURNOVER RATIO

The turnover ratio of this Sub-Fund for the year ended 31 December 2024 is 4.62%.

[50] Performance is measured from the inception of Class 1C on 24 June 2010.
[51] Performance is calculated in USD on a Bid to Bid basis. Performance figures over the last one (1) year, the last three (3) years, the last five (5) years, the last ten (10) years and since inception show the percentage change (with net dividends or distributions reinvested, if any, and based on the assumption that investors subscribed on 30 April 2024, 29 April 2022, 30 April 2020, 30 April 2015 or 24 June 2010 (as the case may be) and redeemed on 30 April 2024)) taking into account the Upfront Subscription Sales Charge and Redemption Charge (if applicable). For the avoidance of doubt, no Upfront Subscription Sales Charge or Redemption Charge is applicable to this Sub-Fund as at the date of this Singapore Prospectus.

M. INFORMATION ON THE REFERENCE INDEX

The Reference Index is a free float-adjusted market capitalisation index which is designed to reflect the performance of the shares of certain companies in or connected to China. The Reference Index is a total return net index which calculates the performance of the index constituents on the basis that any dividends or distributions are reinvested after the deduction of any taxes that may apply.

You can find details on the Reference Index under the heading "General Description of the Reference Index" in Product Annex 61.

You can find further / the latest available information on the Reference Index from www.msci.com. An English language version of the methodology for the Reference Index is available to you upon request at the Company's registered office.

The top ten components (by weight) of the Reference Index as of 20 October 2025 are set out below:

No.	Name	Weighting (% of the Reference Index)
1.	TENCENT HOLDINGS LTD	17.95%
2.	ALIBABA GROUP HOLDING LTD	9.53%
3.	XIAOMI CORP	4.24%
4.	CHINA CONSTRUCTION BANK CORP	3.52%
5.	PDD HOLDINGS INC	3.02%
6.	MEITUAN	2.84%
7.	BYD LTD	1.97%
8.	PING AN INSURANCE GROUP COMPANY	1.83%
9.	INDUSTRIAL AND COMMERCIAL BANK OF CHINA LTD	1.82%
10.	NETEASE INC	1.66%

N. DIVIDEND POLICY

This Sub-Fund does not currently intend to make any dividend payments for the Shares of Class 1C.

Schedule 4 – Xtrackers MSCI Singapore UCITS ETF

A. GENERAL INFORMATION

Please refer to Product Annex 69 for more details on this Sub-Fund.

SGX-ST counter name (SGX-ST stock code)	XT MS SING US$ (O9A)
SGX-ST Listing Date	3 November 2011
Reference Index	MSCI Singapore Investable Market Total Return Net Index
Investment Policy	The Sub-Fund is passively managed in accordance with a Direct Investment Policy and is a Full Replication Fund
Investment Manager	DWS Investment GmbH
Sub-Portfolio Manager	DWS Investments UK Limited DWS Investments Hong Kong Limited (Internal sub-delegation, at the discretion of the Investment Manager)
Index Administrator	MSCI Inc. and its subsidiaries (which include MSCI Limited)
List of exchanges on which the relevant Share Class of this Sub-Fund offered in this Singapore Prospectus is listed as of the date of registration of this Singapore prospectus	Luxembourg Stock Exchange, Xetra, and SGX-ST
Share Classes of this Sub-Fund offered in this Singapore Prospectus	Class 1C (ISIN Code: LU0659578842)
Launch Date	Class 1C: 19 September 2011
Significant Market	Direct Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
Denomination Currency	Class 1C: USD
Currency(ies) in which the Singapore Shares are traded on the SGX-ST (i.e. Trading Currency(ies))	Class 1C: USD

Board lot size	1 Singapore Share
Product Suitability*	The Sub-Fund is only suitable for you, if you: • want capital growth rather than regular income; • believe that the MSCI Singapore Investable Market Total Return Net Index will increase in value over your planned investment holding period; • are prepared to lose some or all of the total capital invested; • are able and willing to invest in a fund: (1) where the Net Asset Value may have a high volatility; and (2) which has a high risk grading; and • are comfortable with investing in a fund which exposes you to asset classes with high volatility and/or limited liquidity, where no strategies are implemented to ensure that you will get back your original investment or capital.

** Please refer to the "IMPORTANT INFORMATION" and the "Risk Factors" sections of this Singapore Prospectus and the "TYPOLOGY OF RISK PROFILES" section of the Prospectus for more information.*

B. INVESTMENT OBJECTIVE, POLICY, FOCUS AND APPROACH

The investment objective of this Sub-Fund is to reflect the performance of the MSCI Singapore Investable Market Total Return Net Index (the "**Reference Index**"). Please refer to Section M of this Schedule for more information on the Reference Index.

As at the date of this Singapore Prospectus, this Sub-Fund carries out its Investment Objective via a Direct Investment Policy and adopts the investment policy as described in the relevant Product Annex and paragraph 3.3 of this Singapore Prospectus.

Please refer to the "Investment Objective" and "Investment Policy" sections of Product Annex 69 for more details.

You should note that this Sub-Fund is an EIP Sub-Fund. In accordance with the Regulations 2018 and the Notices and subject to the extent allowed by the Authority, as long as Shares of a Sub-Fund are classified as prescribed capital markets products and EIPs, the EIP Sub-Fund does not and will not invest in any product, or engage in any transaction, which will cause its Shares not to be regarded as prescribed capital markets products or EIPs.

C. FEES AND EXPENSES

Fees and expenses payable by a Shareholder	
	Class 1C
Conversion Charge	Not applicable
Primary Market Transaction Costs	Applicable
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil
Fees and expenses payable by each Class	
	Class 1C
Management Company Fee[52]	Up to 0.30% p.a.
Fixed Fee[53]	0.20% p.a.
All-In Fee (the sum of the Fixed Fee and the Management Company Fee)	Up to 0.50% p.a.
Transaction Costs[54]	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it
Any other substantial fees or charges (i.e., 0.1% or more of the Net Asset Value of this Sub-Fund)	Currently nil

The Fixed Fee covers the Depositary Fee, the Administrative Agent Fee and the Registrar, Transfer Agent and Listing Agent Fee and certain Other Administrative Expenses. No establishment costs have been paid out of this Sub-Fund or are currently amortised.

Full details of the fees and expenses in respect of the Shares of this Sub-Fund are set out in Product Annex 69 and under the heading “FEES AND EXPENSES” in the Prospectus.

[52] The Management Company Fee is currently 0.30% p.a. for Share Class 1C. The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Share Class.
[53] Please refer to “Fixed Fee” under the “FEES AND EXPENSES - *Fees and Expenses Payable by the Company*” section of the Prospectus for details.
[54] Transaction Costs means any costs and expenses incurred in respect of the buying and selling of portfolio securities and financial instruments, brokerage fees and commissions, interest or taxes payable in respect of such purchase and sale transactions, as may be more fully described in the Product Annex.

D. SPECIFIC RISK FACTORS

The risks set out below are in addition to the risk factors described in paragraph 5 of this Singapore Prospectus.

(1) No guarantee

You should note that this Sub-Fund is not guaranteed and that the capital invested or its respective amount is not guaranteed. If you invest in this Sub-Fund, you should be prepared and be able to sustain losses up to the total capital invested.

(2) Concentration of the Reference Index

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

E. MINIMUM INITIAL SUBSCRIPTION AMOUNT AND MINIMUM SUBSEQUENT SUBSCRIPTION AMOUNT

	Class 1C
Minimum initial subscription amount	810,000 Shares
Minimum subsequent subscription amount	810,000 Shares

F. NUMERICAL EXAMPLE OF HOW SHARES ARE ALLOTTED

Class 1C

The number of Shares allotted based on an investment amount of USD 810,000 at the Net Asset Value per Share of USD 1 is calculated as follows:

e.g.	**USD 810,000**	**/**	**USD 1**	**=**	**810,000 Shares**
	Investment amount		Net Asset Value per Share (= Issue Price per Share)		Number of Shares allotted^

^ You should note that no fractions of Shares will be issued and the Company will only accept subscriptions based on whole number of Shares.

You should note that the Issue Price per Share will vary in line with the Net Asset Value of this Sub-Fund. You should note that the above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the number of Shares to be allotted based on the above investment amount and Issue Price per Share will be calculated.

G. MINIMUM NET ASSET VALUE

The Minimum Net Asset Value of this Sub-Fund is USD 50,000,000.

H. MINIMUM HOLDING REQUIREMENT AND MINIMUM REDEMPTION AMOUNT

	Class 1C
Minimum Holding Requirement	1 Share
Minimum Redemption Amount	810,000 Shares

I. NUMERICAL EXAMPLE OF CALCULATION OF REDEMPTION PROCEEDS

Class 1C

Based on a hypothetical redemption of 810,000 Shares at a Net Asset Value of USD 1 per Share, the redemption proceeds payable to you will be calculated as follows:

e.g.	**810,000 Shares**	**x**	**USD 1**	**=**	**USD 810,000**
	Shares redeemed		Net Asset Value per Share (= redemption price per Share)		Redemption proceeds

You should note that the actual redemption price will vary in line with the Net Asset Value of this Sub-Fund. The above example is purely hypothetical and is not a forecast or indication of any expectation of performance. The above example is to illustrate how the redemption proceeds will be calculated.

J. PAST PERFORMANCE OF THE CLASSES OF THIS SUB-FUND AND THIS SUB-FUND'S BENCHMARK

Past performance of the Classes of this Sub-Fund and this Sub-Fund's benchmark as of 30 April 2025:

Classes and benchmark	**Returns over the last one (1) year**	**Returns over the last three (3) years**	**Returns over the last five (5) years**	**Returns over the last ten (10) years**	**Returns since inception [55]**
		(Average annual compounded return)			
Class 1C[56]	32.24%	11.01%	10.40%	3.30%	4.51%
MSCI Singapore	32.73%	11.46%	10.87%	3.70%	4.95%

[55] Performance is measured from the inception of Class 1C on 19 September 2011.
[56] Performance is calculated in USD on a Bid to Bid basis. Performance figures over the last one (1) year, the last three (3) years, the last five (5) years, the last ten (10) years and since inception show the percentage change (with net dividends or distributions reinvested, if any, and based on the assumption that investors subscribed on 30 April 2024, 29 April 2022, 30 April 2020, 30 April 2015 or 19 September 2011 (as the case may be) and redeemed on 30 April 2024) taking into account the Upfront Subscription Sales Charge and Redemption Charge (if applicable). For the avoidance of doubt, no Upfront Subscription Sales Charge or Redemption Charge is applicable to this Sub-Fund as at the date of this Singapore Prospectus.

Classes and benchmark	Returns over the last one (1) year	Returns over the last three (3) years	Returns over the last five (5) years	Returns over the last ten (10) years	Returns since inception [55]
		(Average annual compounded return)			
Investable Market Total Return Net Index					

Source: DWS Investments Singapore Limited and Bloomberg.

The benchmark against which the performance of this Sub-Fund is measured is the MSCI Singapore Investable Market Total Return Net Index.

You should note that past performance is not necessarily indicative of the future performance.

K. EXPENSE RATIO(S)

The expense ratio for Class 1C for the year ended 31 December 2024 is as follows:

Class	Expense ratio
Class 1C	0.50%

L. TURNOVER RATIO

The turnover ratio of this Sub-Fund for the year ended 31 December 2024 is 152.21%.

M. INFORMATION ON THE REFERENCE INDEX

The Reference Index is a free float-adjusted market capitalisation weighted index reflecting the performance of listed equity securities of large, mid and small capitalisation companies of Singapore. The Reference Index is a total return net index which calculates the performance of the index constituents on the basis that any dividends or distributions are reinvested after the deduction of any taxes that may apply.

You can find details on the Reference Index under the heading “General Description of the Reference Index” in Product Annex 69.

You can find further / the latest available information on the Reference Index from www.msci.com. An English language version of the methodology for the Reference Index is available to you upon request at the Company’s registered office.

The top ten components (by weight) of the Reference Index as of 20 October 2025 are set out below:

No.	Name	Weighting (% of the Reference Index)
1.	DBS GROUP HOLDINGS LTD	19.89%
2.	SEA LTD	16.40%
3.	OVERSEA-CHINESE BANKING LTD	10.68%
4.	UNITED OVERSEAS BANK LTD	8.26%
5.	SINGAPORE TELECOMMUNICATIONS LTD	5.78%
6.	GRAB HOLDINGS LTD	2.86%
7.	SINGAPORE EXCHANGE LTD	2.61%
8.	CAPITALAND INTEGRATED COMMERCIAL TRUST	2.46%
9.	SINGAPORE TECHNOLOGIES ENGINEERING LTD	2.30%
10.	KEPPEL LTD	2.26%

N. DIVIDEND POLICY

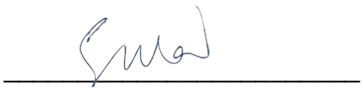
This Sub-Fund does not currently intend to make any dividend payments for the Shares of Class 1C.

Xtrackers
Board of Directors

Signed:

Philippe Ah-Sun
Director
(Signed by Teresa Xu
as attorney for Philippe Ah-Sun)

Signed:

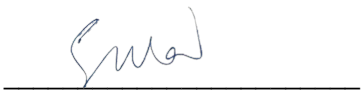


Philippe Ah-Sun
Director
(Signed by Stella Wai
as attorney for Philippe Ah-Sun)

Signed:

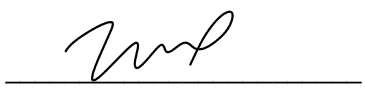
Simon Klein
Director
(Signed by Teresa Xu
as attorney for Simon Klein)

Signed:



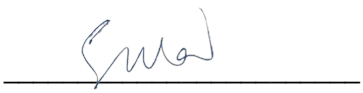
Simon Klein
Director
(Signed by Stella Wai
as attorney for Simon Klein)

Signed:



Stefan Kreuzkamp
Director
(Signed by Teresa Xu
as attorney for Stefan Kreuzkamp)

Signed:

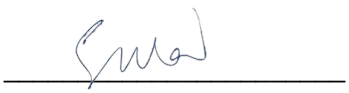


Stefan Kreuzkamp
Director
(Signed by Stella Wai
as attorney for Stefan Kreuzkamp)

Signed:

Alfred Francois Brausch
Director
(Signed by Teresa Xu
as attorney for Alfred Francois Brausch)

Signed:

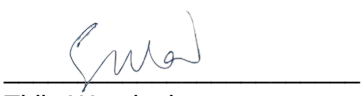


Alfred Francois Brausch
Director
(Signed by Stella Wai
as attorney for Alfred Francois Brausch)

Signed:

Thilo Wendenburg
Director
(Signed by Teresa Xu
as attorney for Thilo Wendenburg)

Signed:



Thilo Wendenburg
Director
(Signed by Stella Wai
as attorney for Thilo Wendenburg)

Xtrackers

Prospectus

14 October 2025

Xtrackers®, Xtrackers is a registered trademark of DWS Investment GmbH

INTRODUCTION

General

Xtrackers (the "**Company**") is registered in the Grand Duchy of Luxembourg as an undertaking for collective investment pursuant to Part I of the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as may be amended (the "**Law**"). The Company qualifies as an undertaking for collective investment in transferable Securities ("**UCITS**") under article 1(2) of the European Parliament and Council Directive 2009/65/EC of 13 July 2009 on the co-ordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities as may be amended (the "**UCITS Directive**") and may therefore be offered for sale in each EU Member State, subject to registration. The Company is presently structured as an umbrella fund to provide both institutional and retail investors with a variety of sub-funds (the "**Sub-Funds**" or individually a "**Sub-Fund**") of which the performance may be linked partially or in full to the performance of an underlying asset, such as, for instance, a basket of securities or an index. The registration of the Company does not constitute a warranty by any supervisory authority as to the performance or the quality of the shares issued by the Company (the "**Shares**"). Any representation to the contrary is unauthorised and unlawful.

Listing on a Stock Exchange

Unless otherwise specified in the relevant Product Annex (as defined below), the purpose of the Company is for each of its Sub-Funds through having its Shares listed on one or more stock exchanges to qualify as an exchange traded fund ("**ETF**"). As part of those listings there is an obligation on one or more members of the relevant stock exchanges to act as market makers offering prices at which the Shares can be purchased or sold by investors. The spread between those purchase and sale prices may be monitored and regulated by the relevant stock exchange authority.

It is contemplated that application will be made to list certain Classes of Shares on (i) the Luxembourg Stock Exchange and/or (ii) the Frankfurt Stock Exchange and/or (iii) any other stock exchange.

The approval of any listing particulars pursuant to the listing requirements of the relevant stock exchange does not constitute a warranty or representation by such stock exchange as to the competence of the service providers or as to the adequacy of information contained in the listing particulars or the suitability of the Shares for investment or for any other purpose.

Selling and Transfer Restrictions

The Shares being offered hereby have not been approved by the United States Securities and Exchange Commission (the "**SEC**") or any other United States governmental authority and neither the SEC nor any such other authority has passed upon the accuracy or adequacy of this Prospectus. The Shares will be offered and sold outside of the United States in accordance with Regulation S promulgated under the United States Securities Act of 1933, as amended (the "**Securities Act**"). Any person that is a United States Person (as defined in Regulation S of the Securities Act) is not eligible to invest in the Shares. The Company has not and will not be registered as an investment company under the United States Investment Company Act of 1940, as amended (the "**Investment Company Act**"), and therefore, the Company will not be subject to the provisions of the Investment Company Act designed to protect investors in registered investment companies.

The Shares may not be sold, assigned, transferred, exchanged, pledged, charged, hypothecated, encumbered, granted a participation in, or made subject to, any derivatives contract, swap, structured note or any other arrangement, directly, indirectly or synthetically (each, a "**Transfer**") to a United States Person and any such Transfer to a United States Person will be void.

The United States Commodity Futures Trading Commission has not reviewed or approved this offering or any offering memorandum for the Company.

This Prospectus may not be distributed into the United States. The distribution of this Prospectus and the offering of the Shares may also be restricted in certain other jurisdictions.

No person is authorised to make any representation other than as contained in the Prospectus or in the documents referred to in the Prospectus (as defined under "**Definitions**"). Such documents are available to the public at the registered office of the Company which is located at, 49, avenue J.F. Kennedy, L-1855 Luxembourg.

Marketing and Distribution

The Management Company has the overall responsibility for marketing and distribution of the Shares. However, the Management Company may appoint distributors or dealers for the distribution of Shares in certain jurisdictions which in turn may appoint sub-distributors (each a "**Distributor**").

Information on Distributors may be found in the country annex and/or the marketing material setting out information relevant for the jurisdictions in which the Shares are offered for subscription.

Marketing Rules

Subscriptions can be accepted only on the basis of the latest available version of this Prospectus, of the key investor information document (the "KIID")[1] and the Company's latest annual report (the "**Annual Report**") containing the audited accounts, semi-annual report (the "**Semi-annual Report**") and (where required by law or any applicable stock exchange listing rules) the quarterly report (the "**Quarterly Report**") provided such reports are published after the latest Annual Report. The Annual Report and the Semi-annual Report form an integral part of the Prospectus.

[1] *From 1 January 2023, Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for retail and insurance-based packaged investment products (PRIIPs) (the "**PRIIPs Regulation**") will apply to the Company and all references to the "KIID" in this Prospectus shall be read as a reference to the key information documents for retail and insurance-based packaged investment products within the meaning of the PRIIPs Regulation ("**PRIIPS KID**") from that date. For the avoidance of doubt, the UCITS KIIDs will continue to be used for the UK.*

Prospective investors should review this Prospectus carefully, in its entirety and consult with their legal, tax and financial advisers in relation to (i) the legal and regulatory requirements within their own countries of residence or nationality for the subscribing, purchasing, holding, converting, redeeming or disposing of Shares; (ii) any foreign exchange restrictions to which they are subject in their own countries in relation to the subscribing, purchasing, holding, converting, redeeming or disposing of Shares; (iii) the legal, tax, financial or other consequences of subscribing for, purchasing, holding, converting, redeeming or disposing of Shares; and (iv) any other consequences of such activities. Investors that have any doubt about the contents of this document should consult their stockbroker, bank manager, solicitor, accountant, tax, or other financial adviser.

No person has been authorised to give any information or to make any representation in connection with the offering of Shares other than those contained in this Prospectus, and the reports referred to above and, if given or made, such information or representation must not be relied upon as having been authorised by the Company. To reflect material changes, this document may be updated from time to time and investors should investigate whether any more recent Prospectus is available.

Responsibility for the Prospectus

The Board of Directors has taken all reasonable care to ensure that at the date of publication of this Prospectus the information contained herein is accurate and complete in all material respects. The Board of Directors accepts responsibility accordingly.

Currency References

All references in the Prospectus to "**USD**" refer to the currency of the United States of America; to "**Euro(s)**" or "**EUR**" refer to the currency of the EU Member States that adopt the single currency in accordance with the Treaty establishing the European Economic Community (signed in Rome on 25 March 1957), as amended; to "**JPY**" or "**Yen**" refer to the currency of Japan; to "**GBP**" refer to the currency of the United Kingdom, to "**CHF**" refer to the currency of Switzerland, to "**SEK**" refer to the currency of Sweden and/or such other currency as defined in the Product Annex.

Time

All references in the Prospectus to time are to Luxembourg time (which is equivalent to CET) unless otherwise indicated.

Date

The date of this Prospectus is the date mentioned on the cover page.

TABLE OF CONTENTS

INTRODUCTION **2**

General 2
Listing on a Stock Exchange 2
Selling and Transfer Restrictions 2
Marketing and Distribution 2
Marketing Rules 2
Responsibility for the Prospectus 3
Currency References 3
Time 3
Date 3

MANAGEMENT & ADMINISTRATION **8**

DEFINITIONS **10**

STRUCTURE **22**

The Sub-Funds 22
The Classes of Shares 22
The Currency Hedged Share Classes 22

INVESTMENT OBJECTIVES AND POLICIES **23**

Change of Reference Index of Index Tracking Funds 26
Efficient Portfolio Management 26

COLLATERAL ARRANGEMENTS IN RESPECT OF SECURITIES LENDING TRANSACTION(S) **34**

TYPOLOGY OF RISK PROFILES **41**

INVESTMENT RESTRICTIONS **42**

SUSTAINABILITY-RELATED DISCLOSURES UNDER SFDR AND EU TAXONOMY REGULATION **52**

RISK FACTORS **55**

ADMINISTRATION OF THE COMPANY **67**

Determination of the Net Asset Value 67
Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions 68
Publication of the Net Asset Value 69

GLOBAL CLEARING AND SETTLEMENT, INTERNATIONAL CENTRAL SECURITIES DEPOSITARY AND COMMON DEPOSITARY **70**

SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET) **72**

THE SECONDARY MARKET **76**

CONVERSION OF SHARES **78**

PROHIBITION OF LATE TRADING AND MARKET TIMING **79**

FEES AND EXPENSES **80**

Dealing Fees Payable by Investors 80
Fees and Expenses Payable by the Company 80

GENERAL TAXATION **83**

Warning 83
The Company 83
The Shareholders 83

GENERAL INFORMATION ON THE COMPANY AND THE SHARES **86**

I. The Shares 86
II. The Company 86
III. Personal Data 89
IV. Anti-money laundering and prevention of terrorist financing 90

MANAGEMENT AND ADMINISTRATION OF THE COMPANY **91**

The Board of Directors 91
The Management Company 91
The Investment Managers and Sub-Portfolio Managers 92
Best Execution Agent 94
Other Agents 94

The Swap Counterparties 94
The Depositary 94
The Administrative Agent, Paying Agent, Domiciliary Agent and Listing Agent 96
The Registrar, Transfer Agent and Listing Agent 97
PRODUCT ANNEX 1: XTRACKERS MSCI WORLD SWAP UCITS ETF 98
PRODUCT ANNEX 2: XTRACKERS MSCI EUROPE UCITS ETF 102
PRODUCT ANNEX 3: XTRACKERS MSCI JAPAN UCITS ETF 106
PRODUCT ANNEX 4: XTRACKERS MSCI USA SWAP UCITS ETF 110
PRODUCT ANNEX 5: XTRACKERS EURO STOXX 50 UCITS ETF 114
PRODUCT ANNEX 6: XTRACKERS DAX UCITS ETF 117
PRODUCT ANNEX 7: XTRACKERS FTSE MIB UCITS ETF 121
PRODUCT ANNEX 8: XTRACKERS SWITZERLAND UCITS ETF 124
PRODUCT ANNEX 9: XTRACKERS FTSE 100 INCOME UCITS ETF 127
PRODUCT ANNEX 10: XTRACKERS FTSE 250 UCITS ETF 130
PRODUCT ANNEX 11: XTRACKERS MSCI UK ESG UCITS ETF 133
PRODUCT ANNEX 12: XTRACKERS MSCI EMERGING MARKETS SWAP UCITS ETF 138
PRODUCT ANNEX 13: XTRACKERS MSCI EM ASIA SCREENED SWAP UCITS ETF 142
PRODUCT ANNEX 14: XTRACKERS MSCI EM LATIN AMERICA ESG SWAP UCITS ETF 148
PRODUCT ANNEX 15: XTRACKERS MSCI EM EUROPE, MIDDLE EAST & AFRICA ESG SWAP UCITS ETF 154
PRODUCT ANNEX 16: XTRACKERS MSCI TAIWAN UCITS ETF 160
PRODUCT ANNEX 17: XTRACKERS MSCI BRAZIL UCITS ETF 164
PRODUCT ANNEX 18: XTRACKERS NIFTY 50 SWAP UCITS ETF 167
PRODUCT ANNEX 19: XTRACKERS MSCI KOREA UCITS ETF 171
PRODUCT ANNEX 20: XTRACKERS MSCI CHINA A UCITS ETF 174
PRODUCT ANNEX 21: XTRACKERS EURO STOXX QUALITY DIVIDEND UCITS ETF 182
PRODUCT ANNEX 22: XTRACKERS STOXX GLOBAL SELECT DIVIDEND 100 SWAP UCITS ETF 185
PRODUCT ANNEX 23: XTRACKERS MSCI EUROPE MATERIALS SCREENED UCITS ETF 188
PRODUCT ANNEX 24: XTRACKERS MSCI EUROPE HEALTH CARE SCREENED UCITS ETF 193
PRODUCT ANNEX 25: XTRACKERS MSCI EUROPE FINANCIALS SCREENED UCITS ETF 198
PRODUCT ANNEX 26: XTRACKERS MSCI EUROPE COMMUNICATION SERVICES SCREENED UCITS ETF 203
PRODUCT ANNEX 27: XTRACKERS MSCI EUROPE INFORMATION TECHNOLOGY SCREENED UCITS ETF 208
PRODUCT ANNEX 28: XTRACKERS MSCI EUROPE UTILITIES SCREENED UCITS ETF 213
PRODUCT ANNEX 29: XTRACKERS MSCI EUROPE CONSUMER STAPLES SCREENED UCITS ETF 218
PRODUCT ANNEX 30: XTRACKERS MSCI EUROPE INDUSTRIALS SCREENED UCITS ETF 223
PRODUCT ANNEX 31: XTRACKERS BLOOMBERG COMMODITY EX-AGRICULTURE & LIVESTOCK SWAP UCITS ETF 228
PRODUCT ANNEX 32: XTRACKERS SHORTDAX DAILY SWAP UCITS ETF 233
PRODUCT ANNEX 33: XTRACKERS EURO STOXX 50 SHORT DAILY SWAP UCITS ETF 238
PRODUCT ANNEX 34: XTRACKERS SLI UCITS ETF 242
PRODUCT ANNEX 35: XTRACKERS FTSE 100 SHORT DAILY SWAP UCITS ETF 246
PRODUCT ANNEX 36: XTRACKERS S&P 500 INVERSE DAILY SWAP UCITS ETF 251
PRODUCT ANNEX 37: XTRACKERS PORTFOLIO UCITS ETF 255
PRODUCT ANNEX 38: XTRACKERS MSCI AC ASIA EX JAPAN ESG SWAP UCITS ETF 258
PRODUCT ANNEX 39: XTRACKERS MSCI PACIFIC EX JAPAN SCREENED UCITS ETF 263
PRODUCT ANNEX 40: XTRACKERS VIETNAM SWAP UCITS ETF 269
PRODUCT ANNEX 41: XTRACKERS LPX PRIVATE EQUITY SWAP UCITS ETF 273
PRODUCT ANNEX 42: XTRACKERS S&P ASX 200 UCITS ETF 277

PRODUCT ANNEX 43: XTRACKERS STOXX EUROPE 600 UCITS ETF 280
PRODUCT ANNEX 44: XTRACKERS S&P GLOBAL INFRASTRUCTURE SWAP UCITS ETF 284
PRODUCT ANNEX 45: XTRACKERS CAC 40 UCITS ETF 287
PRODUCT ANNEX 46: XTRACKERS MSCI EUROPE SCREENED UCITS ETF 290
PRODUCT ANNEX 47: XTRACKERS MSCI EUROPE SMALL CAP UCITS ETF 295
PRODUCT ANNEX 48: XTRACKERS S&P SELECT FRONTIER SWAP UCITS ETF 298
PRODUCT ANNEX 49: XTRACKERS S&P 500 2X LEVERAGED DAILY SWAP UCITS ETF 302
PRODUCT ANNEX 50: XTRACKERS SHORTDAX X2 DAILY SWAP UCITS ETF 306
PRODUCT ANNEX 51: XTRACKERS LEVDAX DAILY SWAP UCITS ETF 310
PRODUCT ANNEX 52: XTRACKERS BLOOMBERG COMMODITY SWAP UCITS ETF 315
PRODUCT ANNEX 53: XTRACKERS S&P 500 2X INVERSE DAILY SWAP UCITS ETF 319
PRODUCT ANNEX 54: XTRACKERS CSI300 SWAP UCITS ETF 323
PRODUCT ANNEX 55: XTRACKERS MSCI CANADA SCREENED UCITS ETF 328
PRODUCT ANNEX 56: XTRACKERS MSCI INDONESIA SWAP UCITS ETF 333
PRODUCT ANNEX 57: XTRACKERS MSCI MEXICO UCITS ETF 337
PRODUCT ANNEX 58: XTRACKERS MSCI EUROPE VALUE UCITS ETF 341
PRODUCT ANNEX 59: XTRACKERS S&P 500 SWAP UCITS ETF 344
PRODUCT ANNEX 60: XTRACKERS FTSE DEVELOPED EUROPE REAL ESTATE UCITS ETF 348
PRODUCT ANNEX 61: XTRACKERS MSCI CHINA UCITS ETF 351
PRODUCT ANNEX 62: XTRACKERS MSCI INDIA SWAP UCITS ETF 360
PRODUCT ANNEX 63: XTRACKERS MSCI MALAYSIA UCITS ETF 365
PRODUCT ANNEX 64: XTRACKERS MSCI THAILAND UCITS ETF 369
PRODUCT ANNEX 65: XTRACKERS MSCI PHILIPPINES UCITS ETF 373
PRODUCT ANNEX 66: XTRACKERS MSCI AFRICA TOP 50 SWAP UCITS ETF 377
PRODUCT ANNEX 67: XTRACKERS SPAIN UCITS ETF 381
PRODUCT ANNEX 68: XTRACKERS MSCI PAKISTAN SWAP UCITS ETF 385
PRODUCT ANNEX 69: XTRACKERS MSCI SINGAPORE UCITS ETF 389
PRODUCT ANNEX 70: XTRACKERS ATX UCITS ETF 392
PRODUCT ANNEX 71: XTRACKERS MSCI EMU UCITS ETF 395
PRODUCT ANNEX 72: XTRACKERS DAX ESG SCREENED UCITS ETF 399
PRODUCT ANNEX 73: XTRACKERS FTSE 100 UCITS ETF 404
PRODUCT ANNEX 74: XTRACKERS NIKKEI 225 UCITS ETF 407
PRODUCT ANNEX 75: XTRACKERS HARVEST CSI300 UCITS ETF 411
PRODUCT ANNEX 76: XTRACKERS HARVEST CSI A500 UCITS ETF 422
PRODUCT ANNEX 77: XTRACKERS HARVEST MSCI CHINA TECH 100 UCITS ETF 433
PRODUCT ANNEX 78: XTRACKERS MSCI CHINA A SCREENED SWAP UCITS ETF 445
PRODUCT ANNEX 79: XTRACKERS CSI500 SWAP UCITS ETF 450
PRODUCT ANNEX 80: XTRACKERS WORLD GREEN TECH INNOVATORS UCITS ETF 455
PRODUCT ANNEX 81: XTRACKERS WORLD SMALL CAP GREEN TECH INNOVATORS UCITS ETF 459
PRODUCT ANNEX 82: SCALABLE MSCI AC WORLD XTRACKERS UCITS ETF 464
PRODUCT ANNEX 83: XTRACKERS EUROPE DEFENCE TECHNOLOGIES UCITS ETF 470
PRODUCT ANNEX 84: XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF 473
PRODUCT ANNEX 85: XTRACKERS DIVERSIFIED PORTFOLIO 20% EQUITY UCITS ETF 479
PRODUCT ANNEX 86: XTRACKERS DIVERSIFIED PORTFOLIO 40% EQUITY UCITS ETF 483
PRODUCT ANNEX 87: XTRACKERS DIVERSIFIED PORTFOLIO 60% EQUITY UCITS ETF 487
PRODUCT ANNEX 88: XTRACKERS DIVERSIFIED PORTFOLIO 80% EQUITY UCITS ETF 491

ANNEX I: DISCLAIMERS **495**
ANNEX II: **501**
ANNEX III: **503**
ANNEX IV: **506**

MANAGEMENT & ADMINISTRATION

Registered Office

Xtrackers
49, avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Board of Directors

Philippe Ah-Sun

Head of Operational Strategy at DWS Investments UK Limited, 21 Moorfields, London, EC2Y 9DB, United Kingdom.

Alfred Francois Brausch

Member of the Luxembourg Bar, independent director, 35, avenue John F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

Thilo Wendenburg

Independent director, c/o DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Stefan Kreuzkamp

External director, c/o DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Simon Klein

Global Head of Xtrackers Sales at DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg

Depositary

State Street Bank International GmbH, Luxembourg Branch, 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

Administrative Agent, Paying Agent, Domiciliary Agent and Listing Agent

State Street Bank International GmbH, Luxembourg Branch, 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

Registrar and Transfer Agent

State Street Bank International GmbH, Luxembourg Branch, 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

Management Company

DWS Investment S.A.
2, boulevard Konrad Adenauer,
L-1115 Luxembourg,
Grand Duchy of Luxembourg.

Management Board of the Management Company

Nathalie Bausch (Chairman), DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Stefan Junglen, DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg

Leif Bjurström, DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg

Michael Mohr, DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg

Supervisory Board of the Management Company

Manfred Bauer (Chairman), DWS Investment S.A., 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg.

Holger Naumann, DWS Investment GmbH, Mainzer Landstr. 11-17, 60329 Frankfurt am Main, Germany.

Dr. Matthias Liermann, DWS Investment GmbH, Mainzer Landstr. 11-17, 60329 Frankfurt am Main, Germany.

Corinna Orbach, DWS Investment GmbH, Mainzer Landstr. 11-17, 60329 Frankfurt am Main, Germany.

Investment Managers and Sub-Portfolio Managers (as specified under "Management and Administration of the Company")

DWS Investment GmbH
Mainzer Landstrasse 11-17
60329 Frankfurt am Main
Germany

DWS Investments UK Limited
21 Moorfields
London, EC2Y 9DB
United Kingdom

DWS Investments Hong Kong Limited
60/F, International Commerce Centre
1 Austin Road West, Kowloon
Hong Kong

Harvest Global Investments Limited (if and as specified in the relevant Product Annex)
31/F, One Exchange Square
8, Connaught Place, Central
Hong Kong

Securities Lending Agent

(unless otherwise specified in the relevant Product Annex)
Deutsche Bank AG, acting through its Frankfurt am Main head office and its London and New York branches

Auditor of the Company

KPMG Audit S.à r.l.
39, Avenue J.F. Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg

Legal Advisers to the Company

Elvinger Hoss Prussen
société anonyme
2, place Winston Churchill
L-1340 Luxembourg
Grand Duchy of Luxembourg

DEFINITIONS

Unless otherwise specified in the main part of this Prospectus or in the relevant Product Annex:

"Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement"	Means the agreement dated 20 October 2006 between the Company, the Management Company and the Administrative Agent;
"Administrative Agent"	Means State Street Bank International GmbH, Luxembourg Branch, with registered office at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg;
"Administrative Agent Fee"	Means any fees payable by the Company to the Administrative Agent pursuant to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement;
"Administrative Expenses"	Means the expenses incurred in connection with the Company's operations as described in more detail under section "Fees and Expenses";
"Agency Securities Lending and Repurchase Agreement(s)"	Means the agreement(s) between the Securities Lending Agent, the Company in respect of the Sub-Funds concerned, as the case may be and/or the relevant Investment Manager and/or Sub-Portfolio Manager;
"AIFM Law"	Means the Luxembourg law of 12 July 2013 relating to alternative investment fund managers and implementing the AIFM Directive into Luxembourg legislation;
"All-In Fee"	Means an all-in fee comprising the Fixed Fee and the Management Company Fee;
"Annual Report"	Means the last available annual report of the Company including its audited accounts;
"Articles of Incorporation"	Means the articles of incorporation of the Company, as amended;
"Authorised Participant"	Means an institutional investor, market maker or broker entity authorised by the Company for the purposes of directly subscribing and/or redeeming Shares in a Sub-Fund with the Company;
"Authorised Payment Currency"	Means the currencies in which, in addition to the Reference Currency and the Denomination Currency, subscriptions and redemptions for Shares in a particular Class may be made;
"Benchmark Regulation"	Regulation (EU) 2016/1011 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds;
"Board of Directors"	Means the board of directors of the Company. Any reference to the Board of Directors includes a reference to its duly authorised agents or delegates;
"Business Day"	Means (unless otherwise provided in the Product Annex) a day which is: (i) a Luxembourg Banking Day; and (ii) a London Banking Day.
"Capitalisation Shares"	Means Shares not distributing dividends;
"Cash Component"	Means the cash component of the Portfolio Composition File. The Cash Component will be made up of three elements, namely: (i) the accrued dividend attributable to Shareholders of the Sub-Fund (generally dividends and interest earned less fees and expenses incurred since the previous distribution); (ii) cash amounts representing amounts arising as a result of rounding down the number of Shares to be delivered, capital cash held by the Sub-Fund or amounts representing differences between the weightings of the Portfolio Composition File and the Sub-Fund; and (iii) any Primary Market Transaction Costs which may be payable;
"Central Securities Depositary"	Means a clearing system which is a national settlement system for individual national markets;
"Class(-es)" or "Share Class(-es)"	Means the class or classes of Shares relating to a Sub-Fund where specific features with respect to fee structures, minimum subscription amount, dividend policy, investor eligibility criteria or other specific features may be applicable. The details applicable to each Class will be described in the relevant Product Annex;
"Common Depositary"	Means the entity appointed as a depositary for the International Central Securities Depositaries. As of the date of this Prospectus, Citibank Europe plc is acting as Common Depositary;

"Common Depositary Nominee"	Means an entity appointed as nominee for the Common Depositary and being the registered holder of the Shares of the Company;
"Company"	Means Xtrackers, an investment company incorporated under Luxembourg law in the form of a *société anonyme* qualifying as a *société d'investissement à capital variable* under the Law (SICAV);
"Conversion Charge"	Means the charge to be paid by investors in the event of a conversion of Shares as described under "Conversion of Shares" and in the relevant Product Annex;
"CRS"	Means the common reporting standard ("**CRS**") to achieve a comprehensive and multilateral automatic exchange of information (AEOI) on a global basis as developed by the OECD;
"CRS Law"	Means the Luxembourg law of 18 December 2015 on the automatic exchange of financial account information in the field of taxation, as amended from time to time;
"CSSF"	The *Commission de Surveillance du Secteur Financier* of Luxembourg;
"Currency Hedging Manager"	Means State Street Bank & Trust Company, London Branch, with registered office 20 Churchill Place, London E14 5HJ, UK;
"Currency Hedged Share Class(-es)"	For Direct Replication Funds or Actively Managed Funds, means a Share Class which seeks to reduce the impact of the exchange rate fluctuations between its Denomination Currency and the currencies of the underlying securities included in the portfolio. For Indirect Replication Funds, means a Share Class which seeks to reduce the impact of the exchange rate fluctuations between its Denomination Currency and the currencies of the underlying securities included in the Reference Index. For Hybrid Replication Funds, means a Share Class which seeks to reduce the impact of the exchange rate fluctuations between its Denomination Currency and both the currencies of the underlying securities included in the relevant portfolio and the underlying securities included in the Reference Index. Unless stated otherwise, all references to Classes or Share Classes include the Currency Hedged Share Classes;
"Cut-off Time"	Means the latest time by which an order for a subscription or redemption can be received for a Transaction Day, as further set out in the relevant Product Annex;
"Dealing Form"	Means such dealing form as the Directors may prescribe for the purposes of dealing in shares of the relevant Sub-Fund;
"Denomination Currency"	Means the currency that is used by the Administrative Agent to calculate the Net Asset Value per Share of the relevant Share Class. Unless otherwise specified in the relevant Product Annex, the Denomination Currency will be the Reference Currency;
"Depositary"	Means State Street Bank International GmbH, Luxembourg Branch, with registered office at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg;
"Depositary Agreement"	Means the agreement dated 12 October 2016 by which State Street Bank International GmbH, Luxembourg Branch has been appointed as depositary of the Company, as further described under "Management and Administration of the Company" and as may be amended from time to time;
"Depositary Fee"	Means any fees payable by the Company to the Depositary pursuant to the Depositary Agreement;
"Direct Investment Policy"	Has the meaning set forth in the main part of the Prospectus under "Investment Objectives and Policies";
"Director"	Means the directors of the Company for the time being;
"Direct Replication Fund"	Means a Sub-Fund with a Direct Investment Policy as described in the main part of the Prospectus under "Investment Objectives and Policies";
"Direct Replication Significant Market"	Means any market and/or exchange or combination of markets and/or exchanges where the value of the Sub-Fund's investments in those markets and/or exchanges exceeds 30 percent. of the Net Asset Value of the Sub-Fund, calculated on a quarterly basis and recorded in the Company's financial statements. The Management Company may determine that a different percentage of Net Asset Value and/or date may apply at their discretion where they believe it is more appropriate;
"Distributor"	Means any distributor or dealer for the distribution of Shares in certain jurisdictions, as appointed by the Management Company, or any sub-distributor thereof;
"Distribution Fee"	Means the fees which may be paid by the Management Company to the relevant Distributor out of the Management Company Fee;

"Distribution Shares"	Means Shares distributing dividends;
"DWS Affiliates"	Means entities within, and/or employees, agents, affiliates or subsidiaries of members of, DWS Group;
"DWS Group"	Means an affiliate or subsidiary of DWS Group GmbH & Co. KGaA which is part of the Deutsche Bank AG group;
"EEA Member State"	Means any of the member states of the European Economic Area including at the date of this Prospectus: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, the Grand Duchy of Luxembourg, Malta, Norway, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden;
"Eligible State"	Means any OECD Member State and any other country of Europe, North, Central & South America, Asia, Africa and the Pacific Basin;
"EMIR"	Means (i) the European Union Regulation No 648/2012 on OTC derivatives, central counterparties and trade repositories, (ii) any regulation of any type taken pursuant to (i) and (iii) any rule, guideline and specific position from time to time adopted by the CSSF or the European Securities and Markets Authority;
"Equity Fund"	Means, for the purpose of the Fund Classification (InvStG) a Sub-Fund in respect of which, in addition to the investment limits described in this Prospectus including the relevant Product Annex of the Sub-Fund, at least 51 percent., or such higher target minimum percentage as defined in the relevant Product Annex, of the Sub-Fund's gross assets (determined in accordance with the InvStG as being the value of the Sub-Fund's assets without taking into account liabilities), are invested in equities that are admitted to official trading on a stock exchange or admitted to or included in another organised market (in accordance with the definition of an organised market of the KAGB) and which are not: - units of investment funds; - equities indirectly held via partnerships; - units of corporations, associations of persons or estates at least 75 percent. of the gross assets of which consist of immovable property in accordance with statutory provisions or their investment conditions, if such corporations, associations of persons or estates are subject to corporate income tax of at least 15 percent and are not exempt from it or if their distributions are subject to tax of at least 15 percent and the Sub-Fund is not exempt from said taxation; - units of corporations which are exempt from corporate income taxation to the extent they conduct distributions unless such distributions are subject to taxation at a minimum rate of 15 percent and the Sub-Fund is not exempt from said taxation; - units of corporations the income of which originates, directly or indirectly, to an extent of more than 10 percent from units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent or are exempt from it; - units of corporations which hold, directly or indirectly, units of corporations that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent or are exempt from it, if the fair market value of units of such corporations equal more than 10 percent. of the fair market value of those corporations;
"Equity Fund of Fund"	Means, for the purpose of the Fund Classification (InvStG), a Sub-Fund in respect of which, in addition to the investment limits described in this Prospectus including the relevant Product Annex of the Sub-Fund, at least 51 percent, or such higher target minimum percentage as defined in the relevant Product Annex, of the Sub-Fund's gross assets (determined in accordance with the InvStG as being the value of the Sub-Fund's assets without taking into account liabilities), are invested in such equity capital investments as defined in article 2 (8) InvStG. Equity capital investments in this respect are - equities admitted to official trading on a stock exchange or admitted to, or included in, another organised market (in accordance with the definition of an organised market of the KAGB) and which are not: - units of investment funds

- units of corporations, associations of persons or estates at least 75 percent. of the gross assets of which consist of immovable property in accordance with statutory provisions or their investment conditions, if such corporations, associations of persons or estates are subject to corporate income tax of at least 15 percent. and are not exempt from it or if their distributions are subject to tax of at least 15 percent. and the Sub-Fund is not exempt from said taxation;
- units of corporations which are exempt from corporate income taxation to the extent they conduct distributions unless such distributions are subject to taxation at a minimum rate of 15 percent. and the Sub-Fund is not exempt from said taxation;
- units of corporations the income of which originates, directly or indirectly, to an extent of more than 10 percent., from units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it;
- units of corporations which hold, directly or indirectly, units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it if the fair market value of units of such corporations equal more than 10 percent. of the fair market value of those corporations.

– units of investment funds which in accordance with their terms and conditions of investment invest more than 50 percent. of their value or more than 50 percent. of their gross assets (determined in accordance with the InvStG as being the value of the fund´s assets without taking into account liabilities) themselves or as a fund of fund indirectly in units of corporations in the amount of 51 percent. of their value; if the terms and conditions of an equity fund make provisions for a percentage higher than 51 percent. of its value or its gross assets, the share of the equity capital investment is, by way of derogation, deemed to be the amount of the higher percentage;

– units of investment funds which in accordance with their terms and conditions of investment invest at least 25 percent. of their value or at least 25 percent. of their gross assets (determined in accordance with the InvStG as being the value of the fund´s assets without taking into account liabilities) themselves or as a fund of fund indirectly in units of corporations in the amount of 25 percent. of their value; if the terms and conditions of a mixed fund make provisions for a percentage higher than 25 percent. of its value or its gross assets, the share of the equity capital investment is, by way of derogation, deemed to be the amount of the higher percentage;

– units of investment funds that carry out a valuation at least once per week in the amount of the percentage of their assets published on each valuation date that they actually invest themselves, or as a fund of fund, in units of corporations.

Units of corporations as defined in indents 2 through 4 are:

- units of corporations that are admitted to official trading on a stock exchange or admitted to, or included in, another organised market (in accordance with the definition of an organised market of the KAGB);

- units of corporations that are not real estate companies and that are domiciled in an EU Member State or EEA Member State and are subject there to corporate income tax and are not exempt from it;

- units of corporations that are not real estate companies and that are domiciled in a third country and are subject there to corporate income tax of at least 15 percent. and are not exempt from it; and

- units of other investment funds, which in turn meet the requirements of indents 2 through 4 and of this sentence, in the respective amount specified there.

However, units of corporations are not those that correspond to categories as set out in sub-indents 1 through 5 in indent 1 or are held indirectly via partnerships.

Equity capital investments indirectly held by the Sub-Fund via partnerships are not equity capital investments.

Individual investment fund units may only be taken into consideration once for the purposes of determining the daily equity capital investment rate;

"ESMA"	Means the European Securities and Markets Authority;
"ETF"	Means exchange traded fund(s);
"EU"	Means the European Union whose member states at the date of this Prospectus include Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, the Grand Duchy of Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden;
"EU Member State"	Means any of the member states of the EU. The states that are contracting parties to the agreement creating the European Economic Area other than the member states of the EU, within the limits set forth by this agreement and related acts, are considered as equivalent to member states of the EU;
"Euro-CRS Directive"	Means Council Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation, as adopted on 9 December 2014 in order to implement the CRS among the Member States;
"EU Taxonomy Regulation"	Means Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088;
"Extraordinary Expenses"	Means expenses relating to litigation costs as well as any tax, levy, duty or similar charge imposed on the Company or its assets that would otherwise not qualify as ordinary expenses;
"FATCA"	Means the Foreign Account Tax Compliance Act as enacted by the United States Congress in March 2010;
"FDI"	Means financial derivative instrument(s);
"First Class Institutions"	Means first class financial institutions selected by the Board of Directors, subject to prudential supervision and belonging to the categories approved by the CSSF for the purposes of the OTC derivative transactions and specialised in this type of transactions;
"Fixed Fee"	Means, as further described under "Fees and Expenses" below, the comprehensive fee payable by the Company for each Sub-Fund in respect of the ordinary fees, expenses and costs incurred by that Sub-Fund;
"Fixed Fee Agent"	Means DWS Investments UK Limited;
"Fund Classification (InvStG)"	Sub-Fund classification for the purpose of the German Investment Tax Act ("*Investmentsteuergesetz*" / "InvStG");
"G20"	Means the countries represented in the Group of Twenty Finance Ministers and Central Bank Governors representing 20 major global economies;
"Global Share Certificate(s)"	Means the certificate(s) evidencing entitlement to the Shares issued pursuant to the Articles of Incorporation and the Prospectus as described in further details under "Global Clearing and Settlement, International Central Securities Depositary and Common Depositary";
"Hybrid Investment Policy"	Has the meaning set forth in the main part of the Prospectus under "Investment Objectives and Policies";
"Hybrid Replication Fund"	Means a Sub-Fund with a Hybrid Investment Policy as described in the main part of the Prospectus under "Investment Objectives and Policies";
"Index Administrator"	Means the administrator of an Index as defined in the relevant Product Annex;
"Index Tracking Fund"	Means a Sub-Fund the Investment Objective of which is to reflect the performance of a Reference Index through an Indirect Investment Policy (Indirect Replication Funds), a Direct Investment Policy (Direct Replication Funds) or a Hybrid Investment Policy (Hybrid Replication Fund);
"Indirect Investment Policy"	Has the meaning set forth in the main part of the Prospectus under "Investment Objectives and Policies";
"Indirect Replication Fund"	Means a Sub-Fund with an Indirect Investment Policy as described in the main part of the Prospectus under "Investment Objectives and Policies";
"Indirect Replication Significant Market"	Means any market and/or exchange on which constituents of the Reference Index are traded, unless otherwise set out in the relevant Product Annex;

"Initial Issue Price"	Means the price at which Shares may be subscribed to during the Offering Period (if any) and/or up to (but excluding) the Launch Date (if applicable). The Initial Issue Price is available upon request and on www.Xtrackers.com;
"Initial Subscriptions"	Means subscriptions for Shares made at the Initial Issue Price as described in detail under "Subscriptions and Redemptions of Shares (Primary Market)";
"Institutional Investors"	Means an investor meeting the requirements to qualify as an institutional investor for the purposes of article 174 of the Law;
"Insolvency Event"	Occurs in relation to a person where (i) an order has been made or an effective resolution passed for the liquidation or bankruptcy of the person; (ii) a receiver or similar officer has been appointed in respect of the person or of any of the person's assets or the person becomes subject to an administration order, (iii) the person enters into an arrangement with one or more of its creditors or is deemed to be unable to pay its debts, (iv) the person ceases or threatens to cease to carry on its business or substantially the whole of its business or makes or threatens to make any material alteration to the nature of its business, (v) an event occurs in relation to the person in any jurisdiction that has an effect similar to that of any of the events referred to in (i) to (iv) above or (vi) the Company in good faith believes that any of the above may occur;
"International Central Securities Depositaries" or "ICSDs"	Means the International Central Securities Depositary (ICSD) settlement system through which shares of the Company may be settled, which is an international settlement system connected to multiple national markets. As of the date of this Prospectus, the International Central Securities Depositaries for the Company are Euroclear Bank S.A./N.V. and Clearstream Banking, Socíeté Anonyme, Luxembourg;
"Invested Asset(s)"	Means certain assets in which a Sub-Fund is invested, as set forth in the main part of the Prospectus under "Investment Objectives and Policies" and/or in the relevant Product Annex;
"Investment Management Agreement"	Means the agreement between the Management Company and the relevant Investment Manager as further defined under "Management and Administration of the Company";
"Investment Management Fee"	Means any fees payable by the Management Company to the relevant Investment Manager pursuant to the relevant Investment Management Agreement;
"Investment Manager"	Means the entities referred to under "MANAGEMENT & ADMINISTRATION" and "Management and Administration of the Company";
"Investment Objective"	Means the predefined investment objective of the Sub-Funds as specified in the relevant Product Annex;
"Investment Policy"	Means the predefined investment policy of the Sub-Funds as specified in the relevant Product Annex;
"Investment Restrictions"	Means the investment restrictions set out in more detail under "Investment Restrictions";
"Investments"	Means transferable securities and all other liquid financial assets referred to under section 1 of "Investment Restrictions";
"KAGB"	Means the German Investment Act ("*Kapitalanlagegesetzbuch*");
"Launch Date"	Means the date on which the Company issues Shares relating to a Sub-Fund for the first time in exchange for the subscription proceeds;
"Law"	Means the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as may be amended;
"London Banking Day"	Means a day on which commercial banks are open and settle payments in London, excluding days on which such commercial banks are open for only half a day;
"Luxembourg Banking Day"	Means a day (other than a Saturday or a Sunday) on which commercial banks are open and settle payments in Luxembourg, excluding days on which such commercial banks are open for only half a day;
"Luxembourg IGA"	Means the Model 1 intergovernmental agreement between the government of the United States of America and the government of the Grand Duchy of Luxembourg to improve international tax compliance and with respect to the United States information reporting provisions commonly known as the Foreign Account Tax Compliance Act dated 28 March 2014, as implemented in Luxembourg law;
"Management Company"	Means DWS Investment S.A. with registered office at 2, boulevard Konrad Adenauer, L-1115 Luxembourg, Grand Duchy of Luxembourg (see also section "The Management Company" under "Management and Administration of the Company"). Any reference to the Management Company includes a reference to its duly authorised agents or delegates;

"Management Company Agreement"	Means the management company agreement dated 7 October 2015 between the Company and the Management Company as may be amended from time to time;
"Management Company Fee"	Means the annual fee, payable on a periodic basis by the Company to the Management Company, which will accrue daily on each calendar day and will be calculated on each Valuation Day on the basis of a percentage of (i) the last available Net Asset Value of each Sub-Fund or Class of Shares or (ii) the Initial Issue Price multiplied by the number of outstanding Shares of each Sub-Fund or Class of Shares (as indicated for each Sub-Fund or Class of Shares in the relevant Product Annex and further specified under section "Fees and Expenses"), pursuant to the Management Company Agreement;
"Market Makers"	Financial institutions that are members of the Relevant Stock Exchanges and have signed a market making contract with the Company or its delegate(s) or that are registered as such with the Relevant Stock Exchanges;
"Maturity Date"	Means the date indicated in the relevant Product Annex on which the outstanding Shares will be redeemed, the Sub-Fund being thereafter closed, as more fully described under "Subscriptions and Redemptions of Shares (Primary Market)". Unless a Maturity Date has been indicated in the relevant Product Annex, Sub-Funds will have no Maturity Date;
"MiFID"	Means the Markets in Financial Instruments Directive 2014/65/EU;
"Minimum Holding Requirement"	Means the minimum number of Shares or Net Asset Value per Share (as appropriate) which must be held at any time by a Shareholder. Unless otherwise specified in the relevant Product Annex, the Minimum Holding Requirement will be 1 Share;
"Minimum Initial Subscription Amount"	Means the minimum number of Shares or Net Asset Value per Share (as appropriate) which must be subscribed/converted for by an investor during the Offering Period and up to but excluding the Launch Date (if applicable). Unless otherwise specified in the relevant Product Annex, the Minimum Initial Subscription Amount will be 1 Share;
"Minimum Net Asset Value"	Means an amount specified in the relevant Product Annex. Unless otherwise specified in the relevant Product Annex, the Minimum Net Asset Value per Sub-Fund will be Euro 50,000,000 (or the equivalent in the Reference Currency of the relevant Sub-Fund);
"Minimum Redemption Amount"	Means the minimum number of Shares or Net Asset Value for which Shares may be redeemed. Unless otherwise specified in the relevant Product Annex, the Minimum Redemption Amount will be 1 Share;
"Minimum Subsequent Subscription Amount"	Means the minimum number of Shares or Net Asset Value per Share (as appropriate) which must be subscribed/converted for on or after the Launch Date. Unless otherwise specified in the relevant Product Annex, the Minimum Subsequent Subscription Amount will be 1 Share;
"Mixed Fund"	Means, for the purpose of the Fund Classification (InvStG), a Sub-Fund in respect of which, in addition to the investment limits described in this Prospectus including the relevant Product Annex of the Sub-Fund, at least 25 percent., or such higher target minimum percentage as defined in the relevant Product Annex, of the Sub-Fund's gross assets (determined in accordance with the InvStG as being the value of the Sub-Fund's assets without taking into account liabilities), are invested in equities that are admitted to official trading on a stock exchange or admitted to or included in another organised market (in accordance with the definition of an organised market of the KAGB) and which are not: - units of investment funds; - equities indirectly held via partnerships; - units of corporations, associations of persons or estates at least 75 percent. of the gross assets of which consist of immovable property in accordance with statutory provisions or their investment conditions, if such corporations, associations of persons or estates are subject to corporate income tax of at least 15 percent. and are not exempt from it or if their distributions are subject to tax of at least 15 percent. and the Sub-Fund is not exempt from said taxation; - units of corporations which are exempt from corporate income taxation to the extent they conduct distributions unless such distributions are subject to taxation at a minimum rate of 15 percent. and the Sub-Fund is not exempt from said taxation; - units of corporations the income of which originates, directly or indirectly, to an extent of more than 10 percent. from units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it; - units of corporations which hold, directly or indirectly, units of corporations that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in

an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it, if the fair market value of units of such corporations equal more than 10 percent. of the fair market value of those corporations;

"Mixed Fund of Fund"

Means, for the purpose of the Fund Classification (InvStG), a Sub-Fund in respect of which, in addition to the investment limits described in this Prospectus including the relevant Product Annex of the Sub-Fund, at least 25 percent., or such higher target minimum percentage as defined in the relevant Product Annex, of the Sub-Fund's gross assets (determined in accordance with the InvStG as the value of the Sub-Fund's assets without taking into account liabilities), are invested in such equity capital investments as defined in article 2 (8) of the InvStG.

Equity capital investments in this respect are:

– equities admitted to official trading on a stock exchange or admitted to, or included in, another organised market (in accordance with the definition of an organized market of the KAGB) and which are not:

- units of investment funds;
- units of corporations, associations of persons or estates at least 75 percent. of the gross assets of which consist of immovable property in accordance with statutory provisions or their investment conditions, if such corporations, associations of persons or estates are subject to corporate income tax of at least 15 percent. and are not exempt from it or if their distributions are subject to tax of at least 15 percent. and the Sub-Fund is not exempt from said taxation;
- units of corporations which are exempt from corporate income taxation to the extent they conduct distributions unless such distributions are subject to taxation at a minimum rate of 15 percent. and the Sub-Fund is not exempt from said taxation;
- units of corporations the income of which originates, directly or indirectly, to an extent of more than 10 percent. from units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it;
- units of corporations which hold, directly or indirectly, units of corporations, that are (i) real estate companies or (ii) are not real estate companies, but (a) are domiciled in an EU Member State or EEA Member State and are not subject in said domicile to corporate income tax or are exempt from it or (b) are domiciled in a third country and are not subject in said domicile to corporate income tax of at least 15 percent. or are exempt from it, if the fair market value of units of such corporations equal more than 10 percent. of the fair market value of those corporations.

– units of investment funds, which in accordance with their terms and conditions of investment invest more than 50 percent. of their value or more than 50 percent. of their gross assets (determined in accordance with the InvStG as being the value of the fund´s assets without taking into account liabilities) themselves or as a fund of fund indirectly in units of corporations in the amount of 51 percent. of their value; if the terms and conditions of an equity fund make provisions for a percentage higher than 51 percent. of its value or its gross assets, the share of the equity capital investment is, by way of derogation, deemed to be the amount of the higher percentage;

– units of investment funds, which in accordance with their terms and conditions of investment invest at least 25 percent. of their value or at least 25 percent. of their gross assets (determined in accordance with the InvStG as being the value of the fund´s assets without taking into account liabilities) themselves or as a fund of fund indirectly in units of corporations in the amount of 25 percent. of their value; if the terms and conditions of a mixed fund make provisions for a percentage higher than 25 percent. of its value or its gross assets, the share of the equity capital investment is, by way of derogation, deemed to be the amount of the higher percentage;

– units of investment funds that carry out a valuation at least once per week in the amount of the percentage of their assets published on each valuation date that they actually invest themselves, or as a fund of fund, in units of corporations.

	Units of corporations as defined in indents 2 through 4 are: - units of corporations that are admitted to official trading on a stock exchange or admitted to, or included in, another organised market (in accordance with the definition of an organised market of the KAGB); - units of corporations that are not real estate companies and that are domiciled in an EU Member State or EEA Member State and are subject there to corporate income tax and are not exempt from it; - units of corporations that are not real estate companies and that are domiciled in a third country and are subject there to corporate income tax of at least 15 percent. and are not exempt from it; and - units of other investment funds, which in turn meet the requirements of indents 2 through 4 and of this sentence, in the respective amount specified there. However, units of corporations are not those that correspond to the categories as set out in sub-indents 1 through 5 in indent 1 or are held indirectly via partnerships. Equity capital investments indirectly held by the Sub-Fund via partnerships are not equity capital investments. Individual investment fund units may only be taken into consideration once for the purposes of determining the daily equity capital investment rate;
"Money Market Instruments"	Means instruments normally dealt in on a money market which are liquid and have a value which can be accurately determined at any time;
"NAV Date"	Means (unless otherwise provided in the Product Annex) a day other than a Saturday and a Sunday, 1 January, 2 January (if 1 January falls on a Sunday), 3 January (if 1 January falls on a Saturday), Good Friday, Easter Monday, 25 December, 26 December, 27 December (if 25 December falls on a Saturday or a Sunday) and 28 December (if 25 December falls on a Friday or a Saturday). A NAV Date is the day as of which the assets and liabilities of the Sub-Fund are valued in accordance with the section "Determination of the Net Asset Value" of the Prospectus. Each Transaction Day will also be a NAV Date;
"Net Assets"	Means the Net Asset Value of a Sub-Fund or of a Class of a Sub-Fund or of the Shares but before deduction of the Management Company Fee and Fixed Fee and any other fees and expenses to be deducted from the assets of such Sub-Fund;
"Net Asset Value"	Means the net asset value of the Company, of a Sub-Fund or of a Class of Shares, as appropriate, calculated as described in this Prospectus;
"Net Asset Value per Share"	Means the Net Asset Value attributable to all the Shares issued in respect of a particular Sub-Fund and/or Class of Shares, as appropriate, divided by the number of Shares issued by the Company in respect of such Sub-Fund or Class of Shares;
"New Class"	Means, in case of conversion of Shares, the new Class of Shares into which a Shareholder has converted part or all of his Shares belonging to the Original Class, as described under "Conversion of Shares";
"New Sub-Fund"	Means in case of conversion of Shares, the new Sub-Fund into which a Shareholder has converted part or all of his Shares relating to the Original Sub-Fund, as described under "Conversion of Shares";
"OECD"	Means the Organisation for Economic Cooperation and Development, whose member states include all countries listed on the OECD website: http://www.oecd.org;
"OECD Member State"	Means any of the member states of the OECD;
"Offering Period"	Means the period during which Shares in relation to a Sub-Fund may be subscribed at the Initial Issue Price as specified in the relevant Product Annex;
"Original Class"	Means, in case of a conversion of Shares, the Class of Shares from which a Shareholder wants to convert part or all of his Shares into Shares of a New Class, as described under "Conversion of Shares";
"Original Sub-Fund"	Means in case of a conversion of Shares, the Sub-Fund from which a Shareholder requests to convert part or all of his Shares into Shares relating to the New Sub-Fund, as described under "Conversion of Shares";
"Other Administrative Expenses"	Means the expenses incurred in connection with the Company's operations as described in more detail under "Fees and Expenses";

"Participants"	Means account holders in an International Central Securities Depositary, which may include, amongst others, Authorised Participants, their nominees or agents and who hold their interest in Shares settled and/or cleared through the applicable International Central Securities Depositary;
"Portfolio Composition File"	Means the file setting out the Investments and/or Cash Component which may be delivered (a) by Authorised Participants in the case of subscriptions or (b) by the Company in the case of redemptions;
"Primary Market Transaction Costs"	Means in relation to subscriptions or redemptions on the primary market, costs which may be charged to Authorised Participants, which may include: part or all of any Transaction Costs; all stamp and other duties; taxes; governmental charges; brokerage; bank charges; foreign exchange spreads; interest; custodian charges (relating to sales and purchases); transfer fees; registration fees and other duties and charges whether in connection with the original acquisition or increase of the assets of the relevant Sub-Fund or the creation, issue, sale, conversion or redemption of Shares or the sale or purchase of Investments or otherwise which may have become or may be payable in respect of or prior to or in connection with or arising out of or upon the occasion of the transaction or dealing in respect of which such duties and charges are payable. For the avoidance of doubt, this may include a provision for the difference between the price at which assets were valued for the purpose of calculating the Net Asset Value and the estimated or actual price at which such assets shall be bought as a result of a subscription or sold as a result of a redemption. It shall not include any commission payable to agents on sales and purchases of Shares or any commission, taxes, charges or costs which may have been taken into account in ascertaining the Net Asset Value of Shares in the relevant Sub-Fund;
"Product Annex"	Means an annex to this Prospectus describing the specific features of a Sub-Fund. The Product Annex is to be regarded as an integral part of the Prospectus;
"Professional Investors"	Means an investor who possesses the experience, knowledge and expertise to make its own investment decisions and properly assess the risks that it incurs and comply with the criteria of the MiFID (annex II);
"Prohibited Persons"	Means any person, firm or corporate entity, determined in the sole discretion of the Board of Directors as being not entitled to subscribe for or hold Shares in the Company or, as the case may be, in a specific Sub-Fund or Class, (i) if in the opinion of the Board of Directors such holding may be detrimental to the Company or the majority of its shareholders, (ii) if it may result in a breach of any law or regulation, whether Luxembourg or foreign, (iii) if as a result thereof the Company or its shareholders may become exposed to disadvantages of a tax, legal or financial nature that it would not have otherwise incurred (including inter alia any liability that might derive from FATCA or a requirement to register under any securities or investment laws or other laws or requirements of any country or authority) or (iv) if such person would not comply with the eligibility criteria of a given Class. Would especially qualify as Prohibited Person any person, firm or corporate entity which (i) is not an exempt beneficial owner, nor an active NFFE, (ii) is a U.S. person qualifying as U.S. specified person, or (iii) is a non-participating financial institution, within the meaning of the Luxembourg IGA;
"Prospectus"	Means this prospectus including, Annual Report, Semi-annual Report, Quarterly Reports (as the case may be) and Product Annexes, as amended, supplemented, restated or otherwise modified from time to time;
"Redemption Charge"	Means the charge or fee to be paid out of the Redemption Price which Shares may be subject to, as described under "Subscriptions and Redemptions of Shares (Primary Market)" and in the relevant Product Annex. No Redemption Charge will be applicable unless otherwise provided for in the relevant Product Annex;
"Redemption Dividend"	Means a dividend paid in respect of Shares which are the subject of a valid request for redemption;
"Redemption Price"	Means the price at which Shares are redeemed (before deduction of any charges, costs, expenses or taxes), as described under "Subscriptions and Redemptions of Shares (Primary Market)";
"Redemption Proceeds"	Means the Redemption Price less any charges, costs, expenses or taxes, as described under "Subscriptions and Redemptions of Shares (Primary Market)";
"Reference Currency"	Means the currency that is used by the Administrative Agent to calculate the Net Asset Value per Share of the relevant Sub-Fund. Unless otherwise specified in the relevant Product Annex, the Reference Currency will be Euro;

"Reference Index"	Means the index of securities or other assets whose performance an Index Tracking Fund will aim to reflect, pursuant to its investment objective and in accordance with its investment policies, as specified in the relevant Product Annex. The "Reference Index" could comprise several indices, and references to "Reference Index" shall be read accordingly;
"Registrar and Transfer Agent"	Means State Street Bank International GmbH, Luxembourg Branch with registered office at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg;
"Registrar, Transfer Agent and Listing Agent Fee"	Means any fees payable to the Registrar and Transfer Agent pursuant to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement;
"Regulated Market"	Means a regulated market, which operates regularly and is recognised and open to the public;
"Regulations"	Means (i) Part 1 of the Law, (ii) the UCITS Directive, (iii) any amendment or replacement legislation thereto for the time being in force, (iv) any regulation of any type taken in pursuant of (i), (ii) or (iii), as well as (v) any rule, binding guideline and general or specific position from time to time adopted by the CSSF or ESMA pursuant thereto;
"Relevant Stock Exchanges"	Markets on which the Shares of the Sub-Funds may be listed such as Luxembourg Stock Exchange, Deutsche Börse or other stock exchanges;
"Retail Investor"	Means an investor not qualifying as an Institutional Investor;
"Securities Lending Agent"	Means Deutsche Bank AG, acting through its Frankfurt am Main head office and its London and New York branches, unless otherwise specified in the Product Annex;
"Semi-annual Report"	Means the last available semi-annual report of the Company including the Company's semi-annual unaudited accounts, all to be considered as an integral part of the Prospectus;
"Settlement Day"	Means a day other than a Saturday and a Sunday, 1 January, Good Friday, Easter Monday, 25 December, and 26 December. A Settlement Day is the day on which the subscription proceeds or Redemption Proceeds are paid. For further information, please refer to the "Subscriptions and Redemptions of Shares (Primary Market)" section of the Prospectus as well as the relevant Product Annex;
"SFDR"	Means Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector, as amended;
"Shareholder(s)"	Means the Shareholder(s) duly registered in the Company's shareholders' register;
"Shares"	Means the Shares with no par value in the Company, issued in such form as described in the relevant Product Annex;
"Significant Market"	Means either a Direct Replication Significant Market or an Indirect Replication Significant Market;
"Sub-Fund"	Means a separate portfolio of assets established for one or more Share Classes of the Company which is invested in accordance with a specific Investment Objective. The Sub-Funds do not have a legal existence distinct from the Company; however each Sub-Fund is liable only for the debts, liabilities and obligations attributable to it. The specifications of each Sub-Fund will be described in the relevant Product Annex;
"Sub-Portfolio Management Agreement"	Means the agreement between the relevant Investment Manager and a Sub-Portfolio Manager;
"Sub-Portfolio Manager"	Means the entities referred to under "MANAGEMENT & ADMINISTRATION" and "Management and Administration of the Company";
"Subsequent Subscriptions"	Means subscriptions for Shares made on or after the Launch Date, as described under "Subscriptions and Redemptions of Shares (Primary Market)";
"Swap Calculation Agent"	Means any Swap Counterparty of a Sub-Fund, unless otherwise specified in the Product Annex;
"Swap Counterparty"	Means any entity or entities with whom the Company or the Management Company will conclude OTC Swap Transactions in respect of one or more Sub-Funds as described under "The Swap Counterparties" under "Management and Administration of the Company";

"Total Return Swaps" or "TRS"	Means a bilateral derivative agreement in which each party agrees to exchange the total economic performance based of an underlying instrument represented by a basket of securities or the performance of the index or underlying asset. The total economic performance will include the income from interest and fees, gains and losses from price movements and credit losses on the underlying during the contract period according to the type of underlying. The total economic performance to be exchanged is calculated by reference to an agreed notional amount of quantity;
"Transaction Costs"	Means any costs and expenses incurred in respect of the buying and selling of portfolio securities and financial instruments, brokerage fees and commissions, interest or taxes payable in respect of such purchase and sale transactions, as may be more fully described in the relevant Product Annex;
"Transaction Day"	Means a day for which subscriptions for, conversions from and redemptions of Shares can be made in order to be dealt with by the Registrar and Transfer Agent as described under "Conversion of Shares" and "Subscriptions and Redemptions of Shares (Primary Market)" in the main part of the Prospectus. In general, each Business Day will be a Transaction Day. However, some Business Days will not be Transaction Days where Significant Markets are closed and/or such other days as the Management Company may from time to time determine provided that there is at least one Transaction Day per fortnight. Any applications received by the Registrar and Transfer Agent after the Cut-off Time for a Transaction Day will be deferred to the next Transaction Day and processed on the basis of the Net Asset Value per Share calculated for such deferred Transaction Day. The Management Company may declare that a Business Day is a Transaction Day when a Significant Market is closed, in its discretion, where it believes it to be more appropriate. The Transaction Day for each Sub-Fund is available from the Investment Manager and/or Sub-Portfolio Manager;
"UCI"	Means an undertaking for collective investment;
"UCITS"	Means an Undertaking for Collective Investment in Transferable Securities established pursuant to the Regulations;
"UCITS Directive"	Means the European Parliament and Council Directive 2009/65/EC of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to UCITS, as may be amended;
"United States" or "U.S."	Means the United States of America or any of its territories, possessions or other areas subject to its jurisdiction including the Commonwealth of Puerto Rico;
"Upfront Subscription Sales Charge"	Means the sales charge which investors subscribing for Shares as described under "Fees and Expenses" and in the relevant Product Annex may be subject to. No Upfront Subscription Sales Charge will be applicable unless otherwise provided for in the relevant Product Annex;
"U.S. Person"	Means U.S. persons (as defined for the purposes of the United States federal securities, commodities and tax laws, including Regulation S under the Securities Act) or persons who are resident in the United States at the time the Shares are offered or sold; and
"Valuation Day"	Means (unless otherwise defined in the Product Annex) the first day (other than a Saturday and a Sunday, 1 January, 2 January (if 1 January falls on a Sunday), 3 January (if 1 January falls on a Saturday), Good Friday, Easter Monday, 25 December, 26 December, 27 December (if 25 December falls on a Saturday or a Sunday) and 28 December (if 25 December falls on a Friday or a Saturday)) following a NAV Date. A Valuation Day is the day on which the Net Asset Value in respect of a Sub-Fund is calculated and published.

STRUCTURE

The Sub-Funds

The Company has adopted an "umbrella" structure to provide both institutional and individual investors with a choice of different investment portfolios ("**Sub-Funds**"). Each Sub-Fund will be differentiated by its specific Investment Objective, Investment Policy, and currency of denomination or other specific features as described in the relevant Product Annex. A separate pool of assets is generally maintained for each Sub-Fund and is invested in accordance with each Sub-Fund's respective Investment Objective and Policy.

The Classes of Shares

The Board of Directors of the Company may decide to create within each Sub-Fund different Classes of Shares. All Classes of Shares relating to the same Sub-Fund will be commonly invested in accordance with such Sub-Fund's Investment Objective and Policy but may differ with regard to their fee structure, Minimum Initial Subscription Amount, Minimum Subsequent Subscription Amount, Minimum Holding Requirement, Minimum Redemption Requirement, dividend policy, investor eligibility criteria or other particular feature(s) as the Board of Directors shall decide. A separate Net Asset Value per Share will be calculated for each issued Class of Shares in relation to each Sub-Fund. The different features of each Class of Shares available relating to a Sub-Fund are described in detail in the relevant Product Annex.

The Company reserves the right to offer only one or several Classes of Shares for purchase by investors in any particular jurisdiction in order to conform to local law, custom or business practice. The Company also reserves the right to adopt standards applicable to certain classes of investors or transactions in respect of the purchase of a particular Class of Shares.

Any Shareholder or Authorised Participant may be required to provide the Company with any information or document considered as necessary for the purpose of determining whether or not the beneficial owner of such Shares is (i) a Prohibited Person or (ii) a U.S. Person.

If at any time it shall come to the Company's attention that Shares are beneficially owned by one of the persons mentioned under (i) and (ii) above, either alone or in conjunction with any other person, and such person fails to comply with the instructions of the Company to sell his Shares and to provide the Company with evidence of such sale within 30 calendar days of being so instructed by the Company, the Company may in its discretion compulsorily redeem such Shares at the Redemption Price immediately after the close of business specified in the notice given by the Company to the Prohibited Person or U.S. Person of such compulsory redemption, the Shares will be redeemed in accordance with their respective terms and such investors will cease to be the owners of such Shares.

Shareholders or Authorised Participants should note that in these circumstances a Redemption Charge may be levied on the basis of the Redemption Price.

The Shares will be issued by the Company exclusively in relation to Sub-Funds with the aforementioned Investment Policies and may be subscribed in cash or in kind (or a combination of both cash and in kind) as explained in further detail under "Subscriptions and Redemptions of Shares (Primary Market)" or as the case may be in the relevant Product Annex.

The Shares may be differentiated between Distribution Shares (identified by the letter "D") and Capitalisation Shares (identified by the letter "C"). Other Classes may be offered with specific features such as fee structures, minimum subscription amount, investor eligibility criteria or other specific features.

The Shares will be listed for trading on one or more stock exchanges, unless otherwise specified in the relevant Product Annex.

The Currency Hedged Share Classes

For a Currency Hedged Share Class, the Investment Manager and/or the Sub-Portfolio Manager and/or the Currency Hedging Manager, as the case may be, will seek to hedge the Denomination Currency of the Currency Hedged Share Class against the currency exposures of the underlying securities in the portfolio/Reference Index which differ to the Denomination Currency of that Currency Hedged Share Class. Currency Hedged Share Classes include "Hedged" and the relevant Denomination Currency in their name (e.g. 1C - EUR Hedged).

Hedging strategies with respect to Currency Hedged Share Classes will be implemented in line with the Regulations.

For Direct Replication Funds, Hybrid Replication Funds, or Actively Managed Funds, the Sub-Portfolio Manager, and for Indirect Replication Funds (where the investment objective of the Currency Hedged Share Class is to track an unhedged index rather than a currency hedged index), the Currency Hedging Manager, will generally hedge these currency exposures at Share Class level by entering into currency forward exchange contracts or other types of derivative contracts which reflect a foreign exchange hedging exposure.

A tolerance level will be applied to seek to ensure that over-hedged positions will not exceed 105 percent. of the Net Asset Value of the relevant Currency Hedged Share Class and that under-hedged positions will not fall short of 95 percent. of the portion of the Net Asset Value of the relevant Currency Hedged Share Class which is to be hedged against currency movements.

Investors should note that there may be costs associated with the use of foreign exchange hedging transactions which will be borne by the relevant Currency Hedged Share Class.

Investors should also note that the Currency Hedged Share Classes do 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. Hedging involves additional risks which are set out in this Prospectus under chapter "Risk Factors".

INVESTMENT OBJECTIVES AND POLICIES

The Board of Directors determines the specific Investment Policy and Investment Objective of each Sub-Fund, which are described in more detail in the respective Product Annexes to this Prospectus. The Investment Objectives of the Sub-Funds will be carried out in compliance with the limits and restrictions set forth under "Investment Restrictions" below. Each Sub-Fund will adhere to the general investment strategy as described hereunder, which in the absence of any unforeseen circumstances or other events may not change.

Index Tracking Funds

The Investment Objective of Index Tracking Funds is to provide investors with a return linked to a Reference Index.

In such case the value of the Sub-Fund's Shares is linked to the Reference Index, the performance of which may rise or fall. Hence, investors should note that the value of their investment could fall as well as rise and they should accept that there is no guarantee that they will recover their initial investment. The Reference Index may have an Index Administrator or other agents. The existence of such Index Administrator and/or agents will be specified in the relevant Product Annex.

A list of the constituents which form the Reference Index as defined in the relevant Product Annex is available on the website of the Index Administrator.

An Index Tracking Fund may carry out its Investment Objective via an Indirect Investment Policy, a Direct Investment Policy, and/or a Hybrid Investment Policy as more fully described in the following paragraphs.

Index Tracking Funds with an Indirect Investment Policy

The Index Tracking Funds with an Indirect Investment Policy include the reference "Swap" in their name.

Index Tracking Funds with an Indirect Investment Policy ("**Indirect Replication Funds**") may not invest directly in the constituents of the Reference Index. Instead, the exposure to the performance of the Reference Index will be achieved by way of derivative transactions and/or instruments (the "**Derivative Transaction(s)**"). In particular, an Indirect Replication Fund will conclude OTC swap transactions negotiated at arm's length with one or more Swap Counterparties (the "**OTC Swap Transaction(s)**"). For the avoidance of doubt, the OTC Swap Transactions would qualify as total return swaps within the meaning of Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 (the "**SFTR Regulation**").

Indirect Replication Funds do not currently provide for the possibility to enter into securities lending agreements, buy-sell or sell-buy back transactions, margin lending transactions or repurchase agreements (and/or reverse repurchase agreements), as covered by the SFTR Regulation. Should the Board of Directors decide to provide for such possibility, the Prospectus will be updated prior to the entry into force of such decision in order for the Company to comply with the relevant disclosure requirements of the SFTR Regulation for these Indirect Replication Funds.

In order to achieve its Investment Objective and in accordance with the Investment Restrictions, an Indirect Replication Fund may at any time invest part or all of the net proceeds of any issue of its Shares:

(a) in Invested Assets and use one or more OTC Swap Transactions the purpose of which is to exchange all or part of the performance and/or income of such Invested Assets to gain exposure to the Reference Index (an "**Unfunded Swap**"); and/or,

(b) in one or more OTC Swap Transactions the purpose of which is to exchange all or part of the invested proceeds to gain exposure to the Reference Index (a "**Funded Swap**").

The Invested Assets that can be subject to an Unfunded Swap are equity securities of issuers listed or traded on an official stock exchange of an OECD Member State unless otherwise specified in the relevant Product Annex. The Investment Manager will exclude from the universe of eligible Invested Assets certain securities as further outlined in the section headed "Sustainability-Related Disclosures Under SFDR And EU Taxonomy Regulation" below.

For Funded Swaps, the maximum proportion of Net Asset Value that is subject to OTC Swap Transactions is 110 percent. excluding the impact of fees and foreign exchange ("**FX**") hedging arrangements, as applicable; whilst the expected proportion of Net Asset Value that is subject to OTC Swap Transactions is 100 percent. of the Net Asset Value, excluding the impact of fees and FX hedging arrangements, as applicable, unless otherwise specified in the relevant Product Annex.

For Unfunded Swaps, the maximum proportion of the Net Asset Value that is subject to OTC Swap Transactions in relation to the Reference Index is 110 percent. of the Net Asset Value excluding the impact of fees and FX hedging arrangements, as applicable; whilst the expected proportion of the Net Asset Value that is subject to OTC Swap Transactions in relation to the Reference Index is 100 percent. of the Net Asset Value, excluding the impact of fees and FX hedging arrangements, as applicable, unless otherwise specified in the relevant Product Annex.

For Unfunded Swaps, the maximum and expected proportion of the Net Asset Value that is subject to Derivatives Transactions in relation to Invested Assets is the same proportion as the proportion of the value of Invested Assets to the Net Asset Value of the relevant Sub-Fund.

An Indirect Replication Fund may, with due regard to the best interests of its Shareholders and subject to any conditions set forth in each specific Product Annex, decide from time to time to switch partially or totally from a Funded Swap to an Unfunded Swap, and vice versa.

The Invested Assets, Derivative Transactions and any techniques used to link the Invested Assets to the Reference Index or the Derivative Transactions, or the invested proceeds to the Reference Index will be managed by the relevant Investment Manager and/or the Sub-Portfolio Manager. The management of the Invested Assets will generally not involve the active buying and selling of securities on the basis of investment judgement and economic, financial and market analysis.

In principle, the return that the Shareholder will receive will largely be dependent on the performance of the Invested Assets, the performance of the Reference Index and the performance of any techniques used to link the Invested Assets and/or the net proceeds from the issue of Shares to the Reference Index.

Depending on the value of the Derivative Transactions and its chosen policy an Indirect Replication Fund may be at any time fully or partially exposed to one or more counterparties (including one or more Swap Counterparties), in which case appropriate collateral or other counterparty risk mitigation arrangements compliant with the Regulations and EMIR will be taken/implemented and/or payment will be received from the Derivative Transactions counterparties so that the percentage of the counterparty risk exposure remains within the limits set out in the Regulations and EMIR. Please refer to section "OTC Derivative Transactions entered into on behalf of Indirect Replication Funds and Direct Replication Funds" below.

Further information on the issuer credit quality, liquidity, valuation, collateral diversification, correlation policies and the management of collateral received are available in section 8 of chapter "Investment Restrictions" of this Prospectus.

Adjustment to OTC Swap Transactions to reflect index replication costs ("**OTC Swap Transaction Costs**")

In relation to Indirect Replication Funds, each of the Swap Counterparties may enter into hedging transactions in respect of the OTC Swap Transaction(s). According to the OTC Swap Transaction(s) entered into between the Sub-Funds and the Swap Counterparty, the Sub-Funds shall receive the performance of the Reference Index adjusted to reflect certain index replication costs and any other transaction costs or charges incurred by the Swap Counterparty in relation to the OTC Swap Transaction. These costs may include, amongst other things, costs, taxes or other duties associated with the buying, selling, custody, holding or any other transactions relating to investments in transferable securities and/or OTC Swap Transactions and/or collateral. In extreme market conditions and exceptional circumstances, particularly in connection with less developed markets and emerging markets, such costs may increase significantly and as a result the OTC Swap Transaction Costs may increase. Please refer to the risk factor "Adjustment to OTC Swap Transactions to reflect index replication costs" for more information in this regard. The Shareholders will therefore bear indirectly the OTC Swap Transaction Costs which may be passed on to certain Indirect Replication Funds by the Swap Counterparty and may affect the ability of the Indirect Replication Fund to achieve its Investment Objective. The OTC Swap Transaction Costs may differ depending on the Reference Index whose performance the Sub-Funds aim to reflect. The OTC Swap Transaction Costs may also vary from time to time depending on actual market conditions.

- Situation 1: the Reference Index is "long" (i.e. its objective is to reflect the performance of its constituents). Then the index replication costs will be associated with (i) the buying and selling by the Swap Counterparty of the constituents of the Reference Index in order to reflect the Reference Index performance; or (ii) custody or other related costs incurred by the Swap Counterparty in relation to holding the constituents of the Reference Index; or (iii) taxes or other duties imposed on the buying or selling of the constituents of the Reference Index; or (iv) taxes imposed on any income derived from the constituents of the Reference Index; or (v) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.
- Situation 2: the Reference Index is "leveraged" (i.e. its objective is to reflect the daily leveraged performance of the long version of the Reference Index). Then the index replications costs will be associated with (i) the buying and selling and any borrowing and/or financing of the constituents of the Reference Index in order to reflect the Reference Index performance, (ii) custody or other related costs incurred by the Swap Counterparty in relation to holding the constituents of the Reference Index, (iii) financing charges incurred to safeguard against severe market movements of the constituents of the Reference Index, (iv) unexpected financing costs in the event of severe market movements, (v) taxes imposed on any income derived from the constituents of the Reference Index, or (vi) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.
- Situation 3: the Reference Index is "short" (i.e. its objective is to reflect the daily inverse performance of the long version of the Reference Index) or "short and leveraged" (i.e. its objective is to reflect the leveraged daily inverse performance of the long version of the Reference Index). Then the index replications costs will be associated with (i) the borrowing and/or financing of the constituents of the Reference Index in order to reflect the Reference Index performance, (ii) financing charges incurred to safeguard against severe market movements of the constituents of the Reference Index, (iii) unexpected financing costs in the event of severe market movements or (iv) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.

According to the OTC Swap Transaction(s) entered into between the Sub-Funds and each Swap Counterparty, the Sub-Funds may receive the performance of the Reference Index adjusted to reflect taxes that may be payable by the Swap Counterparty in relation to such OTC Swap Transaction(s), in addition to any adjustments made in accordance with Situation 1, 2 or 3 above.

The applicable OTC Swap Transaction Costs with respect to each Indirect Replication Fund are disclosed in the Annual and Semi-annual Reports of the Company.

Enhancements resulting from Swap hedging policy

In relation to Indirect Replication Funds, from time to time each Swap Counterparty may achieve certain benefits or enhancements as a result of its hedging activities. In certain circumstances, the Swap Counterparty may, in its absolute and sole discretion, decide to pay some or all of such benefits or enhancements to the Sub-Fund under the OTC Swap Transaction(s) (such payments being referred to as "**Enhancements**") in addition to any payments contractually due under the OTC Swap Transaction(s). The amount and frequency of such Enhancements will be decided by the Swap Counterparty in its sole and absolute discretion. Therefore, a Sub-Fund may receive more than it is contractually entitled to under the OTC Swap Transaction(s) which will be reflected in the Net Asset Value and past performance of the Sub-Fund. Investors should note that there is no guarantee that Enhancements will be paid to the relevant Sub-Fund, even if the Swap Counterparty achieves certain benefits or enhancements as a result of its hedging activities, and investors should also note that payment of any future Enhancements may not mirror past payments of Enhancements (if any).

Index Tracking Funds with a Direct Investment Policy

Index Tracking Funds with a Direct Investment Policy ("**Direct Replication Funds**") may carry out their investment objective by investing in a portfolio of transferable securities or other eligible assets that may comprise either:

(i) all, or a substantial number of, the constituents of the Reference Index (such Sub-Fund a "**Full Replication Fund**"), or

(ii) an optimised sample of the constituents of the Index, or unrelated transferable securities or other eligible assets (such Sub-Fund an "**Optimised Replication Fund**").

Optimised Replication Funds may not hold every constituent or the exact weighting of a constituent in the Reference Index but will seek to provide a return similar to that of its Reference Index by (i) investing either in a sub-set of the constituents of the Reference Index, (ii) seeking to gain exposure to the Reference Index by utilising optimisation techniques and/or (iii) by investing in securities that are not part of that Reference Index. Use of these investment techniques, the implementation of which is subject to a number of constraints detailed in the "Investment Restrictions" section of this Prospectus, may not produce the intended results.

Full Replication Funds may from time to time not contain all of the constituents of the Reference Index, and accordingly such Sub-Funds may hold other transferable securities or other eligible assets in accordance with the Investment Restrictions. The extent to which a Full Replication Fund does not contain all of the constituents of the Reference Index will vary, and will be dependent on a number of factors which may include, but are not limited to; the nature and number of the constituents of the Reference Index (for example, where a Reference Index comprises a large number of securities, contains a number of illiquid securities or where the availability of constituent securities for purchase is limited), legal or regulatory restrictions, the size of the Sub-Fund, and the utilisation of efficient portfolio management techniques.

Index Tracking Funds with a Hybrid Investment Policy

Index Tracking Funds with a Hybrid Investment Policy ("**Hybrid Replication Funds**") may carry out their investment objective by investing in a portfolio of transferable securities or other eligible assets that may comprise:

(i) All or a representation of the securities comprised in the Reference Index, or unrelated transferable securities or other eligible assets; and/or

(ii) Collective investment schemes, including but not limited to, Sub-Funds of the Company, ETFs within the Xtrackers range and other UCITS ETFs which are traded on a regulated market and align with certain segments of the Reference Index of the respective Hybrid Replication Funds; and/or

(iii) Financial contracts (derivatives) referencing their respective Reference Index and/or other regulated financial indices referencing certain countries, regions or sectors that are represented in the relevant Reference Index. Hybrid Replication Funds may conclude OTC swap transactions which will be negotiated at arm's length with one or more Swap Counterparties (the "**OTC Swap Transaction(s)**"). For the avoidance of doubt, the OTC Swap Transactions would qualify as total return swaps within the meaning of Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 (the "**SFTR Regulation**"). Details on the types of OTC Swap Transaction(s) that Hybrid Replication Funds may enter into are set out under the heading *Index Tracking Funds with an Indirect Investment Policy*.

Hybrid Replication Funds may also utilise optimisation or index intelligence techniques seeking to provide a return similar to that of their respective Reference Index.

Hybrid Replication Funds provide for the possibility to enter into Securities Lending Transactions (as defined below) on the direct investments and not in relation to the Invested Assets corresponding to any Unfunded Swap but do not currently provide for the possibility to enter into margin lending transactions or repurchase agreements (and/or reverse repurchase agreements), buy-sell or sell-buy back transactions. Should the Board of Directors decide to provide for such possibility, the Prospectus will be updated prior to the entry into force of such decision in order for the Company to comply with the relevant disclosure requirements of the SFTR Regulation for these Sub-Funds.

Use of these investment techniques, the implementation of which is subject to a number of constraints detailed in the "Investment Restrictions" section of this Prospectus, may not produce the intended results.

Actively Managed Funds

Actively Managed Funds pursue an active investment strategy that will be implemented by the Management Company and/or the Investment Managers/Sub-Portfolio Managers (as applicable) in accordance with the Investment Objective and Investment Policy as set out in the relevant Product Annex. The success of the relevant Sub-Fund is largely dependent upon the Management Company and/or the Investment Managers/Sub-Portfolio Managers (as applicable) and there can be no assurance that the Management Company and/or the Investment Managers/Sub-Portfolio Managers (as applicable) or the individuals employed by them will remain willing or able to provide advice to the Sub-Fund or that trading on this advice by the Management Company and/or the Investment Managers/Sub-Portfolio Managers (as applicable) will be profitable in the future.

Direct Replication Funds and Actively Managed Funds provide for the possibility to enter into securities lending agreements but do not currently provide for the possibility to enter into margin lending transactions or repurchase agreements (and/or reverse repurchase agreements), buy-sell or sell-buy back transactions or total return swaps as covered by the SFTR Regulation. Should the Board of Directors decide to provide for such possibility, the Prospectus will be updated prior to the entry into force of such decision in order for the Company to comply with the relevant disclosure requirements of the SFTR Regulation for these Sub-Funds.

The types of securities in which Direct Replication Funds, Hybrid Replication Funds, and Actively Managed Funds may invest include American depositary receipts ("**ADRs**"), global depositary receipts ("**GDRs**"), and/or non-voting depositary receipts ("**NVDRs**"). Such Sub-funds may also invest in bank deposits, Money Market Instruments and money market funds to carry out their investment objective and/or for treasury purposes. Such Sub-Funds may also receive income in respect of the securities held by them. Taxes may be imposed on income received from securities held by a Sub-Fund.

Direct Replication Funds, Hybrid Replication Funds, and Actively Managed Funds may from time to time invest temporary cash balances (such as subscription proceeds which are pending investment or any other temporary cash balances) in FDIs to gain market exposure and to seek to reduce Tracking Error.

The Investment Manager may exclude from the portfolios of the Sub-Funds certain securities as further outlined in the section headed "Sustainability-Related Disclosures Under SFDR And EU Taxonomy Regulation" below. In addition, the Investment Manager reserves the right to exclude from the portfolios of the Sub-Funds any securities which do not comply with the Investment Manager's policies.

Notwithstanding the foregoing, it should be noted that due to exceptional circumstances, such as, but not limited to, disruptive market conditions or extremely volatile markets, instances may arise which cause a Direct Replication Fund or Hybrid Replication Fund's tracking accuracy to diverge substantially from the Reference Index. Investors should consult the section headed "Risk Factors" below.

Change of Reference Index of Index Tracking Funds

The Board of Directors may decide, if it considers it to be in accordance with the Law and in the interest of the Company or any relevant Index Tracking Fund to do so, to substitute the existing Reference Index of a Sub-Fund for another Reference Index.

The Board of Directors may, for instance, decide to substitute such a Reference Index in the following circumstances:

- the swaps and other techniques or instruments described under "Investment Restrictions" which are necessary for the implementation of the relevant Sub-Fund's Investment Objective cease to be available in a manner which is regarded as acceptable by the Board of Directors;
- in the determination of the Board of Directors, the accuracy and availability of data of a particular Reference Index has deteriorated;
- the constituents of the Reference Index would cause the Sub-Fund (if it were to follow the Reference Index closely) to be in breach of the limits set out under "Investment Restrictions" and/or materially affect the taxation or fiscal treatment of the Company or any of its Shareholders;
- the particular Reference Index ceases to exist or, in the determination of the Board of Directors, there is a material change in the formula for or the method of calculating a constituent of the Reference Index or there is a material modification of the constituents of the Reference Index;
- the counterparty of swap agreements or options or other derivative instruments notifies the Company that there is limited liquidity in a portion of the constituents of the Reference Index or it becomes impractical to invest in the constituents of the Reference Index;
- the Index Administrator increases its license fees to a level which the Board of Directors considers excessive;
- the licence agreement is terminated; or
- any successor Index Administrator is not considered acceptable by the Board of Directors.

The above list is indicative only and cannot be understood as being exhaustive or limiting the ability of the Board of Directors to change the Reference Index in any other circumstances as the Board of Directors considers appropriate. The Shareholders of the relevant Sub-Fund will be notified of the decision of the Board of Directors to proceed to change the Reference Index through the website www.Xtrackers.com or any successors thereto as well as, if necessary, in the official publications specified in the respective jurisdictions in which the Shares are made available for public distribution. The Prospectus will be updated in case of substitution of the existing Reference Index of a Sub-Fund for another Reference Index.

Any changes to a Reference Index, such as the composition and/or weighting of its constituents, may require a Direct Replication Fund or Hybrid Replication Fund to make corresponding adjustments or rebalancings to its investment portfolio to conform to the relevant Reference Index. Such adjustments may result in (extraordinary) Transaction Costs. The Management Company, the Investment Managers and/or the Sub-Portfolio Managers (as applicable) will monitor such changes and may make adjustments to the portfolio as necessary over several days, if necessary. The use of benchmarks more generally is subject to ongoing regulatory development which may affect a Sub-Fund and/or Reference Index, as set out in this Prospectus under chapter "Risk Factors".

The Board of Directors will also consider certain sustainability risks in the selection of another Reference Index where substitution is required. Please refer to chapter "Sustainability-related disclosures under SFDR and EU Taxonomy Regulation" and to the website https://www.dws.com/en-lu/solutions/sustainability/information-on-sustainability/ under "Information about Policies on the Integration of Sustainability Risks" for further information on the policy, and its application.

Efficient Portfolio Management

The Company may, on behalf of each Sub-Fund, under the conditions and within the meaning and the limits laid down by law and Regulations (including SFTR Regulation), and subject to the Investment Restrictions employ techniques and instruments relating to transferable securities and Money Market Instruments. Such techniques and instruments will be used for efficient portfolio management including for hedging purposes or to provide protection against exchange risk as more particularly described under "Risk Management Policy for FDI" in the Investment Restrictions section of the Prospectus. For the avoidance of doubt, Direct

Replication and Hybrid Replication Funds may use FDIs and/or transferable securities which relate to the Reference Index or constituents of the Reference Index, which may include FDIs which are expected to generate 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 FDIs which each Direct Replication Fund, Hybrid Replication Fund and Actively Managed Fund may invest in include futures, options, swaps, Credit Default Swaps ("**CDSs**"), contracts for differences ("**CFDs**"), forwards including non-deliverable forwards ("**NDFs**"). A Direct Replication Fund, a Hybrid Replication Fund and an Actively Managed Fund may also invest in depositary receipts, certificates, ETFs, UCITS or other eligible collective investment undertakings or P-notes, and money market instruments.

A Direct Replication Fund, a Hybrid Replication Fund, and an Actively Managed Fund may enter into temporary sale and transfer transactions in regard to securities in its portfolio (i.e. securities lending) for up to 50 percent. of its assets and without distinction per asset classes ("**Securities Lending Transactions**") to generate additional income and therewith offset part or all of its costs. The expected portion of assets of Direct Replication Funds, Hybrid Replication Funds and Actively Managed Funds which should be subject to Securities Lending Transactions is specified in the relevant Product Annex. Such transactions are strictly regulated and must, amongst other things, be able to be terminated at any time at the initiative of the Sub-Fund. Securities Lending Transactions nonetheless give rise to certain risks including valuation and operational risks and market and counterparty risks. Depending on the value of the Securities Lending Transactions and its chosen policy, a Sub-Fund may be at any time fully or partially exposed to one or more counterparties, in which case appropriate collateral or other counterparty risk mitigation arrangements compliant with the Regulations will be taken/implemented and/or payment will be received from the Securities Lending Transactions counterparties so that the percentage of the counterparty risk exposure remains within the limits set out in the Regulations.

While all net assets of a Sub-Fund which engages in Securities Lending Transactions will be eligible for such transactions (with no distinction per asset classes in which the Sub-Fund may invest, except for Hybrid Replication Funds which can engage in Securities Lending Transactions on direct investments only), the proportion of a Sub-Fund's net assets subject to Securities Lending Transactions may typically vary within the range specified in the relevant Product Annex. Such variations may be dependent on factors such as, but not limited to, total Sub-Fund's net assets, borrower demand to borrow stocks from the underlying market and seasonal trends in the underlying market. During periods of high demand, the proportion of the Sub-Fund's net assets subject to Securities Lending Transactions may approach the maximum percentage, while there may also be periods in which there is little or no demand from the market to borrow the underlying securities, in which case this proportion could be 0 percent. The Company's counterparties for Securities Lending Transactions are regulated financial institutions headquartered in OECD countries which have, either directly or at parent level, an investment grade rating from at least two of the three main credit rating agencies and which comply with Article 3 of the SFTR Regulation.

For certain Sub-Funds, the Company, as the case may be, and/or the relevant Investment Manager and/or Sub-Portfolio Manager have appointed the Securities Lending Agent. The Securities Lending Agent is authorised (i) to enter into Securities Lending Transactions on behalf of the Company and (ii) to invest any cash received/held on behalf of the Company as collateral pursuant to such Securities Lending Transactions, in accordance with and within the limits set forth in the Agency Securities Lending and Repurchase Agreement, the rules set out in this Prospectus and the Regulations. Any income generated by Securities Lending Transactions (reduced by any applicable direct or indirect operational costs and fees arising there from and paid to the Securities Lending Agent, as the case may be, and/or the relevant Investment Manager and/or Sub-Portfolio Manager) will be payable to the relevant Sub-Fund. As these direct and indirect operational costs do not increase the costs of running the Sub-Fund, they have been excluded from the All-In Fee.

Unless otherwise specified in the relevant Product Annex and to the extent a Sub-Fund undertakes Securities Lending Transactions, the Securities Lending Agent, as the case may be, and/or the relevant Investment Manager and/or Sub-Portfolio Manager shall receive a fee for the services provided in this respect.

Any revenues arising from efficient portfolio management techniques will, after deduction of any expenses and fees, be returned to the relevant Sub-Fund, as specified in the relevant Product Annex.

For further information, please refer to sections 10 and 11 of chapter "Investment Restrictions", chapter "Collateral Arrangements in respect of Securities Lending Transaction(s)" and chapter "Risk Factors" (*Securities lending, buy-sell or sell-buy back transactions and repurchase and reverse repurchase agreement transactions)*.

OTC Derivative Transactions entered into on behalf of Indirect Replication Funds, Direct Replication Funds, Hybrid Replication Funds and Actively Managed Funds

Under EMIR, both parties to OTC derivative contracts not subject to central clearing obligations and not cleared through a CCP within the meaning of EMIR ("**Non-cleared OTC Transactions**"), are required to implement appropriate procedures and arrangements to measure, monitor and mitigate operational risk and counterparty credit risk. This includes the need to put in place between the parties to these Non-Cleared OTC Transactions measures to ensure timely, accurate and appropriately segregated exchange of collateral.

As a result thereof, the Company may have to provide variation margin for a Sub-Fund (i.e. collateral collected by a counterparty to reflect the results of the daily marking-to-market or marking-to-model of outstanding non-cleared OTC derivative contracts) to its counterparty to an OTC derivative transaction.

In addition for certain Sub-Funds, the Company may have to provide initial margin which protects counterparties against potential losses which could stem from movements in the market value of OTC derivative transactions occurring between the last exchange of variation margin before the default of a counterparty and the time that the OTC derivative transactions is replaced or the corresponding risk is hedged.

In relation to the OTC derivative transactions entered into between the Company and counterparties (including Swap Counterparties), the Company may deliver or receive requested collateral by way of title transfer or by way of pledge, depending on the terms of the agreement between the relevant Sub-Fund and the counterparty. Each party will deliver cash or securities

with a view to reduce the net exposure of the relevant Sub-Fund to each counterparty, and vice versa, to 0% (zero per cent), albeit a minimum transfer amount of up to EUR 500,000 (or currency equivalent) will be applicable.

The securities which may be posted as collateral will be bonds issued by certain OECD country governments, central banks, international organisations or corporate bodies or any other eligible collateral under EMIR, including convertible bonds which may be converted into equities included in a main index and equities included in a main index. Haircuts will be applied to such securities in line with the requirements under EMIR. These will be generally at least 15 percent. for equities and between at least 0.5 percent. and 8 percent. for bonds, the haircut depending on factors such as the credit rating, time to maturity and currency for such bonds. Cash collateral will not be subject to haircut. For all non-cash collateral in any other currency than the termination currency of the Non-cleared OTC Transaction, a haircut of at least 8 percent. shall apply. There will also be diversification requirements such that concentration of collateral to cash, single issuer or single issuance is within the "Risk Diversification" requirements set out above.

The market value of securities received as collateral on any day is the bid price at close of business on the preceding day which is in line with market practice.

Further information on the issuer credit quality, liquidity, valuation, collateral diversification, correlation policies and the management of collateral received are available in section 8 of chapter "Investment Restrictions" of this Prospectus.

Reliance on Index Administrators

The Management Company, the Investment Managers and/or the Sub-Portfolio Managers will rely solely on the Index Administrator for information as to the constituents of the Reference Index. If the Management Company, the Investment Manager and/or the Sub-Portfolio Manager of a Sub-Fund is unable to obtain or process such information then the composition and/or weighting of the Reference Index most recently published may, subject to the Management Company's, the Investment Manager's and/or the Sub-Portfolio Manager's overall discretion, be used by the Sub-Fund for the purpose of all adjustments.

Benchmark Regulation

In accordance with the provisions of the Benchmark Regulation, supervised entities (such as UCITS management companies) may use benchmarks in the EU if the benchmark is provided by an administrator which is included in the register of administrators and benchmarks maintained by ESMA pursuant to the Benchmark Regulation (the "**Register**").

Benchmark administrators located in a third country whose indices are used by the Company benefit from the transitional arrangements afforded under the Benchmark Regulation and accordingly may not appear on the Register.

A list of the benchmark administrators whose indices are used by the Company and which, as at the date of this Prospectus, are inscribed in the Register is disclosed in Annex II.

The Management Company maintains a written plan setting out the actions that will be taken in the event that a Reference Index materially changes or ceases to be provided and which is available free of charge at the registered office of the Management Company. For further information please refer to "Change of Reference Index" under chapter "Investment Objectives and Policies".

Costs of rebalancing the Reference Index

Each investor should consider the rebalancing frequency of the relevant Reference Index with reference to their investment strategy.

Investors should note that index rebalancing allows the relevant Reference Index to adjust its constituent weightings to ensure it is accurately reflecting the market(s) it is aiming to represent. Index rebalancing can either occur (i) on a scheduled basis (please see the "General Description of the Reference Index" section of the relevant Product Annex for a more detailed description of the rebalancing frequency of the relevant Reference Index, if applicable); or (ii) on an ad hoc basis to reflect, for example, corporate activity such as mergers and acquisitions. It is possible that index constituents which become ineligible between schedule rebalancing dates, may not be removed from the relevant Reference Index until the next scheduled rebalancing.

For Indirect Replication Funds, the costs of rebalancing may be reflected in the level of the Reference Index, which will thus be reflected in the Net Asset Value of the relevant Sub-Fund. Where applicable, the types of costs of rebalancing will be disclosed in the relevant Product Annex. In this respect, it should be noted that such costs may be referred to by different terms, such as reconstitution costs or roll(ing) costs.

For Direct Replication Funds, the rebalancing of a Reference Index may require the Sub-Fund's portfolio of transferable securities or other eligible assets to be re-balanced accordingly. This may result in transaction costs which may reduce the overall performance of the relevant Sub-Fund.

For Hybrid Replication Funds, the rebalancing of a Reference Index may involve the re-balancing of the Sub-Fund's portfolio of transferable securities or other eligible assets (for the direct replication portion) as well as the adjustment of derivative contracts (for the indirect replication portion). This may require the Sub-Fund's portfolio of transferable securities or other eligible assets to be re-balanced accordingly. This may result in transaction costs related to the rebalancing of the physical portfolio and/or adjustment costs associated with derivative instruments, which may reduce the overall performance of the relevant Sub-Fund. The costs of rebalancing may also be reflected in the level of the Reference Index, which will thus be reflected in the Net Asset Value of the relevant Sub-Fund. Where applicable, the types of costs of rebalancing will be disclosed in the relevant Product Annex. In this respect, it should be noted that such costs may be referred to by different terms, such as reconstitution costs or roll(ing) costs.

Tracking Error and Tracking Difference

The Sub-Funds which track an index are subject to tracking error risks which may result in the value and performance of the Shares not tracking exactly the value and performance of the corresponding Reference Index. For further information on why tracking error may occur, please see "Risks in relation to the tracking of indices" under chapter "Risk Factors" below.

The tracking error is defined as the volatility (as measured by the standard deviation) of the difference between the return of the Sub-Fund and the return of its Reference Index, on an annual basis (the "**Tracking Error**"). It should be differentiated from the tracking difference, which is simply the difference between the return of the Sub-Fund and the return of its Reference Index, on an annual basis or another given period of time (the "**Tracking Difference**").

For Sub-Funds with Currency Hedged Share Classes, the anticipated Tracking Error disclosed represents the Tracking Error of the unhedged Share Class(es) against the relevant Sub-Fund's Reference Index (which is also unhedged), where applicable.

The Tracking Difference indicates the extent to which a Sub-Fund has outperformed or underperformed its Reference Index on an annual basis or another given period of time. In contrast, the Tracking Error measures how consistently the Sub-Fund return matches its Reference Index on an annual basis.

For Hybrid Replication Funds, the use of both direct and indirect replication methods may affect the Tracking Error, as rebalancing and other adjustments are carried out on both the physical portfolio and derivative instruments. In particular, transaction and derivative adjustment costs incurred during rebalancing could influence the Sub-Fund's ability to precisely track its Reference Index.

The anticipated level of Tracking Error, in normal market conditions, will be disclosed for each Share Class in the Product Annexes (please see the "General Description of Share Classes" section of the relevant Product Annex). Investors' attention is drawn to the fact that these figures are only estimates of the Tracking Error level in normal market conditions and should not be understood as strict limits.

A Tracking Error may be impacted as a result of the Investment Manager seeking to ensure compliance with the CW Statement and any other ESG commitments, such as those set out in the relevant Product Annex under "Transparency under SFDR and EU Taxonomy Regulation" and further in Annex IV "Pre-contractual information on Sustainable Investments" (as applicable).

The anticipated tracking error disclosed in each Product Annex is calculated by measuring the performance of the adjusted NAV with reference to the total return net version of the relevant Reference Index, unless otherwise disclosed in the relevant Product Annex. This method is applied as the total return net version of the Reference Index assumes that dividends received from index constituents (net of the applicable withholding taxes) are reinvested in the index, and the adjusted NAV assumes that dividend amounts (net of applicable withholding taxes) payable by that Share Class are reinvested, rather than being distributed. The use of an adjusted NAV should result in an anticipated tracking error which is more representative of the actual performance of the Share Class, as both the index and the Share Class include both price appreciation/depreciation and distributions, if applicable.

Use of increased diversification limits for Index Tracking Funds

In certain exceptional market circumstances, an Index Tracking Fund may make use of the increased risk diversification limits permitted by the Law, which are more fully described in section 2 and 3 of chapter "Investment Restrictions" of this Prospectus, when the relevant Reference Index is rebalanced, either as a function of the rules for composition of the Reference Index, or as a result of the nature of the underlying security universe of the relevant Reference Index. In cases where a Sub-Fund intends to make consistent use of these increased risk diversification limits, an explanation as to the reason for this is given more fully in the relevant Product Annex.

However, in certain exceptional market circumstances, it may be that the weightings of the constituents of a Reference Index and the Sub-Fund tracking such Reference Index exceed the relevant risk diversification limits between rebalancings, irrespective of the relevant rules of composition for such Reference Index:

(1) Equity

In the event that the value of one constituent of the Reference Index increases in value relative to the other constituents within the same Reference Index, for example as a result of that Reference Index constituent significantly outperforming all other constituent companies, the situation may occur whereby the constituent with an increased proportion of the Reference Index could constitute a percentage of the Reference Index which is greater than 20 percent. and up to 35 percent. of the total value of the Reference Index.

For example, over the period 1 December 2001 to 1 December 2012 the weighting of 'Apple (APPL)' within the NASDAQ 100 index rose from 0.95 percent. to 18.21 percent., due to the significant increase in value of 'Apple (APPL)' relative to the other index constituents. As this index represents 100 of the largest non-financial securities listed on the NASDAQ Stock Exchange based on market capitalisation, such continued relative growth could result in the security 'Apple (APPL)' constituting a percentage of the Index which is greater than 20 percent.

(2) Fixed Income

In the event that the value of one constituent of the Reference Index increases in value relative to the other constituents within the same Reference Index, the situation may occur whereby the constituent with an increased proportion of the Reference Index could constitute a percentage of the Reference Index which is greater than 20 percent. and up to 35 percent. of the total value of the Reference Index. For example, such a situation may occur if a number of issuers contained within the Reference Index were to conduct further debt issuances (thereby increasing their respective credit risks and therefore reducing the value of their outstanding bonds) whilst simultaneously, the credit rating of another issuer were to improve, resulting in an increase in the market value of their outstanding bonds. This would result in an increase in the proportional value of the bonds of the issuer with the improved credit rating within the Reference Index.

For example, over the period 29 June 2012 to 31 December 2012 the weighting of 'Republic of Italy 1 March 2026' within the iBoxx® EUR Sovereigns Eurozone 10-15 Total Return Index rose from 4.06 percent. to 4.40 percent., due to the increase in value of this security relative to the other index constituents.

Daily leveraged and/or inverse Index Tracking Funds

The impact of path dependency and compounding on daily returns

Index Tracking Funds that aim to reflect the performance of daily short, daily leveraged short and daily leveraged long indices provide exposure to indices that reset on a daily basis. The performance of a Sub-Fund following such strategies will differ from the performance of the Reference Index it is linked to, on a comparable basis, if an open position in the ETF is held across a number of trading days.

The impact of compounding on Index Tracking Funds that aim to reflect the performance of daily short indices

Daily short indices provide the inverse performance of the corresponding long index on a daily basis. The closing value of a daily short index is therefore used as the starting reference point for index movements on the following day. Due to this daily 'resetting' of the daily short index, the returns of the daily short index will not be inversely proportional to that of the corresponding long index for periods longer than one day, due to the compounding or cumulative effect of the daily returns. The hypothetical example below illustrates the effect of this compounding.

The example below assumes that the daily short index and the corresponding long index are both at 100 points at the end of day 1. At the end of day 2 the long index has fallen by 10 percent. to 90 points and correspondingly the daily short index would increase by 10 percent. to 110 points and would be the starting point for the index measurement the next day.

	Day 1	Day 2	Day 3	Change over 3 days
Long index	100	90 (-10%)	94.5 (+5%)	-5.5%
Daily short index	100	110 (+10%)	104.5 (-5%)	+4.5%

At the end of day 3 the long index has increased by 5 percent. so the new index level will be 94.5 (90 + 4.5; i.e. 5 percent. of 90). At the same time the short index will decrease by 5 percent. from 110 to 104.5 points (110 – 5.5; i.e. 5 percent. of 110). At this point it is clear that the returns of the daily short index are not inversely proportional to that of the corresponding long index. Due to the effects of compounding of the daily returns, the daily short index is up 4.5 percent. whereas the corresponding long index is down 5.5 percent. over the same period. The compounding of the daily returns on the daily short index shows that the cumulative return over periods longer than one day will not be inversely proportional to the returns of the corresponding long index. As the example above shows, compounding has caused the daily short index to underperform. To illustrate the impact of compounding on cumulative returns there are a further four hypothetical scenarios shown below:

1 – Steadily falling market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-2%	-2%	-2%	-2%	
Long index	100	98.00	96.04	94.12	92.24	-7.76%
Daily short index	100	102.00	104.04	106.12	108.24	8.24%

2 – Steadily rising market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		2%	2%	2%	2%	
Long index	100	102.00	104.04	106.12	108.24	8.24%
Daily short index	100	98.00	96.04	94.12	92.24	-7.76%

3 – Market is flat overall and not volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-1.0%	1.0%	-0.5%	1.5%	
Long index	100	99.00	99.99	99.49	100.98	0.98%
Daily short index	100	101.00	99.99	100.49	98.98	-1.02%

4 – Market is flat overall and volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		8%	-6%	-7%	7%	
Long index	100	108.00	101.52	94.41	101.02	1.02%
Daily short index	100	92.00	97.52	104.35	97.04	-2.96%

As the final example shows, the daily short index is likely to underperform against the corresponding long index during periods where markets are volatile and exhibit large day-to-day movements, even though the cumulative movement over the whole period is minimal.

The impact of compounding on Index Tracking Funds that aim to reflect the performance of daily leveraged short indices

The example below assumes that the daily leveraged short index and the corresponding long index are both at 100 points at the end of day 1. At the end of day 2 the long index has fallen by 10 percent. to 90 points. Ignoring the impact of the overnight interest, the daily leveraged short index would have increased by 20 percent. to 120 (100+20 (i.e. 20 percent. of 100)) points and this would be the starting point for the index measurement the next day.

At the end of day 3 the long index has increased by 5 percent. so the new index level will be 94.5 (90 + 4.5 (i.e. 5 percent. of 90)). At the same time the daily leveraged short index will have decreased by 10 percent. from 120 to 108 points (120 - 12 (i.e. 10 percent. of 120)).

At this point it is already clear that the returns of the daily leveraged short index are not two times the inverse returns of the corresponding long index. Due to the effects of compounding of the daily returns, the daily leveraged short index is up 8 percent. whereas the corresponding long index is down 5.5 percent. over the same period.

	Day 1	Day 2	Day 3	Change over 3 days
Long index	100	90 (-10%)	94.5 (+5%)	-5.5%
Daily leveraged short index	100	120(+20%)	108(-10%)	8%

This compounding of the daily returns on the daily leveraged short index shows that the cumulative return over periods longer than one day will not be twice the inverse return of the corresponding long index. Rather, compounding has caused the daily leveraged short index to underperform.

To illustrate the impact of compounding on cumulative returns, a further four hypothetical scenarios are outlined below:

1 - Steadily falling market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-2%	-2%	-2%	-2%	
Long index	100	98.00	96.04	94.12	92.24	-7.76%
Daily leveraged short index	100	(+4%) 104	(+4%) 108.16	(+4%) 112.49	(+4%) 116.99	16.99%

2 - Steadily rising market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		2%	2%	2%	2%	
Long index	100	102.00	104.04	106.12	108.24	8.24%
Daily leveraged short index	100	(-4%) 96.00	(-4%) 92.16	(-4%) 88.47	(-4%) 84.93	-15.07%

3 - Market is flat overall and not volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-1.0%	1.0%	-0.5%	1.5%	
Long index	100	99.00	99.99	99.49	100.98	0.98%
Daily leveraged short index	100	(+2%)	(-2%)	(+1%)	(-3%)	-2.07%

		102	99.96	100.96	97.93	

4 - Market is flat overall and volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		8%	-6%	-7%	7%	
Long index	100	108.00	101.52	94.41	101.02	1.02%
Daily leveraged short index	100	(-16%) 84	(+12%) 94.08	(+14%) 107.25	(-14%) 92.24	-7.76%

As the final example shows, the daily leveraged short index is likely to underperform against the corresponding long index during periods where markets are volatile and exhibit large day-to-day movements, even though the cumulative movement over the relevant period with respect to the corresponding long index is minimal. Shareholders should note that a relatively small upward movement in the value of the underlying long index may result in a disproportionately larger loss to an investor in a daily leveraged short ETF.

Impact of compounding on Index Tracking Funds that aim to reflect the performance of daily leveraged long indices

The example below assumes that the daily leveraged long index and the corresponding long index are both at 100 points at the end of day 1. At the end of day 2 the long index has increased by 10 percent. to 110 points. Ignoring the impact of the overnight interest, the daily leveraged long index would increase by 20 percent. to 120 (100 + 20 (i.e. 20 percent. of 100)) points and this would be the starting point for the index measurement the next day.

At the end of day 3 the long index has decreased by 5 percent., so the new index level will be 104.5 (110 - 5.5 (i.e. 5 percent. of 110)). At the same time the leveraged long index will have decreased by 10 percent. from 120 to 108 points (120 - 12 (i.e. 10 percent. of 120)).

At this point it is already clear that the returns of the daily leveraged long index are not two times those of the corresponding long index. Due to the effects of the compounding of the daily returns, the daily leveraged long index is up 8 percent., whereas the corresponding long index is up 4.5 percent. over the period.

	End of Day 1	End of Day 2	End of Day 3	Change over 3 days
Long index	100	110 (+10%)	104.5 (-5%)	+4.5%
Daily leveraged long index	100	120(+20%)	108.0 (-10%)	+8.0%

This compounding of the daily returns on the daily leveraged long index shows that the cumulative return over periods longer than one day will not be twice the return of the corresponding long index. Rather, compounding has caused the daily leveraged long index to seemingly "underperform".

To illustrate the impact of compounding on cumulative returns, a further four hypothetical scenarios are outlined below:

1 - Steadily rising market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		2%	2%	2%	2%	
Long index	100	102.00	104.04	106.12	108.24	8.24%
Daily leveraged long index	100	(+4%) 104.00	(+4%) 108.16	(+4%) 112.49	(+4%) 116.99	16.99%

2 - Steadily falling market

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-2%	-2%	-2%	-2%	
Long index	100	98.00	96.04	94.12	92.24	-7.76%
Daily leveraged long index	100	(-4%) 96.00	(-4%) 92.16	(-4%) 88.47	(-4%) 84.93	-15.07%

3 - Market is flat overall and not volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		-1.0%	1.0%	-0.5%	1.5%	
Long index	100	99.00	99.99	99.49	100.98	0.98%
Daily long leveraged index	100	(-2%) 98.00	(2%) 99.96	(-1%) 98.96	(3%) 101.93	1.93%

4 - Market is flat overall and volatile

Day	**1**	**2**	**3**	**4**	**5**	**Cumulative change**
Daily change		11%	-12%	14%	-10%	
Long index	100	111.00	97.68	111.36	100.22	0.22%
Daily long leveraged index	100	(22%) 122.00	(-24%) 92.72	(28%) 118.68	(-20%) 94.95	-5.05%

As the final example shows, the daily leveraged long index is likely to underperform against the corresponding long index during periods where markets are volatile and exhibit large day-to-day movements, even though the cumulative movement over the relevant period with respect to the corresponding long index is minimal. Shareholders should note that a relatively small adverse movement in the value of an underlying long index may result in a disproportionately larger loss to an investor in a daily leveraged long ETF.

Irrespective of the investment techniques used, there is no assurance that the Investment Objective of any Sub-Fund will actually be achieved. Investors should further pay thorough attention to the "Risk Factors", below.

COLLATERAL ARRANGEMENTS IN RESPECT OF SECURITIES LENDING TRANSACTION(S)

For certain Direct Replication Funds, Hybrid Replication Funds, and Actively Managed Funds, the Company, as the case may be, and/or the relevant Investment Manager and/or Sub-Portfolio Manager have appointed the Securities Lending Agent. The Securities Lending Agent has been authorised (i) to enter into Securities Lending Transactions on behalf of the Company and (ii) to invest any cash received/held on behalf of the Company as collateral pursuant to such Securities Lending Transactions, in accordance with and within the limits set forth in the Agency Securities Lending and Repurchase Agreement, the rules set out in this Prospectus and the Regulations.

In order to mitigate the counterparty risk in relation to such transactions, collateral may be received in accordance with the following collateral arrangement ("**Collateral**").

All diversification limits set out below shall apply on a Sub-Fund level. Therefore, where Collateral is held by both the Securities Lending Agent and The Bank of New York Mellon ("**BoNY**"), such Collateral shall be aggregated at the level of the relevant Sub-Fund and the diversification limits shall apply to the aggregated Collateral amounts.

Further information on the issuer credit quality, liquidity, valuation, collateral diversification and correlation policies are available in section 8 of chapter "Investment Restrictions" of this Prospectus.

Collateral received by way of transfer of title will be kept on a segregated account in the name of the Sub-Fund at the Depositary or the sub-custodian on behalf of the Depositary in accordance with applicable laws and the Depositary Agreement.

DB ELIGIBLE COLLATERAL

Where the Securities Lending Agent is acting as sub-custodian in respect of the Collateral (the Collateral in such case being referred to as "**DB Collateral**"), it is authorised to take Fixed Income Bonds and Equities (each as defined below), in accordance with the limitations set out below, or cash as Collateral as agreed between the parties in writing from time to time ("**DB Eligible Collateral**").

The market value of securities comprising the DB Collateral is determined by the Securities Lending Agent, acting in good faith, based on the relevant valuation provisions contained in the relevant securities lending transaction agreement between the Securities Lending Agent and its securities lending counterparty. For purposes of determining the market value of DB Collateral, the Securities Lending Agent may rely on any recognised pricing service using generally mid-day market price from the previous business day for Collateral qualifying as fixed income bonds.

(i) Equity

The equity-related DB Eligible Collateral shall be (i) listed on a recognised exchange in any of the countries listed below and (ii) a constituent of any of the below "**Eligible Indices**" in respect of countries as set out below. Any common stock which is a constituent of any of the Eligible Indices listed below is deemed to be listed on a recognised exchange, unless information to the contrary is available.

Country	Eligible Indices
Australia	Australian All Ordinaries Index, S&P/ASX20 Index, S&P/ASX200 Index
Austria	Austrian Traded ATX Index, Austrian ATX Prime Index
Belgium	BEL20 Index
Canada	S&P/TSX Composite Index, S&P/TSX60 Index
Czech Republic	Prague Stock Exchange Index
Denmark	OMX Cop ex OMX Cop20 (KFMX Index), OMX Copenhagen Midcap PR
Finland	OMX Helsinki Index, OMX Helsinki 25 Index
France	CAC40 Index, SBF120 Index, CAC All-Tradable (SBF250 Index), CAC All-Share Index
Germany	DAX Index, HDAX Index, Germ CDAX Performance
Hungary	Budapest Stock Exchange Index
Ireland	Irish Overall Index
Italy	FTSE MIB Index, FTSE Italia All-Share
Japan	Nikkei 225, Nikkei 300 Index, TOPIX Index (Tokyo)
Luxembourg	Luxembourg LuxX Index
Netherlands	Amsterdam Exchanges Index, Amsterdam Midcap Index

New Zealand	NZX 50 Gross Index
Norway	OBX Stock Index, OSE All-Share Index
Poland	WSE WIG Index
Portugal	PSI All-Share Index GR
Spain	IBEX 35 Index, Spain Madrid Index
Sweden	OMX Stockholm 30 Index, OMX Stockholm All-Share
Switzerland	Swiss Market Index
UK	FTSE100 Index, FTSE250 Index, FTSE350 Index, FTSE All-Share Index
European Others	EuroStoxx50, FTSEurofirst 300 Index
USA	S&P100 Index, S&P500 Index, Russell 1000 Index, Russell 2000 Index, Dow Jones Indus. AVG, NASDAQ 100 Stock Index, Russell 3000 Index, NASDAQ Composite Index, NYSE Composite Index

The market value of any DB Collateral identified by the same security identifier, which comprises securities specified in this section "Equity", taken in aggregate in respect of all relevant Sub-Funds, shall not exceed 10 percent. of the relevant entity's market capitalisation of all outstanding securities identified by that same security identifier.

The market value of any DB Collateral comprising common stock of one or more entities within the same corporate group (as identified by their having the same ultimate parent identifier on Bloomberg) shall not in the aggregate exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund.

Type of Assets	**Margin**	**Concentration Limits**
Common stock (For the avoidance of doubt, any security listed as "REITS" on Bloomberg's pages (or any alternative vendor used by DB) will be treated as common stock and hence as DB Eligible Collateral provided such security is one of the constituents of any of the Eligible Indices.)	105%	- The market value of any DB Collateral comprising common stock identified by the same security identifier shall not exceed 3 percent. of the market capitalisation of all outstanding securities identified by this same security identifier. - The number of securities identified by the same security identifier and which are common stock comprising DB Collateral cannot be greater than five (5) times the 90 business days average daily trading volume of the common stock with such security identifier.

(ii) Fixed income bonds

The market value of any DB Collateral, which comprises securities specified in this section "Fixed Income Bonds", taken in aggregate in respect of all relevant Sub-Funds, which DB Collateral comprises obligations in respect of a single issuer, shall not exceed 10 percent. of the total outstanding obligations (by nominal amount) of such issuer.

Bond accruals will be included in the value of the securities when calculating the market value of the DB Collateral.

Type of Assets	**Margin**	**Concentration Limits**
Government bonds and supranational bonds *Type of Issuer:* Bonds issued by governments and sovereigns ("**Government Bonds**") and bonds issued by supranational organizations ("**Supranational Bonds**"), in each case, stripped and unstripped. *Eligible Issuers:* - Government Bonds issued by the governments and sovereigns of Austria, Finland, France, Germany, Netherlands, Switzerland, United Kingdom or United States of America. - Supranational Bonds will be eligible if included on the list of eligible Supranational Bonds provided, from time to time, by the Management Company.	105%	- The nominal (at par) of any DB Collateral comprising Government Bonds or Supranational Bonds identified by the same security identifier shall not exceed 3 percent. of the total outstanding issue size (by nominal (at par)) of such issuance (identified by the same security identifier). - The market value of any DB Collateral that comprises Government Bonds issued by the government or sovereign of the same country shall not exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund. - The market value of DB Collateral comprising Supranational Bonds in respect of a single issuer shall not exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund.

Issuer Rating: Only Government Bonds and Supranational Bonds with a relevant long term issuer rating of S&P and Fitch above BBB+ (i.e. provided that the minimum rating is A-) and of Moody's above Baa1 (i.e. provided that the minimum rating is A3) will be DB Eligible Collateral. In the case of different rating agencies issuing different credit ratings, the lowest applicable rating will apply.		
Corporate bonds Country of Issue: Corporate bonds ("**Corporate Bonds**") issued by corporates whose country of incorporation is Austria, Australia, Canada, Denmark, Finland, France, Germany, Japan, Netherlands, Norway, Sweden, Switzerland, United Kingdom or United States of America. Security Rating: Only Corporate Bonds that have a long-term issuer rating of S&P, Fitch or Moody's will be acceptable provided that the relevant rating of S&P and Fitch is above BBB+ (i.e. provided that the minimum rating is A-) and of Moody's is above Baa1 (i.e. provided that the minimum rating is A3). In the case of different rating agencies issuing different credit ratings, the lower rating will apply.	105%	- The nominal (at par) of any DB Collateral comprising Corporate Bonds identified by the same security identifier shall not exceed 3 percent. of the total outstanding issue size (by nominal (at par)) of such issuance (identified by the same security identifier). - The market value of DB Collateral comprising Corporate Bonds in respect of a single issuer shall not exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund.

(iii) Cash

Appropriate haircut is applied on DB Eligible Collateral in the form of cash denominated in foreign currencies.

(iv) General Principles

The DB Collateral must also satisfy the following general principles. If there is any conflict between the following general principles and any other provisions, the general principles shall govern.

Concentration limits

1. Unless otherwise stated, all concentration limits are applicable per relevant Sub-Fund.
2. The market value of any DB Collateral comprising securities issued by issuers, which are incorporated in or the government or sovereign of any of the countries listed below, or which are issuers of Supranational Bonds, at any time shall not exceed the applicable percentage (as set out below) of the Net Asset Value of the relevant Sub-Fund.

United States of America:	45%
Germany:	45%
United Kingdom:	35%
Japan:	35%
Canada:	35%
Switzerland:	35%
France:	35%
Australia:	35%
All other countries (including Supranational Bonds):	25%

3. Subject to general principle 4, the market value of any DB Collateral (excluding Government Bonds and Supranational Bonds) comprising securities in respect of a single sector (as represented by the Global Industry Classification Standard) at any time shall not exceed 25 percent. of the Net Asset Value of the relevant Sub-Fund at that time.
4. The market value of the DB Collateral (excluding Government Bonds and Supranational Bonds) comprising securities in the banking, insurance and financial sectors (represented by the Sector 40 Financials of the Global Industry Classification Standard) taken in aggregate at any time shall not exceed 15 percent. of the total market value of DB Collateral at that time.
5. Any determination or calculation in respect of diversification requirements (including compliance with concentration limits) will be performed (where necessary) based on the market value of DB Eligible Collateral before taking into account any margin applicable to such DB Eligible Collateral.

General exclusion principles

6. Structured securities in respect of which the principal and interest payments are contingent on the performance or payment flows of one or more specified entities or assets shall not be DB Eligible Collateral. Structured securities shall include (but not be limited to) credit linked notes, CDOs, CLOs, collateralised mortgage obligations (CMOs), asset-backed securities (ABS) and mortgage-backed securities (MBS). For purposes of this paragraph, classification of a security as ABS, MBS, CMO, CLO and CDO will be determined according to the Securities Lending Agent's internal classification.
7. DB Eligible Collateral may not consist of any securities issued by Deutsche Bank AG or any affiliate or subsidiary of Deutsche Bank AG or any entity promoted or sponsored by Deutsche Bank AG or any affiliate or subsidiary of Deutsche Bank AG.
8. DB Eligible Collateral in relation to a Securities Lending Transaction shall not consist of securities issued by the counterparty to such Securities Lending Transaction, or any securities issued by any affiliate or subsidiary of such counterparty.

BoNY Eligible Collateral

Where BoNY is acting as sub-party custodian in respect of the Collateral (the Collateral in such case being referred to as "**BoNY Collateral**"), it is authorised to take Fixed Income Bonds, Equities or cash (each as defined below) in accordance with the limitations set out below ("**BoNY Eligible Collateral**").

The market value of securities comprising the BoNY Collateral is determined by BoNY, by reference usually to the closing bid price on the Business Day immediately preceding the Business Day on which BoNY calculates the market value together with (in case of a fixed income security) accrued but unpaid interest and in accordance with the relevant terms and conditions for provision of collateral management services between the collateral receiver, the collateral provider and BoNY, divided by the applicable margin percentage.

(i) Equity

The equity-related BoNY Eligible Collateral shall be (i) listed on a recognised exchange in any of the countries listed below and (ii) a constituent of any of the below "**Eligible Indices**" in respect of countries as set out below. Any common stock which is a constituent of any of the Eligible Indices listed below is deemed to be listed on a recognised exchange, unless information to the contrary is available.

Country	Eligible Indices
Australia	Australian All Ordinaries Index, S&P/ASX20 Index, S&P/ASX200 Index
Austria	Austrian Traded ATX Index, Austrian ATX Prime Index
Belgium	BEL20 Index
Canada	S&P/TSX Composite Index, S&P/TSX60 Index
Czech Republic	Prague Stock Exchange Index
Denmark	OMX Cop ex OMX Cop20 (KFMX Index), OMX Copenhagen Midcap PR
Finland	OMX Helsinki Index, OMX Helsinki 25 Index
France	CAC40 Index, SBF120 Index, CAC All-Tradable (SBF250 Index), CAC All-Share Index
Germany	DAX Index, HDAX Index, Germ CDAX Performance
Hungary	Budapest Stock Exchange Index
Ireland	Irish Overall Index
Italy	FTSE MIB Index, FTSE Italia All-Share
Japan	Nikkei 225, Nikkei 300 Index, TOPIX Index (Tokyo)
Luxembourg	Luxembourg LuxX Index
Netherlands	Amsterdam Exchanges Index, Amsterdam Midcap Index
New Zealand	NZX 50 Gross Index
Norway	OBX Stock Index, OSE All-Share Index
Poland	WSE WIG Index
Portugal	PSI All-Share Index GR
Spain	IBEX 35 Index, Spain Madrid Index

Sweden	OMX Stockholm 30 Index, OMX Stockholm All-Share
Switzerland	Swiss Market Index
UK	FTSE100 Index, FTSE250 Index, FTSE350 Index, FTSE All-Share Index
European Others	EuroStoxx50, FTSEurofirst 300 Index
USA	S&P100 Index, S&P500 Index, Russell 1000 Index, Russell 2000 Index, Dow Jones Indus. AVG, NASDAQ 100 Stock Index, Russell 3000 Index, NASDAQ Composite Index, NYSE Composite Index

The market value of any BoNY Collateral identified by the same security identifier, which comprises securities specified in this section "Equity", taken in aggregate in respect of all relevant Sub-Funds, shall not exceed 10 percent. of the relevant entity's market capitalisation of all outstanding securities identified by that same security identifier.

The market value of any BoNY Collateral comprising common stock of one or more entities within the same corporate group (as identified by their having the same ultimate parent identifier on Bloomberg) shall not in the aggregate exceed 4 percent. of the Net Asset Value of the relevant Sub-Fund.

Type of Assets	Margin	Concentration Limits
Common stock (For the avoidance of doubt, any security listed as "REITS" on Bloomberg's pages (or any alternative vendor used by BoNY) will be treated as common stock and hence as BoNY Eligible Collateral provided such security is one of the constituents of any of the Eligible Indices.)	105%	- The market value of any BoNY Collateral comprising common stock identified by the same security identifier shall not exceed 3 percent. of the market capitalisation of all outstanding securities identified by this same security identifier. - The number of securities identified by the same security identifier and which are common stock comprising BoNY Collateral cannot be greater than five (5) times the 90 business days average daily trading volume of the common stock with such security identifier.

(ii) Fixed income bonds

The market value of any BoNY Collateral, which comprises securities specified in this section "Fixed Income Bonds", taken in aggregate in respect of all relevant Sub-Funds, which BoNY Collateral comprises obligations in respect of a single issuer, shall not exceed 10 percent. of the total outstanding obligations (by nominal amount) of such issuer.

Bond accruals will be included in the value of the securities when calculating the market value of the BoNY Collateral.

Type of Assets	Margin	Concentration Limits
Government bonds and supranational bonds *Type of Issuer:* Bonds issued by governments and sovereigns ("**Government Bonds**") and bonds issued by supranational organizations ("**Supranational Bonds**"), in each case, stripped and unstripped. *Eligible Issuers:* - Government Bonds issued by the governments and sovereigns of Austria, Australia, Canada, Denmark, Finland, France, Germany, Japan, Netherlands, Norway, Sweden, Switzerland, United Kingdom or United States of America. *Issuer Rating:* Only Government Bonds and Supranational Bonds with a relevant long term issuer rating of S&P and Fitch above BBB+ (i.e. provided that the minimum rating is A-) and of Moody's above Baa1 (i.e. provided that the minimum rating is A3) will be BoNY Eligible Collateral. In the case of different rating agencies issuing different credit ratings, the lower rating will apply.	105%	- The nominal (at par) of any BoNY Collateral comprising Government Bonds or Supranational Bonds identified by the same security identifier shall not exceed 3 percent. of the total outstanding issue size (by nominal (at par)) of such issuance (identified by the same security identifier). - The market value of any BoNY Collateral that comprises Government Bonds issued by the government or sovereign of the same country shall not exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund. - The market value of BoNY Collateral comprising Supranational Bonds in respect of a single issuer shall not exceed 15 percent. of the Net Asset Value of the relevant Sub-Fund.

Corporate bonds *Country of Issue:* Corporate bonds ("**Corporate Bonds**") issued by corporates whose country of incorporation is Austria, Australia, Canada, Denmark, Finland, France, Germany, Japan, Netherlands, Norway, Sweden, Switzerland, United Kingdom or United States of America. *Security Rating:* Only Corporate Bonds that have a long-term issuer rating of S&P, Fitch or Moody's will be acceptable provided that the relevant rating of S&P and Fitch is above BBB+ (i.e. provided that the minimum rating is A-) and of Moody's is above Baa1 (i.e. provided that the minimum rating is A3). In the case of different rating agencies issuing different credit ratings, the lower rating will apply.	105%	- The nominal (at par) of any BoNY Collateral comprising Corporate Bonds identified by the same security identifier shall not exceed 3 percent. of the total outstanding issue size (by nominal (at par)) of such issuance (identified by the same security identifier). - The market value of BoNY Collateral comprising Corporate Bonds in respect of a single issuer shall not exceed 4 percent. of the Net Asset Value of the relevant Sub-Fund.

(iii) Cash

Cash in U.S. Dollars, Euro or Sterling shall comprise BoNY Eligible Collateral, with a margin percentage of 100 percent. Appropriate haircut is applied on BoNY Eligible Collateral in the form of cash denominated in foreign currencies. For the avoidance of doubt, interest will not accrue in respect of any BoNY Eligible Collateral that comprises cash.

(iv) General Principles

The BoNY Collateral must also satisfy the following general principles. If there is any conflict between the following general principles and any other provisions, the general principles shall govern.

Concentration limits

1. The market value of any BoNY Collateral comprising securities identified by the same security identifier shall not exceed 3.3332 percent. of the Net Asset Value of the relevant Sub-Fund.
2. Unless otherwise stated, all concentration limits are applicable per relevant Sub-Fund.
3. The market value of any BoNY Collateral comprising securities issued by issuers, which are incorporated in or the government or sovereign of any of the countries listed below, or which are issuers of Supranational Bonds, at any time shall not exceed the applicable percentage (as set out below) of the Net Asset Value of the relevant Sub-Fund.

United States of America:	45%
Germany:	45%
United Kingdom:	35%
Japan:	35%
Canada:	35%
Switzerland:	35%
France:	35%
Australia:	35%
All other countries (including Supranational Bonds):	25%

4. Subject to general principle 6, the market value of any BoNY Collateral (excluding Government Bonds and Supranational Bonds) comprising securities in respect of a single sector (as represented by the Global Industry Classification Standard) at any time shall not exceed 25 percent. of the Net Asset Value of the relevant Sub-Fund at that time.
5. The market value of the BoNY Collateral (excluding Government Bonds and Supranational Bonds) comprising securities in the banking, insurance and financial sectors (represented by the Sector 40 Financials of the Global Industry Classification Standard) taken in aggregate at any time shall not exceed 15 percent. of the total market value of BoNY Collateral at that time.
6. Any determination or calculation in respect of diversification requirements (including compliance with concentration limits) will be performed (where necessary) based on the market value of BoNY Eligible Collateral before taking into account any margin applicable to such BoNY Eligible Collateral.

General exclusion principles

7. Structured securities in respect of which the principal and interest payments are contingent on the performance or payment flows of one or more specified entities or assets shall not be BoNY Eligible Collateral. Structured securities shall include (but not be limited to) credit linked notes, CDOs, CLOs, collateralised mortgage obligations (CMOs), asset-backed securities (ABS) and mortgage-backed securities (MBS). For purposes of this paragraph, classification of a security as ABS, MBS, CMO, CLO and CDO will be determined according to the Securities Lending Agent's internal classification.

8. BoNY Eligible Collateral may not consist of any securities issued by Deutsche Bank AG or any affiliate or subsidiary of Deutsche Bank AG or any entity promoted or sponsored by Deutsche Bank AG or any affiliate or subsidiary of Deutsche Bank AG.
9. BoNY Eligible Collateral in relation to a Securities Lending Transaction shall not consist of securities issued by the counterparty to such Securities Lending Transaction, or any securities issued by any affiliate or subsidiary of such counterparty.
10. In respect of common stock issued in, or by entities which are incorporated in Portugal, some specific criteria apply in particular with respect to tax documentation. In respect of Corporate Bonds, Government Bonds and/or Supranational Bonds issued in, by or by entities which are incorporated in Portugal, Italy and Japan, some specific criteria may apply in particular with respect to tax documentation.

TYPOLOGY OF RISK PROFILES

Unless otherwise specified in the relevant Product Annex, the Sub-Funds are available for investment by Institutional and Retail Investors. The Sub-Funds are however complex products where typical investors are expected to be informed investors and, for certain Sub-Funds, to have a good knowledge of derivatives instruments. Generally speaking, typical investors are expected to be willing to adopt capital and income risk.

The risk associated with an investment in the various Sub-Funds of the Company can be low, medium or high as described below:

- a *'low risk'* grading applies to Sub-Funds exposed to limited capital losses. The low expectation of capital losses is the result of the low intrinsic volatility of the asset classes to which the Sub-Funds are exposed and/or the implementation of capital protection strategies (including, as the case may be, a bank guarantee applying on (a) date(s) as specified in the relevant Product Annex);
- a *'medium risk'* grading applies to Sub-Funds exposed to capital losses either because the asset classes to which the Sub-Funds are exposed have a medium intrinsic volatility and/or because the Sub-Funds entail some capital protection; and
- a *'high risk'* grading applies to Sub-Funds providing an exposure to asset classes with a high intrinsic volatility and/or limited liquidity and where no capital protection strategies are implemented.

The above grading is indicative of the level of risk associated with each Sub-Fund and is not supposed to be a guarantee of likely returns, nor is it equivalent to, or calculated in the same way as the risk and reward category[2] set out in a Sub-Fund's KIID. It should only be used for comparison purposes with other Sub-Funds offered to the public by the Company. If you are in any doubt as to the level of risk that you should take, you should seek independent advice from your personal investment adviser.

Additional information to that contained in the Prospectus may be provided to third parties concerning the typical investor profile to enable these third parties to comply with their legal or regulatory obligations.

[2] The risk and reward category set out in the KIIDs corresponds to the "synthetic risk and reward indicators" or "SRRI" as defined by CSSF Regulation No. 10-5 transposing Commission Directive 2010/44/EU of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards certain provisions concerning fund mergers, master-feeder structures and notification procedure (amended). As from 1 January 2023, the reference to "SRRI" shall be read as reference to the "summary risk indicator" set out in the PRIIPS KID.

INVESTMENT RESTRICTIONS

The Company and the Sub-Funds are subject to the "Investment Restrictions" set out below. The Company may adopt further investment restrictions in order to conform to particular requirements in the countries where the Shares of the Company shall be distributed. To the extent permitted by applicable law and regulation, the Board of Directors may decide to amend the Investment Restrictions set forth below for any newly created Sub-Fund if this is justified by the specific Investment Policy of such Sub-Fund. Any amendments to the investment restrictions which relate to a particular Sub-Fund will be disclosed in the relevant Product Annex to this Prospectus.

1 Investments

1.1 The Company's investments in relation to each Sub-Fund may consist solely of:

(a) transferable securities and Money Market Instruments admitted to official listing on a stock exchange in an EU Member State;

(b) transferable securities and Money Market Instruments dealt on another Regulated Market in an EU Member State;

(c) transferable securities and Money Market Instruments admitted to official listing on a stock exchange in a non-EU Member State or dealt on another Regulated Market of an Eligible State;

(d) new issues of transferable securities and Money Market Instruments, provided that:

- the terms of issue include an undertaking that application will be made for admission to official listing on a stock exchange or to another Regulated Market, provided that such choice of stock exchange or market is in an Eligible State;
- such admission is secured within a year of issue;

(e) units of UCITS and/or other collective investment undertakings within the meaning of points a) and b) of Article 1 (2) of the UCITS Directive, should they be situated in an EU Member State or not, provided that:

- such other collective investment undertakings are authorised under laws which provide that they are subject to supervision considered by the Luxembourg supervisory authority, CSSF, to be equivalent to that that laid down in European Union law, and that cooperation between authorities is sufficiently ensured,
- the level of protection for unit-holders in the other collective investment undertakings is equivalent to that provided for unit-holders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales of transferable securities and Money Market Instruments are equivalent to the requirements of the UCITS Directive,
- the business of the other collective investment undertakings is reported in half-yearly and annual reports to enable an assessment to be made of the assets and liabilities, income and operations over the reporting period,
- no more than 10 percent. of the UCITS' or the other collective investment undertakings' net assets, whose acquisition is contemplated, can, according to their fund rules or constitutional documents, be invested in aggregate in units of other UCITS or other collective investment undertakings;

(f) deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in an EU Member State or, if the registered office of the credit institution is situated in a non-EU Member State, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in EU law;

(g) financial derivative instruments, including equivalent cash-settled instruments, dealt in on a Regulated Market referred to in subparagraphs a), b) and c); and/or OTC derivatives, provided that:

- the underlying consists of instruments covered by this section 1, financial indices, interest rates, foreign exchange rates or currencies, in which a Sub-Fund may invest according to its Investment Objective as stated in the Prospectus and the relevant Product Annex,
- the counterparties to OTC derivative transactions are First Class Institutions, and
- the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Company's initiative; and/or

(h) Money Market Instruments other than those dealt in on a Regulated Market if the issue or issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided that they are:

- issued or guaranteed by a central, regional or local authority or central bank of an EU Member State, the European Central Bank, the EU or the European Investment Bank, a non-EU Member State or, in the case of a federal State, by one of the members making up the federation, or by a public international body to which one or more EU Member States belong, or
- issued by an undertaking, any securities of which are listed on a stock exchange or dealt in on Regulated Markets referred to in subparagraphs a), b) or c), or
- issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by EU law, or by an establishment which is subject to and complies with prudential rules considered by the CSSF to be at least as stringent as those laid down by EU law; or

- issued by other bodies belonging to the categories approved by the CSSF provided that investments in such instruments are subject to investor protection rules equivalent to that laid down in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to at least EUR 10 million and which (i) represents and publishes its annual accounts in accordance with Directive 2013/34/EU, (ii) is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or (iii) is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

1.2 Under the conditions and within the limits laid down by the Law, the Company may, to the widest extent permitted by the Regulations (i) create a Sub-Fund qualifying either as a feeder UCITS (a "Feeder UCITS") or as a master UCITS (a "Master UCITS"), (ii) convert any existing Sub-Fund into a Feeder UCITS (or vice-versa), or (iii) change the Master UCITS of any of its Feeder UCITS.

(a) A Feeder UCITS shall invest at least 85 percent. of its assets in the units of another Master UCITS;

(b) A Feeder UCITS may hold up to 15 percent. of its assets in one or more of the following:

- ancillary liquid assets in accordance with paragraph 1.3 (b) below;
- financial derivative instruments, which may be used only for hedging purposes;

(c) For the purposes of compliance with paragraph 7.2 below, the Feeder UCITS shall calculate its global exposure related to financial derivative instruments by combining its own direct exposure under the second indent under (b) with either;

- the Master UCITS actual exposure to financial derivative instruments in proportion to the Feeder UCITS investment into the Master UCITS; or
- the Master UCITS potential maximum global exposure to financial derivative instruments provided for in the Master UCITS management regulations or instruments of incorporation in proportion to the Feeder UCITS investment into the Master UCITS.

1.3 Contrary to the investment restrictions laid down in paragraph 1.1 above, each Sub-Fund may:

(a) invest up to 10 percent. of its net assets in transferable securities and Money Market Instruments other than those referred to under paragraph 1.1 above; and

(b) hold up to 20 percent. of its net assets in ancillary liquid assets. Ancillary liquid assets are bank deposits at sight, such as cash held in current accounts with a bank accessible at any time, in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets or for a period of time strictly necessary in case of unfavourable market conditions. In exceptionally unfavourable market conditions (such as the September 11 attacks or the bankruptcy of Lehman Brothers in 2008), on a temporary basis and for a period of time strictly necessary, this limit may be increased to up to 100% of a Sub-Fund's net assets, if justified in the interest of the investors. Liquid assets held in margin accounts in relation to financial derivative instruments do not qualify as ancillary liquid assets.

1.4 A Sub-Fund (the "**Investing Sub-Fund**") may subscribe, acquire and/or hold securities to be issued or issued by one or more Sub-Funds of the Company (each, a "**Target Sub-Fund**"), without the Company being subject to the requirements of the Luxembourg law of 10 August 1915 on commercial companies, as amended, with respect to the subscription, acquisition and/or the holding by a company of its own shares, under the condition however that:

- the Target Sub-Fund(s) does(do) not, in turn, invest in the Investing Sub-Fund invested in this (these) Target Sub-Fund(s); and
- no more than 10 percent. of the assets of the Target Sub-Fund(s) whose acquisition is contemplated, may, according to its (their) investment policy, be invested in units of other UCITS or other UCIs; and
- voting rights, if any, attaching to the Shares of the Target Sub-Fund(s) are suspended for as long as they are held by the Investing Sub-Fund concerned and without prejudice to the appropriate processing in the accounts and the periodic reports; and
- in any event, for as long as these securities are held by the Investing Sub-Fund, their value will not be taken into consideration for the calculation of the net assets of the Company for the purposes of verifying the minimum threshold of the net assets imposed by the Law; and
- there is no duplication of management/subscription or repurchase fees between those at the level of the Investing Sub-Fund having invested in the Target Sub-Fund(s), and this (these) Target Sub-Fund(s).

2 Risk Diversification

2.1 In accordance with the principle of risk diversification, the Company is not permitted to invest more than 10 percent. of the net assets of a Sub-Fund in transferable securities or Money Market Instruments of one and the same issuer. The total value of the transferable securities and Money Market Instruments in each issuer in which more than 5 percent. of the net assets of a Sub-Fund are invested must not exceed 40 percent. of the value of the net assets of the respective Sub-Fund. This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

2.2 The Company is not permitted to invest more than 20 percent. of the net assets of a Sub-Fund in deposits made with the same body.

2.3 The risk exposure to a counterparty of a Sub-Fund in an OTC derivative transaction and/or efficient portfolio management transaction may not exceed:

- 10 percent. of its net assets when the counterparty is a credit institution referred to in paragraph 1.1 (f), or
- 5 percent. of its net assets, in other cases.

2.4 Notwithstanding the individual limits laid down in paragraphs 2.1, 2.2 and 2.3, a Sub-Fund may not combine, where this would lead to investment of more than 20 percent. of its assets in a single body, any of the following:

- investments in transferable securities or Money Market Instruments issued by that body,
- deposits made with that body, or
- net exposures arising from OTC derivative transactions and efficient portfolio management techniques undertaken with that body.

2.5 The 10 percent. limit set forth in paragraph 2.1 can be raised to a maximum of 25 percent. in case of certain bonds issued by credit institutions which have their registered office in an EU Member State and are subject by law, in that particular country, to specific public supervision designed to ensure the protection of bondholders. In particular the funds which originate from the issue of these bonds are to be invested, in accordance with the law, in assets which sufficiently cover the financial obligations resulting from the issue throughout the entire life of the bonds and which are allocated preferentially to the payment of principal and interest in the event of the issuer's failure. Furthermore, if investments by a Sub-Fund in such bonds with one and the same issuer represent more than 5 percent. of the net assets, the total value of these investments may not exceed 80 percent. of the net assets of the corresponding Sub-Fund.

2.6 The 10 percent. limit set forth in paragraph 2.1 can be raised to a maximum of 35 percent. for transferable securities and Money Market Instruments that are issued or guaranteed by an EU Member State or its local authorities, by another Eligible State, or by public international organisations of which one or more EU Member States are members.

2.7 Transferable securities and Money Market Instruments which fall under the special ruling given in paragraphs 2.5 and 2.6 are not counted when calculating the 40 percent. risk diversification ceiling mentioned in paragraph 2.1.

2.8 The limits provided for in paragraphs 2.1 to 2.6 may not be combined, and thus investments in transferable securities or Money Market Instruments issued by the same body or in deposits or derivative instruments with this body shall under no circumstances exceed in total 35 percent. of the net assets of a Sub-Fund.

2.9 Companies which are included in the same group for the purposes of consolidated accounts, as defined in accordance with Directive 83/349/EEC or in accordance with recognised international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in this section 2.

2.10 A Sub-Fund may invest, on a cumulative basis, up to 20 percent. of its net assets in transferable securities and Money Market Instruments of the same group.

3 The following exceptions may be made:

3.1 Without prejudice to the limits laid down in section 6 the limits laid down in section 2 are raised to a maximum of 20 percent. for investment in shares and/or bonds issued by the same body if the constitutional documents of the Company so permit, and, if according to the Product Annex relating to a particular Sub-Fund the Investment Objective of that Sub-Fund is to replicate the composition of a certain stock or debt securities index which is recognised by the CSSF, on the following basis:

- its composition is sufficiently diversified,
- the index represents an adequate benchmark for the market to which it refers,
- it is published in an appropriate manner.

The above 20 percent. limit may be raised to a maximum of 35 percent., but only in respect of a single body, where that proves to be justified by exceptional market conditions in particular in Regulated Markets where certain transferable securities or Money Market Instruments are highly dominant.

3.2 The Company is authorised, in accordance with the principle of risk diversification, to invest up to 100 percent. of the net assets of a Sub-Fund in transferable securities and Money Market Instruments from various offerings that are issued or guaranteed by an EU Member State or its local authorities, by another OECD Member State, by Singapore or any member state of the G20, or by public international organisations in which one or more EU Member States are members. These securities must be divided into at least six different issues, with securities from one and the same issue not exceeding 30 percent. of the total net assets of a Sub-Fund.

4 Investment in UCITS and/or other collective investment undertakings

4.1 A Sub-Fund may acquire the units of UCITS and/or other collective investment undertakings referred to in paragraph 1.1 e), provided that no more than 20 percent. of its net assets are invested in units of a single UCITS or other collective investment undertaking. If the UCITS or the other collective investment undertakings have multiple compartments (within the meaning of Articles 40 and 181 of the Law) and the assets of a compartment may only be used to satisfy the rights of the investors relating to that compartment and the rights of those creditors whose claims have arisen in connection with the setting-up, operation and liquidation of that compartment, each compartment is considered as a separate issuer for the purposes of applying the above limit.

4.2 Investments made in units of collective investment undertakings other than UCITS may not exceed, in aggregate, 30 percent. of the net assets of the Sub-Fund.

4.3 When a Sub-Fund has acquired units of UCITS and/or other collective investment undertakings, the assets of the respective UCITS or other collective investment undertakings do not have to be combined for the purposes of the limits laid down in section 2.

4.4 When a Sub-Fund invests in the units of other UCITS and/or other collective investment undertakings that are managed, directly or by delegation, by the Management Company or by any other company with which the Management Company is linked by common management or control, or by a direct or indirect holding of more than 10 percent. of the capital or votes, the Management Company or other company may not charge subscription or redemption fees on account of the Sub-Fund's investment in the units of such other UCITS and/or collective investment undertakings. Moreover, in such case, the Management Company or other company may not charge a management fee to the Sub-Fund's assets in respect of such investments.

A Sub-Fund that invests a substantial proportion of its assets in other UCITS and/or collective investment undertakings shall disclose in its Product Annex the maximum level of the management fees that may be charged both to the Sub-Fund itself and to the other UCITS and/or collective investment undertakings in which it intends to invest. In the annual report of the Company it shall be indicated for each Sub-Fund the maximum proportion of management fees charged both to the Sub-Fund and to the UCITS and/or other collective investment undertaking in which the Sub-Fund invests.

5 Tolerances and multiple compartment issuers

If, because of market movements or the exercising of subscription rights, the limits mentioned in section 1 are exceeded, the Company must have as a priority objective in its sale transactions to reduce these positions within the prescribed limits, taking into account the best interests of the Shareholders.

Provided that they continue to observe the principles of diversification, newly established Sub-Funds may deviate from the limits mentioned under sections 2, 3 and 4 above for a period of six months following the date of their initial launch.

If an issuer of Investments is a legal entity with multiple compartments and the assets of a compartment may only be used to satisfy the rights of the investors relating to that compartment and the rights of those creditors whose claims have arisen in connection with the setting-up, operation and liquidation of that compartment, each compartment is considered as a separate issuer for the purposes of applying the limits set forth under sections 2, 3.1 and 4.

6 Investment Prohibitions

The Company is **prohibited** from:

6.1 acquiring equities with voting rights that would enable the Company to exert a significant influence on the management of the issuer in question;

6.2 acquiring more than

- 10 percent. of the non-voting equities of one and the same issuer,
- 10 percent. of the debt securities issued by one and the same issuer,
- 10 percent. of the Money Market Instruments issued by one and the same issuer, or
- 25 percent. of the units of one and the same UCITS and/or other undertaking for collective investment;

The limits laid down in the second, third and fourth indents may be disregarded at the time of acquisition if at that time the gross amount of the debt securities or of the Money Market Instruments, or the net amount of the securities in issue, cannot be calculated;

Exempted from the above limits are transferable securities and Money Market Instruments which, in accordance with Article 48, paragraph 3 of the Law are issued or guaranteed by an EU Member State or its local authorities, by another OECD Member State, by Singapore or any member state of the G20, or which are issued by public international organisations of which one or more EU Member States are members;

6.3 selling transferable securities, Money Market Instruments and other investments mentioned under sub-paragraphs e) g) and h) of paragraph 1.1 short;

6.4 acquiring precious metals or related certificates;

6.5 investing in real estate and purchasing or selling commodities or commodities contracts;

6.6 borrowing on behalf of a particular Sub-Fund, unless:

- the borrowing is in the form of a back-to-back loan for the purchase of foreign currency; or
- the loan is only temporary and does not exceed 10 percent. of the net assets of the Sub-Fund in question (taking into account the possibility of a temporary loan amounting to not more than 10 percent. of the net assets of the Sub-Fund in question, the overall exposure may not exceed 210 percent. of the net assets of the Sub-Fund in question). The Company may borrow for investment purposes. The Sub-Fund in question may therefore be subject to shortfall risk, as this term is further detailed under the section "Risk Factors" of this Prospectus;

6.7 granting credits or acting as guarantor for third parties. This limitation does not refer to the purchase of transferable securities, Money Market Instruments and other investments mentioned under sub-paragraphs e), g) and h) of paragraph 1.1 that are not fully paid up.

7 Risk management and limits with regard to derivative instruments and the use of techniques and instruments

7.1 The Company must employ (i) a risk-management process which enables it to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of the portfolio and (ii) a process for accurate and independent assessment of the value of OTC derivatives.

7.2 Each Sub-Fund shall ensure that its global risk exposure relating to derivative instruments does not exceed its total Net Asset Value.

The risk exposure is calculated taking into account the current value of the underlying assets, the counterparty risk, future market movements and the time available to liquidate the positions. This shall also apply to the following subparagraphs.

A Sub-Fund may invest, as a part of its Investment Policy and within the limit laid down in paragraphs 2.7 and 2.8, in financial derivative instruments provided that the exposure to the underlying assets does not exceed in aggregate the investment limits laid down in section 2. If a Sub-Fund invests in index-based financial derivative instruments, these investments do not have to be combined to the limits laid down in section 2.

When a transferable security or Money Market Instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this section.

8 Management of collateral for OTC financial derivative transactions and efficient portfolio management techniques

8.1 All assets received by each Sub-Fund in the context of efficient portfolio management techniques shall be considered as collateral for the purpose of these guidelines and should comply with the criteria laid down in section 8.2 below.

8.2 *Liquidity*: any collateral received other than cash must be highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation. Collateral received should also comply with the provisions of Article 56 of the UCITS Directive.

Valuation: collateral received must be valued on at least a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place.

Issuer credit quality: collateral received must be of high quality.

Maturity: the maturity of the collateral received by the Company is not a decisive criterion for the Company.

Correlation: while correlation is not a main criterion, the collateral received by the Sub-Fund must be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.

Collateral diversification (asset concentration): collateral must be sufficiently diversified in terms of country, markets and issuers. The criterion of sufficient diversification with respect to issuer concentration is considered to be respected if each Sub-Fund receives from a counterparty of efficient portfolio management and over-the-counter financial derivative transactions a basket of collateral with a maximum exposure to a given issuer of 20 percent. of its net asset value. When a Sub-Fund is exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20 percent. limit of exposure to a single issuer.

By way of derogation from the abovementioned 20 percent. limit of exposure to a single issuer, a Sub-Fund may receive up to 100 percent. collateral consisting of different transferable securities and Money Market Instruments issued or guaranteed by a single EU Member State, one or more of its local authorities, by another OECD Member State, by Singapore or any member state of the G20, or a public international body to which one or more EU Member States belong. Such a Sub-Fund shall receive securities from at least six different issues, and securities from any single issue shall not account for more than 30 percent. of the net assets of the Sub-Fund. Any use of such derogation will be disclosed in the relevant Product Annex to this Prospectus.

Risks linked to the management of collateral, such as operational and legal risks, must be identified, managed and mitigated by the risk management process.

Where there is a title transfer, the collateral received must be held by the Depositary. For other types of collateral arrangement, the collateral can be held by a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

Collateral received must be capable of being fully enforced by the Sub-Funds at any time without reference to or approval from the counterparty.

Non-cash collateral received should not be sold, reinvested or pledged.

Cash collateral received should only be:

- placed on deposit with entities prescribed in section 1.1.f);
- invested (if allowed under the relevant Product Annex) in high-quality government bonds and/or short-term money market funds;
- used for the purpose of reverse repo transactions provided the transactions are with credit institutions subject to prudential supervision and the relevant Sub-Fund is able to recall at any time the full amount of cash on accrued basis;
- invested in short-term money market funds as defined in the CESR's Guidelines on a common definition of European money market funds (Ref.: CESR/10-049).

8.3 Reinvested cash collateral (if allowed under the relevant Product Annex) must be diversified in accordance with the diversification requirements applicable to non-cash collateral.

8.4 A Sub-Fund receiving collateral for at least 30 percent. of its assets must have an appropriate stress testing policy in place to ensure regular stress tests are carried out under normal and exceptional liquidity conditions to enable the Sub-Fund to assess the liquidity risk attached to the collateral. The liquidity stress testing policy must at least prescribe the following:

a) design of stress test scenario analysis including calibration, certification & sensitivity analysis;

b) empirical approach to impact assessment, including back-testing of liquidity risk estimates;

c) reporting frequency and limit/loss tolerance threshold/s; and

d) mitigation actions to reduce loss including haircut policy and gap risk protection.

8.5 The Sub-Funds must have in place a clear haircut policy adapted for each class of assets received as collateral. When devising the haircut policy, the Sub-Funds must take into account the characteristics of the assets such as the credit standing or the price volatility, as well as the outcome of the stress tests performed in accordance with the above. This policy must be documented and must justify each decision to apply a specific haircut, or to refrain from applying any haircut, to a certain class of assets.

9 Techniques and Instruments for Hedging Currency Risks

In order to protect its present and future assets and liabilities against the fluctuation of currencies, the Company may enter into foreign exchange transactions, call options or put options in respect of currencies, forward foreign exchange transactions, or transactions for the exchange of currencies, provided that these transactions be made either on a Regulated Market or over-the-counter with First Class Institutions specialising in these types of transactions.

The objective of the transactions referred to above presupposes the existence of a direct relationship between the contemplated transaction and the assets or liabilities to be hedged and implies that, in principle, transactions in a given currency – including a currency bearing a substantial relation to the value of the Reference Currency of a Sub-Fund (usually referred to as "cross hedging") – may not exceed the total valuation of such assets and liabilities nor may they, as regards their duration, exceed the period where such assets are held or anticipated to be held or for which such liabilities are incurred or anticipated to be incurred. It should be noted, however, that transactions with the aim of hedging currencies for single Share Classes of a Sub-Fund may have a negative impact on the Net Asset Value of other Share Classes of the same Sub-Fund since Share Classes are not separate legal entities.

10 Securities Lending and Repurchase Transactions

To the extent permitted by the Regulations, and in particular the CSSF Circular 08/356 relating to the rules applicable to undertakings for collective investment when they use certain techniques and instruments relating to transferable securities and money market instruments and CSSF Circular 14/592, each Sub-Fund may, for the purpose of generating additional capital or income or for reducing its costs or risks, engage in securities lending transactions and enter, either as purchaser or seller, into repurchase or buy-sell and sell-buy back transactions.

These transactions may be carried out for 50 percent. of the assets held by the relevant Sub-Fund provided (i) that their volume is kept at an appropriate level or that the Company is entitled to request the return of the securities lent in a manner that enables it, at all times, to meet its redemption obligations and (ii) that these transactions do not jeopardise the management of the Company' assets in accordance with the investment policy of the relevant Sub-Fund. Their risks shall be captured by the risk management process of the Company. All the revenues arising from these transactions (if any), net of direct and indirect operational costs, will be returned to the relevant Sub-Fund.

These transactions will be subject to the main investment restrictions described under the following paragraphs, it being understood that this list is not exhaustive. In case any of the Sub-Funds shall receive revenues by engaging in securities lending or repurchase transactions, (i) the Company's or Sub-Fund's policy regarding direct and indirect operational costs/fees arising from securities lending or repurchase transactions that may be deducted from the revenue delivered to the relevant Sub-Fund and (ii) the identity of the entity(ies) to which the direct and indirect costs and fees are paid and if these are related parties to the Depositary shall be described under the following paragraphs or in the relevant Product Annex, as appropriate.

10.1 Securities lending transactions

The Company may, for certain Sub-Funds, enter into Securities Lending Transactions provided that it complies with the following rules:

10.1.1 the Company must be able at any time to recall any security that has been lent out or terminate any Securities Lending Transaction into which it has entered;

10.1.2 the Company may lend securities either directly or through a standardised system organised by a recognised clearing institution or a lending programme organised by a financial institution subject to prudential supervision rules which are recognised by the CSSF as equivalent to those laid down in European Union law and specialised in this type of transactions;

10.1.3 the borrower must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by European Union law;

10.1.4 as part of its lending transactions, the Company must receive collateral issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty, the value of which, during the duration of the lending agreement, must be equal to at least 90 percent. of the global valuation of the securities lent (interests, dividends and other eventual rights included). Non-cash collateral must be sufficiently diversified in accordance with section 8.2 "Collateral diversification" above;

10.1.5 such collateral must be received prior to or simultaneously with the transfer of the securities lent. When the securities are lent through the intermediaries referred to under 10.1.2 above, the transfer of the securities lent may be effected prior to receipt of the collateral, if the relevant intermediary ensures proper completion of the transaction. Said intermediary may provide collateral in lieu of the borrower;

10.1.6 the collateral must be given in the form of:

(i) liquid assets such as cash, short term bank deposits, money market instruments as defined in Directive 2007/16/EC of 19 March 2007, letters of credit and guarantees at first demand issued by a first class credit institution not affiliated to the counterparty;

(ii) bonds issued or guaranteed by a OECD Member State or by their local authorities or supranational institutions and bodies of a community, regional or world-wide scope;

(iii) shares or units issued by money market-type UCIs calculating a daily net asset value and having a rating of AAA or its equivalent;

(iv) shares or units issued by UCITS investing mainly in bonds/shares mentioned under (v) and (vi) hereunder;

(v) bonds issued or guaranteed by first class issuers offering an adequate liquidity; or

(vi) shares admitted to or dealt in on a regulated market of a EU Member State or on a stock exchange of a OECD Member State, provided that these shares are included in a main index;

10.1.7 the collateral given under any form other than cash or shares/units of a UCI/UCITS shall be issued by an entity not affiliated to the counterparty;

10.1.8 when the collateral given in the form of cash exposes the Company to a credit risk vis-à-vis the trustee of this collateral, such exposure shall be subject to the 20 percent. limitation as laid down in paragraph 2.2 above. Moreover such cash collateral shall not be safekept by the counterparty unless it is legally protected from consequences of default of the latter;

10.1.9 the collateral given in a form other than cash may be safekept by a third party custodian which is subject to prudential supervision and which is unrelated to the provider of the collateral but shall be safekept by the Depositary in case of a title transfer;

10.1.10 the Company shall proceed on a daily basis to the valuation of the collateral received. In case the value of the collateral already granted appears to be insufficient in comparison with the amount to be covered, the counterparty shall provide additional collateral at very short term. A haircut policy adapted for each class of assets received as collateral shall apply in order to take into consideration credit risk, exchange risks or market risks inherent to the assets accepted as collateral. In addition, when the Company is receiving collateral for at least 30 percent. of the net assets of the relevant Sub-Fund, it shall have an appropriate stress testing policy in place to ensure that regular stress tests are carried out under normal and exceptional liquidity conditions to enable the Company to assess the liquidity risk attached to the collateral;

10.1.11 the Company shall ensure that it is able to claim its rights on the collateral in case of the occurrence of an event requiring the execution thereof, meaning that the collateral shall be available at all times, either directly or through the intermediary of a first class financial institution or a wholly-owned subsidiary of this institution, in such a manner that the Company is able to appropriate or realise the assets given as collateral, without delay, if the counterparty does not comply with its obligation to return the securities lent;

10.1.12 during the duration of the agreement, the collateral cannot be sold or given as a security or pledged; and,

10.1.13 the Company shall disclose the global valuation of the securities lent in the Annual and Semi-annual Reports.

10.2 Repurchase transactions

The Company may, for certain Sub-Funds, enter into (i) repurchase transactions which consist of the purchase or sale of securities with a clause reserving the seller the obligation to repurchase from the acquirer the securities sold at a price and term specified by the two parties in their contractual arrangement and (ii) reverse repurchase agreement transactions, which consist of a forward transaction at the maturity of which the seller (counterparty) has the obligation to repurchase the securities sold and the Company the obligation to return the securities received under the transaction (collectively, the "**repo transactions**").

The Company can act either as purchaser or seller in repo transactions. Its involvement in such transactions is however subject to the following rules:

10.2.1 the Sub-Fund that enters into a repurchase agreement must ensure that it is able at any time to recall (i) any securities subject to the repurchase agreement or to terminate the repurchase agreement into which it has entered and (ii) the full amount of cash or to terminate the reverse repurchase agreement on either an accrued basis or a mark-to-market basis. When the cash is recallable at any time on a mark-to-market basis, the mark-to-market value of the reverse repurchase agreement should be used for the calculation of the net assets of the Sub-Fund. Fixed-term repurchase and reverse repurchase agreements that do not exceed seven days should be considered as arrangements on terms that allow the assets to be recalled at any time by the Company;

10.2.2 the fulfilment of the conditions 10.1.2 and 10.1.3;

10.2.3 during the life of a repo transaction with the Company acting as purchaser, the Company shall not sell the securities which are the object of the contract, before the counterparty has exercised its option or until the deadline for the repurchase has expired;

10.2.4 the securities acquired by the Company under a repo transaction must conform to the Sub-Fund's investment policy and investment restrictions and must be limited to:

(i) short-term bank certificates or money market instruments as defined in Directive 2007/16/EC of 19 March 2007;

(ii) bonds issued by non-governmental issuers offering an adequate liquidity; and,

(iii) assets referred to under 10.1.6 (ii), (iii) and (vi) above.

10.2.5 the Company shall disclose the total amount of the open repo transactions on the date of reference of its Annual and Semi-Annual Reports.

10.3 Reinvestment of the cash collateral

Without prejudice to the more restrictive provisions in section 8 above, the Company may reinvest the collateral received in the form of cash under securities lending and/or repo transactions in:

(i) shares or units of UCIs of the short-term money market-type, as defined in the CESR's Guidelines on a common definition of European money market funds (Ref.: CESR/10-049);

(ii) short-term bank deposits eligible in accordance with section 1 (f) above;

(iii) high-quality government bonds; and

(iv) reverse repurchase agreements.

In addition, the conditions under 10.1.6, 10.1.7, 10.1.8, 10.1.9 and 10.1.11 above, shall apply mutatis mutandis to the assets into which the cash collateral is reinvested. Reinvested cash collateral must be sufficiently diversified in accordance with section 8.2 "Collateral diversification" above. The reinvestment of the cash collateral in financial assets providing a return in excess of the risk free rate shall be taken into account for the calculation of the Company's global exposure in accordance with section 7.2 above. The Annual and Semi-Annual Reports of the Company shall disclose the assets into which the cash collateral is re-invested.

11 Risk Management Policy for FDI

The following section provides a summary of the risk management policy and procedures implemented by the Management Company, the Investment Managers and/or the Sub-Portfolio Managers (as applicable) in relation to the use of FDIs by the Sub-Funds for investment purposes. Shareholders are invited to refer to the sections headed "Risk Factors – General Risks - Use of Derivatives" and "Risk Factors – General Risks – Risk of Swap Transactions" in this Prospectus for a general description of the risks associated with the use of FDIs.

General

The ultimate responsibility for monitoring the risks linked to the use of FDIs by the Sub-Funds and for the implementation of risk management procedures lies with the Board of Directors of the Company, as well as the Management Company. The Management Company may appoint the Investment Managers to provide certain risk management services in order to monitor the risk exposure of the Sub-Funds. The day-to-day monitoring function may be delegated to the Investment Managers with the view of:

i) ensuring review and assessment of risks independently from the fund management duties performed by the Management Company; and

ii) reducing conflicts of interests, and eliminating them where possible.

The relevant Investment Manager may, with the approval of the Management Company and of the CSSF but under its own supervision, responsibility and expenses, appoint a Sub-Portfolio Manager to provide certain portfolio management and risk management services with respect to a Sub-Fund.

The members of the Board of Directors, as well as the personnel of the Management Company, the Investment Managers and the Sub-Portfolio Managers, are highly qualified and have an extensive experience related to fund management, and also specific experience relevant to the use of FDIs. The persons responsible for risk management at the Management Company all have graduate degrees and have all the necessary knowledge and experience.

Control Management

Each Investment Manager shall monitor the activities of the Sub-Portfolio Managers (if any) it has appointed and shall receive regular reports as agreed between the relevant Investment Manager and the Sub-Portfolio Manager. The Investment Managers will report any breaches and compliance issues that may arise to the Management Company, which will in turn inform the Board of Directors. The Management Company shall review and monitor the activities of the Investment Managers on an ongoing basis, perform additional independent controls and submit regular reports for the consideration of the Board of Directors. The Management Company shall notify the Board of Directors of any material and significant issues and any breaches of the guidelines laid down in the risk management manual and in this Prospectus.

An Investment Manager may have the day-to-day responsibility for the provision of such risk management services to the Sub-Funds in respect of which it has been appointed, as may be agreed between the Investment Manager and the Management Company from time to time, and shall provide periodic reports to the Management Company covering amongst other things:

- new FDI trades entered into on behalf of the Sub-Funds;
- a review and confirmation of Sub-Funds' performance in accordance with the Reference Index over the period;

- the occurrence of any investment restriction breach; and
- any other information which the Investment Manager considers relevant to the Sub-Funds, or which is requested by the Management Company.

Calculation of the Global Exposure

The Global Exposure resulting from the use of FDIs can be defined as the sum of the counterparty risk and the market risk to which a Sub-Fund is exposed, calculated in accordance with applicable regulations and guidelines. Unless otherwise provided in the relevant Product Annex, the Management Company will apply the commitment approach for the purposes of calculating the Global Exposure of the Sub-Funds, in accordance with the Regulations and based on the principle that the FDIs entered into by the Indirect Replication Funds and Hybrid Replication Funds are structured to reflect the performance of the Reference Index.

The performance of the Indirect Replication Funds and Hybrid Replication Funds with a non-leveraged underlying can be compared to the performance of the Reference Index as if the Indirect Replication Funds and Hybrid Replication Funds were not exposed to FDIs. In other words, this means that these Indirect Replication Funds and Hybrid Replication Funds do not bear any additional market risk (compared to Direct Replication Funds) as a result of their investment into FDIs if the un-invested cash position of the Indirect Replication Funds and Hybrid Replication Funds is zero, i.e. if there is no residual leverage or de-leverage. Compared to a Direct Replication Fund, the Global Exposure to FDIs can therefore be reduced to the counterparty risk.

The Indirect Replication Funds and Hybrid Replication Funds may be linked to a Reference Index which may include a leverage (or multiplication) factor of maximum two (2). Such leverage (or multiplication) factor embedded in the Reference Index is described in the Description of the Reference Index in the relevant Product Annex. Such Reference Indices reflect the performance of a leveraged position in an underlying index. The risks of taking a leveraged position are greater than the risks corresponding to an unleveraged position. Leverage will magnify any gains compared with an unleveraged position but, conversely, will also magnify any losses. Such Reference Indices are constructed to reflect the performance of a leveraged position in an underlying index on a daily basis only. Therefore this should not be equated with seeking a leveraged position for periods longer than a day. For the avoidance of doubt, the risk management of such Indirect Replication and Hybrid Replication Funds will be conducted in accordance with the commitment approach.

*Calculation of the Gross Counterparty Exposure ("**Gross CRE**")*

The Gross CRE is calculated by the Management Company as the sum of the mark-to-market value of all the FDIs entered into by the Sub-Fund with the Swap Counterparty.

Use of Leverage

When calculating the leverage used by the Sub-Funds, the leverage will be the quotient of the:

i) the notional value of the FDIs, and

ii) the Net Asset Value of the Sub-Fund.

At the time the Sub-Fund enters into a FDI with the Swap Counterparty, the leverage ratio will always be 1.

The Indirect Replication Funds may be linked to a Reference Index which may include a leverage (or multiplication) factor of maximum two (2) as further described in the above mentioned paragraph "Calculation of the Global Exposure".

*Calculation of the Net Counterparty Exposure ("**Net CRE**")*

The Net CRE is defined as the Gross CRE after deductions for provision of collateral by the Swap Counterparty. The Net CRE must be maintained below 10 percent. at all times. The Investment Manager may reduce the Gross CRE related to the Indirect Replication Funds and Hybrid Replication Funds FDIs by causing the Swap Counterparty to deliver collateral. Alternatively, the Investment Manager may require that the Swap Counterparty proceed to a restrike of existing swap transactions to the current level of the Reference Index and/or foreign exchange rate which, by fully resetting the mark-to-market value of these transactions to zero (or partially resetting it to a lower value), will result in the payment of an amount in cash to the Indirect Replication Funds and Hybrid Replication Funds which, at the discretion of the Investment Manager, will be used in the general cash management of the relevant Indirect Replication Funds and Hybrid Replication Funds (e.g. to finance pending redemptions), or will be reinvested into a new swap transaction entered into at the current level of the Reference Index.

12 Mitigation of Counterparty Risk Exposure

When applying the limits specified in sections 2.3 and 2.4 of the chapter "Investment Restrictions" in the Prospectus to the OTC Swap Transaction, reference must be made to the net counterparty risk exposure as determined pursuant to the Regulations and EMIR. In order to reduce its net counterparty risk exposure, the Company may in relation to any of its Sub-Funds use risk mitigation techniques such as netting and financial collateral techniques which are or would become authorised by the Regulations and EMIR.

The Company may notably reduce the overall counterparty risk of each Sub-Fund's OTC Swap Transaction by causing the relevant Swap Counterparty to deliver to the Depositary or to a third party bank collateral in the form of eligible financial assets and given in accordance with the Regulations. Such collateral will be enforceable by the Company at all times and will be marked to market on a daily basis. The amount of collateral to be delivered will be at least equal to the value by which the overall exposure limit as determined pursuant to the Regulations and EMIR has been exceeded.

In this context, the Company may notably cause the relevant Swap Counterparty to pledge certain of its assets, or certain accounts on which these assets are held, in favour of the Company in accordance with the provisions of appropriate collateral contractual documentation. These accounts may be opened in the books of, and the assets held thereon maintained by, one or more financial institutions which do not necessarily belong to the group of the Depositary and which are hence acting as sub-custodian.

The Company may also organize relevant collateral arrangements via any of the pooling techniques which are or would become authorised by the Regulations and which are compliant with the ring fencing principles among Sub-Funds as required by the Law. Such a collateral arrangement may in particular be organised through a global account opened in the name of the relevant Swap Counterparty, which account would be pledged in favour of the Company acting on behalf of all or part of its Sub-Funds and the financial assets of which would be allocated among the Sub-Funds concerned so that each of the latter would be able to identify the specific financial assets held on such account which are pledged in its favour.

The Company may also reduce the overall counterparty risk of the Sub-Fund's OTC Swap Transaction by resetting the OTC Swap Transaction. The effect of resetting the OTC Swap Transaction is to reduce the marked to market of the OTC Swap Transaction and, herewith, reduce the net counterparty exposure to the applicable rate.

The collateral arrangement applicable to each Sub-Fund may vary from time to time. Information in relation to the outstanding collateral arrangement applicable to any specific Sub-Fund may be obtained by investors at the registered office of the Company, which is located at, 49, avenue J.F. Kennedy, L-1855 Luxembourg.

SUSTAINABILITY-RELATED DISCLOSURES UNDER SFDR AND EU TAXONOMY REGULATION

Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector, as amended (**SFDR**) governs the transparency requirements regarding the integration of sustainability risks into investment decisions, the consideration of adverse sustainability impacts and the disclosure of Environment, Social, and Governance (ESG) and sustainability-related information.

Sustainability Risk

Sustainability risk means an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a negative material impact on the investment's value. Sustainability risk can either represent a risk on its own or have an impact on other risks and contribute significantly to risks, such as market risks, operational risks, liquidity risks or counterparty risks.

These events or conditions are split into "Environment, Social, and Governance" (ESG), and relate, among other things, to the following topics:

Environment

- Failure to contribute to climate mitigation including reduction of greenhouse gas emissions
- Failure to protect biodiversity
- Non-sustainable use and protection of water and maritime resources
- Failure to transition to a circular economy, to avoid waste, and use recycling
- Exports and imports of waste violating of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- Failure of avoidance and reduction of environmental pollution, including violations of the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants
- Failure of protection of healthy ecosystems
- Non-sustainable land use

Social

- Incompliance with recognized labour standards
- Incompliance with employment safety and health protection
- No reasonable remuneration or unfair working conditions
- Low level and no promotion of diversity and lack of inclusiveness
- Insufficient training and development opportunities
- Incompliance with trade union rights and freedom of assembly
- Failure to guarantee adequate product safety, including health protection
- Application of different requirements to entities in the supply chain
- Disregard of the interests of communities and social minorities
- Environmental damages impairing the natural bases of food and drinking water, preventing sanitary access or harming human health
- Unlawful eviction; unlawful taking of land, forest or water; use of land, forest or water securing human livelihood
- Use of security forces involved in torture; cruel, inhumane or degrading treatment; damage of life or limb; or impairing the right to organize and the freedom of association
- Other violation of general norm standards impacting employees or stakeholders

Governance

- Insufficient consideration of E&S factors by the Board / management
- Insufficient Board diversity
- Insufficient anti-corruption measures
- Insufficient anti-fraud measures
- Insufficient risk management and compliance practices related to E&S factors
- Board remuneration does not consider ESG criteria or matters
- Insufficient or wrong information disclosure – in particular those related to E&S factors • Violation of employee rights
- Violation of data protection standards
- Tax fraud
- Failure to facilitate whistle blowing

As part of the consideration of environmental issues, the Management Company considers especially the following aspects related to climate change:

Physical climate factors

- Individual extreme weather events
    - Heatwaves, Drought, Floods and Storms
    - Hail, Forest fires or Avalanches

- Long-term climate change
    - Decreasing amounts of snow or changes in rainfall frequency and volume
    - Volatile weather conditions
    - Rising sea levels, ocean acidification and changes in winds
    - Changes in land and soil productivity
    - Reduced water availability
    - Global warming including regional extremes

Climate Transition factors

- Exit from fossil fuels
- Exit from specific technologies (e.g. combustion engines)
- Industry driven technology change related to the change to a low-carbon economy
- Bans and/or restrictions impacting specific sectors
- Changes in client preferences and client behaviour
- Other political or regulatory measures related to the transition to a low-carbon economy

Sustainability risks can lead to a significant deterioration in the financial profile, liquidity, profitability or reputation of the underlying investment.

The Management Company assesses each Sub-Fund's requirement for the integration of sustainability risk consideration and implements additional disclosures on this integration in the investment process as appropriate for each Sub-Fund as well as in its risk management procedure. Unless the sustainability risks were already expected and taken into account in the valuations of the investments, they may have a significant negative impact on the expected/estimated market price and/or the liquidity of the investment and thus on the return of the fund.

Market risk in connection with sustainability risks

The market price of underlying investments may also be affected by risks from environmental, social or corporate governance aspects. For example, market prices can change if companies do not act sustainably and do not invest in sustainable transformations. Similarly, the strategic orientations of companies that do not take sustainability into account can have a negative impact on their share prices. The reputational risk arising from unsustainable corporate actions can also have a negative impact on market price. Additionally, physical damage caused by climate change or measures to transition to a low-carbon economy can also have a negative impact on market price.

Risks due to criminal acts, maladministration, natural disasters, lack of attention to sustainability

An underlying investment may become a victim of fraud or other criminal acts. It may suffer losses due to misunderstandings or errors by employees or external third parties, or be damaged by outside events such as natural disasters. These events may be caused or exacerbated by a lack of attention to sustainability. The Management Company strives to keep operational risks and potential financial impacts thereof which may be affecting the value of the assets of a fund as low as reasonably possible by having processes and procedures in place to identify, manage and mitigate such risks.

Tracking Error

A Tracking Error may be impacted as a result of the Investment Manager seeking to ensure compliance with the CW Statement and any other ESG commitments, such as those set out in the relevant Product Annex under "Transparency under SFDR and EU Taxonomy Regulation" and further in Annex IV "Pre-contractual information on Sustainable Investments" (as applicable).

Investment Process

Controversial Weapons

In its investment decisions, the Investment Manager considers, in addition to financial data, the sustainability risk posed by entities classified as controversial weapon companies based on their direct or indirect involvement with controversial weapons, from its investment universe. Controversial weapons are those weapons which, due to their harmful impact or indiscriminate effects, are subject to international conventions including cluster munitions, anti-personnel mines, biological and chemical weapons, all as determined by applicable policies of the Investment Manager and the DWS Controversial Weapons ("**CW**") identification methodology (the "**CW Statement**"). Further information on the CW Statement and the Information about Policies on the Integration of Sustainability Risks is available on https://www.dws.com/en-lu/solutions/sustainability/information-on-sustainability/.

For Direct Replication Funds and Actively Managed Funds, the Investment Manager will exclude securities identified by the DWS Group as per applicable policies, subject to a materiality calculation which determines the importance of those securities to the achievement of the Investment Objective of the Sub-Fund.

For Indirect Replication Funds, securities identified as per applicable policies will not be eligible transferable securities for the Invested Assets of the Sub-Fund.

For Hybrid Replication Funds, the Investment Manager will exclude securities identified by the DWS Group as per applicable policies, subject to a materiality calculation which determines the importance of those securities to the achievement of the Investment Objective of the Sub-Fund. Securities identified as per applicable policies will also not be eligible transferable securities for the Invested Assets of the Sub-Fund.

In addition, the Investment Manager reserves the right to exclude from the portfolios of the Sub-Funds any such further securities that do not comply with the Investment Manager's policies.

Coal

For Indirect Replication Funds, securities identified by the DWS Coal policy will not be eligible transferable securities for the Invested Assets of the Sub-Fund.

For Direct Replication Funds and Actively Managed Funds such securities will not be excluded from the portfolio.

For Hybrid Replication Funds, securities identified by the DWS Coal policy will not be eligible transferable securities for the Invested Assets of the Sub-Fund. Securities identified by the DWS Coal policy will not be excluded from the portfolio with regard to any direct investments.

Please refer to the DWS website https://www.dws.com/en-lu/solutions/sustainability/information-on-sustainability/ for further information.

Where a Sub-Fund promotes, amongst other characteristics, ESG characteristics or has a specific sustainable investment objective, this is specified in the relevant Product Annex under "Transparency under SFDR and EU Taxonomy Regulation" and further in Annex IV "Pre-contractual Information on Sustainable Investments" of this Prospectus where additional sustainability-related information can be found.

Please note that it is not necessary for an ESG designated Sub-Fund disclosing under Article 8 or 9 of SFDR to contain "ESG" in its name.

EU Taxonomy Regulation

Unless stated otherwise in the relevant Product Annex, investments within the Sub-Funds do not take into account the EU Taxonomy Regulation criteria for environmentally sustainable economic activities.

While the Management Company is responsible with respect to disclosures in accordance with SFDR and the assessment for the integration of sustainability risk consideration, the identification of a Sub-Fund as "ESG" is mainly based on the level of ESG filters applied to the Reference Index or Underlying Asset in accordance with ESG standards or thresholds determined by the administrator of the Reference Index or Underlying Asset. The Management Company reviews and monitors the ESG criteria. Investors are advised to carry out their own assessment as to whether an ESG designated Sub-Fund, its Reference Index or its Underlying Asset meets their own ESG criteria.

The following disclosure is made in accordance with Article 7(1) of SFDR.

Sub-Funds that do not disclose under Article 8 or 9 of SFDR will not consider any principle adverse impacts ("**PAIs**") on sustainability factors as they do not promote any ESG characteristics and/or do not have a sustainable investment objectives. For Sub-Funds disclosing under Article 8 or 9 of SFDR, the PAIs considered for each Sub-Fund will be detailed in the relevant pre-contractual disclosures in Annex IV "Pre-contractual Information on Sustainable Investments" of this Prospectus.

RISK FACTORS

The following is a general discussion of a number of risks which may affect the value of Shares. See also the section of the relevant Product Annex headed "Other Information – Risk Factors" (if any) for a discussion of additional risks particular to a specific issue of Shares. Such risks are not, nor are they intended to be, exhaustive. Not all risks listed necessarily apply to each issue of Shares, and there may be other considerations that should be taken into account in relation to a particular issue. What factors will be of relevance to a particular Sub-Fund will depend upon a number of interrelated matters including, but not limited to, the nature of the Shares and the Sub-Fund's Investment Policy.

No investment should be made in the Shares until careful consideration of all these factors has been made. Investors should note that the Sub-Funds are not capital protected or guaranteed and that the capital invested or its respective amount are not protected or guaranteed and investors in the Sub-Funds should be prepared and able to sustain losses up to the total capital invested.

General Risk Factors

In general: The value of investments and the income from them, and therefore the value of and income from Shares relating to a Sub-Fund can go down as well as up and an investor may not get back the amount he invests. Due to the various commissions and fees which may be payable on the Shares, an investment in Shares should be viewed as medium to long term. An investment in a Sub-Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors. Investors should only reach an investment decision after careful consideration with their legal, tax, accounting, financial and other advisers. The legal, regulatory, tax and accounting treatment of the Shares can vary in different jurisdictions. Any descriptions of the Shares set out in the Prospectus and/or a Product Annex are for general information purposes only. Investors should recognise that the Shares may decline in value and should be prepared to sustain a total loss of their investment. Risk factors may occur simultaneously and/or may compound each other resulting in an unpredictable effect on the value of the Shares.

Extreme Market Movements: In the event of large index movements, including large intra-day movements, a Sub-Fund's performance may be inconsistent with its stated investment objective.

Valuation of the Shares: The value of a Share will fluctuate as a result of, amongst other things, changes in the value of the Sub-Fund's assets, the Reference Index and, where applicable, the derivative techniques used to link the two.

Lack of Discretion of the Management Company to Adapt to Market Changes: Sub-Funds following a passive investment strategy are not "actively managed". Accordingly, the Management Company will not adjust the composition of such a Sub-Fund's portfolio except (where relevant) in order to seek to closely correspond to the duration and total return of the relevant Reference Index. The Sub-Funds do not try to "beat" the market they reflect and do not seek temporary defensive positions when markets decline or are judged to be overvalued. Accordingly, a fall in the relevant Reference Index may result in a corresponding fall in the value of the Shares of the relevant Sub-Fund.

Derivatives: A Sub-Fund may use derivatives to achieve its Investment Objective. While the prudent use of such derivatives can be beneficial, derivatives also involve risks which, in certain cases, can be greater than the risks presented by more traditional investments. There may be transaction costs associated with the use of derivatives.

Risk of Swap Transactions: Swap transactions are subject to the risk that the Swap Counterparty may default on its obligations or become insolvent. If such a default were to occur the Sub-Funds would, however, have contractual remedies pursuant to the relevant OTC Swap Transaction. Investors should be aware that such remedies may be subject to bankruptcy and insolvency laws which could affect a Sub-Fund's rights as a creditor and as a result a Sub-Fund may for example not receive the net amount of payments that it contractually is entitled to receive on termination of the OTC Swap Transaction where the Swap Counterparty is insolvent or otherwise unable to pay the amount due. The net counterparty risk exposure each Sub-Fund may have with respect to a single Swap Counterparty, expressed as a percentage (the "Percentage Exposure") (i) is calculated by reference to this Sub-Fund's Net Asset Value, (ii) may take into account certain mitigating techniques (such as remittance of collateral in accordance with the Regulations and EMIR) and (iii) cannot exceed 5 percent. or 10 percent. depending on the status of the Swap Counterparty, in accordance with and pursuant to the Regulations (please refer to paragraph 2.3 of the section "Risk Diversification" for more details on the maximum Percentage Exposure and to the section "Investment Objectives and Policies" for more information on the collateral arrangements and subject to EMIR, as the case may be). Investors should nevertheless be aware that the actual loss suffered as a result of a Swap Counterparty's default may exceed the amount equal to the product of the Percentage Exposure multiplied by the Net Asset Value, even where arrangements have been taken to reduce the Percentage Exposure to nil. As a matter of illustration, there is a risk that the realised value of collateral received by a Sub-Fund may prove less than the value of the same collateral which was taken into account as an element to calculate the Percentage Exposure, whether because of inaccurate pricing of the collateral, adverse market movements, a deterioration in the credit rating of issuers of the collateral or the illiquidity of the market in which the collateral is traded. Any potential investor should therefore understand and evaluate the Swap Counterparty credit risk prior to making any investment.

Valuation of the Reference Index and the Sub-Fund's assets: The Sub-Fund's assets, the Reference Index or the derivative techniques used to link the two may be complex and specialist in nature. Valuations for such assets or derivative techniques will only usually be available from a limited number of market professionals which frequently act as counterparties to the transactions to be valued. Such valuations are often subjective and there may be substantial differences between any available valuations.

Exchange Rates: An investment in the Shares may directly or indirectly involve exchange rate risk. Because the Net Asset Value of the Sub-Fund will be calculated in its Reference Currency, the performance of a Reference Index or of its constituents denominated in another currency than the Reference Currency will also depend on the strength of such currency against the Reference Currency and the interest rate of the country issuing this currency. Equally, the currency denomination of any Sub-Fund asset in another currency than the Reference Currency will involve exchange rate risk for the Sub-Fund. It should be noted that the Shares may be denominated in a currency other than (i) the currency of the investor's home jurisdiction and/or (ii) the currency in which an investor wishes to receive monies.

Currency Hedging: The Sub-Funds may enter into foreign exchange hedging transactions, the aim of which is to protect against adverse currency fluctuations. Such hedging transactions may consist of foreign exchange forward contracts or other types of derivative contracts which reflect a foreign exchange hedging exposure that is regularly adjusted in line with the Regulations. Investors should note that this may not always be successful and may result in greater fluctuations in the value of the Sub-Funds and may negatively affect the value of the Sub-Funds and their investments. Investors should further note that there may be costs associated with the use of foreign exchange hedging transactions which may be borne by the relevant Sub-Fund. For further information on currency hedging, please refer to "The Currency Hedged Share Classes" under the chapter "Structure".

Interest Rate: Interest rate risk is the risk which arises from potential movements in the level and volatility of yields. Fluctuations in interest rates of the currency or currencies in which the Shares, the Sub-Fund's assets and/or the Reference Index are denominated may affect financing costs and the real value of the Shares. As a general rule, the value of fixed-rate instruments will increase when interest rates fall and vice-versa.

Inflation: The rate of inflation will affect the actual rate of return on the Shares. A Reference Index may reference the rate of inflation.

Yield: High yield securities are often more volatile, less liquid and more prone to financial distress than other higher rated securities. The valuation of high yield securities may be more difficult than other higher rated securities because of lack of liquidity. Investment in this kind of securities may lead to unrealised capital losses and/or losses that can negatively affect the Net Asset Value of the Sub-Funds. Also, returns on Shares may not be directly comparable to the yields which could be earned if any investment were instead made in any Sub-Fund's assets or Reference Index.

Correlation: The Shares may not correlate either perfectly or highly with movements in the value of Sub-Fund's assets and/or the Reference Index.

Volatility: The value of the Shares may be affected by market volatility and/or the volatility of the Sub-Fund's assets and/or the Reference Index.

Credit: The ability of the Company to make payments to Shareholders in respect of the Shares will be diminished to the extent of any other liabilities undertaken by, or imposed on, the Company. Any Sub-Fund's assets, Reference Index or derivative technique used to link the two may involve the risk that the counterparty to such arrangements may default on any obligations to perform thereunder. Investment restrictions may rely on credit rating thresholds and thus have an impact on securities selection and asset allocation. The Investment Manager may be forced to sell securities at an unfavourable time or price. Credit rating agencies may fail to correctly assess the credit worthiness of issuers.

Liquidity: Certain types of securities invested in by the Sub-Fund or provided as collateral to the Sub-Fund may be difficult to buy or sell, particularly during adverse market conditions. This may also affect the ability to obtain prices for the components of the Underlying Asset, if applicable, and may therefore affect the value of the Underlying Asset. As a result, the Net Asset Value per Share of the Sub-Fund may be affected. The fact that the Shares may be listed on a stock exchange is not an assurance of liquidity in the Shares. On the asset side, liquidity risk refers to the inability of a Sub-Fund to dispose of investments at a price equal or close to their estimated value within a reasonable period of time. On the liability side, liquidity risk refers to the inability of a Sub-Fund to raise sufficient cash to meet a redemption request due to its inability to dispose of investments. In principle, each Sub-Fund will only make investments for which a liquid market exists or which can otherwise be sold, liquidated or closed at any time within a reasonable period of time. In the case of financial derivative transactions, if a financial derivative transaction is particularly large or if the relevant market is illiquid, it may not be possible to initiate a transaction or liquidate a position at an advantageous price (however, a Sub-Fund will only enter into OTC financial derivative instruments if it is allowed to liquidate such transactions at any time at fair value). Difficulties in disposing of investments may result in a loss for a Sub-Fund and/or compromise the ability of the Sub-Fund to meet a redemption request.

Leverage Risk: The Sub-Fund's assets, Reference Index and the derivative techniques used to link the two may comprise elements of leverage (or borrowings) which may potentially magnify losses and may result in losses greater than the amount borrowed or invested.

Shortfall Risk: Shortfall risk of a portfolio refers to the risk that a portfolio's net assets may suffer from an accelerated decrease in value due to the income on investments made with borrowed funds being lower than the cost of the borrowed capital and the value of such investments decreasing and becoming less than the value of the borrowed capital, and which may in extreme circumstances result in such a portfolio incurring losses greater than the value of its assets, which would result in investors in such a portfolio losing more than the total capital invested.

Political Factors, Emerging and/or Frontier Market and Non-OECD Member State Assets: The performance of the Shares and/or the possibility to purchase, sell, or repurchase the Shares may be affected by changes in general economic conditions and uncertainties such as political developments, changes in government policies, the imposition of restrictions on the transfer of capital and changes in regulatory requirements. Such risks can be heightened in investments in, or relating to, emerging and/or frontier markets or non-OECD Member States. In addition, local custody services remain underdeveloped in many non-OECD and emerging and/or frontier market countries and there is a transaction and custody risk involved in dealing in such markets. In certain circumstances, a Sub-Fund may not be able to recover or may encounter delays in the recovery of some of its assets. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging and/or frontier markets or non-OECD Member States, may not provide the same degree of investor information or protection as would generally apply to major markets.

Emerging Markets: Investors in emerging markets Sub-Funds should be aware of the risk associated with investment in emerging market securities. Investments in emerging markets may be subject to greater risks than investments in well developed markets, as a result of a number of considerations, including potentially significant legal and political risks. Such considerations may include greater risk of market shutdown, greater governmental involvement in the economy, less complete and reliable official data and, in some cases, greater volatility, greater liquidity risks, greater unpredictability and higher risk of civil or international conflict. Emerging markets may also be exposed to greater political and economic risks, such as the possibility of nationalisation,

expropriation, political changes, social instability or other developments which could adversely affect the economies of such nations or the foreign exchange rates. There may also be certain political and economic factors that affect emerging markets as set out in "Political Factors, Emerging and/or Frontier Market and Non-OECD Member State Assets" under the chapter "Risk Factors".

Frontier Markets: Investors in frontier markets Sub-Funds should be aware of the risk associated with investment in frontier market securities. Investments in frontier markets may be subject to greater risks than investments in well developed markets, as a result of a number of considerations, including potentially significant legal and political risks. Such considerations may include greater risk of market shutdown, greater governmental involvement in the economy, less complete and reliable official data and, in some cases, greater volatility, greater liquidity risks, greater unpredictability and higher risk of civil or international conflict. Frontier markets may also be exposed to greater political and economic risks, such as the possibility of nationalisation, expropriation, political changes, social instability or other developments which could adversely affect the economies of such nations or the foreign exchange rates. There may also be certain political and economic factors that affect frontier markets as set out in "Political Factors, Emerging and/or Frontier Market and Non-OECD Member State Assets" under the chapter "Risk Factors".

Capital Protection: Shares may be expressed to be fully or partially protected. In certain circumstances, such protection may not apply. Shareholders may be required to hold their Shares until maturity in order to realise the maximum protection available. Investors should read the terms of any protection with great care. Specifically, it should be noted that, unless otherwise expressly provided, it is unlikely that protection levels will be based on the price at which investors may purchase the Shares in the secondary market (if any).

Path Dependency: Shares may be linked to products which are path dependent. This means that any decision or determination made (whether pursuant to the exercise of a discretion in consequence of an error or otherwise) can have a cumulative effect and may result in the value of such product over time being significantly different from the value it would have been if there had been no such cumulative effect. Please refer to the numerical examples in the section "Daily leveraged and/or inverse index tracking Sub-Funds" above for further explanation in this regard.

Share Subscriptions and Redemptions: Provisions relating to the subscription and redemption of Shares grant the Company discretion to limit the amount of Shares available for subscription or redemption on any Transaction Day and, in conjunction with such limitations, to defer or pro rata such subscription or redemption. In addition, where requests for subscription or redemption are received late, there will be a delay between the time of submission of the request and the actual date of subscription or redemption. Such deferrals or delays may operate to decrease the number of Shares or the redemption amount to be received.

Inaction by the Common Depositary and/or an International Central Securities Depositary: Investors who settle or clear through an International Central Securities Depositary will not be a registered Shareholder in the Company, but will hold an indirect beneficial interest in such Shares, if such investors are Participants, their right will be governed by their agreement with the relevant International Central Securities Depositary , if such investors are not Participants, then their rights will be governed by the direct or indirect arrangement with the relevant Participant of the International Central Securities Depositary (who may be their nominee, broker or Central Securities Depositaries, as the case may be).

Under the current arrangement, the Company will issue any notices and associated documentation to the registered holder of the Global Share Certificate, the Common Depositary Nominee, with such notice as is given by the Company in the ordinary course of business. It is the Directors understanding that (i) the Common Depositary will be subject to a contractual obligation to relay such notices and associated documentation issued by the Company to the Common Depositary Nominee, which will further be obliged to pass on such notices and documentation to the ICSDs; (ii) the relevant ICSD will in turn relay such notices and associated documentation received from the Common Depositary to the Participants in accordance with its rules and procedures; (iii) the Common Depositary is contractually bound to collate all votes received from the relevant International Central Securities Depositaries (which reflects votes received by the relevant International Central Securities Depositary from its Participants) and that the Common Depositary Nominee should vote in accordance with such instructions. Nonetheless, the Company is not empowered to compel the Common Depositary to relay any notices or voting instructions in accordance with the instructions from the International Central Securities Depositaries.

Failure to Settle through International Central Securities Depositary: If an Authorised Participant submits a dealing request and subsequently fails or is unable to settle and complete the dealing request, as the Authorised Participant is not a registered Shareholder of the Company, the Company will have no recourse to the Authorised Participant other than its contractual right to recover such costs. In the event that no recovery can be made from the Authorised Participant, any costs incurred as a result of the failure to settle will be borne by the relevant Sub-Fund and its investors.

Voting Rights and Arrangements: The Company cannot accept voting instructions from any persons, other than the registered Shareholder which is the Common Depositary Nominee. Investors are advised to consult with their relevant Participant, broker or nominee regarding their ability, or not, as the case may be, to exercise voting or other rights and how these are relayed to the Common Depositary.

Authorised Participant Concentration: Only an Authorised Participant may subscribe or redeem Shares directly with the Company. The Company has a limited number of institutions that may act as Authorised Participants. To the extent that Authorised Participant(s) are unable or do not desire to proceed with subscription or redemption orders with respect to the Company and no other Authorised Participant(s) are able or willing to do so, Shares may trade at a premium or discount to Net Asset Value and this may lead to liquidity issues or delisting.

Large Shareholder: Certain account holders may from time to time own or control a significant percentage of a Sub-Fund's Shares. A Sub-Fund is subject to the risk that a redemption by large Shareholders of all or a portion of their Shares or a purchase of Shares in large amounts and/or on a frequent basis will adversely affect a Sub-Fund's performance if it is forced to sell portfolio securities or invest cash when the Investment Managers would not otherwise choose to do so. This risk will be particularly pronounced if one Shareholder owns a substantial portion of a Sub-Fund. Redemptions of a large number of Shares may affect the liquidity of a Sub-Fund's portfolio, increase a Sub-Fund's transaction costs and/or lead to the liquidation of a Sub-Fund.

Listing: There can be no certainty that a listing on any stock exchange applied for by the Company will be achieved and/or maintained or that the conditions of listing will not change. Further, trading in Shares on a Stock Exchange may be halted pursuant to that Stock Exchange's rules due to market conditions and investors may not be able to sell their Shares until trading resumes.

Regulatory Reforms: The Prospectus has been drafted in line with currently applicable laws and regulations. It cannot be excluded that the Company and/or the Sub-Funds and their respective Investment Objective and Policy may be affected by any future changes in the legal and regulatory environment. New or modified laws, rules and regulations may not allow, or may significantly limit the ability of, the Sub-Fund to invest in certain instruments or to engage in certain transactions. They may also prevent the Sub-Fund from entering into transactions or service contracts with certain entities. This may impair the ability of all or some of the Sub-Funds to carry out their respective Investment Objectives and Policies. Compliance with such new or modified laws, rules and regulations may also increase all or some of the Sub-Funds' expenses and may require the restructuring of all or some of the Sub-Funds with a view to complying with the new rules. Such restructuring (if possible) may entail restructuring costs. When a restructuring is not feasible, a termination of affected Sub-Funds may be required. A non-exhaustive list of potential regulatory changes in the European Union and the United States of America are listed below.

European Union: Europe is currently dealing with numerous regulatory reforms that may have an impact on the Company and the Sub-Funds. Policy makers have reached agreement or tabled proposals or initiated consultations on a number of important topics, such as (list not exhaustive): the consultation initiated by the EU Commission on product rules, liquidity management, depositary, money market funds, long-term investments in view of a further revision of the UCITS Directive (i.e., the so called "UCITS VI Directive") along with the guidelines adopted by ESMA in July 2012 concerning ETFs and other UCITS, the update of the existing regulatory framework in the Markets in Financial Instruments Directive more commonly referred to as "MIFID" and (ii) to set up directly applicable requirements to be contained in the new regulation known as the Markets in Financial Instruments Regulation more commonly referred to as "MIFIR", the adoption by the European Parliament of the Regulation on Over-the-Counter Derivatives and Market Infrastructures more commonly referred to as "EMIR" and the proposal for a Financial Transaction Tax ("**FTT**").

Brexit: Since 31 January 2020, the United Kingdom no longer is a Member State of the European Union. Depending on the outcome of the EU's negotiations with the United Kingdom there may be a need to amend the structure of the Sub-Funds or replace certain service providers.

United States of America: The U.S. Congress, the SEC, the U.S. Commodity Futures Trading Commission ("**CFTC**") and other regulators have also taken or represented that they may take action to increase or otherwise modify the laws, rules and regulations applicable to short sales, derivatives and other techniques and instruments in which the Company may invest. The Dodd-Frank Wall Street Reform and Consumer Protection Act (the "**Dodd-Frank Act**") imposed the so-called "Volcker Rule" which restricts, "banking entities" and "non-bank financial companies" from engaging in certain activities, such as proprietary trading and investing in, sponsoring, or holding interests in investment funds.

Legal and Regulatory: The Company must comply with regulatory constraints or changes in the laws affecting it, the Shares, or the Investment Restrictions, and such compliance might require a change in the investment policy and objectives followed by a Sub-Fund, and/or the restructuring or termination of such policy and objective. The Sub-Fund's assets, the Reference Index and any other derivative transaction or securities financing transaction the Sub-Fund enters into may also be subject to change in laws or regulations and/or regulatory actions, limitations or restrictions which may affect their value and/or liquidity and performance of the Sub-Fund's holdings as compared to the performance of its Reference index. This may increase the risk of tracking error and the Sub-Fund may require some form of restructuring or termination. For further information relating to regulatory reforms, please refer to "Regulatory Reforms" under the chapter "Risk Factors".

Bans on Short Selling: In light of the credit crunch and the financial turmoil which started in late 2007 and aggravated in September 2008, many markets around the world have made significant changes to rules regarding short selling. In particular, many regulators (including those in the United States and the United Kingdom) have moved to ban "naked" short selling or to completely suspend short selling for certain stocks. The operation and market making activities in respect of a Sub-Fund may be affected by regulatory changes to the current scope of such bans. Furthermore, such bans may have an impact on the market sentiment which may in turn affect the performance of the Reference Index and as a result the performance of a Sub-Fund. It is impossible to predict whether such an impact caused by the ban on short selling will be positive or negative for any Sub-Fund. In the worst case scenario, a Shareholder may lose all his investments in a Sub-Fund.

Past and Future Performance: The performance of a Sub-Fund is dependent upon several factors including, but not limited to, the Reference Index's performance, the performance of any currency hedging activities, as applicable, as well as fees and expenses, tax and administration duties, certain amounts (such as Enhancements resulting from Swap hedging policy), etc. which will or may have actually been charged, applied and/or discounted. These elements generally vary during any performance period, and it should therefore be noted that when comparing performance periods, some may appear to have enhanced or reduced performance when compared to similar performance periods, due to the application (or reduction) of some or all of the factors set out above. Past performance, as published in the KIID or in any marketing documentation, is not a guarantee of, and should not be used as a guide to, future returns.

Reference Index Calculation and Substitution: In certain circumstances described in the relevant Product Annex, the Reference Index may cease to be calculated or published on the basis described, or such basis may be altered, or the Reference Index may be substituted.

In certain circumstances such as the discontinuance in the calculation or publication of the Reference Index or suspension in the trading of any constituents of the Reference Indices, it could result in the suspension of trading of the Shares or the requirement for Market Makers to provide two way prices on the Relevant Stock Exchanges.

Corporate Actions: Securities comprising a Reference Index or the assets of the Sub-Fund may be subject to change in the event of corporate actions in respect of those securities.

Risks in relation to the tracking of indices: Investors should be aware and understand that Sub-Funds are subject to risks which may result in the value and performance of the Shares varying from those of the Reference Index. Reference Indices such as financial indices may be theoretical constructions which are based on certain assumptions and Sub-Funds aiming to reflect such financial indices may be subject to constraints and circumstances which may differ from the assumptions in the relevant Reference Index. Factors that are likely to affect the ability of a Sub-Fund to track the performance of the relevant Reference Index include:

- the composition of a Sub-Fund's portfolio deviating from time to time from the composition of the Reference Index, especially in case not all components of the Reference Index can be held and/or traded by the relevant Sub-Fund;
- investment, regulatory and/or tax constraints (including Investment Restrictions) affecting the Company but not the Reference Index;
- investments in assets other than the Reference Index giving rise to delays or additional costs/taxes compared to an investment in the Reference Index;
- constraints linked to income reinvestment;
- constraints linked to the timing of rebalancing of the Sub-Fund's portfolio;
- transaction costs and other fees and expenses to be borne by the Sub-Funds (including costs, fees and expenses to be borne in relation to the use of financial techniques and instruments);
- adjustments to OTC Swap Transactions to reflect index replication costs ("**OTC Swap Transaction Costs**"); and/or
- the possible existence of idle (non invested) cash or cash assimilated positions held by a Sub-Fund and, as the case may be, cash or cash assimilated positions beyond what it requires to reflect the Reference Indices (also known as "cash drag").

No investigation or review of the Reference Index: None of the Company, any Investment Manager or Sub-Portfolio Manager or each of their affiliates has performed or will perform any investigation or review of the Reference Index on behalf of any prospective investor in the Shares. Any investigation or review made by or on behalf of the Company, any Investment Manager, Sub-Portfolio Manager or any of their affiliates is or shall be for their own proprietary investment purposes only.

Licence to use the relevant Reference Index may be terminated: Each Sub-Fund has been granted a licence by the relevant Index Administrator to use the relevant Reference Index in order to create a Sub-Fund based on the relevant Reference Index and to use certain trademarks and any copyright in the relevant Reference Index. A Sub-Fund may not be able to fulfil its objective and may be terminated if the licence agreement between the Sub-Fund and the relevant Index Administrator is terminated. A Sub-Fund may also be terminated if the relevant Reference Index ceases to be compiled or published and there is no replacement index using the same or substantially similar formula for the method of calculation as used in calculating the relevant Reference Index.

Changes made to the Reference Index by the Index Administrator: The attention of Shareholders is hereby drawn to the complete discretion of the Index Administrator to decide upon and so amend the features of the relevant Reference Index for which it acts as administrator. Depending on the terms of the relevant licence agreement, an Index Administrator may have no obligation to provide the licence holders who use the relevant Reference Index (including the Company) with adequate prior notice of any changes which are made to such Reference Index. As a consequence, the Company shall not necessarily be able to inform the Shareholders of the Sub-Fund in advance of any such changes made by the relevant Index Administrator to the features of the relevant Reference Index. For those changes made to a Reference Index which require a prior notice and the right for Shareholders to redeem their shares free of charge, the Company will accord such rights to the relevant Shareholders as soon as possible; however, this will not necessarily take place prior to the effective date of those changes made to the features of the relevant Reference Index. Once becoming aware of such changes, the Company shall inform those Shareholders affected by any such changes as soon as practically possible, through a notice on the website www.Xtrackers.com or any successors thereto. To the extent that changes made to a Reference Index do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com The Shareholders are consequently invited to consult the website of the relevant Index Administrator on a regular basis.

Allocation of shortfalls among Classes of a Sub-Fund: The right of holders of any Class of Shares to participate in the assets of the Company is limited to the assets (if any) of the relevant Sub-Fund and all the assets comprising a Sub-Fund will be available to meet all of the liabilities of the Sub-Fund, regardless of the different amounts stated to be payable on the separate Classes (as set out in the relevant Product Annex). For example, if (i) on a winding-up of the Company or (ii) as at the Maturity Date (if any), the amounts received by the Company under the relevant Sub-Fund's assets (after payment of all fees, expenses and other liabilities which are to be borne by the relevant Sub-Fund) are insufficient to pay the full Redemption Amount payable in respect of all Classes of Shares of the relevant Sub-Fund, each Class of Shares of the Sub-Fund will rank *pari passu* with each other Class of Shares of the relevant Sub-Fund, and the proceeds of the relevant Sub-Fund will be distributed equally amongst each Shareholder of that Sub-Fund pro rata to the amount paid up on the Shares held by each Shareholder. The relevant Shareholders will have no further right of payment in respect of their Shares or any claim against any other Sub-Fund or any other assets of the Company. This may mean that the overall return (taking account of any dividends already paid) to Shareholders who hold Shares paying dividends quarterly or more frequently may be higher than the overall return to Shareholders who hold Shares paying dividends annually and that the overall return to Shareholders who hold Shares paying dividends may be higher than the overall return to Shareholders who hold Shares paying no dividends. In practice, cross liability between Classes is only likely to arise where the aggregate amounts payable in respect of any Class exceed the assets of the Sub-Fund notionally allocated to that Class, that is, those amounts (if any) received by the Company under the relevant Sub-Fund's assets (after payment of all fees, expenses and other liabilities which are to be borne by such Sub-Fund) that are intended to fund payments in respect of such Class or are otherwise attributable to that Class. Such a situation could arise if, for example, there is a default by a counterparty in respect of the relevant Sub-Fund's assets. In these circumstances, the remaining assets of the Sub-Fund notionally allocated to any other Class of the same Sub-Fund may be available to meet such payments and may accordingly not be available to meet any amounts that otherwise would have been payable on such other Class.

Segregated Liability between Sub-Funds: While the provisions of the Law provide for segregated liability between Sub-Funds, these provisions have yet to be tested in foreign courts, in particular, in satisfying local creditors' claims. Accordingly, it is not free from doubt that the assets of any Sub-Fund of the Company may be exposed to the liabilities of other funds of the Company. As at the date of this Prospectus, the Directors are not aware of any existing or contingent liability of any Sub-Fund of the Company.

Contagion Risk between Share Classes: There is no legal segregation of liability between Share Classes in the same Sub-Fund. Where a Sub-Fund is comprised of multiple Currency Hedged Share Classes, there is a risk that under certain circumstances, other Share Class holders of a Sub-Fund will be exposed to liabilities arising from currency exposure hedging transactions for a Currency Hedged Share Class which negatively impacts the Net Asset Value of the other Share Classes. An up-to-date list of Share Classes with a contagion risk can be obtained from the Management Company upon request.

Consequences of winding-up proceedings: If the Company fails for any reason to meet its obligations or liabilities, or is unable to pay its debts, a creditor may be entitled to make an application for the winding-up of the Company. The commencement of such proceedings may entitle creditors (including counterparties) to terminate contracts with the Company (including Sub-Fund's assets) and claim damages for any loss arising from such early termination. The commencement of such proceedings may result in the Company being dissolved at a time and its assets (including the assets of all Sub-Funds) being realised and applied to pay the fees and expenses of the appointed liquidator or other insolvency officer, then in satisfaction of debts preferred by law and then in payment of the Company's liabilities, before any surplus is distributed to the Shareholders of the Company. In the event of proceedings being commenced, the Company may not be able to pay the full amounts anticipated by the Product Annex in respect of any Class or Sub-Funds.

Conflicts of Interest: The following discussion enumerates certain potential divergences and conflicts of interest that may exist or arise in relation to the Directors, Shareholders, Management Company, and any other service provider (including their affiliates and respective potential investors, partners, members, directors, officers, employees, consultants, agents and representatives) (each a "**Service Provider**"), with respect to all or part of the Sub-Funds (collectively the "**Connected Persons**" and each a "**Connected Person**").

This section does not purport to be an exhaustive list or a complete explanation of all the potential divergences and conflicts of interest.

- Each Connected Person may be deemed to have a fiduciary relationship with a Sub-Fund in certain circumstances and consequently the responsibility for dealing fairly with the Company and relevant Sub-Fund(s). However, the Connected Persons may engage in activities that may diverge from or conflict with the interests of the Company, one or several Sub-Funds or potential investors. They may for instance:
  - contract or enter into any financial, banking or other transactions or arrangements with one another or with the Company including, without limitation, investment by the Company in securities or investment by any Connected Persons in any company or body any of whose investments form part of the assets of the Company or be interested in any such contracts or transactions;
  - invest in and deal with Shares, securities, assets or any property of the kind included in the property of the Company for their respective individual accounts or for the account of a third party; and
  - deal as agent or principal in the sale or purchase of securities and other investments to or from the Company through or with any Investment Manager, Sub-Portfolio Manager, investment adviser or the Depositary or any subsidiary, affiliate, associate, agent or delegate thereof.

  Any assets of the Company in the form of cash or securities may be deposited with any Connected Person. Any assets of the Company in the form of cash may be invested in certificates of deposit or banking investments issued by any Connected Person. Banking or similar transactions may also be undertaken with or through a Connected Person.
- DWS Affiliates may act as Service Providers. DWS Affiliates may for instance act as counterparties to the derivatives transactions or contracts entered into by the Company (for the purposes hereof, the "**Counterparty**" or "**Counterparties**"), Director, distributor, Index Administrator, securities lending agent, authorised participant, market maker, management company, investment manager, sub-portfolio manager, investment adviser and provide sub-custodian services to the Company, all in accordance with the relevant agreements which are in place. In addition, in many cases the Counterparty may be required to provide valuations of such derivative transactions or contracts. These valuations may form the basis upon which the value of certain assets of the Company is calculated.

  The Board of Directors acknowledges that, by virtue of the functions which DWS Affiliates will perform in connection with the Company, potential conflicts of interest are likely to arise. In such circumstances, each DWS Affiliate has undertaken to use its or his reasonable endeavours to resolve any such conflicts of interest fairly (having regard to its or his respective obligations and duties) and to ensure that the interests of the Company and the Shareholders are not unfairly prejudiced.

  Prospective investors should note that, subject always to their legal and regulatory obligations in performing each or any of the above roles:
  - DWS Affiliates will pursue actions and take steps that it deems appropriate to protect their interests;
  - DWS Affiliates may act in their own interests in such capacities and need not have regard to the interests of any Shareholder;
  - DWS Affiliates may have economic interests adverse to those of the Shareholders. DWS Affiliates shall not be required to disclose any such interests to any Shareholder or to account for or disclose any profit, charge, commission or other remuneration arising in respect of such interests and may continue to pursue its business interests and activities without specific prior disclosure to any Shareholder;
  - DWS Affiliates do not act on behalf of, or accept any duty of care or any fiduciary duty to any investors or any other person;

- DWS Affiliates shall be entitled to receive fees or other payments and to exercise all rights, including rights of termination or resignation, which they may have, even though so doing may have a detrimental effect on investors; and
- DWS Affiliates may be in possession of information which may not be available to investors. There is no obligation on any DWS Affiliate to disclose to any investor any such information.

Notwithstanding the above, the Board of Directors believes that these divergences or conflicts can be adequately managed, and expect that the Counterparty will be suitable and competent to provide such services and will do so at no further cost to the Company which would be the case if the services of a third party were engaged to provide such services.

Operations: The Company's operations (including investment management, distribution and collateral management) are carried out by several service providers some of whom are described in the section headed "Administration of the Company". The Company follows a rigorous due diligence process in selecting service providers; nevertheless operational risk can occur and have a negative effect on the Company's operations, and it can manifest itself in various ways, including business interruption, poor performance, information systems malfunctions or failures, regulatory or contractual breaches, human error, negligent execution, employee misconduct, fraud or other criminal acts.

In the event of a bankruptcy or insolvency of a service provider, investors could experience delays (for example, delays in the processing of subscriptions, conversions and redemption of Shares) or other disruptions.

Depositary: The Company's assets, as well as the assets provided to the Company as collateral, are held in custody by the Depositary or, as the case may be, third party custodians and sub-custodians. This exposes the Company to custody risk. Investors should note that under Luxembourg law, assets held in custody (excluding cash) by the Depositary or, as the case may be, third party custodians and sub-custodians located within the EU are unavailable for distribution among, or realisation for the benefit of, creditors of the Depositary, third party custodians or sub-custodians and, subject to certain exceptions, the Depositary is required to return to the Company assets of identical type or the corresponding amount where assets held in its custody are lost by the Depositary or its sub-custodians. The Company however remains exposed to the risk of loss of assets as a result of negligence or fraudulent trading by the Depositary, its sub-custodians and third parties, and particularly in respect of cash, as well as the insolvency of third party custodians located in non-EU jurisdictions.

Where Company's assets as well as the assets provided to the Company as collateral are held by Custodians or third party custodians and sub-custodians in emerging and/or frontier market jurisdictions, the Company is exposed to greater custody risk due to the fact that emerging and/or frontier markets are by definition "in transformation" and are therefore exposed to the risk of swift political change and economic downturn. In recent years, many emerging and/or frontier market countries have undergone significant political, economic and social change. In many cases, political concerns have resulted in significant economic and social tensions and in some cases both political and economic instability has occurred. Political or economic instability may adversely affect the safe custody of the Company's assets.

DWS Affiliates significant holdings: Investors should be aware that DWS Affiliates may from time to time own interests in any individual Sub-Fund which may represent a significant amount or proportion of the overall investor holdings in the relevant Sub-Fund. Investors should consider what possible impact such holdings by DWS Affiliates may have on them. For example, DWS Affiliates may like any other Shareholder ask for the redemption of all or part of their Shares of any Class of the relevant Sub-Fund in accordance with the provisions of this Prospectus which could result in (a) a reduction in the Net Asset Value of the relevant Sub-Fund to below the Minimum Net Asset Value which might result in the Board of Directors deciding to close the Sub-Fund and compulsorily redeem all the Shares relating to the Sub-Fund or (b) an increase in the holding proportion of the other Shareholders in the Sub-Fund beyond those allowed by laws or internal guidelines applicable to such Shareholder.

Shares may trade at prices other than Net Asset Value: The Net Asset Value of a Sub-Fund represents the price for subscribing or redeeming Shares of that Sub-Fund. The market price of Shares may sometimes trade above or below this Net Asset Value. There is a risk, therefore, that investors may not be able to buy or sell at a price close to this Net Asset Value. The deviation from the Net Asset Value is dependent on a number of factors, but will be accentuated when there is a large imbalance between market supply and demand for underlying securities. The "bid/ask" spread of the Shares (being the difference between the prices being bid by potential purchasers and the prices being asked by potential sellers) is another source of deviation from the Net Asset Value. The bid/ask spread can widen during periods of market volatility or market uncertainty, thereby increasing the deviation from the Net Asset Value.

Taxes on transactions (Financial transaction tax): a number of jurisdictions have implemented, or are considering implementing, certain taxes on the sale, purchase or transfer of financial instruments (including derivatives), such tax commonly known as the "Financial Transaction Tax" ("**FTT**"). By way of example, the EU Commission adopted a proposal on 14 February 2013 for a common Financial Transaction Tax which will, subject to certain exemptions, affect: (i) financial transactions to which a financial institution established in any of the participating EU Member States is a party; and (ii) financial transactions in financial instruments issued in a participating EU Member State regardless of where they are traded. It is currently unclear as to when the EU Financial Transaction Tax will apply from. In addition, certain countries such as France and Italy have implemented their own financial transaction tax provisions at a domestic level already and others, including both EU and non-EU countries, may do so in the future.

The imposition of any such taxes may impact Sub-Funds in a number of ways. For example:

- where Sub-Funds enter directly into transactions for the sale, purchase or transfer of financial instruments, FTT may be payable by the Sub-Fund and the Net Asset Value of such Sub-Funds may be adversely impacted;
- similarly, the imposition of FTT on transactions relating to the underlying securities of an Underlying Asset may have an adverse effect on the value of such Underlying Asset and hence the Net Asset Value of any Sub-Fund that references such Underlying Asset;

- the Net Asset Value of Sub-Funds may be adversely impacted by any adjustments to the valuation of OTC Swap Transaction(s) made as a result of costs associated with any FTT suffered by the relevant Swap Counterparty in relation to its hedging activities (see "Specific Risks in relation to Indirect Replication Funds" and "Specific Risks in relation to Hybrid Replication Funds" below);
- subscriptions, transfers and redemptions of Shares may be affected by FTT.

Cyber Security: Failures or breaches of the electronic systems of the Company, its service providers, or the issuers of securities in which a Sub-Fund invests have the ability to cause disruptions and negatively impact a Sub-Fund's business operations, potentially resulting in financial losses to a Sub-Fund and its Shareholders. While the Management Company has established business continuity plans and risk management systems seeking to address system breaches or failures, there are inherent limitations in such plans and systems. Furthermore, the Management Company cannot control the cyber security plans and systems of the Company's service providers or issuers of securities in which a Sub-Fund invests.

Sustainability: Please refer to chapter "Sustainability-related disclosures under SFDR and EU Taxonomy Regulation".

Sector Concentration: Investments or the constituents of a Reference Index may be exposed to risks relating to particular sectors. If a Sub-Fund invests in a narrow range of sectors, the performance of the Sub-Fund may not reflect changes in broad markets. Furthermore, the Sub-Fund is likely to be more susceptible to greater price volatility when compared to more diverse funds as it only has exposure to a limited number of sectors. This could lead to a greater risk of loss to the value of Shareholders' investments.

Region Concentration: Investments or the constituents of a Reference Index may be exposed to risks relating to particular regions or countries. If a Sub-Fund invests in a narrow range of regions or countries, the performance of the Sub-Fund may not reflect changes in broad markets. Furthermore, the Sub-Fund is likely to be more susceptible to greater price volatility when compared to more diverse funds as it only has exposure to a limited number of regions or countries. This could lead to a greater risk of loss to the value of Shareholders' investments.

Counterparty: A Sub-Fund may not invest directly in the components of the Reference Index and its returns will be dependent on the performance of the shares and/or cash deposits and the performance of the derivatives used. A Sub-Fund may enter into one or more derivatives with one or more counterparties. If any of the counterparties fails to make payments (for example, it becomes insolvent) this may result in Shareholders' investments suffering a loss. For further risks relating to counterparty performance, please refer to "Securities lending, buy-sell or sell-buy back transactions and repurchase and reverse repurchase agreement transactions" under the chapter "Risk Factors".

Disruption / Adjustment Events: A Reference Index may be subject to disruption or adjustment events which may prevent its calculation or lead to adjustments to the rules of the index which may cause Shareholders' investments to suffer losses. Further matters which may affect a Reference Index are outlined at "Political Factors, Emerging and/or Frontier Market and Non-OECD Member State Assets" under the chapter "Risk Factors".

Rules Based Index: A Reference Index may be rules-based and may not be capable of being adjusted to take into account changing market circumstances. As a result Shareholders may be negatively affected by, or may not benefit from, the lack of such adjustments in changing market circumstances. A Reference Index may also be subject to disruption or adjustment events which may prevent their calculation or lead to adjustments to the rules of the index which may cause Shareholders' investments to suffer losses.

Leveraged Index: A Sub-Fund may track a Reference Index which is constructed to track the performance of an increased (leveraged) exposure to an underlying index, meaning that a fall in value of the underlying index can result in a greater reduction in the level of the Reference Index. Where a Reference Index is designed to do this, it shall be on a daily basis only and should not be equated with seeking a leveraged position for periods longer than a day. The performance of a Sub-Fund tracking such a Reference Index over periods longer than one day will not be correlated or symmetrical with the returns of the underlying index. A Sub-Fund tracking such a Reference Index is intended for investors who wish to take a very short term view on the underlying index and whose investments are not intended as buy and hold investments.

Leveraged Short Index: A Sub-Fund may track a Reference Index which is constructed to track the performance of an increased (leveraged) negative (known as short) exposure to an underlying index, meaning that the level of the Reference Index should rise when the underlying index falls and fall when the underlying index rises. Such an index is designed to do this on a daily basis only which should not be equated with seeking a leveraged position for periods longer than a day. The performance of a Sub-Fund tracking such a Reference Index over periods longer than one day may not be inversely proportional or symmetrical with the returns of the underlying index. A Sub-Fund tracking such a Reference Index is intended for investors who wish to take a very short term view on the underlying index and whose investments are not intended as buy and hold investments.

Settlement: The settlement risk is the risk of loss resulting from a party's failure to deliver the terms of a contract at the time of settlement. The acquisition and transfer of holdings in certain investments may involve considerable delays and transactions may need to be carried out at unfavourable prices as clearing, settlement and registration systems may not be well organised in some markets.

Short Index: A Sub-Fund may track a Reference Index which is constructed to track the performance of a negative (known as a short) position on an underlying index meaning that the level of the Reference Index should rise when the underlying index falls and fall when the underlying index rises. Such an index is designed to do this on a daily basis only which should not be equated with seeking a short position for periods longer than a day. The performance of a Sub-Fund tracking such a Reference Index over periods longer than one day may not be inversely proportional or symmetrical with the returns of the underlying index. A Sub-Fund tracking such a Reference Index is intended for investors who wish to take a very short term view on the underlying index and whose investments are not intended as buy and hold investments.

Small and Mid-sized Companies: Exposure to small and mid-sized companies potentially involves greater risks compared to investing in larger companies. The shares may have less liquidity and could experience more price swings (or volatility) which could adversely affect the value of your investment.

Country Risk China: A Sub-Fund may be exposed to liquidity, operational, clearing, settlement and custody risks linked to investments in PRC, the RQFII system and/or China Bond Connect. In addition there may be risks relating to taxes on PRC Investments which may result in the Sub-Fund making certain provisions or payments as described in "Tax (Emerging Markets)" under the chapter "Risk Factors". For example, certain Sub-Funds make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. Any such provision may be excessive or inadequate. Investors may be advantaged or disadvantaged depending on the time they subscribed and/or redeemed their Shares. For further information please consult the specific risk factors set out in the Product Annex of any Sub-Fund with PRC Investments.

Tax (Emerging Markets): There may be exposure to jurisdictions where the tax regime is not fully developed or is not sufficiently certain, and as such changes to the tax policies may be implemented without any prior notice and may also apply retrospectively. Any changes in tax policies may reduce the after-taxation returns of the Sub-Funds' investments. For example, certain Sub-Funds make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. Any such provision may be excessive or inadequate. Investors may be advantaged or disadvantaged depending on the time they subscribed and/or redeemed their shares. For further information relating to this risk factor, please refer to "Risk Factors – Taxes on Transactions (Financial Transaction Taxes)" and "Lack of Discretion of the Company to Adapt to Market Changes" under the chapter 'Risk Factors'. Please also see the "General Taxation" section.

Exceptional Circumstances: Exceptional circumstances may arise, such as, but not limited to, disruptive market conditions, additional costs/taxes or extremely volatile markets, which may cause the Sub-Funds' performance to be substantially different from the performance of the Reference Index. Please refer to "Volatility" and "Disruption / Adjustment Event" under "Risk Factors" for more information.

Active Funds Risk: Sub-Funds managed according to an active approach rely upon the performance of the Investment Manager, Sub-Portfolio Manager, and/or the portfolio of securities selected. If the Investment Manager, Sub-Portfolio Manager and/or the portfolio of securities selected perform poorly, the value of a Shareholder's investment may be adversely affected.

Sub-Fund Classification under German Investment Tax Act (Investmentsteuergesetz or "*InvStG*")**:** Each Product Annex, where relevant, will contain the relevant Sub-Fund classification for the purpose of the German Investment Tax Act ("Investmentsteuergesetz" / "*InvStG*"): Equity Fund, Equity Fund of Fund, Mixed Fund or Mixed Fund of Fund.

In addition a Sub-Fund may have an additional target minimum percentage of its gross assets to be invested in equities. However, such target will not be categorized as an investment limit and it cannot be guaranteed that such target will always be achieved.

FATCA and CRS: Rules under FATCA and CRS (as those terms defined further below) are particularly complex and although the Company will attempt to satisfy any obligations imposed on it to avoid the imposition of the thirty percent (30%) withholding tax under FATCA or a penalty or fine under FATCA and CRS, no assurance can be given that the Company will be able to satisfy these obligations. If the Company becomes subject to a withholding tax as a result of FATCA or a penalty or fine under FATCA or CRS, the value of units held by all investors may be materially affected. The Company and/or its investors may also be indirectly affected by the fact that a non-U.S. financial institution does not comply with FATCA regulations even if the Company satisfies its own FATCA obligations.

Prospective investors are encouraged to carefully read Sections "FATCA" and "EU Tax Considerations" which are stated in the Section "General Taxation".

Each prospective investor should consult its own tax advisor about how FATCA and CRS might affect such prospective investor.

OECD's BEPS Action Points: The Organization for Economic Co-operation Development ("OECD") together with the G20 countries have committed to addressing abusive global tax avoidance, referred to as base erosion and profit shifting ("BEPS") through 15 actions detailed in reports released on 5 October 2015.

As part of the BEPS project, new rules dealing inter alia with double tax treaties abuse, the definition of permanent establishments, controlled foreign companies and hybrid mismatch arrangements, are being introduced into respective domestic law of BEPS member states including via EU directives and a multilateral instrument.

The European Council has adopted two Anti-Tax Avoidance Directives (Council Directive (EU) 2016/1164 of 12 July 2016) laying down rules against tax avoidance practices that directly affect the functioning of the internal market ("ATAD I") and Directive 2017/952/EU of 29 May 2017 amending ATAD I as regards hybrid mismatches with third countries ("ATAD II") that address many of the above-mentioned issues. The measures included in ATAD I and ATAD II have been implemented into Luxembourg law respectively on 21 December 2018 (the "ATAD I Law") and on 20 December 2019 (the "ATAD II Law") and all of them are gradually applicable as of 1 January 2019, 1 January 2020 and 1 January 2022 (depending on the measure). The ATAD I Law as well as the ATAD II Law may have a material impact on how returns to investors are taxed.

The effect of BEPS, MLI, ATAD I and ATAD II could lead to additional taxes being imposed on the Company, intermediate entities or portfolio entities which may adversely affect the value of the investments held by investors in the Company. In addition, certain information may be requested from investors to enable the Company to comply with these requirements.

At the international level, the "Multilateral Convention to Implement Tax Treaty Related Measures to prevent Base Erosion and Profit Shifting" ("MLI") was published by the OECD on 24 November 2016. The aim of the MLI is to update international tax rules and lessen the opportunity for tax avoidance by transposing the results from the BEPS project into more than 2,000 double tax treaties worldwide. A number of jurisdictions (including Luxembourg) have signed the MLI. The ratification process in Luxembourg has been achieved through the law of 7 March 2019 and the deposit of the ratification instrument with the OECD on 9 April 2019. As a consequence, the MLI entered into force on 1 August 2019. Its application per double tax treaty concluded with Luxembourg will depend on the ratification by the other contracting state and on the type of tax concerned. Subsequent changes in tax treaties negotiated by Luxembourg incurred by the MLI could adversely affect the returns from the Company to its investors.

Specific Risks in relation to Direct Replication Funds

Securities lending, buy-sell or sell-buy back transactions and repurchase and reverse repurchase agreement transactions: Use of the aforesaid techniques and instruments involves certain risks, some of which are listed in the following paragraphs, and there can be no assurance that the objective sought to be obtained from such use will be achieved.

Although Regulations require each Sub-Fund entering into one of the aforementioned transactions to receive sufficient collateral to reduce its counterparty exposure, the Regulations do however not require that such counterparty exposure be fully covered by collateral. This leaves room for the Sub-Funds to be exposed to a net counterparty risk and investors should be aware of the possible resulting loss in case of default or insolvency of the relevant counterparty.

In relation to reverse repurchase transactions and buy-sell or sell-buy back transactions in which a Sub-Fund acts as purchaser and in the event of the failure of the counterparty from whom securities have been purchased, investors should note that (A) there is the risk that the value of the securities purchased may yield less than the cash originally paid, whether because of inaccurate pricing of such securities, an adverse market value evolution, a deterioration in the credit rating of the issuers of such securities, or the illiquidity of the market in which these are traded; and (B) (i) locking cash in transactions of excessive size or duration, and/or (ii) delays in recovering cash at maturity may restrict the ability of the Sub-Fund to meet redemption requests, security purchases or, more generally, reinvestment.

In relation to repurchase transactions and buy-sell or sell-buy back transactions in which a Sub-Fund acts as seller and in the event of the failure of the counterparty to which securities have been sold, investors should note that (A) there is the risk that the value of the securities sold to the counterparty is higher than the cash originally received, whether because of a market appreciation of the value of such securities or an improvement in the credit rating of their issuer; and(B) (i) locking investment positions in transactions of excessive size or duration, and/or (ii) delays in recovering, at maturity, the securities sold, may restrict the ability of the Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

In relation to securities lending transactions, investors should note that (A) if the borrower of securities lent by a Sub-Fund fails to return these, there is a risk that the collateral received may be realised at a value lower than the value of the securities lent, whether due to inaccurate pricing of the collateral, adverse market movements in the value of the collateral, a deterioration in the credit rating of the collateral issuer, or the illiquidity of the market in which the collateral is traded; (B) in case of reinvestment of cash collateral, such reinvestment is subject to all risks associated with a normal investment and may also (i) introduce market exposures inconsistent with the objectives of the Sub-Fund, or (ii) yield a sum less than the amount of collateral to be returned; and (C) delays in the return of securities on loans may restrict the ability of a Sub-Fund to meet delivery obligations under security sales or payment obligations arising from redemption requests.

In addition, it should be noted that:

- exceptional circumstances, such as, but not limited to, disruptive market conditions or extremely volatile markets, may arise which cause a Direct Replication Fund's tracking accuracy to diverge substantially from the Reference Index;
- due to various factors, including the Sub-Fund's fees and expenses involved, the concentration limits described in the Investment Restrictions, other legal or regulatory restrictions, and, in certain instances, certain securities being illiquid, it may not be possible or practicable to purchase all of the constituents in proportion to their weighting in the Reference Index or purchase certain of them at all.

Specific Risks in relation to Indirect Replication Funds

*Adjustment to OTC Swap Transactions to reflect index replication costs ("**OTC Swap Transaction Costs**"):* A Swap Counterparty may enter into hedging transactions in respect of the OTC Swap Transaction(s). According to the OTC Swap Transaction(s) entered into between the Sub-Funds and a Swap Counterparty, the Sub-Funds shall receive the performance of the Reference Index adjusted to reflect certain index replication costs. In extreme market conditions and exceptional circumstances, particularly in connection with less developed markets and emerging markets, such costs may increase significantly and as a result the OTC Swap Transaction Costs may increase. The nature of these costs may differ depending on the Reference Index whose performance the Sub-Funds aim to reflect.

- Situation 1: the Reference Index is "long" (i.e. its objective is to reflect the performance of its constituents). Then the index replication costs will be associated with (i) the buying and selling by the Swap Counterparty of the constituents of the Reference Index in order to reflect the Reference Index performance; or (ii) custody or other related costs incurred by the Swap Counterparty in relation to holding the constituents of the Reference Index; or (iii) taxes or other duties imposed on the buying or selling of the constituents of the Reference Index; or (iv) taxes imposed on any income derived from the constituents of the Reference Index; or (v) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.
- Situation 2: the Reference Index is "leveraged" (i.e. its objective is to reflect the daily leveraged performance of the long version of the Reference Index). Then the index replications costs will be associated with (i) the buying and selling and any borrowing and/or financing of the constituents of the Reference Index in order to reflect the Reference Index performance, (ii) custody or other related costs incurred by the Swap Counterparty in relation to holding the constituents of the Reference Index, (iii) financing charges incurred to safeguard against severe market movements of the constituents of the Reference Index, (iv) unexpected financing costs in the event of severe market movements, (v) taxes imposed on any income derived from the constituents of the Reference Index, or (vi) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.
- Situation 3: the Reference Index is "short" (i.e. its objective is to reflect the daily inverse performance of the long version of the Reference Index) or "short and leveraged" (i.e. its objective is to reflect the leveraged daily inverse performance of the long version of the Reference Index). Then the index replications costs will be associated with (i) the borrowing and/or financing of the constituents of the Reference Index in order to reflect the Reference Index performance, (ii)

financing charges incurred to safeguard against severe market movements of the constituents of the Reference Index, (iii) unexpected financing costs in the event of severe market movements or (iv) any other transactions performed by the Swap Counterparty in relation to the constituents of the Reference Index.

These index replication costs may affect the ability of the Sub-Funds to achieve their Investment Objectives and may differ depending on the Reference Index whose performance the Sub-Fund aims to reflect. The OTC Swap Transaction Costs may also vary from time to time depending on actual market conditions. As a result, the attention of investors is drawn to the fact that (x) the Net Asset Value of the Sub-Funds may be adversely impacted by any such adjustments to the valuation of the OTC Swap Transaction(s) and may result in a higher Tracking Error; (y) the potential negative impact on the Sub-Funds' performance that investors may suffer as a result of any such adjustments could depend on the timing of their investment in and/or divestment from the Sub-Funds; and (z) the magnitude of such potential negative impact on the performance of the Sub-Funds may not correspond to an investor's profit or loss arising out of such investor's holding in the Sub-Funds as a result of the potential retroactive effect of any such costs, including those arising from changes in taxation in certain jurisdictions.

Cash Collateral Related Costs: Posting or receiving cash collateral may entail additional costs for the Sub-Fund as a result of the differential between bank charges and interest rates applicable to this collateral.

Specific Risks in relation to Hybrid Replication Funds

The specific risks set forth under 'Specific Risks in relation to Direct Replication Funds' and 'Specific Risks in relation to Indirect Replication Funds' above apply for Hybrid Replication Funds.

Specific Risks in relation to Actively Managed Funds

Although the Management Company and/or its delegates may have substantial prior experience in portfolio management, the past performance of any investments or investment funds managed by the Management Company and/or its delegates cannot be construed as any indication of the future results of an investment in a Sub-Fund. The performance of an Actively Managed Fund will depend on the success of the relevant Investment Objective and Policies. No assurance can be given that suitable investment opportunities in which to deploy all of the Sub-Fund's capital will be located. A reduction in the volatility and pricing inefficiency of the markets in which the Sub-Fund will seek to invest, as well as other market factors, will reduce the effectiveness of the sub-Fund's investment strategy resulting in an adverse effect on performance results.

Specific Risk Factors in Respect of Particular Assets

Certain risks associated with investment in particular assets (whether or not these are Reference Indices or securities comprised therein) are set out below:

• Shares

The value of an investment in shares will depend on a number of factors including, but not limited to, market and economic conditions, sector, geographical region and political events.

• Bonds

Bonds and other debt securities involve credit risk to the issuer which may be evidenced by the issuer's credit rating. In the event that any issuer of bonds or other debt securities experiences financial or economic difficulties, this may affect the value of the relevant securities (which may be zero) and any amounts paid on such securities (which may be zero). Bonds may also be exposed to credit risk and interest rate risk. Please refer to "Credit" and "Interest Rate" under the chapter "Risk Factors" for further details.

• Non-investment grade bonds

Certain Sub-Funds may also be exposed to non-investment grade bonds which generally have a higher risk of default and are more susceptible to market fluctuations than investment grade bonds.

• Credit Derivatives

A Reference Index may provide a notional exposure to the value and/or return of certain credit derivative transactions which may fall. Markets in these asset classes may at times become volatile or illiquid and the Reference Index may be affected.

• Short Term Money Market

A Sub-Fund may have exposure to short term money markets which may be adversely affected by factors which have less effect on a fund investing more broadly.

• Pooled Investment Vehicles

Alternative investment funds, mutual funds and similar investment vehicles operate through the pooling of investors' assets. Investments are then invested either directly into assets or are invested using a variety of hedging strategies and/or mathematical modelling techniques, alone or in combination, any of which may change over time. Such strategies and/or techniques can be speculative, may not be an effective hedge and may involve substantial risk of loss and limit the opportunity for gain. It may be difficult to obtain valuations of products where such strategies and/or techniques are used and the value of such products may depreciate at a greater rate than other investments. Pooled investment vehicles may make available only limited information about their operations, may incur extensive costs, commissions and brokerage charges, involve substantial fees for investors (which may include fees based on unrealised gains), have no minimum credit standards, employ high risk strategies such as short selling and high levels of leverage and/or may post collateral in unsegregated third party accounts.

• Real Estate

The risks associated with a direct or indirect investment in real estate include: the cyclical nature of real estate values, changes in environmental, planning, landlord and tenant, tax or other laws or regulations affecting real property, demographic trends, variations in rental income and increases in interest rates.

• Commodities

Prices of commodities are influenced by, among other things, various macro economic factors such as changing supply and demand relationships, weather conditions and other natural phenomena, agricultural, trade, fiscal, monetary, and exchange control programmes and policies of governments (including government intervention in certain markets) and other events.

• Structured Finance Securities

Structured finance securities include, without limitation, asset-backed securities and credit-linked securities, which may entail a higher liquidity risk than exposure to sovereign or corporate bonds. Certain specified events and/or the performance of assets referenced by such securities, may affect the value of, or amounts paid on, such securities (which may in each case be zero).

• Sovereign Risk

Where the issuer of the underlying fixed income security is a government or other sovereign issuer, there is a risk that such government is unable or unwilling to meet its obligations, therefore exposing the Sub-Fund to a loss corresponding to the amount invested in such security.

• Others

A Reference Index may include other assets which involve substantial financial risk such as distressed debt, low quality credit securities, forward contracts and deposits with commodity trading advisors (in connection with their activities).

ADMINISTRATION OF THE COMPANY

Determination of the Net Asset Value

General Valuation Rules

The Net Asset Value of the Company is at any time equal to the total of the Net Asset Values of the Sub-Funds.

The Articles of Incorporation provide that the Board of Directors shall establish a portfolio of assets for each Sub-Fund as follows:

(i) the proceeds from the issue of each Share are to be applied in the books of the relevant Sub-Fund to the pool of assets established for such Sub-Fund and the assets and liabilities and incomes and expenditures attributable thereto are applied to such portfolio subject to the provisions set forth hereafter;

(ii) where any asset is derived from another asset, such asset will be applied in the books of the relevant Sub-Fund from which such asset was derived, meaning that on each revaluation of such asset, any increase or diminution in value of such asset will be applied to the relevant portfolio;

(iii) where the Company incurs a liability which relates to any asset of a particular portfolio or to any action taken in connection with an asset of a particular portfolio, such liability will be allocated to the relevant portfolio;

(iv) where any asset or liability of the Company cannot be considered as being attributable to a particular portfolio, such asset or liability will be allocated to all the Sub-Funds *pro rata* to the Sub-Funds' respective Net Asset Value at their respective Launch Dates;

(v) upon the payment of dividends to the Shareholders in any Sub-Fund, the Net Asset Value of such Sub-Fund shall be reduced by the gross amount of such dividends.

The liabilities of each Sub-Fund shall be segregated on a Sub-Fund-by-Sub-Fund basis with third party creditors having recourse only to the assets of the Sub-Fund concerned.

Any assets held in a particular Sub-Fund not expressed in the Reference Currency will be translated into the Reference Currency at the last available rate of exchange prevailing in a recognised market on the NAV Date immediately preceding the Valuation Day.

The Net Asset Value per Share of a specific Class of Shares will be determined by dividing the value of the total assets of the Sub-Fund which are attributable to such Class of Shares less the liabilities of the Sub-Fund which are attributable to such Class of Shares by the total number of Shares of such Class of Shares outstanding on the relevant Transaction Day.

For the determination of the Net Asset Value of a Class of Shares the rules sub (i) to (v) above shall apply *mutatis mutandis*. The Net Asset Value per Share of each Class in each Sub-Fund will be calculated by the Administrative Agent in the Reference Currency of the relevant Class of Shares and, as the case may be, in the Denomination Currency as specified in the relevant Product Annex by applying the relevant market conversion rate prevailing on each Valuation Day.

The assets and liabilities of the Sub-Funds are valued periodically as specified in the Prospectus and/or in the relevant Product Annex.

The Net Asset Value per Share is or will be calculated on each Valuation Day. The Net Asset Value for all Sub-Funds will be determined on the basis of the last available closing prices on the NAV Date immediately preceding the Valuation Day or the last available prices from the markets on which the investments of the various Sub-Funds are principally traded.

The Net Asset Value per Share of the different Classes of Shares can differ within each Sub-Fund as a result of the declaration/payment of dividends, differing fee and cost structure for each Class of Shares. In calculating the Net Asset Value, income and expenditure are treated as accruing on a day to day basis.

The Company intends to declare dividends for the Distribution Shares only.

Shareholders owning Distribution Shares are entitled to dividends, which will be determined in accordance with the provisions set out in the relevant Product Annex.

Specific Valuation Rules

The Net Asset Value of the Sub-Funds shall be determined in accordance with the following rules:

(i) the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued and not yet received is deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof shall be determined after making such discount as may be considered appropriate in such case to reflect the true value thereof;

(ii) the value of all securities which are listed or traded on an official stock exchange or traded on any other Regulated Market will be valued on the basis of the last available prices on the NAV Date immediately preceding the Valuation Day or on the basis of the last available prices on the main market on which the investments of the Sub-Funds are principally traded. The Board of Directors will approve a pricing service which will supply the above prices. If, in the opinion of the Board of Directors, such prices do not truly reflect the fair market value of the relevant securities, the value of such securities will be determined in good faith by the Board of Directors either by reference to any other publicly available source or by reference to such other sources as it deems in its discretion appropriate;

(iii) securities not listed or traded on a stock exchange or a Regulated Market will be valued on the basis of the probable sales price determined prudently and in good faith by the Board of Directors;

(iv) securities issued by open-ended investment funds shall be valued at their last available net asset value or in accordance with item (ii) above where such securities are listed;

(v) the liquidating value of futures, forward or options contracts that are not traded on exchanges or on other organised markets shall be determined pursuant to the policies established by the Board of Directors, on a basis consistently applied. The liquidating value of futures, forward or options contracts traded on exchanges or on other organised markets shall be based upon the last available settlement prices of these contracts on exchanges and organised markets on which the particular futures, forward or options contracts are traded; provided that if a futures, forward or options contract could not be liquidated on such Business Day with respect to which a Net Asset Value is being determined, then the basis for determining the liquidating value of such contract shall be such value as the Board of Directors may deem fair and reasonable;

(vi) liquid assets and money market instruments may be valued at nominal value plus any accrued interest or using an amortised cost method; this amortised cost method may result in periods during which the value deviates from the price the relevant Sub-Fund would receive if it sold the investment. The Management Company may, from time to time, assess this method of valuation and recommend changes, where necessary, to ensure that such assets will be valued at their fair value as determined in good faith pursuant to procedures established by the Board of Directors. If the Board of Directors believes that a deviation from the amortised cost per Share may result in material dilution or other unfair results to Shareholders, the Board of Directors shall take such corrective action, if any, as it deems appropriate, to eliminate or reduce, to the extent reasonably practicable, the dilution or unfair results;

(vii) the total return swap transactions will be consistently valued based on a calculation of the net present value of their expected cash flows. TRS are marked to market at each NAV Date;

(viii) all other securities and other permissible assets as well as any of the above mentioned assets for which the valuation in accordance with the above sub-paragraphs would not be possible or practicable, or would not be representative of their fair value, will be valued at fair market value, as determined in good faith pursuant to procedures established by the Board of Directors.

The Management Company has adopted within its governance framework appropriate policies and procedures to ensure integrity of the valuation process and to determine the fair value of the assets under management.

The valuation of assets is ultimately governed by the Management Company's governing body, which established pricing committees that assume valuation responsibility. This includes the definition, approval and regular review of pricing methods, the monitoring and control of the valuation process and the handling of pricing issues. In the exceptional case that a pricing committee cannot reach a decision, the issue may be escalated to the board of the Management Company or the Board of Directors for ultimate decision. The functions involved in the valuation process are hierarchically and functionally independent from the portfolio management function.

The valuation results are further monitored and checked for consistency as part of the price determination process and the calculation of the net asset value by the responsible internal teams and the involved service providers.

Temporary Suspension of Calculation of Net Asset Value and of Issues, Redemptions and Conversions

Pursuant to its Articles of Incorporation, the Company may suspend the calculation of the Net Asset Value of the Sub-Funds, Shares and/or Classes of Shares and, in respect of the primary market, the issue, redemption and conversion of Shares:

(i) during any period in which any of the principal stock exchanges or other markets on which a substantial portion of the constituents of the Invested Assets and/or the Reference Index from time to time are quoted or traded is closed otherwise than for ordinary holidays, or during which transactions therein are restricted, limited or suspended, provided that such restriction, limitation or suspension affects the valuation of the Invested Assets or the Reference Index;

(ii) where the existence of any state of affairs which, in the opinion of the Board of Directors, constitutes an emergency or renders impracticable, a disposal or valuation of the assets attributable to a Sub-Fund;

(iii) during any breakdown of the means of communication or computation normally employed in determining the price or value of any of the assets attributable to a Sub-Fund;

(iv) during any period in which the Company is unable to repatriate monies for the purpose of making payments on the redemption of Shares or during which any transfer of monies involved in the realisation or acquisition of investments or payments due on redemption of Shares cannot, in the opinion of the Board of Directors, be effected at normal rates of exchange;

(v) when for any other reason the prices of any constituents of the Reference Index or, as the case may be, the Invested Assets and, for the avoidance of doubt, where the applicable techniques used to create exposure to the Reference Index, cannot promptly or accurately be ascertained;

(vi) during any period in which the calculation of an index underlying a financial derivative instrument representing a material part of the assets of a Sub-Fund or Class of Shares is suspended;

(vii) in the case of the Company's liquidation or in the case a notice of liquidation has been issued in connection with the liquidation of a Sub-Fund or Class of Shares;

(viii) where in the opinion of the Board of Directors, circumstances which are beyond the control of the Board of Directors make it impracticable or unfair vis-à-vis the Shareholders to continue trading the Shares or any other circumstance or circumstances where a failure to do so might result in the Shareholders of the Company, a Sub-Fund or Class of Shares incurring any liability to taxation or suffering other pecuniary disadvantages or other detriment which the Shareholders of the Company, a Sub-Fund or a Class of Shares might not otherwise have suffered;

(ix) where in the case of a merger of the Company or a Sub-Fund, the Board of Directors deems it necessary and in the best interest of Shareholders; and

(x) in case of a Feeder UCITS, if the net asset value calculation of the Master UCITS is restricted or suspended or when the value of a significant proportion of the assets of any Sub-Fund cannot be calculated with accuracy.

Such suspension in respect of a Sub-Fund shall have no effect on the calculation of the Net Asset Value per Share, the issue, redemption and conversion of Shares of any other Sub-Fund.

Notice of the beginning and of the end of any period of suspension will be given to the Luxembourg supervisory authority and, if required, to the Luxembourg Stock Exchange and any other relevant stock exchange where the Shares are listed and to any foreign regulator where any Sub-Fund is registered in accordance with the relevant rules. Such notice will be published to the attention of Shareholders in accordance with the notification policy as described under paragraph "Notification To Shareholders" of "The Secondary Market" below, and in accordance with applicable laws and regulations.

Furthermore, pursuant to the Law, the issue and redemption of Shares shall be prohibited:

(i) during the period where the Company has no depositary; and

(ii) where the Depositary is put into liquidation or declared bankrupt or seeks an arrangement with the creditors, a suspension of payment or a controlled management or is the subject of similar proceedings.

Publication of the Net Asset Value

The Net Asset Value per Share of each Class of Shares within each Sub-Fund (expressed in the Reference Currency and, as the case may be, translated into the Denomination Currency as specified in the relevant Product Annex), and any dividend declaration will be made public at the registered office of the Company and made available at the offices of the Administrative Agent on each Valuation Day. The Company may arrange for the publication of this information in one or more leading financial newspapers in such countries where the Sub-Funds are distributed to the public and may notify the relevant stock exchanges where the Shares are listed, if applicable. The Company cannot accept any responsibility for any error or delay in publication or for non-publication of prices which are beyond its control.

The Net Asset Value per Share may also be available on the following Website: www.Xtrackers.com. The access to such publication on the Website may be restricted and is not to be considered as an invitation to subscribe for, purchase, convert, sell or redeem Shares.

Anti-Dilution Levy/Duties

The Company reserves the right to impose "an anti-dilution levy" representing a provision for market spreads (the difference between the prices at which assets are valued and/or bought or sold), duties and charges and other dealing costs relating to the acquisition or disposal of assets and to preserve the value of the underlying assets of a Sub-Fund, in the event of receipt for processing of net subscription or redemption including subscriptions and/or redemptions which would be effected as a result of requests for conversion from one Sub-Fund into another Sub-Fund. Any such provision will be added to the price at which Shares will be issued in the case of net subscription requests and deduced from the price at which Shares will be redeemed in the case of net redemption requests including the price of Shares issued or redeemed as a result of requests for conversion. Such levy may vary from Sub-Fund / Class to Sub-Fund /Class and will not exceed 2 percent. of the original Net Asset Value per Share.

GLOBAL CLEARING AND SETTLEMENT, INTERNATIONAL CENTRAL SECURITIES DEPOSITARY AND COMMON DEPOSITARY

International Central Securities Depositary

The Company will apply for admission for clearing and settlement of Shares through the International Central Securities Depositaries.

A Global Share Certificate representing the Shares concerned will be deposited with the Common Depositary and registered in the name of the Common Depositary Nominee (being the registered legal holder of the Shares concerned) of the Company, as nominated by the Common Depositary on behalf of Euroclear Bank S.A./N.V. ("**Euroclear**") and Clearstream Banking, Socíété Anonyme, Luxembourg ("**Clearstream**") and accepted for clearing through Euroclear and Clearstream.

Interests in the Shares represented by the Global Share Certificate will be transferable in accordance with applicable laws and any rules and procedures issued by the International Central Securities Depositary.

Title to Shares

Legal title to the Shares of the Company will be held by the Common Depositary Nominee. A purchaser of interests in the Shares concerned will not be a registered Shareholder in the Company, but will hold an indirect beneficial interest in such Shares. If such investors are Participants, their rights will be governed by their agreement with the relevant International Central Securities Depositary. If such investors are not Participants, then their rights will be governed by the direct or indirect arrangement with the relevant Participant of the International Central Securities Depositary (who may be their nominee, broker or Central Securities Depositaries, as the case may be).

All references to actions by holders of the Global Share Certificate in this Prospectus shall refer to actions taken by the Common Depositary Nominee as the registered Shareholder following instructions from the relevant International Central Securities Depositary upon receipt of instructions from its Participants.

All references to distributions of notices, reports and statements to Shareholder in this Prospectus shall refer to distribution of notices, reports and statements to the Participants in accordance with the relevant International Central Securities Depositary's procedures.

Each Participant shall look solely to its International Central Securities Depositary for:

(iii) documentary evidence as to the amount of its interests in any Shares. Any certificate or other document issued by the relevant International Central Securities Depositary, as to the amount of interests in such Shares standing to the account of any person shall be conclusive and binding as accurately representing such records; and

(iv) such Participant's share of each payment or distribution made by the Company to or on the instructions of the Common Depositary Nominee and in relation to all other rights arising under the Global Share Certificate. The extent to which, and the manner in which, Participants may exercise any rights arising under the Global Share Certificate will be determined by the respective rules and procedures of their International Central Securities Depositary. Participants shall have no claim directly against the Company, the Registrar and Transfer Agent or any other person (other than their International Central Securities Depositary) in respect of payments or distributions due under the Global Share Certificate which are made by the Company to or on the instructions of the Common Depositary Nominee and such obligations of the Company shall be discharged thereby. The International Central Securities Depositary shall have no claim directly against the Company, Registrar and Transfer Agent or any other person (other than the Common Depositary).

Request for information

The Company or its duly authorised agent may from time to time require investors to provide them with information relating to: (a) the capacity in which they hold an interest in shares; (b) the identity of any other person or persons then or previously interested in such shares; (c) the nature of any such interests; and (d) any other matter where disclosure of such matter is required to enable compliance by the Company with applicable laws or the constitutional documents of the Company.

The Company or its duly authorised agent may from time to time request each International Central Securities Depositary to provide the Company with following details: ISIN, ICSD Participant name, ICSD participant type – Sub-Fund/Bank/Individual, residence of ICSD Participant, number of Shares of the Participant within Euroclear and Clearstream, as appropriate. Euroclear and Clearstream Participants which are holders of interests in Shares or intermediaries acting on behalf of such account holders will provide such information upon request of the ICSD or its duly authorised agent and have authorised pursuant to the respective rules and procedures of Euroclear and Clearstream, to disclose such information to the Company of the interest in Shares or to its duly authorised agent.

Investors may be required to provide promptly any information as required and requested by the Company or its duly authorised agent, and agree to the relevant International Central Securities Depositary providing the identity of such Participant or investor to the Company upon their request.

Distribution of notices through the International Central Securities Depositaries

The Company will issue any notices and associated documentation to the registered holder of the Global Share Certificate, the Common Depositary Nominee, with such notice as is given by the Company in the ordinary course of business.

Each Participant shall look solely to its International Central Securities Depositary and the rules and procedures of the relevant International Central Securities Depositary governing delivery of such notices.

The Common Depositary Nominee has a contractual obligation to promptly notify the Common Depositary of any notices issued by the Company and to relay any associated documentation issued by the Company to the Common Depositary, which, in turn,

has a contractual obligation to relay any such notices and documentation to the relevant International Central Securities Depositary. Each International Central Securities Depositary will, in turn, relay notices received from the Common Depositary to its Participants in accordance with its rules and procedures.

Investors who are not Participants in the relevant International Central Securities Depositary would need to rely on their broker-dealer, nominee, custodian bank or other intermediary which is a Participant, or which has an arrangement with a Participant, in the relevant International Central Securities Depositary to receive such notices.

Notice of Meetings and the Exercise of Voting Rights through the International Central Securities Depositaries

The Company will issue notices of general meetings and associated documentation to the registered holder of the Global Share Certificate, the Common Depositary Nominee.

Each Participant shall look solely to its International Central Securities Depositary and the rules and procedures of the relevant International Central Securities Depositary governing delivery of such notices and exercising voting rights.

The Common Depositary Nominee has a contractual obligation to promptly notify the Common Depositary of any Shareholder meetings of the Company and to relay any associated documentation issued by the Company to the Common Depositary, which, in turn, has a contractual obligation to relay any such notices and documentation to the relevant International Central Securities Depositary. Each International Central Securities Depositary will, in turn, relay notices received from the Common Depositary to its Participants in accordance with its rules and procedures. In accordance with their respective rules and procedures, each International Central Securities Depositary is contractually bound to collate and transfer all votes received from its Participants to the Common Depositary and the Common Depositary is, in turn, contractually bound to collate and transfer all votes received from each International Central Securities Depositary to the Common Depositary Nominee, which is obligated to vote in accordance with the Common Depositary's voting instructions.

Investors who are not Participants in the relevant International Central Securities Depositary would need to rely on their broker-dealer, nominee, custodian bank or other intermediary which is a Participant, or which has an arrangement with a Participant, in the relevant ICSD to provide voting instructions.

Payments through International Central Securities Depositary

Upon instruction of the Common Depositary Nominee, redemption proceeds and any dividends declared are paid by the Company or its authorised agent to the relevant International Central Securities Depositary. Each Participant must look solely to the relevant International Central Securities Depositary for its redemption proceeds or its share of each dividend payment made by the Company.

Investors who are not Participants in the relevant International Central Securities Depositary would need to rely on their broker-dealer, nominee, custodian bank or other intermediary which is a Participant, or which has an arrangement with a Participant in the relevant International Central Securities Depositary, to receive any redemption proceeds or any share of each dividend payment made by the Company that relates to their investment.

Investors shall have no claim directly against the Company, the Registrar, the Transfer Agent or any other person (other than their International Central Securities Depositary, broker or intermediary if such investors are not Participants) in respect of redemption proceeds or dividend payments due on Shares represented by the Global Share Certificate and the obligations of the Company will be discharged by payment to the relevant International Central Securities Depositary upon the instruction of the Common Depositary Nominee.

The International Central Securities Depositary shall have no claim directly against the Company, Registrar and Transfer Agent or any other person (other than the Common Depositary).

SUBSCRIPTIONS AND REDEMPTIONS OF SHARES (PRIMARY MARKET)

Shares can be bought and sold on either the primary market or secondary market.

The Primary Market

The primary market is the market on which Shares are issued by the Company to Authorised Participants or redeemed by the Company from Authorised Participants.

The Company has entered into agreements with the Authorised Participants, determining the conditions under which the Authorised Participants may subscribe for and redeem Shares.

An Authorised Participant may submit a dealing request to subscribe or redeem Shares in a Sub-Fund by an electronic order entry facility or by submitting a Dealing Form via facsimile to the Registrar and Transfer Agent. The Cut-off Time for applications received on a Transaction Day is 5.00 p.m. Luxembourg time on this day, unless otherwise defined in the relevant Product Annex. The use of the electronic order entry facility is subject to the prior consent of the Administrative Agent and the Registrar and Transfer Agent and must be in accordance with and comply with applicable law. Subscription and redemption orders placed electronically may be subject to the specific Cut-off Time which will then be specified in the relevant Product Annex. Dealing Forms may be obtained from the Registrar and Transfer Agent.

All applications are at the Authorised Participant's own risk. Dealing Forms and electronic dealing requests, once accepted, shall (save as determined by the Management Company) be irrevocable. The Company, the Management Company and the Registrar and Transfer Agent shall not be responsible for any losses arising in the transmission of Dealing Forms or for any losses arising in the transmission of any dealing request through the electronic order entry facility.

The Company has absolute discretion to accept or reject in whole or in part any subscription for Shares without assigning any reason thereto. The Company also has absolute discretion (but shall not be obliged) to reject or cancel in whole or in part any subscription for Shares prior to the issue of Shares to an Authorised Participant in the event that an Insolvency Event occurs to the Authorised Participant and/or to minimise the exposure of the Company to an Authorised Participant's Insolvency Event. The Company also has the right to determine whether it will only accept redemptions from an Authorised Participant in kind or in cash (or a combination of both cash and in kind) on a case by case basis: (i) upon notification to the relevant Authorised Participant where an Insolvency Event occurs to the relevant Authorised Participant, or the Company reasonably believes that the relevant Authorised Participant poses a credit risk, or (ii) in all other cases, with the relevant Authorised Participant's consent (where relevant). Redemption requests will be processed only where the payment is to be made to the Authorised Participant's account of record. In addition, the Company may impose such restrictions as it believes necessary to ensure that no Shares are acquired by Authorised Participants who are Prohibited Persons.

The Board of Directors may also, in its sole and absolute discretion, determine that in certain circumstances, it is detrimental for existing Shareholders to accept an application for Shares in cash or in kind (or a combination of both cash and in kind), representing more than 5 percent. of the Net Asset Value of a Sub-Fund. In such case, the Board of Directors may postpone the application and, in consultation with the relevant Authorised Participant, require such Authorised Participant to stagger the proposed application over an agreed period of time. The Authorised Participant shall be liable for any costs or reasonable expenses incurred in connection with the acquisition of such Shares.

The Registrar and Transfer Agent and/or Company reserves the right to request further details from an Authorised Participant. Each Authorised Participant must notify the Registrar and Transfer Agent of any change in their details and furnish the Company with any additional documents relating to such change as it may request. Amendments to an Authorised Participant's registration details and payment instructions will only be effected upon receipt by the Registrar and Transfer Agent of original documentation.

Measures aimed at the prevention of money laundering may require an Authorised Participant to provide verification of identity to the Company.

The Company will specify what proof of identity is required, including but not limited to a passport or identification card duly certified by a public authority such as a notary public, the police or the ambassador in their country of residence, together with evidence of the Authorised Participant's address, such as a utility bill or bank statement. In the case of corporate applicants, this may require production of a certified copy of the certificate of incorporation (and any change of name), by-laws, memorandum and articles of association (or equivalent), and the names and addresses of all directors and beneficial owners.

It is further acknowledged that the Company, the Management Company and the Registrar and Transfer Agent shall be held harmless by the Authorised Participant against any loss arising as a result of a failure to process the subscription if information that has been requested by the Company has not been provided by the Authorised Participant.

General Information

Shares may be subscribed for on each Transaction Day at the Net Asset Value thereof plus any applicable Upfront Subscription Sales Charge and Primary Market Transaction Costs in relation to such subscription. Shares may be redeemed on each Transaction Day at the Net Asset Value thereof less any applicable Redemption Charge and Primary Market Transaction Costs in relation to such redemption.

Applications received after the Cut-off Time will be deferred to the next Transaction Day and processed on the basis of the Net Asset Value per Share of the relevant Sub-Fund calculated for such Transaction Day.

Settlement of the transfer of Investments and/or cash payments in respect of subscriptions and redemptions will take place within the Business Days specified in the relevant Product Annex after the Transaction Day (or such earlier time as the Board of Directors may determine). The Company reserves the right, in its sole discretion, to require the applicant to indemnify the Company against any losses arising as a result of a Sub-Fund's failure to receive payment within stated settlement times.

Unless otherwise specified in the relevant Product Annex, the standard settlement period for subscribing directly to Shares will be no later than 5 Settlement Days following the relevant Transaction Day.

Unless otherwise specified in the relevant Product Annex, in the case of redemptions, the Registrar and Transfer Agent will issue instructions for payment or settlement to be effected no later than 5 Settlement Days after the relevant Transaction Day for all Sub-Funds provided however that, in certain circumstances (for example, where settlement in a particular currency is not possible on a given Settlement Day(s) or in the case that a Significant Market is closed for trading or settlement on a given Settlement Day), such payment or settlement may be delayed by up to 5 further Settlement Days.

Notwithstanding the foregoing, the payment of the Redemption Proceeds may be delayed if there are any specific local statutory provisions or events of force majeure which are beyond the Company's control which makes it impossible to transfer the Redemption Proceeds or to proceed to such payment within the normal delay. This payment shall be made as soon as reasonably practicable thereafter but without interest.

Dealings in Kind and in Cash

The Company may accept subscriptions and pay redemptions either in kind or in cash (or a combination of both cash and in kind). The Articles of Incorporation empower the Company to charge such sum as the Board of Directors consider represents an appropriate figure for any applicable Upfront Subscription Sales Charges and Redemption Charges.

Subscription (in kind or in cash) and redemption (in kind or in cash) orders will normally be accepted in multiples of the Minimum Initial Subscription Amount or Minimum Redemption Amount mentioned in the relevant Product Annex. Such minimums may be reduced in any case at the discretion of the Board of Directors.

Minimum Initial Subscription Amounts, Minimum Subsequent Subscription Amounts and Minimum Redemption Amounts are unrelated to the sizes of the Portfolio Composition Files ("**PCFs**"). For Authorised Participants, the Minimum Initial Subscription Amounts, Minimum Subsequent Subscription Amounts and Minimum Redemption Amounts may be higher than the amounts disclosed herein. Minimum PCF sizes, Minimum Initial Subscription Amounts, Minimum Subsequent Subscription Amounts and Minimum Redemption Amounts will be available upon request from the Registrar and Transfer Agent and available via the website: www.Xtrackers.com. For the avoidance of doubt, for primary market investors other than Authorised Participants, the Minimum Initial Subscription Amounts, Minimum Subsequent Subscription Amounts and Minimum Redemption Amounts will remain as stated in each relevant Product Annex, together with any applicable Upfront Subscription Sales Charge and Redemption Charge.

If any single application for cash redemption is received in respect of any one Valuation Day which represents more than 10 percent. of the Net Asset Value of any one Sub-Fund, the Board of Directors may ask such Shareholder to accept payment in whole or in part by an in-kind distribution of the portfolio securities in lieu of cash.

In the event that a redeeming Shareholder requests or accepts payment in whole or in part by a distribution in kind of portfolio securities held by the relevant Sub-Fund, the Company may, but is not obliged to, establish an account outside the structure of the Company into which such portfolio securities can be transferred. Any expenses relating to the opening and maintenance of such an account will be borne by the Shareholder. Once such portfolio assets have been transferred into the account, the account will be valued and a valuation report will be obtained from the Company's auditor when required by and in accordance with applicable laws and regulation. Any expenses for the establishment of such a report shall be borne by the Shareholders concerned or any third party unless the Board of Directors considers that the dealing in kind is in the interest of the Company (or the Sub-Fund concerned) or made to protect the interests of the Company (or the Sub-Fund concerned). The account will be used to sell such portfolio securities in order that cash can then be transferred to the redeeming Shareholder. Investors who receive such portfolio securities in lieu of cash upon redemption should note that they may incur brokerage and/or local tax charges on the sale of such portfolio securities. In addition, the Redemption Proceeds from the sale by the redeeming Shareholder of the Shares may be more or less than the Redemption Price due to market conditions and/or the difference between the prices used to calculate the Net Asset Value and bid prices received on the sale of such portfolio securities.

If any application for redemption is received in respect of any one Valuation Day (the "**First Valuation Date**") which either singly or when aggregated with other applications so received, is more than 10 percent. of the Net Asset Value of any one Sub-Fund, the Board of Directors reserves the right in its sole and absolute discretion (and taking into account the best interests of the remaining Shareholders) to scale down pro rata each application with respect to such First Valuation Date so that no more than 10 percent. of the Net Asset Value of the relevant Sub-Fund be redeemed or converted on such First Valuation Date. To the extent that any application is not given full effect on such First Valuation Date by virtue of the exercise of the power to prorate applications, it shall be treated with respect to the unsatisfied balance thereof as if a further request had been made by the Shareholder in respect of the next Valuation Day and, if necessary, subsequent Valuation Days with a maximum of 7 Valuation Days. With respect to any application received in respect of the First Valuation Date, to the extent that subsequent applications shall be received in respect of following Valuation Days, such later applications shall be postponed in priority to the satisfaction of applications relating to the First Valuation Date, but subject thereto shall be dealt with as set out in the preceding sentence.

In Kind Dealings

The Company will publish the Portfolio Composition File for the Sub-Funds setting out the form of Investments and/or the Cash Component to be delivered (a) by Authorised Participants in the case of subscriptions; or, (b) by the Company in the case of redemptions, in return for Shares. The Company's current intention is that the Portfolio Composition File will normally stipulate that Investments must be in the form of the constituents of the relevant Reference Index. Only Investments which form part of the investment objective and policy of a Sub-Fund will be included in the Portfolio Composition File.

The Portfolio Composition File for the Sub-Funds for each Transaction Day will be available upon request from the Registrar and Transfer Agent and available via the website: www.Xtrackers.com.

In the case of in kind redemptions, the transfer of Investments and Cash Component by the Company will normally take place not later than four Business Days after Shares have been returned to the Company's account at the ICSD.

The settlement of any in kind redemption may include the payment of a Redemption Dividend. Any Redemption Dividend so payable will be included in the Cash Component paid to the redeeming Shareholder.

Cash Dealings

The Company may accept subscription and redemption requests which consist wholly of cash. The Articles of Incorporation empower the Company to charge such sum as the Board of Directors considers represents an appropriate figure for any applicable Upfront Subscription Sales Charges and Redemption Charges.

Authorised Participants wishing to make a cash redemption should notify the Company, care of the Registrar and Transfer Agent in writing and make arrangements for the transfer of their Shares into the Company's account at the ICSD by the relevant redemption settlement time. The proceeds for a cash redemption shall be the Net Asset Value per Share calculated as at the Valuation Day for the Sub-Fund, less any applicable Redemption Charges and Primary Market Transaction Costs.

The settlement of any cash redemption may include the payment of a Redemption Dividend. Any Redemption Dividend so payable will be included in the cash amount paid to the redeeming Shareholder.

Redemption proceeds will normally be paid in the Reference Currency or the Denomination Currency of the relevant Sub-Fund or Share Class, or, alternatively, at the request of the Authorised Participant, in the Authorised Payment Currency in which the subscription was made. Depending whether a multi-currency Net Asset Value is published or not, the Administrative Agent or the Registrar and Transfer Agent, respectively, will proceed with the currency conversion. If necessary, the relevant agent will effect a currency transaction at the Shareholder's cost, to convert the Redemption Proceeds from the Reference Currency of the relevant Sub-Fund into the relevant Authorised Payment Currency. Any such currency transaction will be effected with the relevant agent at the investor's risk and cost. Such currency exchange transactions may delay any transaction in Shares.

Directed Cash Dealings

If any request is made by an Authorised Participant to execute underlying security trades and/or foreign exchange in a way that is different than normal and customary convention, the Registrar and Transfer Agent will use reasonable endeavours to satisfy such request if possible but the Registrar and Transfer Agent will not accept any responsibility or liability if the execution request is not achieved in the way requested for any reason whatsoever.

If any Authorised Participant submitting a cash subscription or redemption requests to have the Investments traded with a particular designated broker, the relevant Investment Manager and/or the Sub-Portfolio Manager may at their sole discretion (but shall not be obliged to) transact for Investments with the designated broker. Authorised Participants that wish to select a designated broker are required, prior to the relevant Investment Manager and/or the Sub-Portfolio Manager transacting Investments, to contact the relevant portfolio trading desk of the designated broker to arrange the trade.

The Investment Managers and/or the Sub-Portfolio Managers will not be responsible, and shall have no liability, if the execution of the underlying securities with the designated broker and, by extension, the Authorised Participant's subscription or redemption, is not carried out due to an omission, error, failed or delayed trade or settlement on the part of the Authorised Participant or the designated broker. Should the Authorised Participant or the designated broker default on, or change the terms of, any part of the underlying securities transaction, the Shareholder shall bear all associated risks and costs. In such circumstances, the Company, the Investment Managers and/or the Sub-Portfolio Managers have the right to transact with another broker and amend the terms of the Authorised Participant's subscription or redemption to take into account the default and the changes to the terms.

Redemption Dividend

The Company may pay any accrued dividends related to a cash redemption or related to the Investments transferred to a Authorised Participant in satisfaction of a valid in kind redemption request. Such a dividend will become due immediately prior to the redemption of the Shares and paid to the Authorised Participant as part of the cash amount in the case of a cash redemption or as part of the Cash Component in the case of an in kind redemption.

Failure to Deliver

In the event an Authorised Participant fails to deliver (i) the required Investments and Cash Component in relation to an in kind subscription; or (ii) cash in relation to a cash subscription in the stated settlement times for the Sub-Funds (as set out in the relevant Product Annex) the Company reserves the right to cancel the relevant subscription order and the Authorised Participant shall indemnify the Company for any loss suffered by the Company as a result of a failure by the Shareholder to deliver the required Investments and Cash Component or cash in a timely fashion. The Company reserves the right to cancel the provisional allotment of the relevant Shares in those circumstances.

The Directors may, in their sole discretion where they believe it is in the best interests of a Sub-Fund, decide not to cancel a subscription and provisional allotment of Shares where an Authorised Participant has failed to deliver the required Investments and Cash Component or cash, as applicable, within the stated settlement times. In this event, the Company may temporarily borrow an amount equal to the subscription and invest the amount borrowed in accordance with the investment objective and policies of the relevant Sub-Fund. Once the required Investments and Cash Component or cash, as applicable, have been received, the Company will use this to repay the borrowings. The Company reserves the right to charge the relevant Authorised Participant for any interest or other costs incurred by the Company as a result of this borrowing. If the Authorised Participant fails to reimburse the Company for those charges, the Company, the Investment Managers and/or the Sub-Portfolio Managers will have the right to sell all or part of the applicant's holdings of Shares in the Sub-Fund or any other Sub-Fund of the Company in order to meet those charges.

Form of the Shares and Register

Shares are only issued in registered form and ownership of Shares will be evidenced by entry in the Shareholders' register. No temporary documents of title or share certificates will be issued, other than the Global Share Certificate required for the International Central Securities Depositary.

Luxembourg Register of beneficial owners

The Luxembourg Law of 13 January 2019 creating a Register of Beneficial Owners (the "**Law of 13 January 2019**") entered into force on the 1st of March 2019 (with a 6 month grandfathering period). The Law of 13 January 2019 requires all companies registered on the Luxembourg Company Register, including the Company, to obtain and hold information on their beneficial owners ("**Beneficial Owners**") at their registered office. The Company must register Beneficial Owner-related information with the Luxembourg Register of beneficial owners, which is established under the authority of the Luxembourg Ministry of Justice.

The Law of 13 January 2019 broadly defines a Beneficial Owner, in the case of corporate entities such as the Company, as any natural person(s) who ultimately owns or controls the Company through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in the Company, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with European Union law or subject to equivalent international standards which ensure adequate transparency of ownership information.

A shareholding of 25 percent. plus one share or an ownership interest of more than 25 percent. in the Company held by a natural person shall be an indication of direct ownership. A shareholding of 25 percent. plus one share or an ownership interest of more than 25 percent. in the Company held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership.

In case the aforementioned Beneficial Owner criteria are fulfilled by an investor with regard to the Company, this investor is obliged by law to inform the Company in due course and to provide the required supporting documentation and information which is necessary for the Company to fulfill its obligation under the Law of 13 January 2019. Failure by the Company and the relevant Beneficial Owners to comply with their respective obligations deriving from the Law of 13 January 2019 will be subject to criminal fines. Should an investor be unable to verify whether they qualify as a Beneficial Owner, the investor may approach the Company for clarification.

For both purposes the following e-mail address may be used:

dws-lux-compliance@list.db.com

Beneficial Ownership Requirements of the Securities and Exchange Board of India

Where a Sub-Fund of the Company invests in Indian securities, it is required to open a securities account and to comply with the disclosure requirements for foreign portfolio investors ("**FPIs**") in relation to their beneficial owner(s) and senior managing official(s) pursuant to the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 (the "**Regulation**").

Accordingly, where an end investor (the ultimate beneficial owner) in a Sub-Fund of the Company holds 10% or more of the outstanding Shares of (i) the Company as a whole or (ii) any of the Sub-Funds of the Company, it is imperative that the Company is informed, thereby enabling the Company to comply with its disclosure requirements as an FPI under the Regulation.

Ultimate beneficial owners holding 10% or more of Shares in the Company as a whole, or any of the Sub-Funds of the Company, should inform the Company, as soon as possible and on an ongoing basis, by providing the following information via email to Xtrackers@dws.com:

1. Name of beneficial owner;
2. Number of Shares held as of the relevant date you are providing the information;
3. Percentage of Shares held as of such date;
4. Details of any entity or natural person which has control over the beneficial owner by virtue of for example holding a 10% or more shareholding in the beneficial owner or having control over management or policy decisions including by virtue of their shareholding or management rights or shareholders agreements or voting agreements; and
5. Any entity or person that has control over such entity referred to at 4 above by virtue of any such similar arrangements until the end entity or person in the chain has been determined.

If at any time the information provided to the Company materially changes, or if any entity or person becomes in scope of the requirements of the Regulation, the Company should be informed as soon as possible on an ongoing basis, in line with the above.

THE SECONDARY MARKET

Trades, whether on a stock exchange or over the counter, which are not between an Authorised Participant and the Company in the primary market, but are between an Authorised Participant and a non-Authorised Participant entity or between two non-Authorised Participant entities are described as trades in the secondary market.

Listing on a Stock Exchange

Unless otherwise specified in the relevant Product Annex, it is the intention of the Company for each of its Sub-Funds, through having its Shares listed on one or more Relevant Stock Exchanges, to qualify as an exchange traded fund ("**ETF**"). As part of those listings there is an obligation on one or more members of the Relevant Stock Exchange to act as market makers offering prices at which the Shares can be purchased or sold by investors. The spread between those purchase and sale prices may be monitored and regulated by the relevant stock exchange authority.

Unless otherwise stated in the Product Annex for the relevant Sub-Fund, it is contemplated that application will be made to list the Shares of each Sub-Fund on one or more of the Relevant Stock Exchanges. If the Directors decide to create additional Sub-Funds or Classes they may in their discretion apply for the Shares of such Sub-Funds to be listed on one or more of the Relevant Stock Exchanges. For so long as the Shares of any Sub-Fund are listed on any Relevant Stock Exchange, the Sub-Fund shall endeavour to comply with the requirements of the Relevant Stock Exchange relating to those Shares. For the purposes of compliance with the national laws and regulations concerning the offering and/or listing of the Shares this Prospectus may have attached to it one or more documents setting out information relevant for the jurisdictions in which the Shares are offered for subscription.

The Company does not charge any fee for purchases of Shares on the secondary market. Orders to buy Shares, including in the case of ETFs through the Relevant Stock Exchanges, can be placed via a member firm or stockbroker. Such orders to buy Shares may incur costs to the investor over which the Company has no control.

The approval of any listing particulars pursuant to the listing requirements of the Relevant Stock Exchange does not constitute a warranty or representation by such Relevant Stock Exchange as to the competence of the service providers or as to the adequacy of information contained in the listing particulars or the suitability of the Shares for investment or for any other purpose.

Certain Authorised Participants who subscribe for Shares may act as market makers; other Authorised Participants are expected to subscribe for Shares in order to be able to offer to buy Shares from or sell Shares to their customers as part of their broker/dealer business. Through such Authorised Participants being able to subscribe for or redeem Shares, a liquid and efficient secondary market may develop over time on one or more Relevant Stock Exchanges as they meet secondary market demand for such Shares. Through the operation of such a secondary market, persons who are not Authorised Participants will be able to buy Shares from or sell Shares to other secondary market investors or market makers, broker/dealers, or other Authorised Participants. Investors should be aware that on days other than Business Days or Transaction Days of a Sub-Fund when one or more markets are trading Shares but the underlying market(s) on which the Reference Index of the Sub-Fund are traded are closed, the spread between the quoted bid and offer prices in the Shares may widen and the difference between the market price of a Share and the last calculated Net Asset Value per Share may, after currency conversion, increase. Investors should also be aware that on such days the Reference Index would not necessarily be calculated and available for investors in making their investment decisions because prices of the Reference Index would not be available on such days.

Intra-Day Net Asset Value ("iNAV")

The Company may at its discretion make available, or may designate other persons to make available on its behalf, on each Business Day, an intra-day net asset value or "iNAV" for one or more Sub-Funds. If the Company or its designee makes such information available on any Business Day, the iNAV will be calculated based upon information available during the trading day or any portion of the trading day, and will ordinarily be based upon the current value of the assets/exposures of the Sub-Fund and/or the Reference Index in effect on such Business Day, together with any cash amount in the Sub-Fund as at the previous Business Day. The Company or its designee will make available an iNAV if this is required by any Relevant Stock Exchange.

An iNAV is not, and should not be taken to be or relied on as being, the value of a Share or the price at which Shares may be subscribed for or redeemed or purchased or sold on any Relevant Stock Exchange. In particular, any iNAV provided for any Sub-Fund where the constituents of the Reference Index are not actively traded during the time of publication of such iNAV may not reflect the true value of a Share, may be misleading and should not be relied on.

Investors should be aware that the calculation and reporting of any iNAV may reflect time delays in the receipt of the prices of the relevant constituent securities in comparison to other calculated values based upon the same constituent securities including, for example, the Reference Index or the iNAV of other exchange traded funds based on the same Reference Index. Investors interested in subscribing for or redeeming Shares on a Relevant Stock Exchange should not rely solely on any iNAV which is made available in making investment decisions, but should also consider other market information and relevant economic and other factors (including, where relevant, information regarding the Reference Index, the relevant constituent securities and financial instruments based on the Reference Index corresponding to the relevant Sub-Fund).

Complaints

Complaints of a general nature regarding the Company's activities or complaints concerning the Board of Directors may be lodged directly with the Company or sent to: dws.lu@dws.com.

Complaints concerning the Management Company or its agents may be lodged directly with the Management Company or sent to: dws.lu@dws.com. Information regarding the Management Company's internal complaint handling procedures is available on request at its e-mail or postal address.

For complaints concerning the service provided by a Distributor, financial intermediary or agent, Shareholders should contact the relevant Distributor, financial intermediary or agent for further information on any potential rights arising out of the relationship with such Distributor, financial intermediary or agent.

Notification to Shareholders

Unless other communication media are specified in the Prospectus or required in accordance with the applicable laws and regulations (including the Law and the Luxembourg law of 10 August 1915 on commercial companies, as amended), the Shareholders will be notified of any developments concerning their investment in the Company through the website www.Xtrackers.com or any successors thereto. The Shareholders are consequently invited to consult this website on a regular basis.

Redemption of Shares by Secondary Market Investors

Shares purchased on the secondary market cannot usually be sold directly back to the Company. Investors must purchase and redeem their Shares on the secondary market with the assistance of an intermediary (e.g. a market maker or a stock broker) and may incur fees for doing so as further described above in this section "The Secondary Market". In addition, investors may pay more than the current Net Asset Value when buying Shares on the secondary market and may receive less than the current Net Asset Value when selling them on the secondary market.

If on a Business Day the stock exchange value of the Shares significantly varies from the Net Asset Value due to, for example market disruption caused by the absence of market makers (as described above under "Listing on a Stock Exchange"), investors who are not Authorised Participants may apply directly to the Company for the redemption of their Shares via the depositary or financial intermediary through which they hold the Shares, such that the Administrative Agent is able to confirm the identity of such investor, the number of Shares and the details of the relevant Sub-Fund and Share Class held by such investors wishing to redeem. In such situations, information shall be communicated to the Relevant Stock Exchange indicating that such direct redemption procedure is available to investors on the secondary market. Applications for redemption shall be made in accordance with the procedure described in the "Subscriptions and Redemptions of Shares (Primary Market)" section of the Prospectus, and the redemption fees disclosed in the Product Annex in respect of the relevant Sub-Fund shall apply.

CONVERSION OF SHARES

Unless otherwise stated in the relevant Product Annex, Shareholders will not be entitled to convert within a given Class of Shares or Sub-Fund all or part of their Shares into Shares relating to other Sub-Funds or Classes of Shares. Prior to converting any Shares, Shareholders should consult with their tax and financial advisers in relation to the legal, tax, financial or other consequences of converting such Shares.

If conversions are allowed, the details of how the conversion will be processed will be set out in the relevant Product Annex.

PROHIBITION OF LATE TRADING AND MARKET TIMING

Late Trading is to be understood as the acceptance of a subscription (or conversion or redemption) order after the relevant Cut-off Time (as set out in the relevant Product Annex) on the relevant Transaction Day and the execution of such order at the price based on the Net Asset Value applicable to such same day. Late Trading is strictly forbidden.

Market Timing is to be understood as an arbitrage method through which an investor systematically subscribes and redeems or converts Shares of the Company within a short time period, by taking advantage of time differences and/or imperfections or deficiencies in the method of determination of the Net Asset Value of the relevant Sub-Fund. Market Timing practices may disrupt the investment management of the portfolios and harm the performance of the relevant Sub-Fund.

In order to avoid such practices, Shares are issued at an unknown price and neither the Company, nor a Distributor will accept orders received after the relevant Cut-off Time.

The Company reserves the right to refuse purchase (and conversion) orders into a Sub-Fund by any person who is suspected of market timing activities.

FEES AND EXPENSES

Dealing Fees Payable by Investors

The Shares may be subject to selling commission and fee structures which are different from those detailed below. Any such exceptions will be described in the relevant Product Annex.

Upfront Subscription Sales Charge

Subscription for Shares made during the Offering Period may be subject to an Upfront Subscription Sales Charge calculated on the Initial Issue Price in the Denomination Currency. Investors subscribing to Shares on or after the Launch Date may be subject to an Upfront Subscription Sales Charge which will be calculated on the basis of the Net Asset Value per Share as determined on the Valuation Day immediately following the relevant Transaction Day. The Upfront Subscription Sales Charge may be waived in whole or in part at the discretion of the Board of Directors. No Upfront Subscription Sales Charge will be applied unless otherwise provided for in the relevant Product Annex. The Upfront Subscription Sales Charge shall revert to the Distributor through which the subscription was made.

Redemption Charge

The Board of Directors of the Company may decide that Shares will be subject to a Redemption Charge which will be calculated on the basis of the Net Asset Value per Share as determined on the Valuation Day immediately following the relevant Transaction Day (as will be determined in the Product Annex) and will usually revert to the relevant Distributor through which the redemption was made. The Redemption Charge may be waived in whole or in part at the discretion of the Board of Directors with due regard to the equal treatment of Shareholders. Shares for which a Maturity Date is designated will not be subject to any Redemption Charge if redeemed on such Maturity Date. Shares for which no Maturity Date has been designated and which have been terminated by a decision of the Board of Directors will not be subject to a Redemption Charge if redeemed as a result of the termination of the relevant Sub-Fund. No Redemption Charge will be applied unless otherwise provided for in the relevant Product Annex.

Conversion Charge

Conversions from Shares relating to one Sub-Fund to Shares relating to another Sub-Fund or, in relation to the same Sub-Fund, from one Class of Shares to another Class of Shares will be subject to a Conversion Charge of maximum 1 percent. based on the Net Asset Value per Share (as will be determined in the Product Annex). No Conversion Charge will be applicable unless otherwise specified in the Product Annex.

Primary Market Transaction Costs

In relation to subscriptions or redemptions on the primary market, Primary Market Transaction Costs may be charged to Authorised Participants.

Fees and Expenses Payable by the Company

Management Company Fee

In accordance with and subject to the terms of the Management Company Agreement, the annual Management Company Fee will accrue on each calendar day and will be calculated on each Valuation Day on the basis of a percentage of (i) the last available Net Asset Value of each Sub-Fund or Class of Shares or (ii) the Initial Issue Price multiplied by the number of outstanding Shares of each Sub-Fund or Class of Shares (as indicated for each Sub-Fund or Class of Shares in the relevant Product Annex). The Management Company Fee is payable on a periodic basis. The Management Company is also entitled to receive reimbursement for any reasonable expenses that were made in its capacity as management company of the Company in the context of the execution of the Management Company Agreement and that were not reasonably foreseeable in the ordinary course of business.

Notwithstanding the above, the Management Company and the Company may agree on a different fee structure in respect of a certain Sub-Fund or Class of Shares, as indicated in the relevant Product Annex.

The Management Company may pay a Distribution Fee to the Distributors out of the Management Company Fee. A Distributor may re-allocate an amount of the Distribution Fee to a sub-distributor (as applicable).

Transaction Costs

No Transaction Costs shall be payable by the Company, unless otherwise specified in the relevant Product Annex.

Extraordinary Expenses

The Company shall be liable for Extraordinary Expenses including, without limitation, expenses relating to litigation costs and any tax, levy, duty or similar charge imposed on the Company or its assets that would otherwise not qualify as ordinary expenses. Extraordinary expenses are accounted for on a cash basis and are paid when incurred or invoiced on the basis of the Net Asset Value of the Sub-Funds to which they are attributable. Extraordinary Expenses are allocated across each Class of Shares.

Investment Managers/Sub-Portfolio Managers

The Management Company shall remunerate the Investment Managers out of the Management Company Fee as agreed from time to time between the two parties.

Each Investment Manager shall remunerate out of the applicable Investment Management Fee any appointed Sub-Portfolio Manager, as agreed from time to time between the parties.

Any agents appointed by an Investment Manager and/or Sub-Portfolio Manager to provide them with administrative or operational support or any other services shall be remunerated by such Investment Manager or Sub-Portfolio Manager, respectively.

Fixed Fee

Under the terms of an arrangement between the Company and the Fixed Fee Agent, the Fixed Fee Agent will in exchange for the payment of a Fixed Fee, calculated on the average daily Net Asset Value per Sub-Fund or per Class as specified in the relevant Product Annex and payable periodically, pay certain fees and expenses, unless otherwise specified in the relevant Product Annex.

The fees and expenses covered by the arrangement are the Administrative Agent Fee, the Depositary Fee, the Registrar, Transfer Agent and Listing Agent Fee, the annual tax in Luxembourg (if any) (the "***Taxe d'Abonnement***"), the formation expenses and certain Other Administrative Expenses, as further described below.

Administrative Agent Fee

The Fixed Fee covers the Administrative Agent Fee, which is normally due under the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement. According to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement, the Company shall pay to the Administrative Agent an Administrative Agent Fee according to current bank practice in Luxembourg for its services as central administration agent, domiciliary agent and listing agent. The Administrative Agent is also entitled to receive reimbursement for any reasonable disbursements and out-of-pocket expenses incurred in connection with the Company.

Registrar, Transfer Agent and Listing Agent Fee

The Fixed Fee covers the Registrar, Transfer Agent and Listing Agent Fee, which is normally due under the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement. According to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement, the Company pays to the Registrar, Transfer Agent and Listing Agent a monthly Registrar, Transfer Agent and Listing Agent Fee according to current bank practice in Luxembourg for its services as registrar, transfer agent and listing agent. The Registrar, Transfer Agent and Listing Agent is also entitled to receive reimbursement for any reasonable disbursements and out-of-pocket expenses incurred in connection with the Company.

Depositary Fee

The Fixed Fee covers the Depositary Fee, which is normally due under the Depositary Agreement.

According to the Depositary Agreement, the Company pays to the Depositary a Depositary Fee according to current bank practice in Luxembourg for its services as depositary bank. The fee will be calculated on the basis of a percentage of the assets of each Sub-Fund under the custody of the Depositary and will be paid on a monthly basis by the Company to the Depositary. The Depositary is entitled to receive reimbursement for its reasonable out-of-pocket expenses incurred in connection with the Company.

Other Administrative Expenses

The Fixed Fee covers certain "Other Administrative Expenses", which include but are not limited to, the costs and expenses relating to the establishment of the Company; organisation and registration costs; licence fees payable to licence holders of an index; taxes, such as *Taxe d'Abonnement* (if any); expenses for legal and auditing services; cost of any proposed listings; maintaining such listings; printing Share certificates (if any), Shareholders' reports; prospectuses; preparation, maintenance, translation and updating of investors fact-sheets for the Sub-Funds; monitoring the performance of the Sub-Funds including the costs of any software associated with such monitoring; maintenance of the website in respect of the Company and the Sub-Funds which provides investors with information on the Company and the Sub-Funds, including but not limited to, provision of Net Asset Values, secondary market prices and updated prospectuses; all reasonable out-of-pocket expenses of the Board of Directors and any remuneration to be paid to the Directors (as may be applicable); foreign registration fees and fees relating to the maintenance of such registrations including translation costs and local legal costs and other expenses due to supervisory authorities in various jurisdictions and local representatives' remunerations in foreign jurisdictions; insurance; brokerage costs which are applicable to the Sub-Fund generally and not those which can be attributed to a specific investment transaction and the costs of publication of the Net Asset Value and such other information which is required to be published in the different jurisdictions; and all costs relating to the distribution of the Sub-Funds in the different jurisdictions. The costs relating to the distribution of the Sub-Funds should not exceed 0.30 percent. of the Net Assets per Sub-Fund, will be amortised per Sub-Fund over a period not exceeding 3 years and will be borne by the relevant Sub-Fund.

The Fixed Fee Agent will only pay invoices of legal advisers, local paying agents and translators provided and to the extent that these invoices do not in aggregate exceed the overall threshold of Euro ten Million (EUR 10,000,000) per Financial Year and the Company will be liable to pay for any amount that exceeds this threshold. The Company will pay this amount out of the relevant Sub-Fund's assets to which the specific costs are attributed.

In addition, since the Fixed Fee will be determined at the outset on a yearly basis by the Company and the Fixed Fee Agent, investors should note that the amount paid to the Fixed Fee Agent may at year end be greater than if the Company would have paid directly the relevant expenses. Conversely, the expenses the Company would have had to pay might be greater than the Fixed Fee and the effective amount paid by the Company to the Fixed Fee Agent would be less. The Fixed Fee will be determined and will correspond to anticipated costs fixed on terms no less favourable for each Sub-Fund than on an arm's length basis by the Company and the Fixed Fee Agent and will be disclosed in the relevant Product Annex.

The Fixed Fee does not include the following fees, expenses and costs:

- the applicable Investment Management Fee;
- the Management Company Fee;
- the costs of any marketing agencies appointed by the Company or the Management Company to provide certain marketing and distribution services to the Company or the Management Company;

- any taxes or fiscal charges which the Company may be required to pay, except the *Taxe d'Abonnement* (if any), or if it should be payable, any value added tax or similar sales or services tax payable by the Company (VAT) (all such taxes or fiscal charges), unless otherwise specified in the relevant Product Annex;
- expenses arising out of any advertising or promotional activities in connection with the Company; nor,
- any costs and expenses incurred outside of the Company's ordinary course of business such as Extraordinary Expenses (e.g. legal fees incurred in prosecuting or defending, a claim or allegation, by or against, the Company).

Costs and Charges Disclosure

This Prospectus, the KIID and financial statements relating to a Sub-Fund contain certain information relating to fees and costs and charges applicable to the Sub-Fund. If the Shareholder is advised by third parties (in particular companies providing services related to financial instruments, such as credit institutions and investment firms) when acquiring the Shares, or if the third parties mediate the purchase, such third parties may have to provide the Shareholder, as the case may be, with a breakdown of costs and charges or expense ratios that are not laid out in the cost details in this Prospectus, the KIID, or the financial reports of the Company.

In particular, such differences may result from regulatory requirements governing how such third parties determine, calculate and report costs and charges. These requirements may arise for example in the course of the national implementation of Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (also known as "**MiFID**"). Shareholders should note that the information provided by third parties on all relevant costs and charges may vary from one party to the other due to these third parties additionally invoicing the costs of their own services (e.g. a surcharge or, where applicable, recurrent brokering or advisory fees, depositary fees, etc.).

GENERAL TAXATION

Warning

The information set forth below is based on present laws, regulations and administrative practice and may be subject to modification possibly with retrospective effect. This summary does not purport to be a comprehensive description of all Luxembourg tax laws and Luxembourg tax considerations that may be relevant to a decision to invest in, own, hold, or dispose of shares and is not intended as tax advice to any particular investor or potential investor. Prospective investors should inform themselves of, and where appropriate take advice on, the laws and regulations (such as those relating to taxation and exchange controls) applicable to the subscription, purchase, holding, selling (via an exchange or otherwise) and redemption of Shares in the country in which they are subject to tax.

This summary does not describe any tax consequences arising under the laws of any state, locality or other taxing jurisdiction other than Luxembourg.

The Company

Under current law and practice, the Company is not liable to any Luxembourg income taxes, stamp or other tax. Investment income and capital gains, if any, received or realised by the Company may, however, be subject to taxation in the country of origin at varying rates, which normally cannot be recovered by the Company.

Although the Company is, in principle, subject in Luxembourg to a subscription tax (*Taxe d'Abonnement*) at an annual rate of 0.05 percent., the following exemptions apply:

- Sub-Funds which are index-tracking ETFs (i) whose Shares are listed or traded on at least one stock exchange or another regulated market operating regularly, recognised and open to the public; and (ii) whose exclusive objective is to reflect the performance of one or more indices are exempt from such tax, it being understood that this condition of exclusive objective does not prevent the management of liquid assets, if any, on an ancillary basis, or the use of techniques and instruments used for hedging or for purposes of efficient portfolio management;
- Sub-Funds which are Actively Managed Funds whose Shares are traded throughout the day on at least one regulated market or multilateral trading facility and where at least one market maker is involved in ensuring that the price of their securities does not deviate significantly from their Net Asset Value and, where applicable, their indicative net asset value are exempt from such tax. If there are Classes within a Sub-Fund, the exemption applies only to the Classes referred to.

A Grand-Ducal regulation may determine additional or alternative criteria with respect to the indices under that exemption.

Subscription tax exemption also applies to (i) investments in a Luxembourg UCI subject itself to the subscription tax, (ii) UCI, compartments thereof or dedicated classes reserved to retirement pension schemes, and (iii) money market UCIs.

A reduced subscription tax of 0.01 percent. per annum is applicable to individual compartments of UCIs with multiple compartments referred to in the 2010 Law, as well as for individual classes of securities issued within a UCI or within a compartment of a UCI with multiple compartments, provided that the securities of such compartments or classes are reserved to one or more institutional investors.

The Company or its Sub-Funds, may benefit from reduced subscription tax rates depending on the value of the relevant Sub-Fund's net assets invested in economic activities that qualify as environmentally sustainable within the meaning of Article 3 of the EU Taxonomy Regulation (the "Qualifying Activities"), except for the proportion of net assets of the Company or its Sub-Funds, invested in fossil gas and/or nuclear energy related activities.

The reduced subscription tax rates would be of:

- 0.04% if at least 5% of the total net assets of the Company, or of its Sub-Funds, are invested in Qualifying Activities;
- 0.03% if at least 20% of the total net assets of the Company, or of its Sub-Funds, are invested in Qualifying Activities;
- 0.02% if at least 35% of the total net assets of the Company, or of its Sub-Funds, are invested in Qualifying Activities; and
- 0.01% if at least 50% of the total net assets of the Company, or of its Sub-Funds, are invested in Qualifying Activities.

The subscription tax rates mentioned above would only apply to the net assets invested in Qualifying Activities.

The Shareholders

Non-resident Shareholders

Non-resident Shareholders without a permanent establishment, a permanent representative or a fixed place of business in Luxembourg to which the Shares are attributable are not, in principle, subject to any capital gains tax, income tax, withholding tax or net wealth tax in Luxembourg.

The tax consequences for Shareholders wishing to purchase, subscribe, acquire, hold, convert, sell, redeem or dispose Shares will depend on the relevant laws of any jurisdiction to which the Shareholder is subject.

Luxembourg resident individual Shareholders

Capital gains realised on the sale of the Shares by Luxembourg resident individual Shareholders who act in the course of the management of his/her private wealth are generally not subject to Luxembourg income tax except if:

(i) the Shares are sold before or within 6 months from their subscription or purchase; or

(ii) the Shares held in the private portfolio constitute a substantial shareholding. A shareholding is considered as substantial when the seller, alone or with his/her spouse and underage children, has participated either directly or indirectly at any time during

the five years preceding the date of the disposal in the ownership of more than 10% of the capital or assets of the Company. An investor is also deemed to alienate a substantial participation if he/she acquired free of charge, within the five years preceding the transfer, a participation that constituted a substantial participation in the hands of the alienator (or the alienators in case of successive transfers free of charge within the same five-year period).

Distributions made by the Company will be subject to income tax. Luxembourg personal income tax is levied following a progressive income tax scale.

Luxembourg resident corporate Shareholders

Luxembourg resident corporate Shareholders will be subject to corporate taxation (including the Luxembourg corporate income tax, the solidarity surcharge and the municipal business tax) on the distribution received from the Company and the gains received upon disposal of the Shares.

Luxembourg resident corporate Shareholders who benefit from a special tax regime, such as, for example: (i) an UCI subject to the Law, (ii) specialized investment funds subject to the amended law of 13 February 2007, related to specialised investment funds, (iii) reserved alternative investment funds subject to the law of 23 July 2016, on reserved alternative investment funds (not opting for the treatment as a venture capital vehicle for Luxembourg tax purposes), or (iv) family wealth management companies subject to the amended law of 11 May 2007, related to family wealth management companies, are exempt from income tax in Luxembourg, but instead subject to an annual subscription tax (*taxe d'abonnement*) and thus income derived from the Shares, as well as gains realized thereon, are not subject to Luxembourg corporate taxes.

The Shares shall be part of the taxable net wealth of the Luxembourg resident corporate Shareholders, except if the holder of the Shares is: (i) an UCI subject to the Law, (ii) a vehicle governed by the amended law of 22 March 2004, on securitization, (iii) an investment company governed by the amended law of 15 June 2004, on the investment company in risk capital, (iv) a specialized investment fund subject to the amended law of 13 February 2007, on specialised investment funds, (v) reserved alternative investment funds subject to the law of 23 July 2016, on reserved alternative investment funds, (vi) a family wealth management company subject to the amended law of 11 May 2007, related to family wealth management companies or (vii) a professional pension institution governed by the law of 13 July 2005, on institutions for occupational retirement provision in the form of pension savings companies with variable capital and pension savings associations. The taxable net wealth is subject to tax on a yearly basis at the rate of 0.5%. A reduced rate of 0.05% is available for the part of the net wealth exceeding EUR 500,000,000.

Withholding Tax

Investor withholding tax

Distributions by the Company as well as liquidation proceeds and capital gains derived therefrom are made free and clear from withholding tax in Luxembourg.

Withholding tax in source countries

Interest and dividend income received by the Company may be subject to non-recoverable withholding tax in the source countries. The Company may further be subject to tax on the realised or unrealised capital appreciation of its assets in the countries of the investments. However, the Company may benefit from double tax treaties entered into by Luxembourg which may provide for exemption from withholding tax or reduction of withholding tax rate.

EU Tax Considerations

The OECD has developed the CRS to achieve a comprehensive and multilateral automatic exchange of information (AEOI) on a global basis. On 9 December 2014, Council Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation (the "Euro-CRS Directive") was adopted in order to implement the CRS among the EU Member States.

The Euro-CRS Directive was implemented into Luxembourg law by the CRS Law.

The CRS Law requires Luxembourg financial institutions to identify financial assets holders and establish if they are fiscally resident in countries with which Luxembourg has a tax information sharing agreement. Luxembourg financial institutions will then report financial account information of the assets holders to the Luxembourg tax authorities, which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis.

Accordingly, the Company may require its investors to provide information in relation to the identity and fiscal residence of financial account holders (including certain entities and their controlling persons), in order to ascertain their CRS status and report information regarding a shareholder and his/her/its account to the Luxembourg tax authorities (*Administration des Contributions Directes*), if such account is deemed a CRS reportable account under the CRS Law. The Company shall communicate any information to the investor according to which (i) the Company is responsible for the treatment of the personal data provided for in the CRS Law; (ii) the personal data will only be used for the purposes of the CRS Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*); (iv) responding to CRS-related questions is mandatory and accordingly the potential consequences in case of no response; and (v) the investor has a right of access to and rectification of the data communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*).

In addition, Luxembourg signed the OECD's multilateral competent authority agreement ("**Multilateral Agreement**") to automatically exchange information under the CRS. The Multilateral Agreement aims to implement the CRS among non-EU Member States; it requires agreements on a country-by-country basis.

The Company reserves the right to refuse any application for Shares if the information provided or not provided does not satisfy the requirements under the CRS Law.

Shareholders should consult their professional advisors on the possible tax and other consequences with respect to the implementation of the CRS.

OECD Model Global Anti-Base Erosion Model Rules ("GloBE Rules") and the implementation of the European Commission's Directive on GloBE Rules in Luxembourg

In December 2021, as part of the base erosion and profit shifting ("**BEPS**") project, the OECD published model rules for a global minimum effective tax rate of 15 per cent ("**Pillar 2**"). In December 2022 the EU Commission adopted a directive setting out how Pillar 2 should be applied within the EU (the "**Minimum Tax Directive**"). The Minimum Tax Directive has been implemented in Luxembourg national law through the law dated 22 December 2023 ("**Luxembourg Pillar 2 Law**") which applies as from fiscal years starting on or after 31 December 2023. To the extent that the Company (i) is not consolidated by another entity on a line-by-line basis and does not itself consolidate with another entity on a line-by-line basis or (ii) has no permanent establishment with which the Company would have an aggregated revenue of at least €750 million a year, the Company should be outside the scope of the Luxembourg Pillar 2 Law.

FATCA

The Foreign Account Tax Compliance Act ("**FATCA**"), a portion of the 2010 Hiring Incentives to Restore Employment Act, became law in the United States in 2010. It requires financial institutions outside the U.S. ("**foreign financial institutions**" or "**FFIs**") to pass information about "Financial Accounts" held by "Specified U.S. Persons", directly or indirectly, to the U.S. tax authorities, the Internal Revenue Service ("**IRS**") on an annual basis. A 30 percent. withholding tax is imposed on certain U.S. source income of any FFI that fails to comply with this requirement. On 28 March 2014, the Grand-Duchy of Luxembourg entered into the Luxembourg IGA. The Company would hence have to comply with the Luxembourg IGA, as implemented into Luxembourg law by the Law of 24 July 2015 relating to FATCA (the "FATCA Law") in order to comply with the provisions of FATCA rather than directly complying with the U.S. Treasury Regulations implementing FATCA. Under the FATCA Law and the Luxembourg IGA, the Company may be required to collect information aiming to identify its direct and indirect shareholders that are Specified U.S. Persons for FATCA purposes ("**reportable accounts**"). Any such information on reportable accounts provided to the Company will be shared with the Luxembourg tax authorities which will exchange that information on an automatic basis with the Government of the United States of America pursuant to Article 28 of the convention between the Government of the United States of America and the Government of the Grand-Duchy of Luxembourg for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes in Income and Capital, entered into in Luxembourg on 3 April 1996. The Company intends to comply with the provisions of the FATCA Law and the Luxembourg IGA to be treated as complying with FATCA and will thus not be subject to the 30 percent. withholding tax with respect to its share of any such payments attributable to actual and deemed U.S. investments of the Company. The Company will continually assess the extent of the requirements that FATCA and notably the FATCA Law place upon it.

To ensure the Company's compliance with FATCA, the FATCA Law and the Luxembourg IGA in accordance with the foregoing, the Management Company may:

a) request information or documentation, including W-8 tax forms, a Global Intermediary Identification Number, if applicable, or any other valid evidence of a shareholder's FATCA registration with the IRS or a corresponding exemption, in order to ascertain such shareholder's FATCA status;

b) report information concerning a shareholder and his account holding in the Company to the Luxembourg tax authorities if such account is deemed a FATCA reportable account under the FATCA Law and the Luxembourg IGA;

c) report information to the Luxembourg tax authorities (*Administration des Contributions Directes*) concerning accounts held by recalcitrant account holders;

d) deduct applicable U.S. withholding taxes from certain payments made to a shareholder by or on behalf of the Company in accordance with FATCA and the FATCA Law and the Luxembourg IGA; and

e) divulge any such personal information to any immediate payor of certain U.S. source income as may be required for withholding and reporting to occur with respect to the payment of such income.

The Company communicates to the investor that (i) the Company is responsible for the treatment of the personal data provided for in the FATCA Law; (ii) the personal data will only be used for the purposes of the FATCA Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*); (iv) responding to FATCA-related questions is mandatory and accordingly the potential consequences in case of no response; and (v) the investor has a right of access to and rectification of the data communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*).

The Company reserves the right to refuse any application for shares if the information provided by a potential investor does not satisfy the requirements under FATCA, the FATCA Law and the IGA.

Sub-Fund Classification under German Investment Tax Act (Investmentsteuergesetz or "InvStG")

Each Product Annex, where relevant, will contain the relevant Sub-Fund classification for the purpose of the German Investment Tax Act ("*Investmentsteuergesetz*" / "InvStG"): Equity Fund, Equity Fund of Fund, Mixed Fund or Mixed Fund of Fund.

In addition a Sub-Fund may have an additional target minimum percentage of its gross assets to be invested in equities. However, such target will not be categorized as an investment limit and it cannot be guaranteed that such target will always be achieved.

GENERAL INFORMATION ON THE COMPANY AND THE SHARES

I. The Shares

I.a: Rights attached to the Shares

The Shares do not carry any preferential or pre-emptive rights and each Share, irrespective of the Class of Shares or Sub-Fund to which it relates is entitled to one vote at all general meetings of Shareholders. The Shares are issued without par value and must be fully paid for. The Shares in relation to any Sub-Fund, within a given Class of Shares, are freely transferable (provided that the Shares are not transferred to a Prohibited Person). Upon issue, and subject to the Class they belong to, the Shares are entitled to participate equally in the profits and dividends of the Sub-Fund attributable to the relevant Class of Shares in which they have been issued as well as in the liquidation proceeds of such Sub-Fund.

No fraction of Shares will be issued.

The Management Company draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Company, notably the right to participate in general Shareholders' meetings if the investor is registered himself and in his own name in the Shareholders' register of the Company. Under the ICSD model, legal title to the Shares of the Company will be held by the Common Depositary Nominee. A purchaser of interests in the Shares concerned will not be a registered Shareholder in the Company, but will hold an indirect beneficial interest in such Shares and the rights of such investors shall be governed by their agreement with the relevant International Central Securities Depositary. If such investors are not Participants, then their rights will be governed by the direct or indirect arrangement with the relevant Participant of the International Central Securities Depositary (who may be their nominee, broker or Central Securities Depositaries, as the case may be). As a result: (i) it may not always be possible for an investor to exercise certain Shareholder rights directly against the Company; and (ii) investors' rights to indemnification in the event of Net Asset Value errors/non-compliance with the investment rules applicable to a Sub-Fund may be impacted and only exercisable indirectly. Investors are advised to seek advice on their rights.

I.b: Listing of the Shares

Application can be made to list the Shares of each Class of Shares of the Sub-Funds on (i) the Luxembourg Stock Exchange and/or (ii) the Frankfurt Stock Exchange and/or (iii) any other stock exchange. If the Board of Directors decides to create additional Sub-Funds or Classes it may in its discretion apply for the Shares of such Sub-Funds to be listed on the stock exchanges mentioned above. For so long as the Shares of any Sub-Fund are listed on any stock exchange, the Sub-Fund shall comply with the requirements of the relevant stock exchange relating to those Shares. For the purposes of compliance with the national laws and regulations concerning the offering and/or listing of the Shares outside Luxembourg this document may have attached to it one or more documents setting out information relevant for the jurisdictions in which the Shares are offered for subscription.

I.c: Dividend policy

Income and capital gains arising in each Sub-Fund in relation to Shares of "C" Classes will be reinvested in such Sub-Fund. The value of the Shares of each such Class will reflect the capitalisation of income and gains. The Board of Directors currently intends to propose to the annual general meeting of the Company the reinvestment of the net results of the year for all such Classes of Shares of Sub-Fund. However, should payment of a dividend in respect of any such Classes of Shares be considered to be appropriate the Board of Directors will propose to the general meeting of Shareholders that a dividend be declared out of any income attributable to such Class of Shares and available for distribution and/or realised investments.

For "D" Classes, the Company intends to declare dividends. Such dividends, if any, will be declared on the dates, which will be determined in the relevant Product Annex. In such a case, Shareholders will be informed in accordance with the procedure set out in section "Publication of the Net Asset Value" of the chapter "Administration of the Company" in the main part of the Prospectus. Dividends which should have been declared on a day which is not a Luxembourg Banking Day, will be accrued and declared on the next succeeding Luxembourg Banking Day. Dividends will be paid within the period disclosed in the dividend announcements.

In the event that a dividend is paid by one or several Sub-Funds, such dividend will be paid to the registered Shareholders by bank transfer. All dividends will be calculated and paid in accordance with the requirements of the Relevant Stock Exchange.

Distributions of dividends and other payments with respect to Shares held through settlement systems will be credited, to the extent received by the Depositary as depositary, to the cash accounts of such settlements systems' participants in accordance with the relevant system's rules and procedures. Any information to the investors will likewise be transmitted via the settlement systems.

II. The Company

II.a: Incorporation of the Company

The Company is an investment company that has been incorporated under the laws of the Grand Duchy of Luxembourg as a SICAV under the name "db x-trackers" on 2 October 2006 for an unlimited period. It changed its name to Xtrackers on 16 February 2018. The minimum capital required by Luxembourg law is Euro 1,250,000.

The Articles of Incorporation have been deposited with the Luxembourg Trade and Companies' Register *("**Registre de Commerce et des Sociétés de Luxembourg**")* and were published in the Mémorial of the Grand Duchy of Luxembourg (the "***Mémorial***") on 16 October 2006. The Articles of Incorporation were last amended by extraordinary shareholders' meeting on 6 May 2020 and the minutes of such meeting were published in the RESA on 11 May 2020. The Company is registered with the Luxembourg Trade and Companies' Register under number B-119 899.

II.b: Merger and division of Sub-Funds or Classes of Shares / Consolidation and split of Shares

Although it is not the intention of the Company to merge any of the Sub-Funds or Classes of Shares, any merger of a Sub-Fund with another Sub-Fund of the Company or with another UCITS (whether subject to Luxembourg law or not) shall be decided by the Board of Directors unless the Board of Directors decides to submit the merger decision to a meeting of Shareholders of the

Sub-Fund(s) concerned. In the latter case, no quorum is required for such meeting and the decision for such merger shall be taken by a simple majority of the votes cast. In the case of a merger of a Sub-Fund where, as a result, the Company ceases to exist, such merger shall, notwithstanding the foregoing, be decided by a meeting of Shareholders resolving in accordance with the quorum and majority requirements for the amendment of the Articles of Incorporation. Such decision will be notified to the relevant shareholders in accordance with the Regulations.

In the event that the Board of Directors determines that it is required for the interests of the Shareholders of the relevant Sub-Fund or Class of Shares or that a change in the economic, regulatory or political situation relating to the Sub-Fund or Class of Shares concerned has occurred which would justify it, the reorganisation of a Sub-Fund or Class of Shares, by means of a division into two or more Sub-Funds or Classes of Shares, may be decided by the Board of Directors. In case such a division of a Sub-Fund falls within the definition of a "merger" as provided for in the Law, the provisions relating to Sub-Fund mergers described above shall apply. In the event that a division of a Sub-Fund or Class of Shares is decided by the Board of Directors, notice shall be given to the Shareholders of the Sub-Fund or Class of Shares concerned at least 30 days before the division becomes effective in order to enable the Shareholders to request redemption or conversion of their Shares free of charge before the division into two or more Sub-Funds or Classes of Shares becomes effective.

For the same reasons as set forth in the previous paragraph, the Board of Directors may decide to split or consolidate the Shares of any Sub-Fund or Class of Shares. In this event, notice shall be given to the Shareholders of the Sub-Fund or Class of Shares concerned at least 30 days before the split or consolidation becomes effective in order to enable these Shareholders to request redemption or conversion of their Shares free of charge before the split or consolidation becomes effective.

The Board of Directors may decide to submit the division, consolidation or split decision to a meeting of Shareholders of the Sub-Fund or Class of Shares concerned, in which case no quorum is required for such meeting and the decision for such division, consolidation or split shall be taken by a simple majority of the votes cast.

II.c: Dissolution and Liquidation of the Company

The Company has been established for an unlimited period of time. However, the Company may be dissolved and liquidated at any time by a resolution of an extraordinary general meeting of Shareholders. Such a meeting must be convened if the Net Asset Value of the Company becomes less than two thirds of the minimum required by the Law.

In the event of dissolution, the liquidator(s) appointed by the Shareholders of the Company will realise the assets of the Company in the best interests of the Shareholders, and the Administrative Agent, upon instruction given by the liquidator(s), will distribute the net proceeds of liquidation (after deducting all liquidation expenses) among the Shareholders of each Class of Shares in proportion to their respective rights. As provided for by Luxembourg law, at the close of liquidation, the proceeds of liquidation corresponding to Shares not surrendered for repayment will be kept in safe custody at the "*Caisse de Consignation*". If not claimed, they shall be forfeited after 30 years. If an event requiring liquidation arises, issue, redemption, exchange or conversion of the Shares are void.

II.d: Termination of Sub-Funds

The Board of Directors may redeem all (but not some) of the outstanding Shares of a Sub-Fund or Class of Shares in the following circumstances:

- if, for any reason, the value of the total net assets of any individual Sub-Fund or Class falls below, at any time, the Minimum Net Asset Value;
- if a redemption request is received that would cause any Sub-Fund's or Classes assets to fall under the Minimum Net Asset Value;
- if a change in the economic, regulatory or political situation relating to the Sub-Fund or Class concerned would justify such liquidation;
- if the Board of Directors deems it appropriate to rationalize the Sub-Funds or Classes offered to Investors; and
- if for other reasons the Board of Directors believes it is required for the interests of the Shareholders,

which may include – but is not limited to – any of the following:

- in the case of a material decrease of the Net Asset Value of the relevant Sub-Fund or Class to the extent that there is no reasonable recovery forecast;
- in the case of (i) a change of tax, law or regulatory provisions or (ii) the promulgation of or any change in the interpretation by any court, tribunal or regulatory authority with competent jurisdiction of any applicable law or regulation (including any action taken by a taxing authority), that has an impact on the performance or the attractiveness for investment of the relevant Sub-Fund or Class;
- if Deutsche Bank AG, any of its affiliates, the Company, the Management Company or any Shareholder is exposed, for any reason, to a reputational risk in respect of the continuation of a Sub-Fund or Class, such as, but not limited to, a reputational risk in respect of using a particular service provider associated with such Sub-Fund or Class, to the extent that there is no reasonable satisfactory alternate to such service provider;
- if an entity providing such services in relation to a Sub-Fund or Class or its Reference Index:
  - (i) fails to perform its duties in a satisfactory manner;
  - (ii) is subject to criminal or regulatory sanctions or is subject to a criminal or regulatory investigation which could lead to criminal or regulatory sanctions;
  - (iii) loses any licence of authorisation necessary to perform its services in relation to such Sub-Fund or Class or Reference Index; or
  - (iv) notifies the termination of the relevant agreement;

to the extent that there is no reasonably satisfactory alternate to such service provider;

- the counterparty of swap agreements or options or other derivative instruments used in order to meet the Investment Objective and Policy of a Sub-Fund or Class is unable to, or it is impractical for such counterparty, after using commercially reasonable efforts, to acquire, establish, re-establish, substitute, maintain, unwind or dispose of any transaction or asset which such counterparty reasonably deems necessary or appropriate to hedge the risk relating to the relevant derivative instrument and there is no reasonably satisfactory alternate to such counterparty;
- if the counterparty of swap agreements or options or other derivative instruments used in order to meet the Investment Objective and Policy of the Sub-Fund or Class notifies the termination of the relevant agreement or in the occurrence of an early termination event (as defined in the relevant Product Annex) in relation to such derivative instrument and there is no reasonably satisfactory alternate to such derivative instrument; or
- in any circumstances listed under paragraph "Change of Reference Index" of Chapter "Investment Objectives and Policies".

A notice regarding the liquidation, to the extent required by Luxembourg laws and regulations or otherwise deemed appropriate by the Board of Directors, will be published in the newspaper(s) determined by the Board of Directors and/or on the Company's website www.Xtrackers.com and/or sent to the Shareholders and/or communicated via other means prior to the effective date of the liquidation.

Unless the Board of Directors otherwise decides in the interests of, or to keep equal treatment between the Shareholders, the Shareholders of the Sub-Fund or Class concerned may continue to request redemption or, if available, conversion of their Shares. However, the liquidation costs will be taken into account in the redemption and conversion price. If a Sub-Fund qualifies as Feeder UCITS of a Master UCITS, the liquidation or merger of such Master UCITS will trigger the liquidation of the Feeder UCITS, unless the Board of Directors decides, in accordance with the Law, to replace the Master UCITS with another Master UCITS or to convert the Feeder UCITS into a standard UCITS Sub-Fund.

In determining the procedure to be followed, the Company will take into due consideration the termination/delisting requirements provided for by any applicable stock exchange rules and/or regulations.

In addition, the general meeting of Shareholders of a Sub-Fund or of a (sub)-Class of Shares issued in any Sub-Fund may, upon proposal from the Board of Directors, resolve to close a Sub-Fund or a Class of Shares by way of liquidation or to redeem all the Shares relating to the relevant Sub-Fund or Class of Shares issued in a Sub-Fund and refund to the Shareholders the Net Asset Value of their Shares (taking into account actual realisation prices of investments and realisation expenses) calculated on the Valuation Day at which such decision shall take effect. There shall be no *quorum* requirements for such general meeting of Shareholders which shall decide by resolution taken by simple majority of those present or represented. For Sub-Funds for which no Maturity Date has been designated, the Board of Directors may in accordance with the provisions of the Articles of Incorporation in its discretion decide to close such a Sub-Fund and redeem all the Shares relating to such Sub-Fund and refund to the Shareholders the Net Asset Value of their Shares (taking into account actual realisation prices of investments and realisation expenses) calculated on the Valuation Day at which such decision shall take effect. The Shareholders of the relevant Sub-Fund will be notified in the same manner as described above.

All redeemed Shares shall be cancelled and will become null and void. Upon compulsory redemptions, the relevant Sub-Fund or Class of Shares will be closed.

Liquidation or redemption proceeds which may not be distributed to the relevant Shareholders upon termination will be deposited with the *Caisse de Consignation* on behalf of the persons entitled thereto. If not claimed, they shall be forfeited after 30 years in accordance with Luxembourg law.

II.e: General Meetings

The annual general meeting of Shareholders of the Company is held at the registered office of the Company or at such other place in the Grand Duchy of Luxembourg as may be specified in the convening notice, at a date and time decided by the Board of Directors being no later than six months after the end of the Company's previous financial year.

Shareholders of any Class of Shares or Sub-Fund may hold, at any time, general meetings to decide on any matters which relate exclusively to such Sub-Fund or to such Class of Shares.

Notices of general meetings will be sent by mail to all registered Shareholders at their registered address at least 8 calendar days prior to the meeting.

The convening notice may be sent to Shareholders by any other means of communication having been individually accepted by such Shareholder such as the email, the fax, the ordinary letter, the courier services or any other means satisfying the conditions provided for by the law. Any Shareholder having accepted email as an alternative means of convening shall provide his email address to the Company no later than fifteen (15) days before the date of the general meeting of Shareholders.

To the extent required by law, notices will also be published in the *Recueil Electronique des Sociétés et Associations* (Luxembourg) (the "RESA"), in a Luxembourg newspaper and/or such other newspapers as the Board of Directors may determine.

The notice will indicate the time and place of the meeting, the conditions of admission thereto, will contain the agenda and refer to the requirements of Luxembourg law with regard to the necessary *quorum* and majorities at the meeting.

The notice of any general meeting of Shareholders may provide that the quorum and the majority at this general meeting shall be determined according to the Shares issued and outstanding at a certain date and time preceding the general meeting (the "Record Date"), whereas the right of a Shareholder to attend a general meeting of Shareholders and to exercise the voting rights attached to his/its/her Shares shall be determined by reference to the Shares held by this Shareholder as at the Record Date.

II.f: Annual, Semi-Annual and Quarterly Reports

Audited Annual Reports, containing the audited consolidated financial reports of the Company and the Sub-Funds expressed in Euro in respect of the preceding financial period, will be made available at the registered office of the Company, of the Registrar and Transfer Agent and of the Distributors. In addition, Semi-annual Reports will also be made available at such registered office within two months after 30 June. The Company's financial year ends on 31 December. In addition Quarterly Reports will be made available if so provided in the relevant Product Annex.

The Company may make available to Shareholders and potential investors an abridged version of the financial reports referred to above, which shall not contain the detailed list of shareholdings held by each of the Sub-Funds. Such abridged annual reports and abridged semi-annual reports will contain the offer to provide to those persons upon request and free of charge a copy of the complete version of such documents.

II.g: Documents Available for Inspection

Copies of the following documents may be inspected free of charge during usual business hours on any Luxembourg Banking Day at the registered office of the Company, 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg:

(i) the Articles of Incorporation;

(ii) the Management Company Agreement;

(iii) the Investment Management Agreement(s);

(iv) the Sub-Portfolio Management Agreement(s);

(v) the Depositary Agreement;

(vi) Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement; and

(vii) the financial reports of the Company.

The Articles of Incorporation may be delivered to investors at their request.

II.h: Information available on the website

The following information may be inspected on the website of the Company www.Xtrackers.com:

(i) the Intra-Day Net Asset Value (the "iNAV"); and

(ii) portfolio information.

III. Personal Data

The Company may hold, store and process personal data in relation to investors, which may or may not be recorded in the register of Shareholders, and as such the Company may act as data controller.

Personal data will be processed to process, manage and administer investors' holding(s) and any related accounts, on an ongoing basis. This includes the assessment of investors' application, the management of investors' investment, maintaining the register of Shareholders, and the provision of associated services to investors (such as account statements or other communications relevant to investors' application or investment), directly or through the use of service providers.

Personal data is processed for the purposes above to the extent necessary to perform the Company's contractual obligations to investors.

The Company is subject to various Luxembourg and international legal and regulatory obligations or statutory requirements (e.g. Luxembourg company law, the Law, laws and regulations relating to anti-money laundering, tax laws) as well as supervisory requirements (e.g. of the Luxembourg *Commission de Surveillance du Secteur Financier*). The Company will process investors' personal data to the extent necessary to comply with its legal and regulatory obligations, including identity verification, prevention of fraud and money laundering, prevention and detection of crime and compliance with monitoring and reporting duties required by tax law such as reporting to the tax authorities under Foreign Account Tax Compliance Act (FATCA), the Common Reporting Standard (CRS) or any other tax identification legislation to prevent tax evasion and fraud as applicable.

The Company may be obliged to collect and report any relevant information in relation to investors and their investments (including but not limited to name and address, date of birth and U.S. tax identification number (TIN), account number, balance on account) to the Luxembourg tax authorities (*Administration des Contributions Directes*) which will exchange this information (including personal data, financial and tax data) on an automatic basis with the competent authorities in the United States or other permitted jurisdictions (including the U.S. Internal Revenue Service (IRS) or other US competent authority and foreign tax authorities located outside the European Economic Area) only for the purposes provided for in FATCA and CRS at OECD and European levels or equivalent Luxembourg legislation.

It is mandatory that investors answer questions and requests with respect to their identification and investment and, as applicable, FATCA and/or CRS. The Company reserves the right to reject any application for investment if investors do not provide the requested information and/or documentation and/or if investors do not comply with the applicable requirements. Investors acknowledge that failure to provide relevant information may result in incorrect or double reporting, prevent them from acquiring or maintaining their investment and may be reported by us to the relevant Luxembourg authorities.

The Company may also process investors' personal data in furtherance of our legitimate business interests, which include:

- Assertion of legal entitlements and defence in the event of legal disputes;
- Ensuring IT security and IT operations of the Company;
- Prevention of criminal acts;
- Measures for business control and the further development of products;
- Risk management.

The Company has published a notice regarding the collection, recording, adaptation, transfer and other processing and use of personal data by and on behalf of the Company acting as controller (the "**Privacy Notice**"), in accordance with the European Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or GDPR) and any other EU or national legislation which implements or supplements the foregoing.

Such Privacy Notice sets out the types of personal data that may be processed, to whom such personal data may relate and how it may be sourced, and the relevant parties who may process or receive such personal data and for what purposes, and otherwise explains certain policies and practices that have been put in place to ensure the privacy of such personal data.

The Privacy Notice further describes the rights of investors to request (i) the access to their personal data, (ii) the rectification and (iii) the erasure of their personal data, (iv) the restriction to the processing of their personal data, and (v) the transfer of their personal data to third parties, as well as the right of investors to lodge a complaint in terms of data protection related issues with the relevant supervisory authority, the right to withdraw their consent on the processing of personal data and the right to object the processing of their personal data.

Details of the up-to-date Privacy Notice are available under "Risks and Terms" or "Additional Information" on the website www.Xtrackers.com.

IV. Anti-money laundering and prevention of terrorist financing

Pursuant to international rules and Luxembourg laws and regulations comprising, but not limited to, the law of 12 November 2004 (as amended) on the fight against money laundering and terrorist financing, as amended, the Grand Ducal Regulation dated 1 February 2010, CSSF Regulation 12-02 of 14 December 2012 and CSSF Circulars 13/556 and 15/609 concerning the fight against money laundering and terrorist financing, and any respective amendments or replacement, obligations have been imposed on professionals of the financial sector to prevent the use of undertakings for collective investment such as the Company for money laundering and terrorist financing purposes ("**AML & KYC**").

As a result of such provisions, the registrar and transfer agent of a Luxembourg undertaking for collective investment shall ascertain the identity of the subscriber in accordance with Luxembourg laws and regulations. The Registrar and Transfer Agent may require applicants to provide any AML&KYC document it deems necessary to effect such identification. In addition, the Registrar and Transfer Agent, as delegate of the Company, may require any other information that the Company may require in order to comply with its legal and regulatory obligations, including but not limited to CRS Law.

In case of delay or failure by an applicant to provide the documents required, the application for subscription will not be accepted and in case of redemption, payment of redemption proceeds delayed. Neither the Company, the Management Company, nor the Registrar and Transfer Agent have any liability for delays or failure to process deals as a result of the applicant providing no or only incomplete documentation.

Shareholders may be requested to provide additional or updated identification documents from time to time pursuant to on-going client due diligence requirements under relevant laws and regulations.

The list of identification documents to be provided by each applicant to the Registrar and Transfer Agent will be based on the AML & KYC requirements as stipulated in the CSSF's circulars and regulations as amended from time to time. These requirements may be amended following any new Luxembourg regulations.

Applicants may be asked to produce additional documents for verification of their identity before acceptance of their applications. In case of refusal by the applicant to provide the documents required, the application will not be accepted.

Before redemption proceeds are released, the Registrar and Transfer Agent will require original documents or certified copies of original documents to comply with the Luxembourg regulations.

MANAGEMENT AND ADMINISTRATION OF THE COMPANY

The Board of Directors

According to the Articles of Incorporation, the Board of Directors is vested with the broadest powers to perform all acts of administration and disposition in the Company's interests. All powers not expressly reserved by law to the general meeting of Shareholders fall within the competence of the Board of Directors.

The Board of Directors of the Company hereinafter is responsible for the overall investment policy, objective, management and control of the Company and for its administration. The Board of Directors will in particular be responsible for the day-to-day discretionary management of the various Sub-Funds unless otherwise indicated in the relevant Product Annex. There are no existing or proposed service contracts between any of the Directors and the Company. None of the Directors has received any remuneration or other direct or indirect benefit material to him.

Philippe Ah-Sun (British): Mr Ah-Sun is the Head of Operational Strategy at DWS. Mr Ah-Sun has a degree in English literature from the University of East Anglia, and is a chartered accountant. Prior to joining Deutsche Bank, Mr Ah-Sun was part of a Graduate Program in finance with Dell Computer Corporation. In 2008 he took up a position in Product Control within Deutsche Bank's Corporate and Investment Bank, focusing on Delta One and ETF products. His scope broadened across a series of equity desks, culminating in a role as Finance Director for European Equity Trading. Between 2013 and 2019, Mr Ah-Sun was Chief Operating Officer - Xtrackers.

Alfred Francois Brausch (Luxembourgish): Mr Brausch is a member of the Luxembourg Bar. Mr Brausch has been a banking and securities law practitioner for many years. Mr Brausch served on several consultative committees of the European Commission, of the Luxembourg government and of the Luxembourg financial regulator. He has been a member of the board of directors and of the executive committee of the Luxembourg Investment Funds Association. Mr Brausch is an independent director. He serves on the boards of directors of several investment funds set-up and managed by prime investment fund houses and banks.

Thilo Wendenburg (German): Mr Wendenburg is the head of a Family Office in Frankfurt where he advises entrepreneurial families in all strategic financial questions. In addition, he is a member of the advisory board of a German family-run business, and since 2017 acts as independent director on the board of various SICAVs of DWS Investment S.A. in Luxembourg. Mr. Wendenburg started his career as a banker at "Deutsche Bank AG" in 1990, where he spent 19 years in various functions within Wealth Management in Germany, Hong Kong and Luxembourg. From 2009 until 2016, Mr. Wendenburg was the CEO of "Fürstlich Castell`sche Bank AG" in Wuerzburg and later of "Merck Finck Privatbankiers AG" in Munich.

Stefan Kreuzkamp (German): Mr Kreuzkamp joined the Deutsche Bank Group in 1998. Mr Kreuzkamp's last roles with DWS were Member of the Executive Board of DWS KGaA and Global Chief Investment Officer & Head of the Investment Division. At the same time he was also member of the Supervisory Board of DWS Investment S.A. Mr Kreuzkamp's earlier roles at DWS included Head of Portfolio Management Money Market Funds, Head of Fixed Income & Cash Portfolio Management and Chief Investment Officer EMEA for Active funds. Mr Kreuzkamp has also served as a member of various Boards of several entities in the DWS Group. Mr Kreuzkamp has a Master's degree in Business Administration from the University of Trier.

Simon Klein (German): Mr. Klein is the Global Head of Xtrackers Sales at DWS Group overseeing the distribution, marketing, and business development of the DWS Passive Asset Management franchise. Additionally, he is a member of the DWS Global Leadership Team and the Global Sustainability Committee. He took on this role in June 2020 having been an integral part of DWS since April 2013 functioning as Managing Director and Head of Passive Investments EMEA & Asia. Prior to joining DWS he worked in various positions within the banking sector including Deutsche Bank. Mr. Klein has a Business Administration Diploma from Friedrich-Alexander Universität Erlangen-Nürnberg and is a certified CIIA holder.

The Management Company

The Management Company has been appointed to act as the management company of the Company and is responsible for providing the investment management services, administration services and distribution and marketing services to the various Sub-Funds (unless otherwise indicated in the relevant Product Annex). The Management Company also exercises and coordinates the client communication function.

The Management Company has been established under the laws of the Grand Duchy of Luxembourg in the form of a "Société Anonyme" on 15 April 1987. The Management Company is registered with the Luxembourg Trade and Companies' Register under number B 25.754. The Management Company is authorised as a UCITS management company under Chapter 15 of the Law and as alternative investment fund manager under Chapter 2 of the AIFM Law.

The articles of incorporation of the Management Company have been lodged with the Luxembourg Trade and Companies' Register and have been published in the Mémorial on 4 May 1987. The articles of incorporation have been last amended by notarial deed on 14 February 2018 with effect from 16 February 2018. The revised articles of incorporation have been deposited with the Luxembourg Trade and Companies Register on or around February 2018.

The Management Company provides investment management services to other investment funds. Further information may be obtained upon request at the registered office of the Company.

The Management Company is part of the DWS Group.

The Management Company Agreement contains provisions indemnifying the Management Company against any liability other than due to its bad faith, fraud, negligence or wilful default.

With the approval of the Company, the Management Company may delegate, under its own supervision and responsibility and at its own expense, any or all of its advisory duties to advisers previously approved by the Company and by the regulatory authorities.

The Management Company Agreement entered into between the Company and the Management Company is for an undetermined duration and may be terminated at any time by either party upon 90 days' prior notice or unilaterally with immediate effect by the Company, in the case of negligence, wilful default, fraud or bad faith on the part of the Management Company or if the interests of Shareholders so require.

In accordance with and subject to the terms of the Management Company Agreement and under its own supervision, responsibility and expense, the Management Company is authorised to delegate its advisory duties and functions. Any such delegation is subject to the prior approval of the Company and, to the extent required by applicable law, any regulatory authorities.

The following functions have been delegated by the Management Company:

- Investment management services including compliance with the investment restrictions and certain risk management services of the Sub-Funds to the Investment Manager* and/or Sub-Portfolio Manager* specified in the relevant Product Annex;
- Provision of certain services as agreed from time to time, including but not limited to legal, regulatory and tax advice, relationship management, marketing, assistance in relation to structuring and restructuring and assistance in relation to the registrations of the Company to DWS Investments UK Limited*;
- Position reporting services to Deutsche Bank AG, acting through its London branch*;
- Currency hedging management services for Indirect Replication Funds, where the investment objective of the Currency Hedged Share Class is to track an unhedged index rather than a currency hedged index, to State Street Bank & Trust Company, London Branch;
- Administration, registrar and transfer agency services, accounting and valuations of the Sub-Funds to State Street Bank International GmbH, Luxembourg Branch;
- Payment of certain administrative expenses of the Sub-Funds to DWS Investments UK Limited* in consideration for a fixed fee;
- Data processing, including the recording of each portfolio transaction or subscription or redemption order to State Street Bank International GmbH, Luxembourg Branch;
- Securities lending agency services, either directly or via the relevant Investment Manager and/or Sub-Portfolio Manager, (including checking the eligibility and allocation of collateral) to:
    - Deutsche Bank AG, acting through its Frankfurt am Main head office*;
    - Deutsche Bank AG, acting through its New York branch*;
    - Deutsche Bank AG, acting through its London branch*.
- Checking of the total value and administration of posted collateral for OTC Swap Transactions for certain Sub-Funds to State Street Bank International GmbH, Zweigniederlassung Frankfurt with a sub-delegation of the performance of valuations, reporting, dispute reporting, interest calculations, failed trade reporting, data set ups, margin calls and transaction processing to State Street Corporate Service Mumbai Private Limited.

*These delegates (excluding Harvest Global Investments Limited) are DWS Affiliates. Please refer to "*Potential Conflicts of Interest*" under chapter "Risk Factors".

The Management Company is included in the compensation strategy of the DWS Group. All matters related to compensation as well as compliance with the regulatory requirements are monitored by the relevant committees of the DWS Group. The DWS Group employs a total compensation philosophy, which comprises fixed pay and variable compensation as well as deferred compensation components, which are linked to both individual future performance and the sustainable development of the DWS Group. To determine the amount of the deferred compensation and the instruments linked to long-term performance (such as equities or fund units), the DWS Group has defined a compensation system that avoids significant dependency on the variable compensation component. The compensation system is laid down in a policy, which, inter alia, fulfils the following requirements:

a) The compensation policy is consistent with and promotes sound and effective risk management and does not encourage excessive risk taking;

b) The compensation policy is in line with the business strategy, objectives, values and interests of the DWS Group (including the Management Company and the UCITS that it manages and of the investors in such UCITS), and includes measures to avoid conflicts of interest;

c) The assessment of performance is set in context of a multi-year framework; and

d) Fixed and variable components of total remuneration are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

Further details on the current compensation policy are published on the Internet under "Information and Policies" on www.dws.com/footer/legal-resources/ including a description of how remuneration and benefits are calculated. The Management Company shall provide this information free of charge in paper form upon request.

The Investment Managers and Sub-Portfolio Managers

The Investment Managers have been appointed to act as the investment manager of the Company by the Management Company pursuant to the Investment Management Agreements, which may be amended by mutual consent of the relevant parties from time to time. In investing the assets of the Sub-Funds for which they have been appointed as Investment Manager, each Investment Manager is obligated to comply at all times with (i) the Investment Policy, (ii) the Investment Restrictions and (iii) the terms of the relevant Investment Management Agreement.

An Investment Manager may, with the approval of the Management Company and the regulatory authorities but under its own supervision and responsibility, appoint a Sub-Portfolio Manager to provide certain portfolio management and risk management

services with respect to a Sub-Fund. Any of the entities mentioned under this section or any other entity may be appointed as a Sub-Portfolio Manager with respect to one or more Sub-Funds.

The Investment Managers and Sub-Portfolio Managers, details of which are set out below, have been appointed in respect of one or more Sub-Funds as specified below:

(i) Direct Replication Funds, Hybrid Replication Funds and Actively Managed Funds

Unless otherwise provided in the relevant Product Annex, the Management Company sub-delegates the day-to-day investment management with respect to Direct Replication Funds, Hybrid Replication Funds and Actively Managed Funds to DWS Investment GmbH.

The Investment Management Agreement entered into between the Management Company and DWS Investment GmbH is for an undetermined duration and may notably be terminated at any time by either party upon 90 days' prior notice or unilaterally with immediate effect by the Management Company at any time where the interests of Shareholders so require.

DWS Investment GmbH, was established in the Federal Republic of Germany as a private limited liability company (*Gesellschaft mit beschränkter Haftung*), having its registered office at Mainzer Landstraße 11-17, D-60329 Frankfurt am Main, Germany and is authorized and regulated by the Federal Financial Supervisory Authority in Germany (*Bundesanstalt für Finanzdienstleistungsaufsicht* – BaFin).

DWS Investment GmbH may, from time to time, and in accordance with an agreed process, delegate all or part of its investment management responsibilities with respect to one or more Direct Replication Funds or Hybrid Replication Funds to DWS Investments UK Limited and/or DWS Investments Hong Kong Limited (each a "**Sub-Portfolio Manager**").

(ii) Indirect Replication Funds

Unless otherwise provided in the relevant Product Annex, the Management Company sub-delegates the day-to-day investment management with respect to Indirect Replication Funds to DWS Investments UK Limited.

The Investment Management Agreement entered into between the Management Company and DWS Investments UK Limited is for an undetermined duration and may notably be terminated at any time by either party upon 90 days' prior notice or unilaterally with immediate effect by the Management Company at any time where the interests of Shareholders so require.

DWS Investments UK Limited is a limited liability company incorporated under the laws of England and Wales on 16 September 2004 and having its registered office at 21 Moorfields, London, EC2Y 9DB. It is authorised and regulated by the Financial Conduct Authority.

(iii) Harvest Sub-Funds

The Management Company has sub-delegated the day-to-day investment management of certain Sub-Funds to Harvest Global Investments Limited as and if specifically provided in the relevant Product Annex.

Harvest Global Investments Limited was established in Hong Kong and holds licenses from the SFC in Hong Kong to conduct Type 1 (dealing in securities), Type 4 (advising on securities) and Type 9 (asset management) regulated activities.

The Investment Management Agreement entered into between the Management Company and Harvest Global Investments Limited is for an undetermined duration. The appointment of the Investment Manager may be terminated in accordance with the terms of the Investment Management Agreement.

The Investment Management Agreement may be terminated by either party, without cause (except within the first six years from the Investment Management Agreement becoming effective) upon three (3) months' prior notice. It may also be terminated unilaterally by the Management Company with immediate effect inter alia if (i) the Investment Manager is in breach of any of its obligations and, if the breach is capable of remedy, it has continued un-remedied for a period of 20 days after notification given to the Investment Manager, (ii) if the Investment Manager breaches the eligibility requirements applicable to investments and does not immediately rectify the breach, and (iii) if the Management Company determines such termination would be in the best interests of the Shareholders of the Sub-Fund concerned.

Investors should be aware that upon the Investment Manager ceasing actively to manage a Sub-Fund, such Sub-Fund will remain exposed to the performance of the investment portfolio of the Sub-Fund but, will not have the benefit of the management expertise of the Investment Manager and no further trades requests may be made in respect of the relevant Sub-Fund's portfolio and the Board of Directors may decide in their sole and absolute discretion to terminate the Sub-Fund concerned.

The Investment Manager shall indemnify the Management Company and the relevant Sub-Fund in respect of which it has been appointed as Investment Manager against all direct loss, including any loss resulting from a breach of the Investment Restrictions and/or costs incurred by the Management Company and the Sub-Fund concerned in correcting such breach, as well as against any damage suffered by the Management Company or the Sub-Fund concerned arising directly out of any failure by the Investment Manager properly to perform and fulfil its obligations under the Investment Management Agreement, provided that the Investment Manager (or any of it directors, employees or agents) shall not in the absence of negligence, bad faith, or wilful default or fraud be responsible for any loss or damage which the Management Company or the relevant Sub-Fund may sustain or suffer as a result of, or in the course of the discharge of its duties under the Investment Management Agreement.

The Management Company shall indemnify the Investment Manager against all direct loss and damage suffered by the Investment Manager in respect of the Investment Manager's performance of its duties, except to the extent that the loss or damage arises, wholly or partially, due to the negligence, bad faith, wilful default or fraud on the part of the Investment Manager or its directors, employees or agents.

Neither the Investment Manger nor the Management Company is liable for any consequential, incidental, indirect or similar loss or damage.

Best Execution Agent

DWS Investments UK Limited has appointed DWS International GmbH to provide best execution services in respect to Indirect Replication Funds Funds and Hybrid Replication Funds.

Other Agents

Any Investment Manager and/or Sub-Portfolio Manager may at its own costs and expenses obtain administrative and operational support services from agents (including DWS Affiliates) with respect to the Sub-Funds for which it has been appointed as Investment Manager or Sub-Portfolio Manager.

The Swap Counterparties

Each Swap Counterparty must be an approved counterparty in relation to OTC derivatives for a UCITS and be subject to prudential supervision rules and specialised in this type of transactions. The Company and the Management Company will seek to appoint First Class Institutions as Swap Counterparties that have been subject to an approval process, approved in relation to OTC derivatives for a UCITS, subject to prudential supervision rules and specialised in this type of transaction. Swap Counterparties are regulated financial institutions headquartered in OECD Member States which have, either directly or at parent-level, an investment grade credit rating from a credit rating agency and which comply with Article 3 of the SFTR Regulation. The Management Company must be satisfied that the Swap Counterparty does not carry undue credit risk, will value the transactions with reasonable accuracy and on a reliable basis and will close out the transactions at any time at the request of the Management Company, the relevant Investment Manager and/or Sub-Portfolio Manager at fair value.

Indirect Replication Funds and Hybrid Replication Funds may enter into OTC Swap Transactions with one or more Swap Counterparties. The Swap Counterparties to each Indirect Replication Fund and Hybrid Replication Fund may vary from time to time. Information in relation to the Swap Counterparties may be obtained by investors at the registered office of the Company, which is located at, 49, avenue J.F. Kennedy, L-1855 Luxembourg and will be disclosed in the Annual and Semi-annual Reports of the Company. The list of the Swap Counterparties is available on the website www.Xtrackers.com.

The Depositary

The Depositary has been appointed by the Board of Directors to act as the depositary bank for (i) the safekeeping of the Company's assets (ii) the cash monitoring, (iii) the oversight functions and (iv) such other services as agreed from time to time and reflected in the Depositary Agreement, which may be amended by mutual consent of the parties. The Depositary has been appointed for an undetermined duration.

The Depositary is State Street Bank International GmbH, Luxembourg Branch, State Street Bank International GmbH is a limited liability company organised under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. It is a credit institution supervised by the European Central Bank, the Federal Financial Supervisory Authority in Germany (*Bundesanstalt für Finanzdienstleistungsaufsicht* – BaFin) and the *Deutsche Bundesbank* in Germany. State Street Bank International GmbH, Luxembourg Branch is authorised by the CSSF in Luxembourg to act as depositary and is specialised in depositary, fund administration, and related services. State Street Bank International GmbH, Luxembourg Branch is registered in the Luxembourg Commercial and Companies' Register under number B 148 186. State Street Bank International GmbH is a member of the State Street group of companies having as their ultimate parent State Street Corporation, a US publicly listed company. The registered office of the Depositary is located at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

Depositary's functions

The Depositary is entrusted with the safekeeping of the Company's assets including the safekeeping of financial instruments to be held in custody and ownership verification and record keeping in relation to other assets. For the financial instruments which can be held in custody, they may be held either directly by the Depositary or, to the extent permitted by applicable laws and regulations, through other credit institutions or financial intermediaries acting as its correspondents, sub-custodians, nominees, agents or delegates. The Depositary also ensures that the Company's cash flows are properly monitored, and in particular that the subscription monies have been received and all cash of the Company has been booked in the cash account in the name of (i) the Company, (ii) the Management Company on behalf of the Company or (iii) the Depositary on behalf of the Company.

The Depositary has also been entrusted with following functions:

- ensuring that the sale, issue, repurchase, redemption and cancellation of Shares are carried out in accordance with the Law and the Articles of Incorporation;
- ensuring that the value of the Shares is calculated in accordance with the Law and Articles of Incorporation;
- carrying out the instructions of the Company unless they conflict with the Law and the Articles of Incorporation;
- ensuring that in transactions involving the assets of the Company any consideration is remitted within the usual time limits; and
- ensuring that the income of the Company is applied in accordance with the Law and Articles of Incorporation.

The Depositary regularly provides the Company and its Management Company with a complete inventory of all assets of the Company.

Depositary's liability

In carrying out its duties, the Depositary shall act honestly, fairly, professionally, independently and solely in the interests of the Company and its Shareholder.

In the event of a loss of financial instruments held in custody, determined in accordance with the UCITS Directive and related regulations, and in particular Article 18 of the Commission Delegated Regulation (EU) 2016/438, the Depositary shall return financial instruments of identical type or the corresponding amount to the Company without undue delay.

The Depositary shall not be liable if it can prove that the loss of a financial instrument held in custody has arisen as a result of an external event beyond its reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary pursuant to the UCITS Directive.

In case of a loss of financial instruments held in custody, the Shareholders may invoke the liability of the Depositary directly or indirectly through the Company or the Management Company provided that this does not lead to a duplication of redress or to unequal treatment of the Shareholders.

The Depositary will be liable to the Company for all other losses suffered by it as a result of the Depositary's negligent or intentional failure to properly fulfil its obligations pursuant to the UCITS Directive.

The Depositary shall not be liable for consequential or indirect or special damages or losses, arising out of or in connection with the performance or non-performance by the Depositary of its duties and obligations.

Delegation

The Depositary has full power to delegate the whole or any part of its safe-keeping functions but its liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping. The Depositary's liability shall not be affected by any delegation of its safe-keeping functions under the Depositary Agreement.

The Depositary has delegated those safekeeping duties set out in Article 22 (5) (a) of the UCITS Directive to State Street Bank and Trust Company with registered office at John Adams Building, 1776 Heritage Drive, North Quincy, Massachusetts 02171, USA, whom it has appointed as its global sub-custodian. State Street Bank and Trust Company as global sub-custodian has appointed local sub-custodians within the State Street Global Custody Network.

Information about the safekeeping functions which have been delegated and the up-to-date list of the relevant delegates and sub-delegates of the Depositary is available to investors upon request at the registered office of the Company and on the website http://www.statestreet.com/about/office-locations/luxembourg/subcustodians.html.

Conflicts of Interest

The Depositary is part of an international group of companies and businesses that, in the ordinary course of their business, act simultaneously for a large number of clients, as well as for their own account, which may result in actual or potential conflicts. Conflicts of interest arise where the Depositary or its affiliates engage in activities under the Depositary Agreement or under separate contractual or other arrangements. Such activities may include:

(i) providing nominee, administration, registrar and transfer agency, research, agent securities lending, investment management, financial advice and/or other advisory services to the Company;

(ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Company either as principal and in the interests of itself, or for other clients.

In connection with the above activities the Depositary or its affiliates:

(i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and are not bound to disclose to the Company the nature or amount of any such profits or compensation including any fee, charge, commission, revenue share, spread, mark-up, mark-down, interest, rebate, discount, or other benefit received in connection with any such activities;

(ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;

(iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Company;

(iv) may provide the same or similar services to other clients including competitors of the Company;

(v) may be granted creditors' rights by the Company which it may exercise.

The Company may use an affiliate of the Depositary to execute foreign exchange, spot or swap transactions for the account of the Company. In such instances the affiliate shall be acting in a principal capacity and not as a broker, agent or fiduciary of the Company. The affiliate will seek to profit from these transactions and is entitled to retain and not disclose any profit to the Company. The affiliate shall enter into such transactions on the terms and conditions agreed with the Company.

Where cash belonging to the Company is deposited with an affiliate being a bank, a potential conflict arises in relation to the interest (if any) which the affiliate may pay or charge to such account and the fees or other benefits which may derive from holding such cash as banker and not as trustee.

An Investment Manager or the Management Company may also be a client or counterparty of the Depositary or its affiliates.

Potential conflicts that may arise in the Depositary's use of sub-custodians include four broad categories:

(i) conflicts from sub-custodian selection and asset allocation among multiple sub-custodians influenced by (a) cost factors, including lowest fees charged, fee rebates or similar incentives and (b) broad two-way commercial relationships in which the Depositary may act based on the economic value of the broader relationship, in addition to objective evaluation criteria;

(ii) sub-custodians, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests;

(iii) sub-custodians, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depositary as its counterparty, which might create incentive for the Depositary to act in its self-interest, or other clients' interests to the detriment of clients; and

(iv) sub-custodians may have market-based creditors' rights against client assets that they have an interest in enforcing if not paid for securities transactions.

The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the depository issues to be properly identified, managed and monitored. Additionally, in the context of the Depositary's use of sub-custodians, the Depositary imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-custodians to ensure a high level of client service by those agents. The Depositary further provides frequent reporting on clients' activity and holdings, with the underlying functions subject to internal and external control audits. Finally, the Depositary internally separates the performance of its custodial tasks from its proprietary activity and follows a standard of conduct that requires employees to act ethically, fairly and transparently with clients.

Up-to-date information on the Depositary, its duties, any conflicts that may arise, the safe-keeping functions delegated by the depositary, the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation will be made available to shareholders on request.

Miscellaneous

Under the Depositary Agreement, the Depositary or the Company may at any time, subject to advance notice of at least ninety (90) days' from one party to the other, terminate the Depositary's duties, it being understood that the Company is under a duty to appoint a new depositary who shall assume the functions and responsibilities defined by the Law. In case of termination by the Depositary, the Company is required to use its best endeavours to appoint a new depositary which will assume the responsibilities and functions of the Depositary as set forth herein.

The Depositary may not be removed by the Company unless a new depositary is appointed within two months and the duties of the Depositary shall continue after its removal for such period as may be necessary to allow the transfer of all assets of the Company to the succeeding depositary.

Any legal disputes arising among or between the Shareholders, the Company and the Depositary shall be subject to the jurisdiction of the competent court in Luxembourg, provided that the Company may submit itself to the competent courts of such countries where required by regulations for the registration of Shares for offer and sale to the public with respect to matters relating to subscription and redemption, or other claims related to their holding by residents in such country or which have evidently been solicited from such country. Claims of Shareholders against the Company or the Depositary shall lapse 5 years after the date of the event giving rise to such claims (except that claims by Shareholders on the proceeds of liquidation to which they are entitled shall lapse only 30 years after these shall have been deposited at the *Caisse de Consignation* in Luxembourg).

Up-to-date information on the Depositary, and a description of its duties, any conflicts that may arise, the safekeeping functions delegated by the Depositary, as well as the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation will be made available to Shareholders on request.

The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the Depositary issues to be properly identified, managed and monitored.

The Administrative Agent, Paying Agent, Domiciliary Agent and Listing Agent

The Administrative Agent has been appointed as the Company's administration agent, paying agent, domiciliary agent and listing agent pursuant to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement.

The relationship between the Company, the Management Company and the Administrative Agent is subject to the terms of the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement. Under the terms of the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement, the Administrative Agent will carry out all general administrative duties related to the administration of the Company required by Luxembourg law, calculate the Net Asset Values, maintain the accounting records of the Company, as well as process all subscriptions, redemptions, and transfers of Shares, and register these transactions in the register of shareholders. In addition, as registrar and transfer agent of the Company, the Administrative Agent is also responsible for collecting the required information and performing verifications on investors to comply with applicable anti-money laundering rules and regulations.

The Administrative Agent is authorised to delegate under its full responsibility some or all of its duties hereunder to an agent or agents, to the extent required, upon clearance from the CSSF, in which case the Prospectus shall be updated.

The Administrative Agent is not responsible for any investment decisions of the Company or the effect of such investment decisions on the performance of the Company.

The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement contains provisions indemnifying the Administrative Agent against any liability other than due to its negligence, bad faith, fraud or wilful misconduct.

The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement has no fixed duration and each party may, in principle, terminate the agreement on not less than 90 days' prior written notice. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement may also be terminated on shorter notice in certain circumstances, for instance where one party commits a material breach of a material clause of the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement may be terminated by the Management Company with immediate effect if this is deemed by the Management Company to be in the interest of the investors. The Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement contains provisions exempting the Administrative Agent from liability and indemnifying the Administrative Agent in certain circumstances. However, the liability of the Administrative Agent towards the Management Company and the Company will not be affected by any delegation of functions by the Administrative Agent.

The Administrative Agent is State Street Bank International GmbH, Luxembourg Branch. State Street Bank International GmbH is a limited liability company organised under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. The registered office of the Administrative Agent is located at 49, avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg.

The Registrar, Transfer Agent and Listing Agent

Pursuant to the Administration Agency, Domiciliary and Corporate Agency, Paying Agency, Registrar, Transfer Agency and Listing Agency Agreement, the Company has appointed State Street Bank International GmbH, Luxembourg Branch in Luxembourg as its registrar, transfer agent and listing agent to administer the issue, conversion and redemption of Shares, the maintenance of records and other related administrative functions.

The Registrar and Transfer Agent is entrusted moreover by the Company with the duty to:

- deliver to investors, if requested, the certificates representing Shares or written confirmations issued against payment of the corresponding asset value; and
- receive and carry out redemption and conversion requests complying with the Articles of Incorporation and cancel certificates or written confirmations issued in lieu of certificates in respect of Shares redeemed or converted.

PRODUCT ANNEX 40: Xtrackers Vietnam Swap UCITS ETF

The information contained in this Product Annex relates to Xtrackers Vietnam Swap UCITS ETF (the "**Sub-Fund**") and forms an integral part of the Prospectus. The Prospectus (which includes this Product Annex) constitutes the terms and conditions of the Sub-Fund.

GENERAL INFORMATION	
Investment Objective	The aim is for your investment to reflect the performance of the STOXX Vietnam Total Market Liquid Index (the " **Reference Index**") which is designed to reflect the performance of the Vietnamese stock market while controlling for liquidity and foreign ownership availability. Further information on the Reference Index is contained under "General Description of the Reference Index".
Investment Policy	The Sub-Fund is passively managed in accordance with an Indirect Investment Policy (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus). To achieve the aim, the Sub-Fund may: - enter into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "**Funded Swap**"); and/or - invest in transferable securities and enter into derivative(s) with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "**Unfunded Swap**"). The Sub-Fund may, with due regard to the best interest of its Shareholders, decide from time to time to switch partially or totally from a Funded Swap to an Unfunded Swap and vice versa, in which case a) the cost of such a switch (if any) will not be borne by the Shareholders; and b) not less than 2 weeks prior notice will be given to Shareholders before the change becomes effective through the website www.Xtrackers.com or any successor thereto.
Specific Investment Restrictions	The Sub-Fund will not invest more than 10 percent. of its assets in units or shares of other UCITS or other UCIs in order to be eligible for investment by UCITS governed by the UCITS Directive. Because the market which the Reference Index seeks to represent is concentrated on a particular country, there are fewer potential constituents than might be the case in an index with a broader universe of potential constituents. As a result of this, and further to the section "Use of increased diversification limits" under "Investment Objectives and Policies" in the main part of the Prospectus, the Sub-Fund may make use of the increased diversification limits under the Law. Further information relevant to the Sub-Fund's Investment Policy is contained in the main part of the Prospectus under chapter "Investment Objectives and Policies" and under "Investment Restrictions".
Fund Classification (InvStG)	Equity Fund, target minimum percentage of 60%[125]
Distribution Policy	The Sub-Fund does not intend to make dividend payments.
Profile of Typical Investor	An investment in the Sub-Fund is suitable for investors who are able and willing to invest in a sub-fund with a high risk grading as further described in the main part of the Prospectus under "Typology of Risk Profiles".
Specific Risk Warning	The specific risk factor(s) should be read in addition to and in conjunction with the section Risk Factors as set out in the main part of the Prospectus. *No Guarantee* Investors should note that the Sub-Fund is not capital protected or guaranteed and that the capital invested or its respective amount are not protected or guaranteed and investors in this Sub-Fund should be prepared and able to sustain losses up to the total capital invested. Investors will also bear some other risks as described in the main part of the Prospectus under the section "Risk Factors".

[125] Please see Sub-Fund Classification under German Investment Tax Act (Investmentsteuergesetz or "InvStG") in "General Taxation" for further information.

	Concentration of the Reference Index The Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the Net Asset Value of the Sub-Fund. *Frontier Markets* Investors in the Sub-Fund should be aware of the following risks associated with an investment in frontier markets: (a) *Frontier Market Risk*: Investments in the market to which the Reference Index relates are currently exposed to risks pertaining to frontier markets generally. These include risks brought about by investment ceiling limits where foreign investors are subject to certain holding limits and constraints imposed on trading of listed securities where a registered foreign investor may only maintain a trading account with one licensed securities company in the relevant market. These may contribute to the illiquidity of the relevant securities market, as well as create inflexibility and uncertainty as to the trading environment. (b) *Legal Risk*: The economies of most frontier markets are often substantially less developed than those of other geographic regions such as the United States and Europe. The laws and regulations affecting these economies are also in a relatively early stage of development and are not as well established as the laws and regulations of developed countries. Such countries' securities laws and regulations may still be in their development stages and not drafted in a very concise manner which may be subject to interpretation. In the event of a securities related dispute involving a foreign party, the laws of these countries would typically apply (unless an applicable international treaty provides otherwise). The court systems of these nations are not as transparent and effective as court systems in more developed countries or territories and there can be no assurance of obtaining effective enforcement of rights through legal proceedings and generally the judgements of foreign courts are often not recognised. (c) *Regulatory Risk:* Foreign investment in frontier economies' primary and secondary securities markets is often still relatively new and much of the relevant securities laws may be ambiguous and/or have been developed to regulate direct investment by foreigners rather than portfolio investment. Investors should note that because of a lack of precedent, securities market laws and the regulatory environment for primary and secondary market investments by foreign investors can be in the early stages of development, and may, in some jurisdictions, remain untested. The regulatory framework of the frontier economies' primary and secondary securities markets is often in the development stage compared to many of the world's leading stock markets, and accordingly there may be a lower level of regulatory monitoring of the activities of the frontier economies' primary and secondary securities markets. (d) *Foreign Exchange Risk*: Some currencies of frontier markets are controlled. Investors should note the risks of limited liquidity in certain foreign exchange markets. (e) *Trading Volumes and Volatility*: Often frontier market stock exchanges are smaller and have lower trading volumes and shorter trading hours than most OECD exchanges and the market capitalisations of listed companies are small compared to those on more developed exchanges in developed markets. The listed equity securities of many companies on such exchanges are accordingly materially less liquid, subject to greater dealer spreads and experience materially greater volatility than those of OECD countries. Many such exchanges have, in the past, experienced substantial price volatility and no assurance can be given that such volatility will not occur in the future. The above factors could negatively affect the Net Asset Value of the Sub-Fund.
Minimum Net Asset Value	USD 50,000,000
Reference Currency	USD
Launch Date	15 January 2008
Significant Market	Indirect Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
OTC Swap Transaction Costs	Situation 1
Securities Lending	N/A

Description of Share Classes	
Classes	**"1C"**
ISIN Code	LU0322252924
WKN Code	DBX1AG
Denomination Currency	USD
Fixed Fee	0.016667% *per* month (0.20% p.a.)
Management Company Fee[126]	Up to 0.65% p.a.
All-In Fee	Up to 0.85% p.a.
Minimum Initial Subscription Amount	USD 100,000
Minimum Subsequent Subscription Amount	USD 100,000
Primary Market Transaction Costs	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it.
Dividend	N/A
Anticipated level of Tracking Error [127]	Up to 2%

[126] The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Class.

[127] During the Transition Period, the Sub-Fund may temporarily experience a higher than anticipated Tracking Error.

General Description of the Reference Index[128]

The Reference Index is based on the STOXX Vietnam Total Market Index (the "**Parent Index**"), which is administered by STOXX Ltd. (the "**Index Administrator**"). The Parent Index aims to represent the Vietnamese listed equity market, covering approximately 95 percent. of the free float market capitalisation of public companies listed and incorporated in Vietnam, identified according to the Index Administrator's country assignment framework. For details on the framework, please refer to the index methodology guide on www.stoxx.com.

The Reference Index excludes companies from the Parent Index which do not fulfil specific liquidity criteria, including but not limited to, minimum thresholds in relation to market capitalisation, average daily traded value (ADTV), foreign ownership availability (FOA), and annualised turnover ratio (the median value of the daily traded volume to free-float shares ratio over a specific period, the "**Annualised Turnover Ratio**").

The securities remaining following the exclusion criteria above are ranked by their Annualised Turnover Ratio. The weight of the highest ranked securities above certain thresholds is scaled by a factor of 2. Securities in the Reference Index are subject to a capping of 15%.

The Reference Index is reviewed and rebalanced on a semi-annual basis.

If during the semi-annual rebalancing, the number of Reference Index constituents falls by more than a certain threshold, the ADTV criteria are incrementally relaxed until such threshold is reached.

The Reference Index is a gross total return index. A gross total return index calculates the performance of the stocks assuming that all dividends and distributions are reinvested on a gross basis.

The Reference Index is calculated in USD on a daily basis.

The Reference Index has a base date of 18 March 2013.

[128] *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 in the website identified below. Such information may change from time to time and details of the changes will appear on that website.*

Shareholders' attention is drawn to the fact that the Index Administrator may make changes to the Reference Index description with a view to dealing with technical adjustments necessary for the good maintenance of the Reference Index. To the extent that those changes do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com. The Shareholders are consequently invited to consult the above stated website of the Index Administrator on a regular basis.

PRODUCT ANNEX 56: Xtrackers MSCI Indonesia Swap UCITS ETF

The information contained in this Product Annex relates to Xtrackers MSCI Indonesia Swap UCITS ETF (the "**Sub-Fund**") and forms an integral part of the Prospectus. The Prospectus (which includes this Product Annex) constitutes the terms and conditions of the Sub-Fund.

GENERAL INFORMATION	
Investment Objective	The aim is for your investment to reflect the performance of the MSCI Indonesia TRN Index (the **"Reference Index"**) which is designed to reflect the performance of the shares of certain companies in Indonesia. Further information on the Reference Index is contained under "General Description of the Reference Index".
Investment Policy	The Sub-Fund is passively managed in accordance with an Indirect Investment Policy (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus). To achieve the aim, the Sub-Fund may: - enter into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "**Funded Swap**"); and/or - invest in transferable securities and enter into derivative(s) with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "**Unfunded Swap**"). The Sub-Fund may, with due regard to the best interest of its Shareholders, decide from time to time to switch partially or totally from a Funded Swap to an Unfunded Swap and vice versa, in which case a) the cost of such a switch (if any) will not be borne by the Shareholders; and b) not less than 2 weeks prior notice will be given to Shareholders before the change becomes effective through the website www.Xtrackers.com or any successor thereto.
Specific Investment Restrictions	The Sub-Fund will not invest more than 10 percent. of its assets in units or shares of other UCITS or other UCIs in order to be eligible for investment by UCITS governed by the UCITS Directive. Further information relevant to the Sub-Fund's Investment Policy is contained in the main part of the Prospectus under chapter "Investment Objectives and Policies" and under "Investment Restrictions".
Fund Classification (InvStG)	Equity Fund, target minimum percentage of 80%
Distribution Policy	The Sub-Fund does not intend to make dividend payments.
Profile of Typical Investor	An investment in the Sub-Fund is suitable for investors who are able and willing to invest in a sub-fund with a high risk grading as further described in the main part of the Prospectus under "Typology of Risk Profiles".
Specific Risk Warning	The specific risk factor(s) should be read in addition to and in conjunction with the section Risk Factors as set out in the main part of the Prospectus. *No Guarantee* Investors should note that the Sub-Fund is not capital protected or guaranteed and that the capital invested or its respective amount are not protected or guaranteed and investors in this Sub-Fund should be prepared and able to sustain losses up to the total capital invested. Investors will also bear some other risks as described in the main part of the Prospectus under the section "Risk Factors". *Concentration of the Reference Index* The Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the Net Asset Value of the Sub-Fund. *Emerging Markets* Investors in the Sub-Fund should be aware of the following risks associated with an investment in emerging markets: (a) *Emerging Market Risk*: Investments in the market to which the Reference Index relates are currently exposed to risks pertaining to emerging markets generally. These include risks brought about by investment ceiling limits where foreign investors are subject to certain holding limits and constraints imposed on trading of listed securities where a registered foreign investor may only maintain a trading account with one licensed

	securities company in the relevant market. These may contribute to the illiquidity of the relevant securities market, as well as create inflexibility and uncertainty as to the trading environment. (b) *Legal Risk*: The economies of most emerging markets are often substantially less developed than those of other geographic regions such as the United States and Europe. The laws and regulations affecting these economies are also in a relatively early stage of development and are not as well established as the laws and regulations of developed countries. Such countries' securities laws and regulations may still be in their development stages and not drafted in a very concise manner which may be subject to interpretation. In the event of a securities related dispute involving a foreign party, the laws of these countries would typically apply (unless an applicable international treaty provides otherwise). The court systems of these nations are not as transparent and effective as court systems in more developed countries or territories and there can be no assurance of obtaining effective enforcement of rights through legal proceedings and generally the judgements of foreign courts are often not recognised. (c) *Regulatory Risk:* Foreign investment in emerging economies' primary and secondary securities markets is often still relatively new and much of the relevant securities laws may be ambiguous and/or have been developed to regulate direct investment by foreigners rather than portfolio investment. Investors should note that because of a lack of precedent, securities market laws and the regulatory environment for primary and secondary market investments by foreign investors can be in the early stages of development, and may, in some jurisdictions, remain untested. The regulatory framework of the emerging economies' primary and secondary securities markets is often in the development stage compared to many of the world's leading stock markets, and accordingly there may be a lower level of regulatory monitoring of the activities of the emerging economies' primary and secondary securities markets. (d) *Foreign Exchange Risk*: Some currencies of emerging markets are controlled. Investors should note the risks of limited liquidity in certain foreign exchange markets. (e) *Trading Volumes and Volatility*: Often emerging market stock exchanges are smaller and have lower trading volumes and shorter trading hours than most OECD exchanges and the market capitalisations of listed companies are small compared to those on more developed exchanges in developed markets. The listed equity securities of many companies on such exchanges are accordingly materially less liquid, subject to greater dealer spreads and experience materially greater volatility than those of OECD countries. Many such exchanges have, in the past, experienced substantial price volatility and no assurance can be given that such volatility will not occur in the future. The above factors could negatively affect the Net Asset Value of the Sub-Fund.
Minimum Net Asset Value	USD 50,000,000
Reference Currency	USD
Launch Date	Means for Share Class 1C 2 March 2010.
Significant Market	Indirect Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
OTC Swap Transaction Costs	Situation 1
Securities Lending	N/A

Description of Share Classes	
Classes	**"1C"**
ISIN Code	LU0476289623
WKN Code	DBX0EU
Denomination Currency	USD
Fixed Fee	0.016667% *per* month (0.20% p.a.)
Management Company Fee[171]	Up to 0.45% p.a.
All-In Fee	Up to 0.65% p.a.
Minimum Initial Subscription Amount	USD 100,000
Minimum Subsequent Subscription Amount	USD 100,000
Primary Market Transaction Costs	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it.
Dividend	N/A
Anticipated level of Tracking Error	Up to 2%

[171] The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Class.

General Description of the Reference Index[172]

The Reference Index is administered by MSCI Inc. and its subsidiaries (which include MSCI Limited).

The Reference Index is a free float-adjusted market capitalisation weighted index reflecting the performance of listed equity securities of large and mid-capitalisation companies of Indonesia.

The Reference Index is calculated in U.S. Dollars on an end of day basis.

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 after the deduction of any taxes that may apply.

The Reference Index is reviewed and rebalanced on a quarterly basis and may also be rebalanced at other times in order to reflect corporate activity such as mergers and acquisitions.

The Reference Index has a base date of 31 December 1998.

Further Information

Additional information on the Reference Index, its composition, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on www.msci.com.

[172] *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 in the website identified below. Such information may change from time to time and details of the changes will appear on that website.*

Shareholders' attention is drawn to the fact that the Index Administrator may make changes to the Reference Index description with a view to dealing with technical adjustments necessary for the good maintenance of the Reference Index. To the extent that those changes do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com.The Shareholders are consequently invited to consult the above stated website of the Index Administrator on a regular basis.

PRODUCT ANNEX 61: Xtrackers MSCI China UCITS ETF

The information contained in this Product Annex relates to Xtrackers MSCI China UCITS ETF (the "**Sub-Fund**") and forms an integral part of the Prospectus. The Prospectus (which includes this Product Annex) constitutes the terms and conditions of the Sub-Fund.

GENERAL INFORMATION	
Investment Objective	The aim is for your investment to reflect the performance of the MSCI China TRN Index (the **"Reference Index"**) which is designed to reflect the performance of the shares of certain companies in or connected to China. The companies making up the Reference Index are large and medium sized companies, based on the combined value of a company's readily available shares as compared to other companies. Further information on the Reference Index is contained under "General Description of the Reference Index".
Investment Policy	The Sub-Fund is passively managed in accordance with a Direct Investment Policy and is a Full Replication Fund (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus). To achieve the Investment Objective, the Sub-Fund will attempt to replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index. The Sub-Fund may directly trade A-shares through Stock Connect. More details are set out under "Stock Connect" below.
Stock Connect	Under Stock Connect, overseas investors (including the Sub-Fund) may be allowed, subject to rules and regulations issued/amended from time to time, to directly trade certain eligible A-shares through the so-called Northbound Trading Links (see below). Stock Connect currently comprises the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect. The Shanghai-Hong Kong Stock Connect is a securities trading and clearing links program developed by Hong Kong Exchanges and Clearing Limited ("**HKEx**"), China Securities Depository and Clearing Corporation Limited ("**ChinaClear**") and the Shanghai Stock Exchange ("**SSE**"), with an aim to achieve mutual stock market access between Shanghai and Hong Kong. Similarly, the Shenzhen-Hong Kong Stock Connect is a securities trading clearing links program developed by HKEx, ChinaClear and the Shenzhen Stock Exchange ("**SZSE**"), with an aim to achieve mutual stock market access between Shenzhen and Hong Kong. Stock Connect comprises two Northbound Trading Links (for investment in A-shares), one between SSE and The Stock Exchange of Hong Kong Limited ("**SEHK**"), and the other between SZSE and SEHK. Investors may place orders to trade eligible A-shares listed on SSE (such securities, "**SSE Securities**") or on SZSE (such securities, "**SZSE Securities**", and SSE Securities and SZSE Securities collectively, "**Stock Connect Securities**") through their Hong Kong brokers, and such orders will be routed by the relevant securities trading service company established by the SEHK to the relevant trading platform of SSE or SZSE, as the case may be, for matching and execution on SSE or SZSE, as the case may be. The SSE Securities include all the constituent stocks of the SSE 180 Index and the SSE 380 Index, and all the SSE-listed A-shares that are not included as constituent stocks of the relevant indices but which have corresponding H-Shares listed on SEHK, except (i) those SSE-listed shares which are not traded in Renminbi ("**RMB**") and (ii) those SSE-listed shares which are under "risk alert". The SZSE Securities include all the constituent stocks of the SZSE Component Index and the SZSE Small/Mid Cap Innovation Index which have a market capitalisation of not less than RMB 6 billion and all the SZSE-listed A-shares which have corresponding H-Shares listed on SEHK, except (i) those SZSE-listed shares which are not traded in Renminbi and (ii) those SZSE-listed shares which are under "risk alert". The list of eligible securities may be changed subject to the review and approval by the relevant regulators in the People's Republic of China ("**PRC**") from time to time. Further information about Stock Connect is available online at the website: http://www.hkex.com.hk/eng/market/sec_tradinfra/chinaconnect/chinaconnect.htm
Specific Investment Restrictions	The Sub-Fund will not invest more than 10 percent. of its assets in units or shares of other UCITS or other UCIs in order to be eligible for investment by UCITS governed by the UCITS Directive. Because the market which the Reference Index seeks to represent is concentrated on a particular country, there are fewer potential constituents than might be the case in an index with a broader universe of potential constituents. As a result of this, and further to the section "Use of increased diversification limits" under "Investment Objectives and Policies" in the main

	part of the Prospectus, the Sub-Fund may make use of the increased diversification limits under the Law. Further information relevant to the Sub-Fund's Investment Policy is contained in the main part of the Prospectus under chapter "Investment Objectives and Policies" and "Investment Restrictions".
Fund Classification (InvStG)	Equity Fund, target minimum percentage of 55%
Distribution Policy	The Company may declare dividends in relation to the D Share Class(es). Yet, the Board of Directors may, for any economic or other compelling reason, decide neither to make interim dividend payments nor to propose to the annual general meeting of the Company to approve a dividend payment. In such case, Shareholders will be informed in accordance with the procedure set out in section I.c of the chapter "General Information on the Company and the Shares" in the main part of the Prospectus. The Sub-Fund does not intend to make dividend payments in relation to the C Share Class(es).
Profile of Typical Investor	An investment in the Sub-Fund is suitable for investors who are able and willing to invest in a sub-fund with a high risk grading as further described in the main part of the Prospectus under "Typology of Risk Profiles".
Specific Risk Warning	The specific risk factor(s) should be read in addition to and in conjunction with the section Risk Factors as set out in the main part of the Prospectus. *No Guarantee* Investors should note that the Sub-Fund is not capital protected or guaranteed and that the capital invested or its respective amount are not protected or guaranteed and investors in this Sub-Fund should be prepared and able to sustain losses up to the total capital invested. Investors will also bear some other risks as described in the main part of the Prospectus under the section "Risk Factors". *Concentration of the Reference Index* The Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the portfolio of transferable securities and eligible assets held by the Sub-Fund. *People's Republic of China* Investors in the Sub-Fund should be aware of the following risks associated with an investment in the People's Republic of China (**"PRC"**): m) *Political, Economic and Social Risks*: Any political changes, social instability and unfavourable diplomatic developments which may take place in or in relation to the PRC could result in the imposition of additional governmental restrictions including expropriation of assets, confiscatory taxes or nationalisation of some of the constituents of the Reference Index. Investors should also note that any change in the policies of the PRC may impose an adverse impact on the securities markets in such place as well as the performance of the Sub-Fund. n) *PRC Economic Risks*: The economy in the PRC has experienced rapid growth in recent years. However, such growth may or may not continue, and may not apply evenly across different sectors of the PRC economy. The PRC government has also implemented various measures from time to time to prevent overheating of the economy. Furthermore, the transformation of the PRC from a socialist economy to a more market-oriented economy has led to various economic and social disruptions in the PRC and there can be no assurance that such a transformation will be continued or be successful. All these may have an adverse impact upon the performance of the Sub-Fund. o) *Legal System of the PRC*: The legal system of the PRC is based on written laws and regulations. However, many of these laws and regulations are still untested and the enforceability of such laws and regulations remains unclear. China is still developing the legal framework required to support a market economy. Fundamental civil, criminal, tax, administrative, property and commercial laws in China are frequently amended. Risk factors relating to the legal system of the China markets that create uncertainties with respect to the investment and investment-related decisions that the Sub-Fund may make include: inconsistencies among governmental, ministerial and local orders, decisions, resolutions and other acts; inefficient administrative regulatory environment; the lack of judicial and administrative guidance on interpreting legislation; substantial gaps in the regulatory structure due to delay or absence of implementing legislation; a high degree of discretion on the part of governmental authorities. Such regulations also empower the China Securities Regulatory Commission (**"CSRC"**) and the State Administration of Foreign Exchange (**"SAFE"**) to exercise discretion in their respective interpretation of the regulations, which may result in uncertainties in their application.

	p) *Taxation in the PRC*: Various tax reforms and policies have been implemented by the PRC government authorities in recent years, and existing tax laws and regulations may be revised or amended in the future. Any changes in tax policies may reduce the after-taxation profits of the companies in the PRC and detrimentally impact the performance of the Reference Index, to which the Sub-Fund is linked. The Sub-Fund will gain economic exposure to the constituents of the Reference Index. The Sub-Fund shall bear any costs and liability including transaction costs, taxes or liabilities relating to the purchase or sale of the relevant securities. Such costs, taxes or liabilities (which may be imposed presently or in the future) may affect the net asset value of the Sub-Fund. *q) PRC taxation on capital gains* H-shares and other overseas listed shares: in the absence of any specific PRC tax laws, capital gains derived by non-PRC resident enterprise investors from the disposal of H-shares and other overseas listed shares issued by PRC companies are subject to withholding income tax at the rate of 10 percent. based on the general principles of the PRC Enterprise Income Tax Law and its Implementation Rules, unless such tax is reduced or eliminated by an applicable double taxation treaty or special tax rules to be issued by the PRC Ministry of Finance ("**MOF**") and/or the State Taxation Administration ("**STA**") in the future. There are uncertainties as to the interpretation and application of such general principles of PRC tax laws. These uncertainties include whether and how withholding income tax on capital gains realised by non-PRC resident enterprise investors upon the disposal of such equity interests shall be collected by the PRC tax authorities and to date, such withholding income tax has not been enforced by the PRC tax authorities on capital gains realised by non-PRC resident enterprise investors where the purchase and subsequent disposal have been concluded on an exchange. If there is any such withholding income tax liability arising from the sale or other disposal of H-shares and other overseas listed shares, the Sub-Fund shall be exposed to the economic risks of such tax. A-shares: On 14 November 2014, MOF, STA and CSRC jointly issued a notice in relation to the taxation rule on Shanghai-Hong Kong Stock Connect under Caishui [2014] No.81 ("Notice No.81"). Moreover, on 23 March, 2016, MOF and STA jointly issued a notice in relation to levying value-added tax to replace business tax under Caishui [2016] No.36 ("**Notice No. 36**"). In addition, on 1 December 2016, MOF, STA and CSRC jointly issued a notice in relation to the taxation rule on Shenzhen-Hong Kong Stock Connect under Caishui [2016] No.127 ("Notice No. 127"). Under Notice No.81, corporate income tax, individual income tax and business tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including the Sub-Fund) on the trading of A-shares through Shanghai-Hong Kong Stock Connect with effect from 17 November 2014. Under Notice No. 36, all business tax taxpayers shall be required to pay value-added tax instead of business tax, and value-added tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including the Sub-Fund) on the trading of A-shares through Shanghai-Hong Kong Stock Connect with effect from 1 May 2016. Under Notice No.127, corporate income tax, individual income tax and value-added tax will be temporarily exempted on gains derived by Hong Kong and overseas investors (including the Sub-Fund) on the trading of A-shares under the Shenzhen Hong Kong Stock Connect Program with effect from 5 December 2016. *r) PRC withholding income tax on dividends and bonuses* H-shares and other overseas listed shares: PRC issuers of H-shares and other overseas listed shares are currently required to withhold income tax at a rate of 10 percent. on dividend and bonus payments distributed to non-PRC resident enterprise investors. If non-PRC resident enterprise investors are eligible to a lower withholding income tax rate according to the applicable double tax treaty, they may apply for a refund of the overpaid withholding income tax with the PRC tax authority. A-shares: However, under both Notice No.81 and Notice No.127, Hong Kong and overseas investors are required to pay income tax on dividends and/or bonus shares at the rate of 10 percent. which will be withheld and paid to the relevant tax authority by the listed companies. If the Hong Kong and overseas investors such as the Sub-Fund are eligible for treaty relief on dividends, the Hong Kong and overseas investors can apply for the entitlement of treaty relief and refund of the overpaid tax with the PRC tax authority having jurisdiction over the A-share issuing company. The Board of Directors intends to make relevant provision on dividend and interest from A-shares if the tax on dividends is not withheld at source at the time when such income is received. There is a possibility of the rules being changed and taxes being applied retrospectively. As such, any provision for taxation made by the Board of Directors may be excessive or inadequate to meet final PRC tax liabilities.

Consequently, Shareholders may be advantaged or disadvantaged depending upon the final tax liabilities, the level of provision and when they subscribed and/or redeemed their Shares. If the actual applicable tax rate levied by STA is higher or more widely applicable than that provided for by the Board of Directors so that there is a shortfall in the tax provision amount, investors should note that the Net Asset Value of the Sub-Fund may suffer more than the tax provision amount as the Sub-Fund will ultimately have to bear the additional tax liabilities. In this case, the then existing and new Shareholders will be disadvantaged.

On the other hand, if the actual applicable tax rate levied by STA is lower or less widely applicable than that provided for by the Board of Directors so that there is an excess in the tax provision amount, Shareholders who have redeemed their Shares before STA's ruling, decision or guidance (or before any such ruling, decision or guidance is considered final) in this respect will be disadvantaged as they would have borne the loss from the Board of Directors' overprovision. In this case, the then existing and new Shareholders may benefit if the difference between the tax provision and the actual taxation liability under that lower tax rate can be returned to the account of the Sub-Fund as assets thereof. Notwithstanding the above provisions, Shareholders who have already redeemed their Shares in the Sub-Fund before the return of any overprovision to the account of the Sub-Fund will not be entitled or have any right to claim any part of such overprovision.

The above summary of PRC taxation is of a general nature, for information purposes only, and is not intended to be an exhaustive list of all of the tax considerations that may be relevant to a decision to purchase, own, redeem or otherwise dispose of Shares. This summary does not constitute legal or tax advice and does not purport to deal with the tax consequences applicable to all categories of investors. Prospective investors should consult their own independent professional advisers as to the implications of their subscribing for, purchasing, holding, redeeming or disposing of Shares both under the laws and practice of the PRC and the laws and practice of their respective jurisdictions. The relevant laws, rules and practice relating to tax are subject to change and amendment. As such, there can be no guarantee that the summary provided above will continue to be applicable after the date of this Prospectus.

s) *Accounting and Reporting Standards*: Accounting, auditing and financial reporting standards and practices applicable to companies in some parts of the PRC may differ from those in countries that have more developed financial markets. These differences may lie in areas such as different valuation methods of the properties and assets, and the requirements for disclosure of information to investors.

t) *Stock Connect risks*

Quota limitations risk

Stock Connect is subject to daily quota limitations on investment, which may restrict the Sub-Fund's ability to invest in A-shares through Stock Connect on a timely basis, and the Sub-Fund may not be able to effectively pursue their investment policies.

Suspension risk

SEHK, SSE and SZSE reserve the right to suspend trading if necessary for ensuring an orderly and fair market and managing risks prudently which would adversely affect the Sub-Fund's ability to access the PRC market.

Differences in trading day

Stock Connect operates on days when both the relevant PRC market and the Hong Kong market are open for trading and when banks in the relevant PRC market and the Hong Kong market are open on the corresponding settlement days. It is possible that there are occasions when it is a normal trading day for the relevant PRC market but Hong Kong and overseas investors (such as the Sub-Fund) cannot carry out any A-shares trading via Stock Connect. As a result, the Sub-Fund may be subject to a risk of price fluctuations in A-shares during the time when Stock Connect is not trading.

Restrictions on selling imposed by front-end monitoring

PRC regulations require that before an investor sells any share, there should be sufficient shares in the account; otherwise SSE or SZSE (as the case may be) will reject the sell order concerned. SEHK will carry out pre-trade checking on A-shares sell orders of its participants (i.e. the stock brokers) to ensure there is no over-selling.

Clearing, settlement and custody risks

The Hong Kong Securities Clearing Company Limited (the "**HKSCC**", which is a wholly-owned subsidiary of HKEx) and ChinaClear establish the clearing links and each is a participant of each other to facilitate clearing and settlement of cross-boundary trades. As the national central counterparty of the PRC's securities market, ChinaClear operates a comprehensive network of clearing, settlement and stock holding infrastructure. ChinaClear has established a risk management framework and measures that are

	approved and supervised by the CSRC. The chances of a ChinaClear default are considered to be remote. Should the remote event of a ChinaClear default occur and ChinaClear be declared as a defaulter, HKSCC will in good faith, seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or through ChinaClear's liquidation. In that event, the Sub-Fund may suffer delay in the recovery process or may not be able to fully recover its losses from ChinaClear. A-shares are issued in scripless form, so there will be no physical certificates of title representing the interests of the Sub-Fund in any A-shares. Hong Kong and overseas investors, such as the Sub-Fund, who have acquired Stock Connect Securities through Northbound Trading Links should maintain Stock Connect Securities with their brokers' or custodians' stock accounts with the Central Clearing and Settlement System operated by HKSCC for the clearing securities listed or traded on SEHK. Further information on the custody set-up relating to Stock Connect is available upon request at the registered office of the Management Company. *Operational risk* Stock Connect provides a channel for investors from Hong Kong and overseas, such as the Sub-Fund, to access the China stock market directly. The securities regimes and legal systems of the two markets differ significantly and in order for the platform to operate, market participants may need to address issues arising from the differences on an on-going basis. Stock Connect is premised on the functioning of the operational systems of the relevant market participants. Market participants are able to participate in this program subject to meeting certain information technology capability, risk management and other requirements as may be specified by the relevant exchange and/or clearing house. Further, the "connectivity" in Stock Connect program requires routing of orders across the border. This requires the development of new information technology systems on the part of the SEHK and exchange participants (i.e. an order routing system ("**China Stock Connect System**") set up by SEHK to which exchange participants need to connect). There is no assurance that the systems of the SEHK and market participants will function properly or will continue to be adapted to changes and developments in both markets. In the event that the relevant systems fail to function properly, trading in both markets through the program could be disrupted. The Sub-Fund's ability to access the A-share market (and hence to pursue their investment strategy) will be adversely affected. *Nominee arrangements in holding A-shares* HKSCC is the "nominee holder" of the Stock Connect Securities acquired by overseas investors (including the Sub-Fund) through Stock Connect. The CSRC Stock Connect Rules expressly provide that investors enjoy the rights and benefits of the Stock Connect Securities acquired through Stock Connect in accordance with applicable laws. CSRC has also made statements dated 15 May 2015 and 30 September 2016 that overseas investors that hold Stock Connect Securities through HKSCC are entitled to proprietary interests in such securities as shareholders. However, it is still possible that the courts in the PRC may consider that any nominee or custodian as registered holder of Stock Connect Securities would have full ownership thereof, and that even if the concept of beneficial ownership is recognized under PRC law those Stock Connect Securities would form part of the pool of assets of such entity available for distribution to creditors of such entities and/or that a beneficial owner may have no rights whatsoever in respect thereof. Consequently, the Sub-Fund and the Depositary cannot ensure that the Sub-Fund's ownership of these securities or title thereto is assured in all circumstances. Under the rules of the Central Clearing and Settlement System operated by HKSCC for the clearing of securities listed or traded on SEHK, HKSCC as nominee holder shall have no obligation to take any legal action or court proceeding to enforce any rights on behalf of the investors in respect of the Stock Connect Securities in the PRC or elsewhere. Therefore, although the relevant Sub-Fund's ownership may be ultimately recognised, the Sub-Fund may suffer difficulties or delays in enforcing their rights in A-shares. To the extent that HKSCC is deemed to be performing safekeeping functions with respect to assets held through it, it should be noted that the Depositary and the Sub-Fund will have no legal relationship with HKSCC and no direct legal recourse against HKSCC in the event that the Sub-Fund suffers losses resulting from the performance or insolvency of HKSCC. *Investor compensation* Investments of the Sub-Fund through Stock Connect will not be covered by Hong Kong's Investor Compensation Fund. Hong Kong's Investor Compensation Fund is established to pay compensation to investors of any nationality who suffer pecuniary losses as a result of default of a licensed intermediary or authorised financial institution in relation to exchange-traded products in Hong Kong.

	Since Northbound trading via Stock Connect does not involve products listed or traded in SEHK or Hong Kong Futures Exchange Limited, such trading will not be covered by the Investor Compensation Fund. On the other hand, since the Sub-Fund is carrying out Northbound trading through securities brokers in Hong Kong but not PRC brokers, it is not protected by the China Securities Investor Protection Fund in the PRC. *Trading costs* In addition to paying trading fees and stamp duties in connection with A-share trading, the Sub-Fund may be subject to new portfolio fees, dividend tax and tax concerned with income arising from stock trades which are yet to be determined by the relevant authorities. *Regulatory risk* Stock Connect is relatively novel in nature, and is subject to regulations promulgated by regulatory authorities and implementation rules made by the stock exchanges in the PRC and Hong Kong. Further, new regulations may be promulgated from time to time by the regulators in connection with operations and cross-border legal enforcement in connection with cross-border trades under Stock Connect. The regulations are subject to change. There can be no assurance that Stock Connect will not be abolished. The Sub-Fund which may invest in the PRC markets through Stock Connect may be adversely affected as a result of such changes. u) *Dependence upon Trading Market for A-shares*: The existence of a liquid trading market for the A-shares may depend on whether there is supply of, and demand for, A-shares. Investors should note that SSE and SZSE on which A-shares are traded are undergoing development and the market capitalisation of, and trading volumes on, those exchanges may be lower than those in more developed financial markets. Market volatility and settlement difficulties in the A-share markets may result in significant fluctuation in the prices of the securities traded on such markets and thereby changes in the Net Asset Value of the Sub-Fund. *v) Restricted markets risk* The Sub-Fund may invest in securities in respect of which the PRC imposes limitations or restrictions on foreign ownership or holdings. Such legal and regulatory restrictions or limitations may have adverse effects on the liquidity and performance of the Sub-Fund holdings as compared to the performance of the Reference Index. This may increase the risk of tracking error and, at the worst, the Sub-Fund may not be able to achieve its investment objective and/or the Sub-Fund may have to be closed for further subscriptions. *w) A-share market trading hours difference risk* Differences in trading hours between foreign stock exchanges (e.g. SSE and SZSE) and the relevant stock exchange may increase the level of premium/discount of the Share price to its Net Asset Value because if a PRC stock exchange is closed while the relevant stock exchange is open, the Reference Index level may not be available. The prices quoted by the relevant stock exchange market maker would therefore be adjusted to take into account any accrued market risk that arises from such unavailability of the Reference Index level and as a result, the level of premium or discount of the Share price of the relevant Share Class to its Net Asset Value may be higher. *x) A-share market suspension risk* A-shares may only be bought or sold when the relevant A-shares are traded on SSE or SZSE, as appropriate. Given that the A-share market is considered volatile and unstable (with the risk of suspension of a particular stock and/or the whole market, whether as a result of government intervention or otherwise), the subscription and redemption of Shares may also be disrupted. An Authorised Participant may be less likely to redeem or subscribe Shares if it considers that A-shares may not be available. *Distribution Shares* There is no guarantee that distributing Share Classes will make dividend payments. Where a dividend payment is made by the D Share Class(es), the Net Asset Value of such Share Class(es) will be reduced by the gross amount of such dividends on the ex-dividend date.
Minimum Net Asset Value	USD 50,000,000
Reference Currency	USD
Launch Date	Means for Share Class 1C 24 June 2010. Means for Share Class 1D 20 April 2022.
Significant Market	Direct Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day

OTC Swap Transaction Costs	N/A
Transaction Costs	Applicable
Settlement Period	Means up to ten Settlement Days following the Transaction Day.[185]
Securities Lending	Yes
Securities Lending limit	The proportion of the Sub-Fund's net assets subject to Securities Lending Transactions may vary between 0% and 30%
Securities Lending revenue/costs policy	To the extent the Sub-Fund undertakes securities lending to reduce costs, the Sub-Fund will receive 82 percent. of the gross revenues generated and will pay a combined 18 percent. of the gross revenues as costs/fees to the Securities Lending Agent and the Sub-Portfolio Manager. The Securities Lending Agent will receive 9 percent. of the gross revenues for its agency services, which includes initiating, preparing, and implementing Securities Lending Transactions. The remaining 9 percent. of the gross revenues will be received by the Sub-Portfolio Manager in order to cover the costs associated with its coordination and oversight tasks related to Securities Lending Transactions. As the payment of the securities revenue does not increase the costs of running the Sub-Fund, this has been excluded from the ongoing charges.

[185] In the case that a Significant Market is closed for trading or settlement on any Settlement Day during the period between the relevant Transaction Day and the expected settlement date (inclusive), and/or settlement in the base currency of the Sub-Fund is not available on the expected settlement date, there may be corresponding delays to the settlement times indicated in this Product Annex. Earlier or later times may be determined by the Management Company at their discretion, whereby notice will be given on *www.Xtrackers.com*.

Description of Share Classes		
Classes	**"1C"**	**"1D"**
ISIN Code	LU0514695690	LU2456436083
WKN Code	DBX0G2	DBX0SC
Denomination Currency	USD	USD
Fixed Fee	0.020833% per month (0.25% p.a.)	0.020833% per month (0.25% p.a.)
Management Company Fee[186]	Up to 0.40% p.a.	Up to 0.03% p.a.
All-In Fee	Up to 0.65% p.a.	Up to 0.28% p.a.
Minimum Initial Subscription Amount	85,000 Shares	85,000 Shares
Minimum Subsequent Subscription Amount	85,000 Shares	85,000 Shares
Minimum Redemption Amount	85,000 Shares	85,000 Shares
Primary Market Transaction Costs	Applicable	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it.	The Sub-Fund will bear any financial transaction taxes that may be payable by it.
Dividends	N/A	Subject to the provisions under "General Information" above, a dividend may be paid up to four times per year
Anticipated level of Tracking Error	Up to 2%	Up to 2%

[186] The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Class.

General Description of the Reference Index[187]

The Reference Index is one of the emerging markets country indices administered by MSCI Inc. and its subsidiaries (which include MSCI Limited) (**"MSCI"**). The Reference Index is a free float-adjusted market capitalisation index and is calculated on a total return basis with net dividends reinvested. The Reference Index is calculated and published in U.S. Dollar (**"USD"**) on an end of day basis.

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 after the deduction of any taxes that may apply.

China has a number of large companies incorporated within it but with securities listed only outside of it. MSCI considers such companies for inclusion in the index universe. The MSCI China universe includes companies incorporated in the People's Republic of China (**"PRC"**) and listed on certain eligible stock exchanges and companies not incorporated in the PRC but listed on the Hong Kong Stock Exchange provided that they meet the following definitions:

- Red-Chip: the company is (directly or indirectly) controlled by organisations or enterprises that are owned by the state, provinces, or municipalities of the PRC;
- P-Chip: the company satisfies the majority of the following conditions:
    - The company is controlled by PRC individuals
    - The company derives more than 80 percent. of its revenue from the PRC
    - The company allocates more than 60 percent. of its assets in the PRC

The MSCI China universe excludes companies which satisfy the above conditions but derive more than 80 percent. of their revenues and profits from the Hong Kong Special Administrative Region.

The Reference Index is reviewed and rebalanced on a quarterly and 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 has a base date of 29 December 2000.

Further Information

Additional information on the Reference Index, its composition, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on www.msci.com.

[187] *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 under "Further Information". Such information may change from time to time and details of the changes will appear on that website.*

Shareholders' attention is drawn to the fact that the Index Administrator may make changes to the Reference Index description with a view to dealing with technical adjustments necessary for the good maintenance of the Reference Index. To the extent that those changes do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com.The Shareholders are consequently invited to consult the above stated website of the Index Administrator on a regular basis.

PRODUCT ANNEX 69: Xtrackers MSCI Singapore UCITS ETF

The information contained in this Product Annex relates to Xtrackers MSCI SINGAPORE UCITS ETF (the "**Sub-Fund**") and forms an integral part of the Prospectus. The Prospectus (which includes this Product Annex) constitutes the terms and conditions of the Sub-Fund.

GENERAL INFORMATION	
Investment Objective	The aim is for your investment to reflect the performance of the MSCI Singapore Investable Market Total Return Net Index (the **"Reference Index"**) which is designed to reflect the performance of the shares of certain companies in Singapore. Further information on the Reference Index is contained under "General Description of the Reference Index".
Investment Policy	The Sub-Fund is passively managed in accordance with a Direct Investment Policy and is a Full Replication Fund (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus). To achieve the Investment Objective, the Sub-Fund will attempt to replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.
Specific Investment Restrictions	The Sub-Fund will not invest more than 10 percent. of its assets in units or shares of other UCITS or other UCIs in order to be eligible for investment by UCITS governed by the UCITS Directive. Further information relevant to the Sub-Fund's Investment Policy is contained in the main part of the Prospectus under chapter "Investment Objectives and Policies" and "Investment Restrictions".
Fund Classification (InvStG)	Equity Fund, target minimum percentage of 65%
Distribution Policy	The Sub-Fund does not intend to make dividend payments.
Profile of Typical Investor	An investment in the Sub-Fund is suitable for investors who are able and willing to invest in a sub-fund with a high risk grading as further described in the main part of the Prospectus under "Typology of Risk Profiles".
Specific Risk Warning	The specific risk factor(s) should be read in addition to and in conjunction with the section Risk Factors as set out in the main part of the Prospectus. *No Guarantee* Investors should note that the Sub-Fund is not capital protected or guaranteed and that the capital invested or its respective amount are not protected or guaranteed and investors in this Sub-Fund should be prepared and able to sustain losses up to the total capital invested. Investors will also bear some other risks as described in the main part of the Prospectus under the section "Risk Factors". *Concentration of the Reference Index* The Reference Index is concentrated in securities from a single country. As a result, any country-specific political or economic changes may have an adverse impact on the performance of the Reference Index and the portfolio of transferable securities and eligible assets held by the Sub-Fund.
Minimum Net Asset Value	USD 50,000,000
Reference Currency	USD
Launch Date	Means for Share Class 1C 19 September 2011.
Significant Market	Direct Replication Significant Market
Cut-off Time	5.00 p.m. Luxembourg time on the Business Day prior to the Transaction Day
OTC Swap Transaction Costs	N/A
Transaction Costs	Applicable
Settlement Period	Means up to nine Settlement Days following the Transaction Day.[207]
Securities Lending	Yes

[207] In the case that a Significant Market is closed for trading or settlement on any Settlement Day during the period between the relevant Transaction Day and the expected settlement date (inclusive), and/or settlement in the base currency of the Sub-Fund is not available on the expected settlement date, there may be corresponding delays to the settlement times indicated in this Product Annex. Earlier or later times may be determined by the Management Company at their discretion, whereby notice will be given on www.Xtrackers.com.

Securities Lending limit	The proportion of the Sub-Fund's net assets subject to Securities Lending Transactions may vary between 0% and 30%
Securities Lending revenue/costs policy	To the extent the Sub-Fund undertakes securities lending to reduce costs, the Sub-Fund will receive 82 percent. of the gross revenues generated and will pay a combined 18 percent. of the gross revenues as costs/fees to the Securities Lending Agent and the Sub-Portfolio Manager. The Securities Lending Agent will receive 9 percent. of the gross revenues for its agency services, which includes initiating, preparing, and implementing Securities Lending Transactions. The remaining 9 percent. of the gross revenues will be received by the Sub-Portfolio Manager in order to cover the costs associated with its coordination and oversight tasks related to Securities Lending Transactions. As the payment of the securities revenue does not increase the costs of running the Sub-Fund, this has been excluded from the ongoing charges.

Description of Share Classes	
Classes	**"1C"**
ISIN Code	LU0659578842
WKN Code	DBX0KG
Denomination Currency	USD
Fixed Fee	0.016667% *per* month (0.20% p.a.)
Management Company Fee[208]	Up to 0.30% p.a.
All-In Fee	Up to 0.50% p.a.
Minimum Initial Subscription Amount	810,000 Shares
Minimum Subsequent Subscription Amount	810,000 Shares
Primary Market Transaction Costs	Applicable
Financial Transaction Taxes	The Sub-Fund will bear any financial transaction taxes that may be payable by it.
Minimum Redemption Amount	810,000 Shares
Dividend	N/A
Anticipated level of Tracking Error	Up to 1%

[208] The Management Company Fee, the amount of which will revert to the Management Company, is a maximum percentage that will be calculated upon each Valuation Day on the basis of the Net Assets of the relevant Class.

General Description of the Reference Index[209]

The Reference Index is administered by MSCI Inc. and its subsidiaries (which include MSCI Limited).

The Reference Index is a free float-adjusted market capitalisation weighted index reflecting the performance of listed equity securities of large, mid, and small capitalisation companies of Singapore.

The Reference Index is calculated in U.S. Dollars on an end of day basis.

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 after the deduction of any taxes that may apply.

The Reference Index is reviewed and rebalanced on a quarterly basis and may also be rebalanced at other times in order to reflect corporate activity such as mergers and acquisitions.

Further Information

Additional information on the Reference Index, its composition, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on www.msci.com.

[209] *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 in the website identified below. Such information may change from time to time and details of the changes will appear on that website.*

Shareholders' attention is drawn to the fact that the Index Administrator may make changes to the Reference Index description with a view to dealing with technical adjustments necessary for the good maintenance of the Reference Index. To the extent that those changes do not affect the nature of the Reference Index and are not expected to have any adverse impact on the performance of the Reference Index, the Company will not be obliged to notify Shareholders via a notice on the website www.Xtrackers.com.The Shareholders are consequently invited to consult the above stated website of the Index Administrator on a regular basis.

ANNEX I: DISCLAIMERS

MSCI DISCLAIMER

XTRACKERS MSCI WORLD SWAP UCITS ETF, XTRACKERS MSCI EUROPE UCITS ETF, XTRACKERS MSCI JAPAN UCITS ETF, XTRACKERS MSCI USA SWAP UCITS ETF, XTRACKERS MSCI EMERGING MARKETS SWAP UCITS ETF, XTRACKERS MSCI EM ASIA SCREENED SWAP UCITS ETF, XTRACKERS MSCI EM LATIN AMERICA ESG SWAP UCITS ETF, XTRACKERS MSCI EM EUROPE, MIDDLE EAST & AFRICA ESG SWAP UCITS ETF, XTRACKERS MSCI TAIWAN UCITS ETF, XTRACKERS MSCI BRAZIL UCITS ETF, XTRACKERS MSCI KOREA UCITS ETF, XTRACKERS MSCI AC ASIA EX JAPAN ESG SWAP UCITS ETF, XTRACKERS MSCI PACIFIC EX JAPAN SCREENED UCITS ETF, XTRACKERS MSCI EUROPE SCREENED UCITS ETF, XTRACKERS MSCI EUROPE SMALL CAP UCITS ETF, XTRACKERS MSCI CANADA SCREENED UCITS ETF, XTRACKERS MSCI INDONESIA SWAP UCITS ETF, XTRACKERS MSCI MEXICO UCITS ETF, XTRACKERS MSCI EUROPE VALUE UCITS ETF, XTRACKERS MSCI CHINA UCITS ETF, XTRACKERS MSCI INDIA SWAP UCITS ETF, XTRACKERS MSCI MALAYSIA UCITS ETF, XTRACKERS MSCI THAILAND UCITS ETF, XTRACKERS MSCI PHILIPPINES UCITS ETF, XTRACKERS MSCI AFRICA TOP 50 SWAP UCITS ETF, XTRACKERS MSCI PAKISTAN SWAP UCITS ETF, XTRACKERS MSCI SINGAPORE UCITS ETF, XTRACKERS MSCI EMU UCITS ETF, XTRACKERS MSCI UK ESG UCITS ETF, XTRACKERS MSCI EUROPE CONSUMER STAPLES SCREENED UCITS ETF, XTRACKERS MSCI EUROPE HEALTH CARE SCREENED UCITS ETF, XTRACKERS MSCI EUROPE INDUSTRIALS SCREENED UCITS ETF, XTRACKERS MSCI EUROPE MATERIALS SCREENED UCITS ETF, XTRACKERS MSCI EUROPE COMMUNICATION SERVICES SCREENED UCITS ETF, XTRACKERS MSCI EUROPE UTILITIES SCREENED UCITS ETF, XTRACKERS MSCI EUROPE INFORMATION TECHNOLOGY SCREENED UCITS ETF, XTRACKERS MSCI EUROPE FINANCIALS SCREENED UCITS ETF, XTRACKERS HARVEST MSCI CHINA TECH 100 UCITS ETF, XTRACKERS MSCI CHINA A SCREENED SWAP UCITS ETF, XTRACKERS MSCI CHINA A UCITS ETF AND SCALABLE MSCI AC WORLD XTRACKERS UCITS ETF (EACH, AN "MSCI SUB-FUND") ARE NOT SPONSORED, ENDORSED, SOLD OR PROMOTED BY MSCI INC. ("MSCI AND ITS SUBSIDIARIES (WHICH INCLUDE MSCI LTD)"), ANY OF ITS AFFILIATES, ANY OF ITS INFORMATION PROVIDERS OR ANY OTHER THIRD PARTY INVOLVED IN, OR RELATED TO, COMPILING, COMPUTING OR CREATING ANY MSCI INDEX (COLLECTIVELY, THE "MSCI PARTIES"). THE MSCI INDEXES ARE THE EXCLUSIVE PROPERTY OF MSCI. MSCI AND THE MSCI INDEX NAMES ARE SERVICE MARK(S) OF MSCI OR ITS AFFILIATES AND HAVE BEEN LICENSED FOR USE FOR CERTAIN PURPOSES BY DWS INVESTMENTS UK LIMITED. NONE OF THE MSCI PARTIES MAKES ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, TO THE ISSUER OR OWNERS OF AN MSCI SUB-FUND OR ANY OTHER PERSON OR ENTITY REGARDING THE ADVISABILITY OF INVESTING IN FUNDS GENERALLY OR IN AN MSCI SUB-FUND PARTICULARLY OR THE ABILITY OF ANY MSCI INDEX TO TRACK CORRESPONDING STOCK MARKET PERFORMANCE. MSCI OR ITS AFFILIATES ARE THE LICENSORS OF CERTAIN TRADEMARKS, SERVICE MARKS AND TRADE NAMES AND OF THE MSCI INDEXES WHICH ARE DETERMINED, COMPOSED AND CALCULATED BY MSCI WITHOUT REGARD TO AN MSCI SUB-FUND OR THE ISSUER OR OWNERS OF AN MSCI SUB-FUND OR ANY OTHER PERSON OR ENTITY. NONE OF THE MSCI PARTIES HAS ANY OBLIGATION TO TAKE THE NEEDS OF THE ISSUER OR OWNERS OF AN MSCI SUB-FUND OR ANY OTHER PERSON OR ENTITY INTO CONSIDERATION IN DETERMINING, COMPOSING OR CALCULATING THE MSCI INDEXES. NONE OF THE MSCI PARTIES IS RESPONSIBLE FOR OR HAS PARTICIPATED IN THE DETERMINATION OF THE TIMING OF, PRICES AT, OR QUANTITIES OF AN MSCI SUB-FUND TO BE ISSUED OR IN THE DETERMINATION OR CALCULATION OF THE EQUATION BY OR THE CONSIDERATION INTO WHICH AN MSCI SUB-FUND IS REDEEMABLE. FURTHER, NONE OF THE MSCI PARTIES HAS ANY OBLIGATION OR LIABILITY TO THE ISSUER OR OWNERS OF AN MSCI SUB-FUND OR ANY OTHER PERSON OR ENTITY IN CONNECTION WITH THE ADMINISTRATION, MARKETING OR OFFERING OF AN MSCI SUB-FUND.

ALTHOUGH MSCI SHALL OBTAIN INFORMATION FOR INCLUSION IN OR FOR USE IN THE CALCULATION OF THE MSCI INDEXES FROM SOURCES THAT MSCI CONSIDERS RELIABLE, NONE OF THE MSCI PARTIES WARRANTS OR GUARANTEES THE ORIGINALITY, ACCURACY AND/OR THE COMPLETENESS OF ANY MSCI INDEX OR ANY DATA INCLUDED THEREIN. NONE OF THE MSCI PARTIES MAKES ANY WARRANTY, EXPRESS OR IMPLIED, AS TO RESULTS TO BE OBTAINED BY THE ISSUER OF AN MSCI SUB-FUND, OWNERS OF AN MSCI SUB-FUND, OR ANY OTHER PERSON OR ENTITY, FROM THE USE OF ANY MSCI INDEX OR ANY DATA INCLUDED THEREIN. NONE OF THE MSCI PARTIES SHALL HAVE ANY LIABILITY FOR ANY ERRORS, OMISSIONS OR INTERRUPTIONS OF OR IN CONNECTION WITH ANY MSCI INDEX OR ANY DATA INCLUDED THEREIN. FURTHER, NONE OF THE MSCI PARTIES MAKES ANY EXPRESS OR IMPLIED WARRANTIES OF ANY KIND, AND THE MSCI PARTIES HEREBY EXPRESSLY DISCLAIM ALL WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, WITH RESPECT TO EACH MSCI INDEX AND ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT SHALL ANY OF THE MSCI PARTIES HAVE ANY LIABILITY FOR ANY DIRECT, INDIRECT, SPECIAL, PUNITIVE, CONSEQUENTIAL OR ANY OTHER DAMAGES (INCLUDING LOST PROFITS) EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

NO PURCHASER, SELLER OR HOLDER OF THIS SECURITY, PRODUCT OR AN MSCI SUB-FUND, OR ANY OTHER PERSON OR ENTITY, SHOULD USE OR REFER TO ANY MSCI TRADE NAME, TRADEMARK OR SERVICE MARK TO SPONSOR, ENDORSE, MARKET OR PROMOTE THIS SECURITY WITHOUT FIRST CONTACTING MSCI TO DETERMINE WHETHER MSCI'S PERMISSION IS REQUIRED. UNDER NO CIRCUMSTANCES MAY ANY PERSON OR ENTITY CLAIM ANY AFFILIATION WITH MSCI WITHOUT THE PRIOR WRITTEN PERMISSION OF MSCI.

STOXX DISCLAIMER

STOXX Ltd., Qontigo Index GmbH and their licensors (the "Licensors"), research partners or data providers have no relationship to the Company, other than the licensing of the Euro STOXX 50® Index, Euro STOXX® Quality Dividend 50 Index, STOXX® Global Select Dividend 100 Index, EURO STOXX 50® Short Index, STOXX® Europe 600 Index, "DAX® Index", "SHORTDAX® Index", "SHORTDAX® x2 Index", "LEVDAX x2", "DAX ESG Screened Index", "STOXX Europe Total Market Defence Space and Cybersecurity Innovation Index" and "STOXX Vietnam Total Market Liquid Index" (hereinafter, " **Index**") and the related trademarks for use in connection with the relevant Sub-Funds (hereinafter the "**Products**").

STOXX Ltd., Qontigo and their Licensors, research partners or data providers do not:

- Sponsor, endorse, sell or promote the Products or recommend that any person invest in the Products or any other securities.
- Have any responsibility or liability for or make any decisions about the timing, amount or pricing of the Products.
- Have any responsibility or liability for the administration, management or marketing of the Products.
- Consider the needs of the Products or the owners of the Products in determining, composing or calculating the Index or have any obligation to do so.

STOXX Ltd. and Qontigo Index GmbH respectively as the licensor and their Licensors, research partners or data providers give no warranty, and exclude any liability (whether in negligence or otherwise), in connection with the Products of their performance. Specifically,

- **STOXX Ltd., Qontigo Index GmbH and their Licensors, research partners or data providers do not give any warranty, express or implied, and exclude any liability about:**
- **The results to be obtained by the Products, the owner of the Products or any other person in connection with the use of the Index and the data included in the Index;**
- **The accuracy, timeless, and completeness of the Index and its data;**
- **The merchantability and the fitness for a particular purpose or use of the Index and its data;**
- **The performance of the Products generally;**
- **STOXX Ltd., Qontigo Index GmbH and their Licensors, research partners or data providers give no warranty and exclude any liability, for any errors, omissions or interruptions in the Index or its data;**
- **Under no circumstances will STOXX Ltd., Qontigo Index GmbH or their Licensors, research partners or data providers be liable (whether in negligence or otherwise) for any lost profits or indirect, punitive, special or consequential damages or losses, arising as a result of such errors, omissions or interruptions in the relevant index or its data or generally in relation to the Products even in circumstances where STOXX Ltd., Qontigo Index GmbH or their Licensors, research partners or data providers are aware that such loss or damage may occur.**

STOXX Ltd. and Qontigo Index GmbH do not assume any contractual relationship with the purchasers of the Product or any other third parties. The licensing agreement between DWS Investments UK Limited and STOXX and the sub-licensing agreement between the Company and the respective Licensors is solely for their benefit and not for the benefit of the owners of the Products or any other third parties.

FTSE INTERNATIONAL LIMITED DISCLAIMER

THE XTRACKERS FTSE 100 INCOME UCITS ETF, XTRACKERS FTSE 100 UCITS ETF, XTRACKERS FTSE 100 SHORT DAILY SWAP UCITS ETF, XTRACKERS FTSE 250 UCITS ETF, XTRACKERS FTSE DEVELOPED EUROPE REAL ESTATE UCITS ETF AND XTRACKERS FTSE MIB UCITS ETF (EACH A "SUB-FUNDS") HAS BEEN DEVELOPED SOLELY BY THE COMPANY. THE SUB-FUND IS/ARE NOT IN ANY WAY CONNECTED TO OR SPONSORED, ENDORSED, SOLD OR PROMOTED BY THE LONDON STOCK EXCHANGE GROUP PLC AND ITS GROUP UNDERTAKINGS (COLLECTIVELY, THE "LSE GROUP"). FTSE RUSSELL IS A TRADING NAME OF CERTAIN OF THE LSE GROUP COMPANIES.

ALL RIGHTS IN THE FTSE 100 INDEX, FTSE 100 DAILY SHORT INDEX, FTSE 250 INDEX, FTSE EPRA/NAREIT DEVELOPED EUROPE NET TOTAL RETURN INDEX AND FTSE MIB INDEX (EACH AN "INDEX") VEST IN THE RELEVANT LSE GROUP COMPANY WHICH OWNS THE INDEX. "FTSE®" IS A TRADE MARK OF THE RELEVANT LSE GROUP COMPANY AND IS USED BY ANY OTHER LSE GROUP COMPANY UNDER LICENSE.

THE INDEX IS CALCULATED BY OR ON BEHALF OF FTSE INTERNATIONAL LIMITED OR ITS AFFILIATE, AGENT OR PARTNER. THE LSE GROUP DOES NOT ACCEPT ANY LIABILITY WHATSOEVER TO ANY PERSON ARISING OUT OF (A) THE USE OF, RELIANCE ON OR ANY ERROR IN THE INDEX OR (B) INVESTMENT IN OR OPERATION OF THE SUB-FUND. THE LSE GROUP MAKES NO CLAIM, PREDICTION, WARRANTY OR REPRESENTATION EITHER AS TO THE RESULTS TO BE OBTAINED FROM THE SUB-FUND OR THE SUITABILITY OF THE INDEX FOR THE PURPOSE TO WHICH IT IS BEING PUT BY THE COMPANY.

SOLACTIVE AG DISCLAIMER

XTRACKERS SWITZERLAND UCITS ETF, XTRACKERS SPAIN UCITS ETF AND XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF ARE NOT IN ANY WAY SPONSORED, PROMOTED, SOLD OR SUPPORTED IN ANY OTHER MANNER BY SOLACTIVE AG NOR DOES SOLACTIVE AG OFFER ANY EXPRESS OR IMPLICIT GUARANTEE OR ASSURANCE EITHER WITH REGARD TO THE RESULTS OF USING THE SOLACTIVE SWISS LARGE CAP INDEX, AND THE SOLACTIVE SPAIN 40 INDEX AND THE SOLACTIVE ZURICH ESG ALLOCATION EQUITIES INDEX (THE "SOLACTIVE INDICES") AND/OR SOLACTIVE INDEX TRADE MARK OR THE SOLACTIVE INDEX PRICE AT ANY TIME OR IN ANYOTHER RESPECT. THE SOLACTIVE INDICES ARE CALCULATED AND PUBLISHED BY SOLACTIVE AG. SOLACTIVE AG USES ITS BEST EFFORTS TO ENSURE THAT THE SOLACTIVE INDICES ARE CALCULATED CORRECTLY.

IRRESPECTIVE OF ITS OBLIGATIONS TOWARDS THE XTRACKERS AND DWS INVESTMENTS UK LIMITED, SOLACTIVE AG HAS NO OBLIGATION TO POINT OUT ERRORS IN THE SOLACTIVE INDICES TO THIRD PARTIES INCLUDING BUT NOT LIMITED TO INVESTORS AND/OR FINANCIAL INTERMEDIARIES OF XTRACKERS SWITZERLAND UCITS ETF, XTRACKERS SPAIN UCITS ETF AND XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF. NEITHER PUBLICATION OF THE SOLACTIVE INDICES BY SOLACTIVE AG NOR THE LICENSING OF THE SOLACTIVE INDICES OR SOLACTIVE INDEX TRADE MARK FOR THE PURPOSE OF USE IN CONNECTION WITH XTRACKERS SWITZERLAND UCITS ETF, XTRACKERS SPAIN UCITS ETF AND XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF CONSTITUTE A RECOMMENDATION BY SOLACTIVE AG TO INVEST CAPITAL IN XTRACKERS SWITZERLAND UCITS ETF, XTRACKERS SPAIN UCITS ETF, AND XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF NOR DOES IT IN ANY WAY REPRESENT AN ASSURANCE OR OPINION OF SOLACTIVE AG WITH REGARD TO ANY INVESTMENT IN XTRACKERS SWITZERLAND UCITS ETF, XTRACKERS SPAIN UCITS ETF AND XTRACKERS ZURICH ESG ALLOCATION EQUITIES UCITS ETF.

SIX SWISS EXCHANGE SLI® DISCLAIMER

XTRACKERS SLI UCITS ETF IS NOT IN ANY WAY SPONSORED, CEDED OR SOLD BY THE SIX SWISS EXCHANGE (THE "SLI® INDEX SPONSOR") AND THE SLI® INDEX SPONSOR MAKES NO WARRANTY OR REPRESENTATION WHATSOEVER, EXPRESS OR IMPLIED, EITHER AS TO THE RESULTS TO BE OBTAINED FROM THE USE OF THE SLI SWISS LEADER INDEX® (THE "SLI® INDEX") AND/OR THE LEVEL AT WHICH THE SLI®INDEX STANDS AT ANY PARTICULAR TIME ON ANY PARTICULAR DAY OR OTHERWISE. THE SLI® INDEX IS COMPILED AND CALCULATED SOLELY BY THE SLI® INDEX SPONSOR. HOWEVER, THE SLI® INDEX SPONSOR SHALL NOT BE LIABLE (WHETHER THROUGH NEGLIGENCE OR OTHERWISE) TO ANY PERSON FOR ANY ERROR IN THE SLI® INDEX AND THE SLI® INDEX SPONSOR SHALL NOT BE UNDER ANY OBLIGATION TO ADVISE ANY PERSON OF ANY ERROR THEREIN.

SIX®, SIX SWISS EXCHANGE®, SLI®, SWISS LEADER INDEX (SLI) ®, SPI®, SWISS PERFORMANCE INDEX (SPI) ®, SPI EXTRA®, SMI®, SWISS MARKET INDEX (SMI) ®, SMI MID (SMIM) ®, SMI EXPANDED®, SXI®, SXI LIFE SCIENCES®, SXI BIO+MEDTECH®, SBI®, SBI SWISS BOND INDEX®, VSMI®, SWX IMMOBILIENFONDS INDEX® AND SWX QUOTEMATCH® ARE TRADEMARKS THAT HAVE BEEN REGISTERED IN SWITZERLAND AND/OR ABROAD BY THE SLI® INDEX SPONSOR. THEIR USE IS SUBJECT TO A LICENSE.

NIFTY 50 INDICES DISCLAIMER

XTRACKERS NIFTY 50 SWAP UCITS ETF (THE "PRODUCT(S)") IS NOT SPONSORED, ENDORSED, SOLD OR PROMOTED BY NSE INDICES LIMITED ("NSE"). NSE DOES NOT MAKE ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, TO THE OWNERS OF THE PRODUCT(S) OR ANY MEMBER OF THE PUBLIC REGARDING THE ADVISABILITY OF INVESTING IN SECURITIES GENERALLY OR IN THE PRODUCT(S) PARTICULARLY OR THE ABILITY OF THE NIFTY 50 INDEX TO TRACK GENERAL STOCK MARKET PERFORMANCE IN INDIA. THE RELATIONSHIP OF NSE TO THE COMPANY IS ONLY IN RESPECT OF THE LICENSING OF THE NIFTY 50 INDEX AND CERTAIN TRADEMARKS AND TRADE NAMES ASSOCIATED WITH THE NIFTY 50 INDEX WHICH IS DETERMINED, COMPOSED AND CALCULATED BY NSE WITHOUT REGARD TO THE COMPANY OR THE PRODUCT(S). NSE DOES NOT HAVE ANY OBLIGATION TO TAKE THE NEEDS OF THE COMPANY OR THE OWNERS OF THE PRODUCT(S) INTO CONSIDERATION IN DETERMINING, COMPOSING OR CALCULATING THE NIFTY 50 INDEX. NSE IS NOT RESPONSIBLE FOR OR HAS PARTICIPATED IN THE DETERMINATION OF THE TIMING OF, PRICES AT, OR QUANTITIES OF THE PRODUCT(S) TO BE ISSUED OR IN THE DETERMINATION OR CALCULATION OF THE EQUATION BY WHICH THE PRODUCT(S) IS TO BE CONVERTED INTO CASH. NSE HAS NO OBLIGATION OR LIABILITY IN CONNECTION WITH THE ADMINISTRATION, MARKETING OR TRADING OF THE PRODUCT(S).

NSE DO NOT GUARANTEE THE ACCURACY AND/OR THE COMPLETENESS OF THE NIFTY 50 INDEX OR ANY DATA INCLUDED THEREIN AND THEY SHALL HAVE NO LIABILITY FOR ANY ERRORS, OMISSIONS, OR INTERRUPTIONS THEREIN. NSE DOES NOT MAKE ANY WARRANTY, EXPRESS OR IMPLIED, AS TO RESULTS TO BE OBTAINED BY THE COMPANY, OWNERS OF THE PRODUCT(S), OR ANY OTHER PERSON OR ENTITY FROM THE USE OF THE NIFTY 50 INDEX OR ANY DATA INCLUDED THEREIN. NSE MAKES NO EXPRESS OR IMPLIED WARRANTIES, AND EXPRESSLY DISCLAIM ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE NIFTY 50 INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, NSE EXPRESSLY DISCLAIM ANY AND ALL LIABILITY FOR ANY CLAIMS, DAMAGES OR LOSSES ARISING OUT OF OR RELATED TO THE PRODUCTS, INCLUDING ANY AND ALL DIRECT, SPECIAL, PUNITIVE, INDIRECT, OR CONSEQUENTIAL DAMAGES (INCLUDING LOST PROFITS), EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

AN INVESTOR, BY SUBSCRIBING OR PURCHASING AN INTEREST IN THE PRODUCT(S), WILL BE REGARDED AS HAVING ACKNOWLEDGED, UNDERSTOOD AND ACCEPTED THE DISCLAIMER REFERRED TO ABOVE AND WILL BE BOUND BY IT.

S&P DISCLAIMER

THE RELEVANT SUB-FUNDS (EACH AN "S&P SUB-FUND") ARE NOT SPONSORED, ENDORSED, SOLD OR PROMOTED BY STANDARD & POOR'S AND ITS AFFILIATES ("S&P"). S&P MAKES NO REPRESENTATION, CONDITION, WARRANTY, EXPRESS OR IMPLIED, TO THE OWNERS OF AN S&P SUB-FUND OR ANY MEMBER OF THE PUBLIC REGARDING THE ADVISABILITY OF INVESTING IN SECURITIES GENERALLY OR IN AN S&P SUB-FUND PARTICULARLY OR THE ABILITY OF THE S&P 500 INVERSE DAILY INDEX TO TRACK SHORT STOCK MARKET PERFORMANCE; THE S&P/ASX 200 TR INDEX TO TRACK THE 200 LARGEST AND MOST ACTIVELY TRADED AUSTRALIAN COMPANIES; THE S&P GLOBAL INFRASTRUCTURE INDEX TO TRACK GLOBAL INFRASTRUCTURE STOCK MARKET PERFORMANCE; THE S&P

SELECT FRONTIER INDEX TO TRACK STOCK MARKET PERFORMANCE; THE S&P 500 2X LEVERAGED DAILY INDEX TO TRACK STOCK MARKET PERFORMANCE; THE S&P 500 2X INVERSE DAILY INDEX TO TRACK SHORT STOCK MARKET PERFORMANCE; OR THE S&P 500 INDEX TO TRACK GENERAL STOCK MARKET PERFORMANCE (EACH AN "S&P INDEX"). S&P'S ONLY RELATIONSHIP TO DEUTSCHE BANK IS THE LICENSING OF CERTAIN TRADEMARKS AND TRADE NAMES AND OF AN S&P INDEX WHICH IS DETERMINED, COMPOSED AND CALCULATED BY S&P WITHOUT REGARD TO DEUTSCHE BANK OR AN S&P SUB-FUND. S&P HAS NO OBLIGATION TO TAKE THE NEEDS OF DEUTSCHE BANK OR THE OWNERS OF AN S&P SUB-FUND INTO CONSIDERATION IN DETERMINING, COMPOSING OR CALCULATING AN S&P INDEX. S&P IS NOT RESPONSIBLE FOR AND HAS NOT PARTICIPATED IN THE DETERMINATION OF THE PRICES AND AMOUNT OF AN S&P SUB-FUND OR THE TIMING OF THE ISSUANCE OR SALE OF AN S&P SUB-FUND OR IN THE DETERMINATION OR CALCULATION OF THE EQUATION BY WHICH AN S&P SUB-FUND SHARES ARE TO BE CONVERTED INTO CASH. S&P HAS NO OBLIGATION OR LIABILITY IN CONNECTION WITH THE ADMINISTRATION, MARKETING, OR TRADING OF AN S&P SUB-FUND.

S&P DOES NOT GUARANTEE THE ACCURACY AND/OR THE COMPLETENESS OF AN S&P INDEX OR ANY DATA INCLUDED THEREIN AND S&P SHALL HAVE NO LIABILITY FOR ANY ERRORS, OMISSIONS, OR INTERRUPTIONS THEREIN. S&P MAKES NO WARRANTY OR CONDITION, EXPRESS OR IMPLIED, AS TO RESULTS TO BE OBTAINED BY DEUTSCHE BANK, OWNERS OF AN S&P SUB-FUND, OR ANY OTHER PERSON OR ENTITY FROM THE USE OF AN S&P INDEX OR ANY DATA INCLUDED THEREIN. S&P MAKES NO EXPRESS OR IMPLIED WARRANTIES OR CONDITIONS, AND EXPRESSLY DISCLAIM ALL WARRANTIES OR CONDITIONS OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO AN S&P INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT SHALL S&P HAVE ANY LIABILITY FOR ANY SPECIAL, PUNITIVE, INDIRECT, OR CONSEQUENTIAL DAMAGES (INCLUDING LOST PROFITS) RESULTING FROM THE USE OF AN S&P INDEX OR ANY DATA INCLUDED THEREIN, EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

LPX DISCLAIMER

"LPX" AND "LPX MAJOR MARKET" ARE REGISTERED TRADEMARK OF LPX AG. LPX AG (HEREIN AFTER REFERRED TO AS "LPX INDEX SPONSOR") DOES NOT SPONSOR, SELL OR PROMOTE XTRACKERS LPX PRIVATE EQUITY SWAP UCITS ETF (THE "LPX SUB-FUND"). THE LPX INDEX SPONSOR MAKES NO WARRANTY, EXPRESS OR IMPLIED, CONCERNING THE RESULTS THAT CAN BE OBTAINED THROUGH THE USE OF THE LPX MAJOR MARKET® INDEX (THE "LPX INDEX") AND/OR THE LEVEL OF THE LPX INDEX ON A CERTAIN TIME ON A CERTAIN DATE, NOR ANY OTHER REPRESENTATION OR WARRANTY. THE LPX INDEX IS CALCULATED AND PUBLISHED BY THE LPX INDEX SPONSOR. THE LPX INDEX SPONSOR IS NOT LIABLE FOR ANY ERRORS IN THE LPX INDEX, WHETHER BASED ON NEGLIGENCE OR OTHERWISE AND IS NOT OBLIGED TO INFORM FOR SUCH ERRORS.

NEITHER THE PUBLICATION OF THE LPX INDEX BY THE LPX INDEX SPONSOR NOR THE LICENSING OF THE TRADEMARK IN CONNECTION WITH LPX INDEX PRODUCTS, SECURITIES OR FINANCIAL PRODUCTS THAT ARE DERIVED IN ANY FORM FROM THE LPX INDEX, SHALL BE CONSIDERED, EITHER EXPRESS OR IMPLIED, A REPRESENTATION OR AN OPINION OF THE LPX INDEX SPONSOR WITH RESPECT TO THE ATTRACTIVENESS OF AN INVESTMENT IN THESE PRODUCTS. AS THE OWNER AND ISSUER OF THE TRADEMARK OF THE LPX INDEX, THE LPX INDEX SPONSOR HAS APPROVED THE USE OF AND REFERENCE TO THE LPX INDEX WITH RESPECT TO THE LPX SUB-FUND.

EURONEXT PARIS S.A. CAC 40® DISCLAIMER

"EURONEXT PARIS S.A. HAS ALL PROPRIETARY RIGHTS WITH RESPECT TO THE CAC 40® INDEX. IN NO WAY DOES EURONEXT PARIS S.A. OR ANY DIRECT OR INDIRECT AFFILIATES SPONSOR, ENDORSE OR ARE OTHERWISE INVOLVED IN THE ISSUE AND OFFERING OF XTRACKERS CAC 40 UCITS ETF. EURONEXT PARIS S.A. AND ANY DIRECT OR INDIRECT AFFILIATES DISCLAIM ANY LIABILITY TO ANY PARTY FOR ANY INACCURACY IN THE DATA ON WHICH THE CAC 40® INDEX IS BASED, FOR ANY MISTAKES, ERRORS, OR OMISSIONS IN THE CALCULATION AND/OR DISSEMINATION OF THE INDEX, OR FOR THE MANNER IN WHICH IT IS APPLIED IN CONNECTION WITH THE ISSUE AND OFFERING OF XTRACKERS CAC 40 UCITS ETF.

"CAC 40®" AND "CAC®" ARE REGISTERED TRADEMARKS OF EURONEXT N.V. SUBSIDIARY: EURONEXT PARIS S.A. ".

"EURONEXT PARIS S.A. DETIENT TOUS DROITS DE PROPRIETE RELATIFS A L'INDICE CAC 40®. EURONEXT PARIS S.A., AINSI QUE TOUTE FILIALE DIRECTE OU INDIRECTE, NE SE PORTENT GARANT, N'APPROUVENT, OU NE SONT CONCERNEES EN AUCUNE MANIERE PAR L'EMISSION ET L'OFFRE DE XTRACKERS CAC 40 UCITS ETF. EURONEXT PARIS S.A., AINSI QUE TOUTE FILIALE DIRECTE OU INDIRECTE, NE SERONT PAS TENUES RESPONSABLES VIS A VIS DES TIERS EN CAS D'INEXACTITUDE DES DONNEES SUR LESQUELLES EST BASE L'INDICE CAC 40®, DE FAUTE, D'ERREUR OU D'OMISSION CONCERNANT LE CALCUL OU LA DIFFUSION DE L'INDICE CAC 40®, OU AU TITRE DE SON UTILISATION DANS LE CADRE DE L'EMISSION ET DE L'OFFRE DE XTRACKERS CAC 40 UCITS ETF.

"CAC 40®" ET "CAC®" SONT DES MARQUES DEPOSEES PAR EURONEXT PARIS S.A., FILIALE D'EURONEXT N.V. "

BLOOMBERG INDEX DISCLAIMER

"Bloomberg®, Bloomberg ex-Agriculture & Livestock 15/30 Capped 3 Month Forward Index and Bloomberg Commodity Index Total Return 3 Month Forward are service marks of Bloomberg Finance L.P. and its affiliates, including Bloomberg Index Services Limited ("BISL"), the administrator of the indices (collectively, "Bloomberg"), and have been licensed for use for certain purposes. Neither Xtrackers Bloomberg Commodity Ex-Agriculture & Livestock Swap UCITS ETF nor Xtrackers Bloomberg Commodity Swap UCITS ETF (the "Bloomberg Sub-Funds") are 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 Bloomberg Sub-Funds or any member of the public regarding the advisability of investing in securities generally or in the

Bloomberg Sub-Funds particularly. The only relationship of Bloomberg to the Sub-Funds is the licensing of certain trademarks, trade names and service marks and of the Bloomberg ex-Agriculture & Livestock 15/30 Capped 3 Month Forward Index and Bloomberg Commodity Index Total Return 3 Month Forward, which is determined, composed and calculated by BISL without regard to the Bloomberg Sub-Funds. Bloomberg has no obligation to take the needs of the Bloomberg Sub-Funds or the owners of the Bloomberg Sub-Funds into consideration in determining, composing or calculating the Bloomberg ex-Agriculture & Livestock 15/30 Capped 3 Month Forward Index and Bloomberg Commodity Index Total Return 3 Month Forward. Bloomberg is not responsible for and has not participated in the determination of the timing of, prices at, or quantities of the Bloomberg Sub-Funds to be issued. Bloomberg shall not have any obligation or liability, including, without limitation, to customers of the Bloomberg Sub-Funds, in connection with the administration, marketing or trading of the Bloomberg Sub-Funds.

BLOOMBERG DOES NOT GUARANTEE THE ACCURACY AND/OR THE COMPLETENESS OF THE BLOOMBERG EX-AGRICULTURE & LIVESTOCK 15/30 CAPPED 3 MONTH FORWARD INDEX AND BLOOMBERG COMMODITY INDEX TOTAL RETURN 3 MONTH FORWARD 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 BLOOMBERG SUB-FUNDS OR ANY OTHER PERSON OR ENTITY FROM THE USE OF THE BLOOMBERG EX-AGRICULTURE & LIVESTOCK 15/30 CAPPED 3 MONTH FORWARD INDEX AND BLOOMBERG COMMODITY INDEX TOTAL RETURN 3 MONTH FORWARD 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 EX-AGRICULTURE & LIVESTOCK 15/30 CAPPED 3 MONTH FORWARD INDEX AND BLOOMBERG COMMODITY INDEX TOTAL RETURN 3 MONTH FORWARD 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 BLOOMBERG SUB-FUNDS OR BLOOMBERG EX-AGRICULTURE & LIVESTOCK 15/30 CAPPED 3 MONTH FORWARD INDEX AND BLOOMBERG COMMODITY INDEX TOTAL RETURN 3 MONTH FORWARD OR ANY DATA OR VALUES RELATING THERETO—WHETHER ARISING FROM THEIR NEGLIGENCE OR OTHERWISE, EVEN IF NOTIFIED OF THE POSSIBILITY THEREOF.

CHINA SECURITIES INDEX DISCLAIMER

CSI INDICES ARE COMPILED AND CALCULATED BY CHINA SECURITIES INDEX CO., LTD (**"CSI"**). CSI WILL APPLY ALL NECESSARY MEANS TO ENSURE THE ACCURACY OF THE CSI300 INDEX, THE CSI SMALLCAP 500 INDEX AND THE CSI A500 INDEX (THE **"CSI INDICES"**). HOWEVER, NEITHER CSI NOR THE SHANGHAI STOCK EXCHANGE NOR THE SHENZHEN STOCK EXCHANGE SHALL BE LIABLE (WHETHER IN NEGLIGENCE OR OTHERWISE) TO ANY PERSON FOR ANY ERROR IN THE CSI INDICES AND NEITHER CSI NOR THE SHANGHAI STOCK EXCHANGE NOR THE SHENZHEN STOCK EXCHANGE SHALL BE UNDER ANY OBLIGATION TO ADVISE ANY PERSON OF ANY ERROR THEREIN. ALL COPYRIGHT IN THE INDEX VALUES AND CONSTITUENTS LIST VESTS IN CSI. EITHER CSI OR THE SHANGHAI STOCK EXCHANGE OR THE SHENZHEN STOCK EXCHANGE WILL APPLY ALL NECESSARY MEANS TO ENSURE THE ACCURACY OF THE CSI INDICES. HOWEVER, NEITHER CSI NOR THE SHANGHAI STOCK EXCHANGE NOR THE SHENZHEN STOCK EXCHANGE WILL MAKE ANY WARRANTIES, EXPRESS OR IMPLIED, OR GUARANTEE TO THEIR CUSTOMERS OR ANY OTHER PARTY REGARDING INSTANTANEITY, COMPLETENESS AND ACCURACY OF THE CONTENT OF THE CSI INDICES, AND SHALL NOT BE LIABLE FOR ANY FAULT OR LOSS SUFFERED BY THE RELEVANT SUB-FUND AS A RESULT OF ANY DELAY, OMISSION, ERROR OR OTHER FAULTS IN THE CONTENT OF THE CSI INDICES OR ARISING FROM THE USE OF INFORMATION THEY PROVIDE.

WIENER BÖRSE AG DISCLAIMER

The **ATX® NTR (ATX® Net Total Return)** was developed and is calculated and published by Wiener Börse AG. The full name of the ATX Index and its abbreviation are protected by copyright law as trademarks. The ATX NTR description, rules and composition are available online on www.indices.cc - the index portal of Wiener Börse AG.

Wiener Börse AG does not guarantee the accuracy and/or the completeness of the ATX NTR or any data included therein and Wiener Börse AG shall have no liability for any errors, omissions, or interruptions therein.

A non-exclusive authorization to use the ATX NTR in conjunction with financial products was granted upon the conclusion of a license agreement between Issuer and Wiener Börse AG. The only relationship to the licensee is the licensing of certain trademarks and trade names of ATX NTR which is determined, composed and calculated by Wiener Börse AG without regard to the licensee or the product(s). Wiener Börse AG reserves the rights to change the methods of index calculation or publication, to cease the calculation or publication of the ATX NTR or to change the ATX NTR trademarks or cease the use thereof.

The issued product(s) is/are not in any way sponsored, endorsed, sold or promoted by the Wiener Börse AG. Wiener Börse AG makes no warranty or representation whatsoever, express or implied, as to results to be obtained by licensee, owners of the product(s), or any other person or entity from the use of the ATX NTR or any data included therein. Without limiting any of the foregoing, in no event shall Wiener Börse AG have any liability for any special, punitive, indirect, or consequential damages (including lost profits), even if notified of the possibility of such damages.

NIKKEI DISCLAIMER

The Nikkei Stock Average (the "Nikkei Index") is the intellectual property of Nikkei Inc (the "Nikkei Index Sponsor") (formerly known as Nihon Keizai Shimbun, Inc. - name changed on January 1, 2007). "Nikkei", "Nikkei Stock Average", and "Nikkei 225" are the service marks of the Nikkei Inc. The Nikkei Inc. reserves all rights, including copyright, to the Nikkei Index. Xtrackers Nikkei 225 UCITS ETF is not in any way sponsored, endorsed or promoted by the Nikkei Index Sponsor. The Nikkei Index Sponsor does not make any warranty or representation whatsoever, express or implied, either as to the results to be obtained as to the use of the Nikkei Index or the figure at which the Nikkei Index stands at any particular day or otherwise. The Nikkei Index is compiled and calculated solely by the Nikkei Index Sponsor. However, the Nikkei Index Sponsor shall not be liable to any person for any error in the Nikkei Index and the Nikkei Index Sponsor shall not be under any obligation to advise any person, including a purchaser or vendor of Xtrackers Nikkei 225 UCITS ETF, of any error therein. In addition, the Nikkei Index Sponsor gives no assurance regarding any modification or change in any methodology used in calculating the Nikkei Index and is under no obligation to continue the calculation, publication and dissemination of the Nikkei Index.

ANNEX II:

List of benchmark administrators whose indices are used by the Company and which, as at the date of this Prospectus, are inscribed in the register of administrators and benchmarks maintained by ESMA:

Index Administrator	Index	Sub-Fund	Supervising Authority
Solactive AG	Solactive Spain 40 Index	Xtrackers Spain UCITS ETF	Germany - Federal Financial Supervisory Authority (BaFin) DEBA
	Solactive Swiss Large Cap Index (NTR)	Xtrackers Switzerland UCITS ETF	
	Solactive Zurich ESG Allocation Equities Index	Xtrackers Zurich ESG Allocation Equities UCITS ETF	
S&P Dow Jones Indices LLC	S&P 500 2x Inverse Daily Index	Xtrackers S&P 500 2x Inverse Daily Swap UCITS ETF	Non Applicable – NOAP (Relevant authority: Netherlands Authority for the Financial Markets (AFM) – NLAF)
	S&P 500 2x Leveraged Daily Index	Xtrackers S&P 500 2x Leveraged Daily Swap UCITS ETF	
	S&P 500 Inverse Daily Index	Xtrackers S&P 500 Inverse Daily Swap UCITS ETF	
	S&P 500 Index	Xtrackers S&P 500 Swap UCITS ETF	
	S&P/ASX 200 TR Index	Xtrackers S&P ASX 200 UCITS ETF	
	S&P Global Infrastructure Index	Xtrackers S&P Global Infrastructure Swap UCITS ETF	
	S&P Select Frontier Index	Xtrackers S&P Select Frontier Swap UCITS ETF	
Wiener Börse AG	ATX Index	Xtrackers ATX UCITS ETF	Austrian Financial Market Authority (FMA) ATFM
Euronext Paris	CAC 40 Index	Xtrackers CAC 40 UCITS ETF	Autorité des Marchés Financiers (AMF) FRAM
LPX AG	LPX Major Market Index	Xtrackers LPX Private Equity Swap UCITS ETF	Swiss Financial Market Supervisory Authority - CHFI
STOXX Ltd.	Euro Stoxx 50 Short Index	Xtrackers Euro Stoxx 50 Short Daily Swap UCITS ETF	Non Applicable – NOAP (Relevant authority: Federal Financial Supervisory Authority (BaFin) – DEBA)
	Euro Stoxx 50 Index	Xtrackers Euro Stoxx 50 UCITS ETF	
	Euro Stoxx Quality Dividend 50 Index	Xtrackers Euro Stoxx Quality Dividend UCITS ETF	
	Stoxx Europe 600 Index	Xtrackers Stoxx Europe 600 UCITS ETF	
	Stoxx Global Select Dividend 100 Index	Xtrackers Stoxx Global Select Dividend 100 Swap UCITS ETF	

	DAX ESG Screened Index	Xtrackers DAX ESG Screened UCITS ETF	
	DAX Index	Xtrackers DAX UCITS ETF	
	LevDAX x2 Index	Xtrackers LevDAX Daily Swap UCITS ETF	
	ShortDAX® Index	Xtrackers ShortDAX Daily Swap UCITS ETF	
	ShortDAX x2 Index	Xtrackers ShortDAX x2 Daily Swap UCITS ETF	
	STOXX Vietnam Total Market Liquid Index	Xtrackers Vietnam Swap UCITS ETF	
	STOXX Europe Total Market Defence Space and Cybersecurity Innovation Index	Xtrackers Europe Defence Technologies UCITS ETF	
Nikkei Inc.	Nikkei Stock Average index	Xtrackers Nikkei 225 UCITS ETF	Non Applicable – NOAP (Federal Financial Supervisory Authority (BaFin) – DEBA)

ANNEX III:

List of benchmark administrators whose indices are used by the Company and which, as at the date of this Prospectus, are inscribed in the UK Benchmarks Register maintained by the Financial Conduct Authority (FCA) of the United Kingdom*:

Index Administrator	Index	Sub-Fund	Supervising Authority
MSCI Limited	MSCI AC Asia Ex Japan Low Carbon SRI Selection Capped Index	Xtrackers MSCI AC Asia ex Japan ESG Swap UCITS ETF	UK - Financial Conduct Authority (FCA)
	MSCI Canada Select Screened Index	Xtrackers MSCI Canada Screened UCITS ETF	
	MSCI China TRN Index	Xtrackers MSCI China UCITS ETF	
	MSCI EMU Index	Xtrackers MSCI EMU UCITS ETF	
	MSCI India TRN Index	Xtrackers MSCI India Swap UCITS ETF	
	MSCI Indonesia TRN Index	Xtrackers MSCI Indonesia Swap UCITS ETF	
	MSCI Thailand TRN Index	Xtrackers MSCI Thailand UCITS ETF	
	MSCI Malaysia TRN Index	Xtrackers MSCI Malaysia UCITS ETF	
	MSCI EFM AFRICA TOP 50 CAPPED TRN INDEX	Xtrackers MSCI Africa Top 50 Swap UCITS ETF	
	MSCI Emerging Markets Asia Select Screened Index	Xtrackers MSCI EM Asia Screened Swap UCITS ETF	
	MSCI EM EMEA Low Carbon SRI Selection Capped Index	Xtrackers MSCI EM Europe, Middle East & Africa ESG Swap UCITS ETF	
	MSCI EM Latin America Low Carbon SRI Selection Capped Index	Xtrackers MSCI EM Latin America ESG Swap UCITS ETF	
	MSCI Europe Enhanced Value TRN Index	Xtrackers MSCI Europe Value UCITS ETF	
	MSCI Europe Select Screened Index	Xtrackers MSCI Europe Screened UCITS ETF	
	MSCI Total Return Net Europe Small Cap Index	Xtrackers MSCI Europe Small Cap UCITS ETF	
	MSCI Total Return Net Japan Index	Xtrackers MSCI Japan UCITS ETF	
	MSCI Korea 20/35 Custom Index	Xtrackers MSCI Korea UCITS ETF	
	MSCI Mexico TRN Index	Xtrackers MSCI Mexico UCITS ETF	

	MSCI Pacific ex Japan Select Screened Index	Xtrackers MSCI Pacific ex Japan Screened UCITS ETF	
	MSCI Pakistan Investable Market Total Return Net Index	Xtrackers MSCI Pakistan Swap UCITS ETF	
	MSCI Philippines Investable Market Total Return Net Index	Xtrackers MSCI Philippines UCITS ETF	
	MSCI Singapore Investable Market Total Return Net Index	Xtrackers MSCI Singapore UCITS ETF	
	MSCI Taiwan 20/35 Custom Index	Xtrackers MSCI Taiwan UCITS ETF	
	MSCI Total Return Net Brazil Index	Xtrackers MSCI Brazil UCITS ETF	
	MSCI Total Return Net Emerging Markets Index	Xtrackers MSCI Emerging Markets Swap UCITS ETF	
	MSCI Total Return Net Europe Index	Xtrackers MSCI Europe UCITS ETF	
	MSCI Total Return Net USA Index	Xtrackers MSCI USA Swap UCITS ETF	
	MSCI Total Return Net World Index	Xtrackers MSCI World Swap UCITS ETF	
	MSCI United Kingdom IMI Low Carbon SRI Selection Capped Index	Xtrackers MSCI UK ESG UCITS ETF	
	MSCI Europe Materials Screened 20-35 Select Index	Xtrackers MSCI Europe Materials Screened UCITS ETF	
	MSCI Europe Health Care Screened 20-35 Select Index	Xtrackers MSCI Europe Health Care Screened UCITS ETF	
	MSCI Europe Financials Screened 20-35 Select Index	Xtrackers MSCI Europe Financials Screened UCITS ETF	
	MSCI Europe Communication Services Screened 20-35 Select	Xtrackers MSCI Europe Communication Services Screened UCITS ETF	
	MSCI Europe Information Technology Screened 20-35 Select Index	Xtrackers MSCI Europe Information Technology Screened UCITS ETF	
	MSCI Europe Utilities Screened 20-35 Select Index	Xtrackers MSCI Europe Utilities Screened UCITS ETF	
	MSCI Europe Consumer Staples Screened 20-35 Select Index	Xtrackers MSCI Europe Consumer Staples Screened UCITS ETF	
	MSCI Europe Industrials Screened 20-35 Select Index	Xtrackers MSCI Europe Industrials Screened UCITS ETF	
	MSCI China All Shares Tech Select Screened 100 Index	Xtrackers Harvest MSCI China Tech 100 UCITS ETF	
	MSCI China A Inclusion Select Screened Index	Xtrackers MSCI China A Screened Swap UCITS ETF	
	MSCI China A Inclusion Index	Xtrackers MSCI China A UCITS ETF	

	MSCI ACWI Index	Scalable MSCI AC World Xtrackers UCITS ETF	
FTSE International Limited	FTSE 100 Index	Xtrackers FTSE 100 Income UCITS ETF	UK - Financial Conduct Authority (FCA)
		Xtrackers FTSE 100 UCITS ETF	
	FTSE 100 Daily Short Index	Xtrackers FTSE 100 Short Daily Swap UCITS ETF	
	FTSE 250 Index	Xtrackers FTSE 250 UCITS ETF	
	FTSE EPRA/NAREIT Developed Europe Net Total Return Index	Xtrackers FTSE Developed Europe Real Estate UCITS ETF	
	FTSE MIB Index	Xtrackers FTSE MIB UCITS ETF	
China Securities Index Co.,Ltd	CSI300 Index	Xtrackers CSI300 Swap UCITS ETF	Non Applicable – NOAP (Relevant Authority: Financial Conduct Authority (FCA) – GBFC)
		Xtrackers Harvest CSI300 UCITS ETF	
	CSI Smallcap 500 Index	Xtrackers CSI500 Swap UCITS ETF	
	CSI A500 Index	Xtrackers Harvest CSI A500 UCITS ETF	
Bloomberg Index Services limited	Bloomberg ex-Agriculture & Livestock 15/30 Capped 3 Month Forward Index	Xtrackers Bloomberg Commodity Ex-Agriculture & Livestock Swap UCITS ETF	UK - Financial Conduct Authority (FCA)
	Bloomberg Commodity Index Total Return 3 Month Forward	Xtrackers Bloomberg Commodity Swap UCITS ETF	

* For the avoidance of doubt, the benchmark administrators in this annex qualify as benchmark administrators located in a third country within the meaning of the Benchmark Regulation.

ANNEX IV:

Pre-contractual Information on Sustainable Investments

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 MSCI UK ESG UCITS ETF

Legal entity identifier: 549300HW2T02FJGTP634

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index is designed to represent the performance of companies that have lower carbon exposure than that of the broad United Kingdom equity market and have high ESG performance.

The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index (as defined below), targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules
The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:
• Companies are required to have an MSCI ESG Controversies Score of 1 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.
• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

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 / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **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 MSCI.

• **Exposure to Fossil Fuels:** The percentage of the financial product's portfolio's market value exposed to companies flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI United Kingdom IMI Low Carbon SRI Selection Capped Index, which is designed to reflect the performance of companies that have lower carbon exposure than that of the broad United Kingdom equity market and have high ESG performance. The Reference Index is based on the MSCI United Kingdom Investable Market Index (IMI) ("Parent Index"), which is designed to reflect the performance of the shares of large, mid and small cap segments of the UK market.

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 applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules
To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules
The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:
• Companies are required to have an MSCI ESG Controversies Score of 1 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.
• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

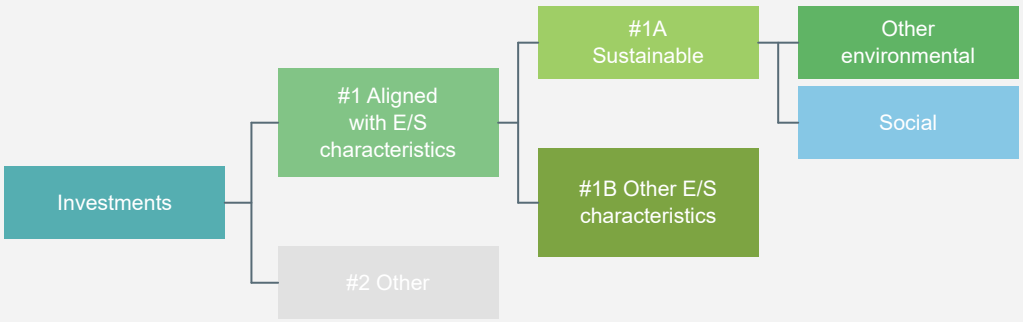
What is the asset allocation planned for this financial product?

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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

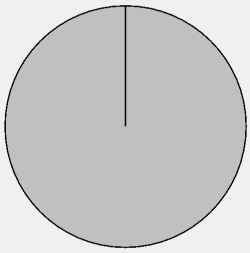
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

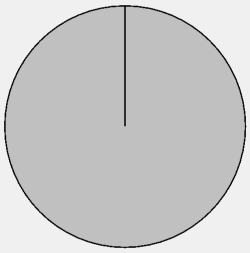
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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.

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 MSCI United Kingdom IMI Low Carbon SRI Selection Capped 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 applying the Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules 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 the Reference Index by buying all or a substantial number of, the constituents of 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 the shares of large, mid and small cap segments of the UK market. The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules
To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules
The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:
• Companies are required to have an MSCI ESG Controversies Score of 1 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.
• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI EM Asia Screened Swap UCITS ETF

Legal entity identifier: 549300Z4GYCGHAKKYJ34

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● ☐ **Yes**	● ○ **X No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	**X** 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	**X** with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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.

Under the Unfunded Swap structure (as defined below), the financial product invests in transferable securities which include certain minimum ESG screening criteria (the "Substitute Basket") and enters into derivative transactions with one or more swap counterparties ("Swap Counterparties") relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil;

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("**GHG**") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI Climate Change Metrics

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

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

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 derivative transactions' 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 derivative transactions' market value exposed to companies with a rating of "CCC" as determined by MSCI.

• **Controversial Weapons Involvement**: The percentage of the financial product's derivative transactions' market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Tobacco involvement**: The percentage of the financial product's derivative transactions' 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 gain exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

At least 1% of the financial product's net assets value will be exposed to securities with 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 investments that the financial product is economically exposed to in the portfolio.

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 investment exposure 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);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Emerging Markets Asia Select Screened Index. The Reference Index is based on the MSCI Emerging Markets Asia Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and medium capitalisation companies in Asian emerging markets. The Reference Index consists of companies from the Parent Index which meet certain minimum environmental, social and governance ("ESG") standards.

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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 the Reference Index until they are removed at the subsequent rebalance or review.

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 exposure 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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

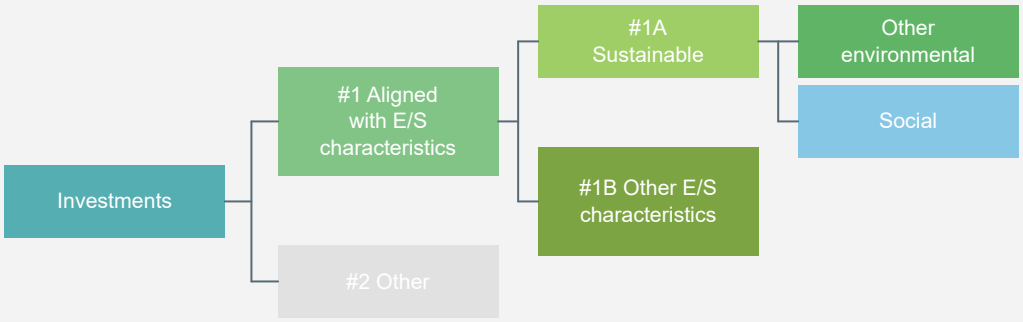
This financial product gains exposure of at least 90% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 1% of the financial product's asset exposure qualifies as sustainable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

Up to 10% of the financial product's asset exposure is not aligned with these characteristics (#2 Other).

Such asset allocation considers only the investments in relation to which the financial product is economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excludes assets held as collateral or as part of the Substitute Basket, in relation to which the financial product is not economically exposed.

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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?

As part of its "Indirect Investment Policy" the financial product uses derivative instruments ("FDIs") for the attainment of its objective, including to attain the environmental and social characteristics promoted by the financial product. Under the Unfunded Swap structure, the financial product invests in the Substitute Basket and enters into derivative transactions with one or more Swap Counterparties on the Reference Index (which incorporates the environmental and social characteristics promoted) in order to obtain the return on such Reference Index (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus).

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

Does the financial product invest in fossil gas and/or nuclear energy[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

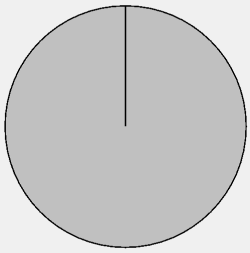
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

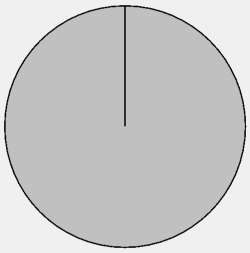
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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 exposure to investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investment exposure aligned with the EU Taxonomy.

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 exposure allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

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 instruments 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 (other than those used to gain exposure to the Reference Index). It may also include that portion of the derivative transactions that are exposed to 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.

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 MSCI Emerging Markets Asia Select Screened 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 from the Parent Index 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 an "Indirect Investment Policy" which means that the financial product will aim to replicate the Reference Index by entering into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "Funded Swap") and/or investing in transferable securities and entering into derivative transactions with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "Unfunded Swap"). As of the date of this pre-contractual disclosure, the financial product obtains the return on the Reference Index using Unfunded Swaps.

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 the shares of certain shares of large and medium capitalisation companies in Asian emerging markets. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research;

• Are assigned an MSCI ESG Rating of CCC;

• Have any involvement in controversial weapons;

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or artic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI EM Latin America ESG Swap UCITS ETF

Legal entity identifier: 549300GABFBJGTJ62T14

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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.

Under the Unfunded Swap structure (as defined below), the financial product invests in transferable securities which include certain minimum ESG screening criteria (the "Substitute Basket") and enters into derivative transactions with one or more swap counterparties ("Swap Counterparties") relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index. The Reference Index is designed to represent the performance of companies that have lower carbon exposure than that of the broad equity market in emerging markets countries in Latin America, and have high ESG performance.

The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index (as defined below), targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

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 derivative transactions' 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 derivative transactions' market value exposed to companies with a rating of "CCC" as determined by MSCI.

• **Controversial Weapons Involvement**: The percentage of the financial product's derivative transactions' market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Greenhouse Gas Intensity**: The financial product's derivative transactions' weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue) as determined by MSCI.

• **Exposure to Fossil Fuels:** The percentage of the financial product's derivative transactions' market value exposed to companies flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

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 gain exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

At least 1% of the financial product's net assets value will be exposed to securities with 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 investments that the financial product is economically exposed to in the portfolio.

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 investment exposure 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);

• 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? Details:

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 not 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.

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.

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

X 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);

• 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 MSCI EM Latin America Low Carbon SRI Selection Capped Index, which is designed to reflect the performance of companies that have lower carbon exposure than that of the broad equity market in emerging markets countries in Latin America, and have high ESG performance. The Reference Index is based on the MSCI EM Latin America Index ("Parent Index"), which is designed to reflect the performance of the shares of the large and mid-cap segments across emerging markets countries in Latin America.

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 applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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 the Reference Index until they are removed at the subsequent rebalance or review.

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 exposure 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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

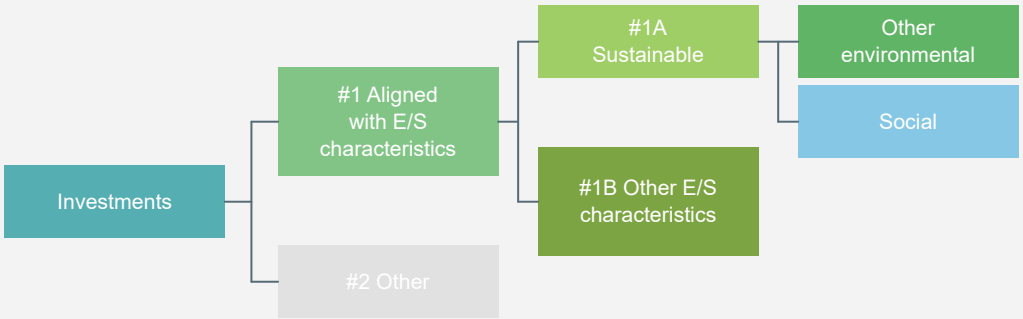
This financial product gains exposure of at least 90% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 1% of the financial product's asset exposure qualifies as sustainable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

Up to 10% of the financial product's asset exposure is not aligned with these characteristics (#2 Other).

Such asset allocation considers only the investments in relation to which the financial product is economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excludes assets held as collateral or as part of the Substitute Basket, in relation to which the financial product is not economically exposed.

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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?

As part of its "Indirect Investment Policy" the financial product uses derivative instruments ("FDIs") for the attainment of its objective, including to attain the environmental and social characteristics promoted by the financial product. Under the Unfunded Swap structure, the financial product invests in the Substitute Basket and enters into derivative transactions with one or more Swap Counterparties on the Reference Index (which incorporates the environmental and social characteristics promoted) in order to obtain the return on such Reference Index (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus).

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

Does the financial product invest in fossil gas and/or nuclear energy[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

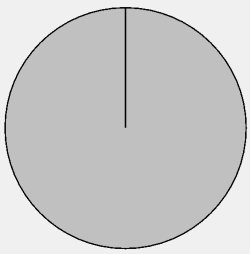
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

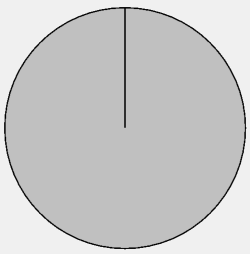
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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 exposure to investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investment exposure aligned with the EU Taxonomy.

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 exposure allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

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 instruments 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 (other than those used to gain exposure to the Reference Index). It may also include that portion of the derivative transactions that are exposed to 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.

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 MSCI EM Latin America Low Carbon SRI Selection Capped 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 applying the Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules 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 an "Indirect Investment Policy" which means that the financial product will aim to replicate the Reference Index by entering into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "Funded Swap") and/or investing in transferable securities and entering into derivative transactions with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "Unfunded Swap"). As of the date of this pre-contractual disclosure, the financial product obtains the return on the Reference Index using Unfunded Swaps.

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 the large and mid-cap segments across emerging markets countries in Latin America. The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI EM Europe, Middle East & Africa ESG Swap UCITS ETF

Legal entity identifier: 549300MQVYIX98ON7X65

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● ☐ **Yes**	● ○ **X No**
☐ It will make a minimum of **sustainable investments with an environmental objective: __%**	**X** 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	**X** with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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.

Under the Unfunded Swap structure (as defined below), the financial product invests in transferable securities which include certain minimum ESG screening criteria (the "Substitute Basket") and enters into derivative transactions with one or more swap counterparties ("Swap Counterparties") relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index. The Reference Index is designed to represent the performance of companies that have lower carbon exposure than that of the broad equity market in European, Middle Eastern and African emerging markets, and have high ESG performance.

The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index (as defined below), targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

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 derivative transactions' 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 derivative transactions' market value exposed to companies with a rating of "CCC" as determined by MSCI.

• **Controversial Weapons Involvement**: The percentage of the financial product's derivative transactions' market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Greenhouse Gas Intensity**: The financial product's derivative transactions' weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue) as determined by MSCI.

• **Exposure to Fossil Fuels:** The percentage of the financial product's derivative transactions' market value exposed to companies flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

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 gain exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

At least 1% of the financial product's net assets value will be exposed to securities with 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 investments that the financial product is economically exposed to in the portfolio.

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 investment exposure 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);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI EM EMEA Low Carbon SRI Selection Capped Index, which is designed to reflect the performance of companies that have lower carbon exposure than that of the broad equity market in European, Middle Eastern and African emerging markets, and have high ESG performance. The Reference Index is based on the MSCI EM EMEA Index ("Parent Index"), which is designed to reflect the performance of the shares of the large and mid-cap segments across emerging markets countries in Europe, the Middle East and Africa (EMEA).

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 applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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 the Reference Index until they are removed at the subsequent rebalance or review.

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 exposure 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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

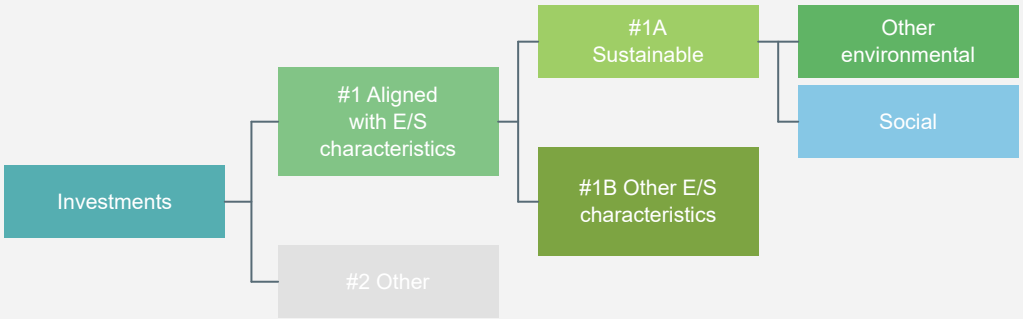
This financial product gains exposure of at least 90% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 1% of the financial product's asset exposure qualifies as sustainable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

Up to 10% of the financial product's asset exposure is not aligned with these characteristics (#2 Other).

Such asset allocation considers only the investments in relation to which the financial product is economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excludes assets held as collateral or as part of the Substitute Basket, in relation to which the financial product is not economically exposed.

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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?

As part of its "Indirect Investment Policy" the financial product uses derivative instruments ("FDIs") for the attainment of its objective, including to attain the environmental and social characteristics promoted by the financial product. Under the Unfunded Swap structure, the financial product invests in the Substitute Basket and enters into derivative transactions with one or more Swap Counterparties on the Reference Index (which incorporates the environmental and social characteristics promoted) in order to obtain the return on such Reference Index (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus).

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

Does the financial product invest in fossil gas and/or nuclear energy[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

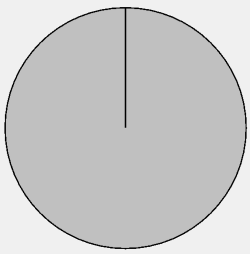
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

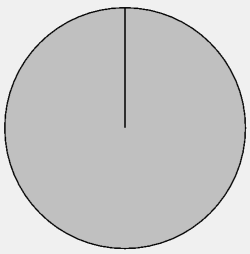
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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 exposure to investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investment exposure aligned with the EU Taxonomy.

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 exposure allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

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 instruments 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 (other than those used to gain exposure to the Reference Index). It may also include that portion of the derivative transactions that are exposed to 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.

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 MSCI EM EMEA Low Carbon SRI Selection 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 applying the Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules 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 an "Indirect Investment Policy" which means that the financial product will aim to replicate the Reference Index by entering into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "Funded Swap") and/or investing in transferable securities and entering into derivative transactions with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "Unfunded Swap"). As of the date of this pre-contractual disclosure, the financial product obtains the return on the Reference Index using Unfunded Swaps.

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 the large and mid-cap segments across emerging markets countries in Europe, the Middle East and Africa (EMEA). The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI Europe Materials Screened UCITS ETF

Legal entity identifier: 549300WQTIB1NF8TQE37

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Materials Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Materials Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the materials sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

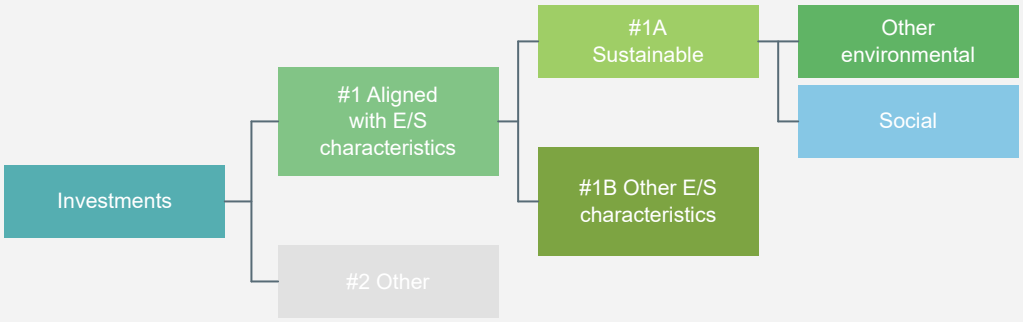
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

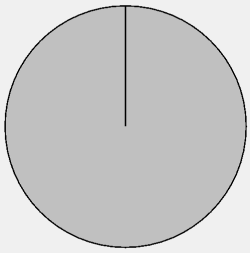
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

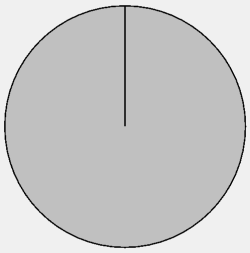
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Materials Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the materials sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI Europe Health Care Screened UCITS ETF

Legal entity identifier: 54930078RS1ES4P71W58

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● ☐ **Yes**	● ○ **X No**
☐ It will make a minimum of **sustainable investments with an environmental objective: __%**	**X** 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
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	**X** with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Health Care Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Health Care Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the health care sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or artic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

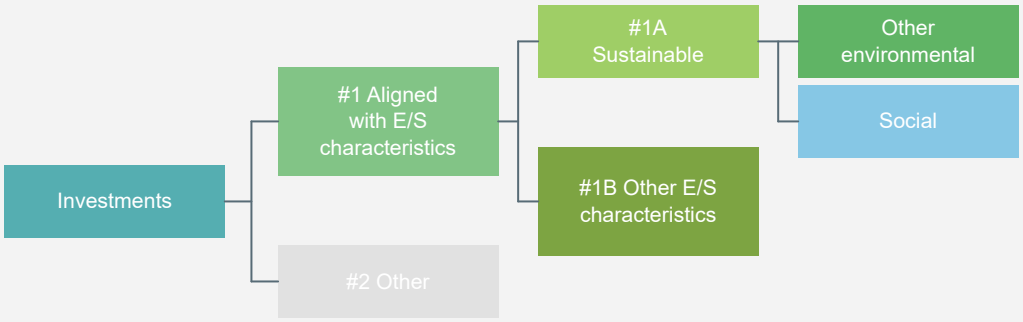
What is the asset allocation planned for this financial product?

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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

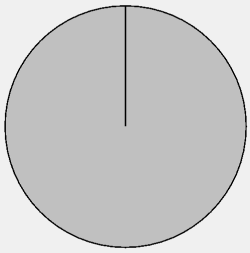
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

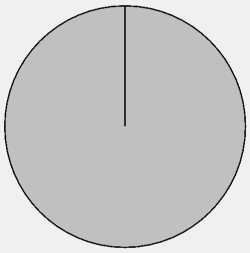
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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.

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 MSCI Europe Health Care Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the health care sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Financials Screened UCITS ETF

Legal entity identifier: 549300YNIXVMFWOP8P94

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Financials Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Financials Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the financials sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

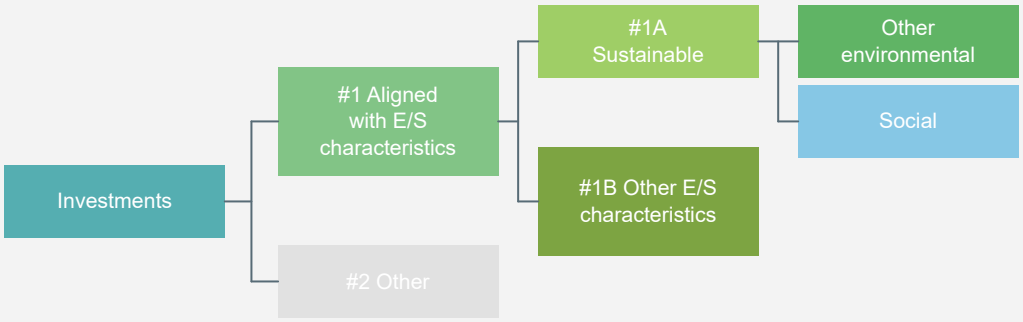
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

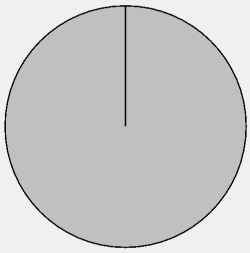
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

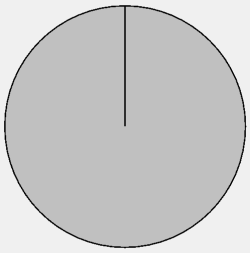
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Financials Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the financials sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction; and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Communication Services Screened UCITS ETF

Legal entity identifier: 549300AGJ1TYQ7FNRT15

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:** __%	☒ 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Communication Services Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Communication Services Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the communication services sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

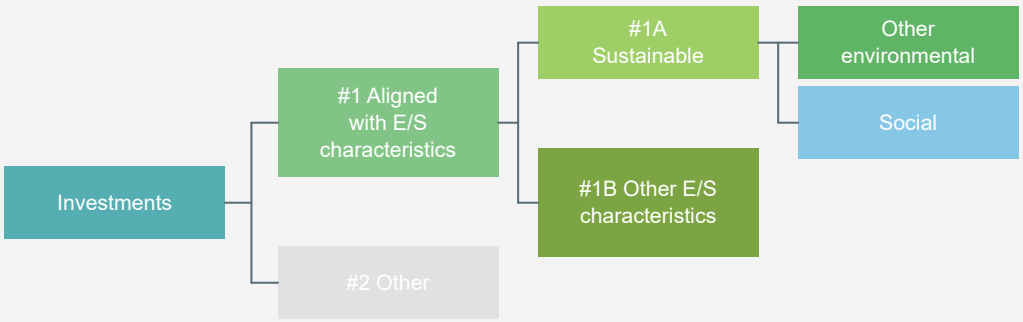
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

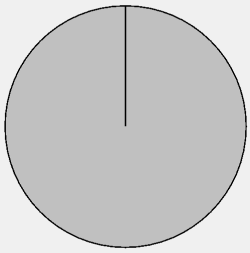
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

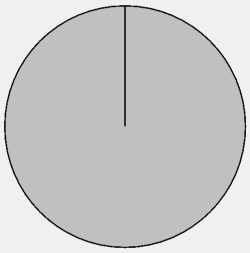
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Communication Services Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the communication services sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Information Technology Screened UCITS ETF

Legal entity identifier: 549300KIYVPQAF3TNN13

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.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
[ ] It will make a minimum of **sustainable investments with an environmental objective:** __%	[X] 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 1% of sustainable investments
[ ] in economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[ ] in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[X] with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[X] 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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Information Technology Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Information Technology Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the information technology sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

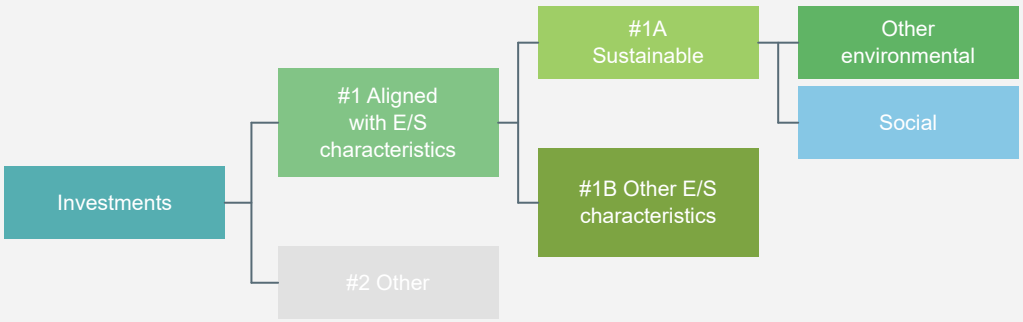
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

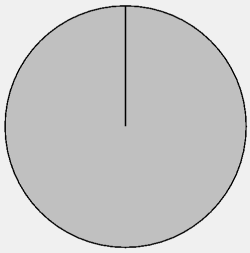
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

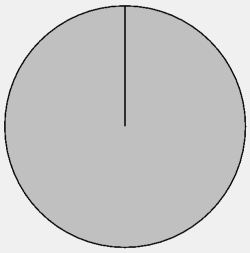
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Information Technology Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the information technology sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI Europe Utilities Screened UCITS ETF

Legal entity identifier: 549300R2FZ8OLQR2BG66

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● ☐ **Yes**	● ○ **X No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	**X** 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	**X** with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

X

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);

• 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 MSCI Europe Utilities Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Utilities Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the utilities sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

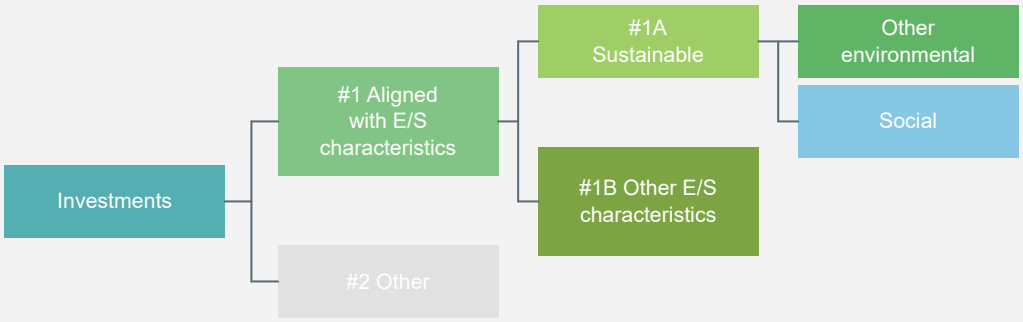
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

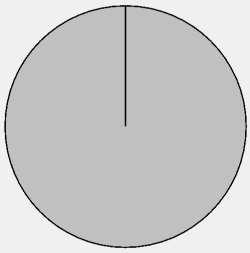
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

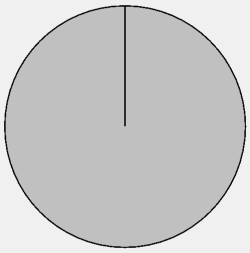
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Utilities Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the utilities sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Consumer Staples Screened UCITS ETF

Legal entity identifier: 549300TA45MCFPU0C423

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Consumer Staples Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Consumer Staples Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the consumer staples sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

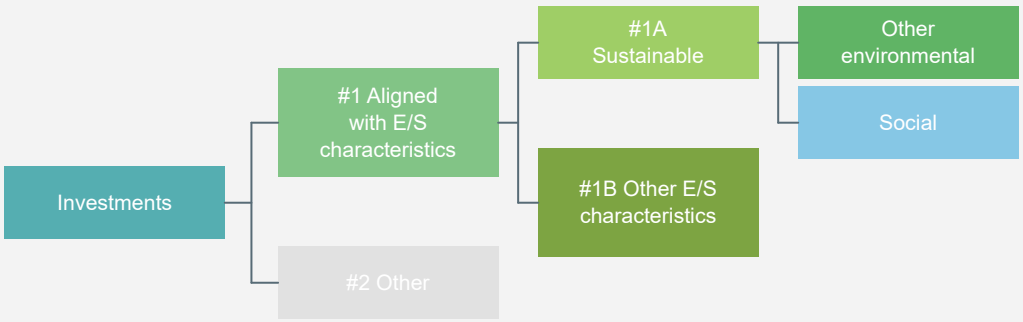
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

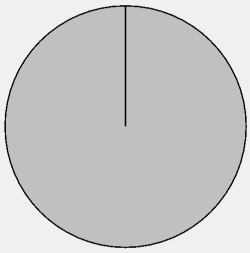
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

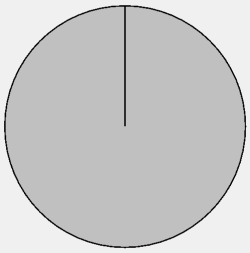
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Consumer Staples Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the consumer staples sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Industrials Screened UCITS ETF

Legal entity identifier: 549300CKZLU243U6UD60

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Industrials Screened 20-35 Select Index. The Reference Index is based on the MSCI Europe Industrials Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the industrials sector as per the Global Industry Classification Standard (GICS®). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

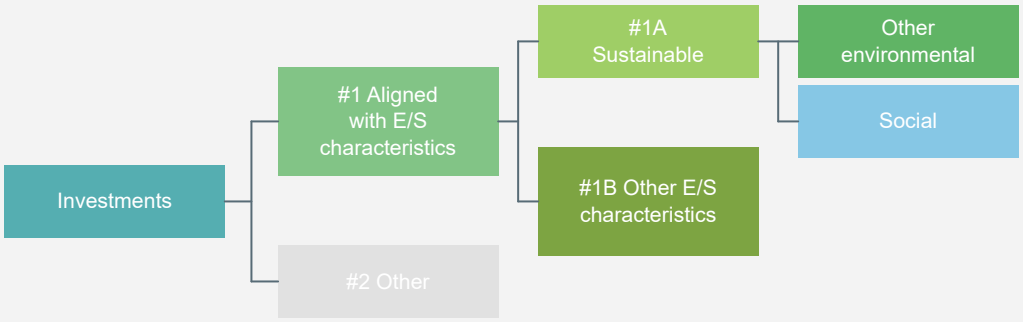
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

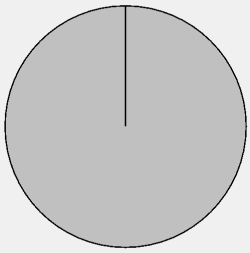
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

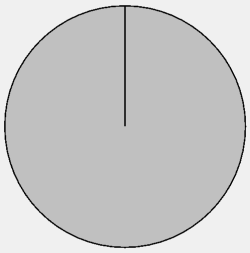
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Industrials Screened 20-35 Select 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and mid-cap securities across certain developed markets countries in Europe, which are classified in the industrials sector as per the Global Industry Classification Standard (GICS®). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI AC Asia ex Japan ESG Swap UCITS ETF

Legal entity identifier: 5493008RMHPSOU8YK549

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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.

Under the Unfunded Swap structure (as defined below), the financial product invests in transferable securities which include certain minimum ESG screening criteria (the "Substitute Basket") and enters into derivative transactions with one or more swap counterparties ("Swap Counterparties") relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index. The Reference Index is designed to represent the performance of companies that have lower carbon exposure than that of the broad market in developed and emerging markets countries in Asia, excluding Japan, and have high ESG performance.

The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index (as defined below), targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

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 derivative transactions' 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 derivative transactions' market value exposed to companies with a rating of "CCC" as determined by MSCI.

• **Controversial Weapons Involvement**: The percentage of the financial product's derivative transactions' market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Greenhouse Gas Intensity**: The financial product's derivative transactions' weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue) as determined by MSCI.

• **Exposure to Fossil Fuels:** The percentage of the financial product's derivative transactions' market value exposed to companies flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

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 gain exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

At least 1% of the financial product's net assets value will be exposed to securities with 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 investments that the financial product is economically exposed to in the portfolio.

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 investment exposure 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);

• 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? Details:

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 not 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.

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.

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

X

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);

• 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 MSCI AC Asia ex Japan Low Carbon SRI Selection Capped Index, which is designed to reflect the performance of companies that have lower carbon exposure than that of the broad equity market in developed and emerging markets countries in Asia, excluding Japan, and have high ESG performance. The Reference Index is based on the MSCI AC Asia ex Japan Index ("Parent Index"), which is designed to reflect the performance of large and mid-capitalisation securities across developed and emerging markets countries in Asia, excluding Japan.

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 applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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 the Reference Index until they are removed at the subsequent rebalance or review.

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 exposure 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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

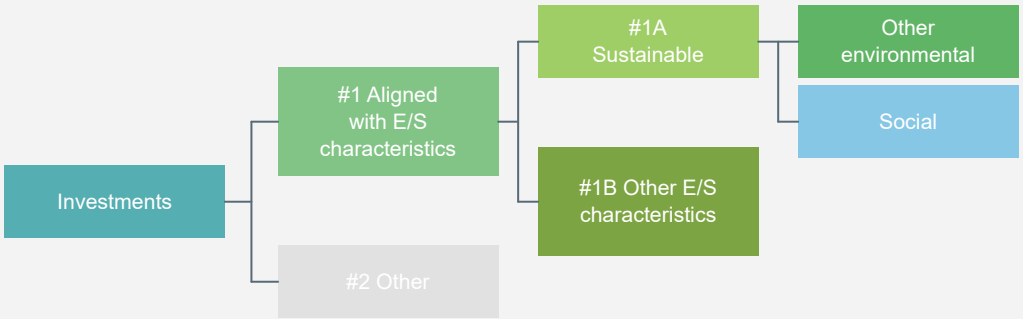
This financial product gains exposure of at least 90% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 1% of the financial product's asset exposure qualifies as sustainable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

Up to 10% of the financial product's asset exposure is not aligned with these characteristics (#2 Other).

Such asset allocation considers only the investments in relation to which the financial product is economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excludes assets held as collateral or as part of the Substitute Basket, in relation to which the financial product is not economically exposed.

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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?

As part of its "Indirect Investment Policy" the financial product uses derivative instruments ("FDIs") for the attainment of its objective, including to attain the environmental and social characteristics promoted by the financial product. Under the Unfunded Swap structure, the financial product invests in the Substitute Basket and enters into derivative transactions with one or more Swap Counterparties on the Reference Index (which incorporates the environmental and social characteristics promoted) in order to obtain the return on such Reference Index (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus).

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

Does the financial product invest in fossil gas and/or nuclear energy[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

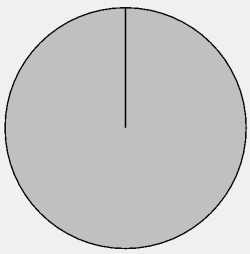
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

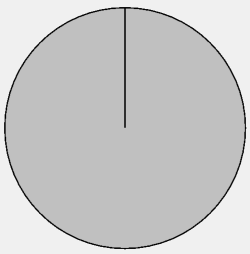
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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 exposure to investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investment exposure aligned with the EU Taxonomy.

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 exposure allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

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 instruments 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 (other than those used to gain exposure to the Reference Index). It may also include that portion of the derivative transactions that are exposed to 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.

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 MSCI AC Asia ex Japan Low Carbon SRI Selection Capped 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 applying the Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules 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 an "Indirect Investment Policy" which means that the financial product will aim to replicate the Reference Index by entering into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "Funded Swap") and/or investing in transferable securities and entering into derivative transactions with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "Unfunded Swap"). As of the date of this pre-contractual disclosure, the financial product obtains the return on the Reference Index using Unfunded Swaps.

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 mid- capitalisation securities across developed and emerging markets countries in Asia, excluding Japan. The Reference Index applies two sets of rules independently, Lowest Carbon Exposure Selection Rules and Highest ESG Performance Selection Rules (together the "Rules").

Lowest Carbon Exposure Selection Rules

To reduce carbon exposure of the index constituents, two rules are independently applied to the constituents of the Parent Index, targeting reductions in: (i) current carbon emission intensity, and (ii) potential carbon emission intensity (the carbon exposure of a security being measured in terms of its greenhouse gas emissions and its potential carbon emissions from fossil fuel reserves). Companies with low exposure to carbon risk relative to their peers are eligible for inclusion in the Reference Index.

Highest ESG Performance Selection Rules

The Highest ESG Performance Selection Rules are based on the MSCI ESG Leaders Indexes Methodology, which uses company ratings and research provided by MSCI ESG Research. In particular, it uses the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provides research, analysis and ratings of how well companies manage environmental, social and governance risks and opportunities. In addition it provides scores and percentiles indicating how well a company manages each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology is applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

• Companies are required to have an MSCI ESG Controversies Score of 3 or above to be eligible for inclusion in the Reference Index. MSCI ESG Controversies Scores provides assessments of controversies concerning the negative environmental, social, and/or governance impact of company operations, products and services. The MSCI ESG Controversies Score falls on a 0-10 scale, with "0" being the most severe.

• The Values Based Exclusions are as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR is utilised to identify and exclude companies involved in industries with a high potential for negative environmental, health and/or social impact, based on the value-based criteria and thresholds from the MSCI SRI Indexes methodology. These industries include, but are not limited to, alcohol, tobacco, gambling, adult entertainment, genetically modified organisms, civilian firearms, oil & gas, nuclear weapons, thermal coal, fossil fuel, and power generation. Companies with any involvement in controversial weapons are explicitly excluded. From time to time, other activities may also be subject to exclusion and more conservative thresholds may apply.

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

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Pacific ex Japan Screened UCITS ETF

Legal entity identifier: 549300PKYNYSI1CU4632

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Pacific ex Japan Select Screened Index. The Reference Index is based on the MSCI Pacific ex Japan Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and medium capitalisation companies in developed markets countries in the Pacific region excluding Japan. The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

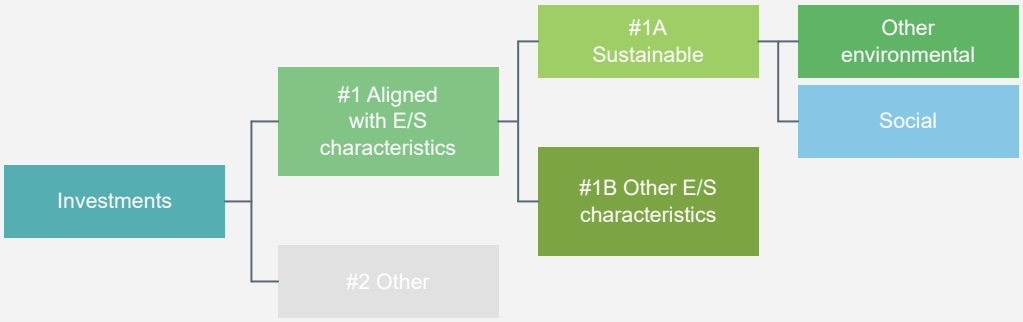
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

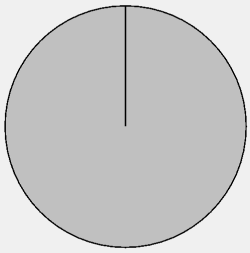
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

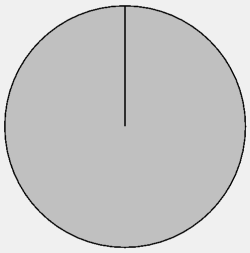
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Pacific ex Japan Select Screened 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and medium capitalisation companies in developed markets countries in the Pacific region excluding Japan. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 MSCI Europe Screened UCITS ETF

Legal entity identifier: 549300K53ZG6VNCNTO67

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Europe Select Screened Index. The Reference Index is based on the MSCI Europe Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of large and medium capitalisation companies in developed European countries. The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

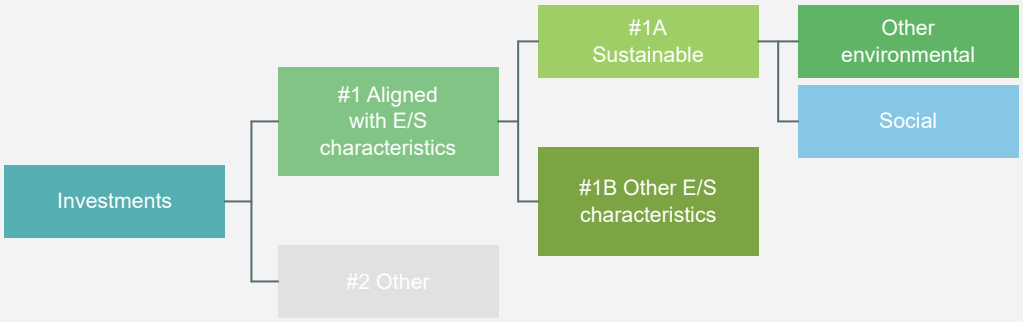
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

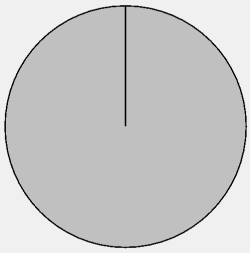
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

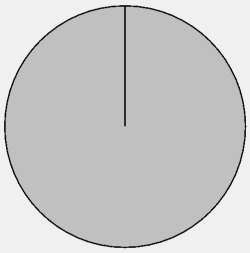
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Europe Select Screened 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of large and medium capitalisation companies in developed European countries. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI Canada Screened UCITS ETF

Legal entity identifier: 54930044H07NIEDYO740

Environmental and/or social characteristics

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.

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 / 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 1% 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.

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:

• Carbon footprint (no. 2);

• GHG intensity of investee companies (no. 3);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI Canada Select Screened Index. The Reference Index is based on the MSCI Canada Index (the "Parent Index"). The Parent Index is designed to reflect the performance of the shares of Canadian large and medium capitalisation companies. The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

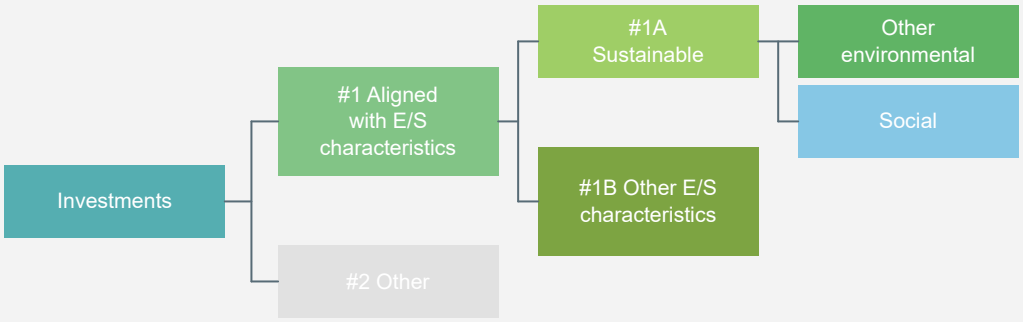
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

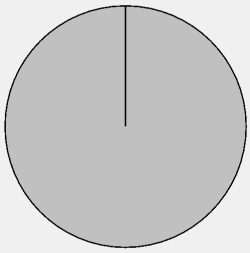
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

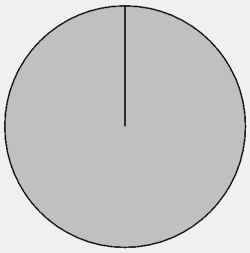
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI Canada Select Screened 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the shares of Canadian large and medium capitalisation companies. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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 DAX ESG Screened UCITS ETF

Legal entity identifier: 549300FN63CGIEPOGE29

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 substantial number of, the securities comprised in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

-Assigned an Institutional Shareholder Services Inc ("ISS ESG") ESG Rating of D- or below;
-Identified as 'Red' by ISS ESG in their Norms Based Screening. ISS ESG's Norms Based Screening assesses companies against their adherence to international norms on human rights, labour standards, environmental protection and anti-corruption established in the UN Global Compact and the OECD Guidelines;
-Identified by ISS ESG as having any involvement in controversial weapons; and/or
-Identified by ISS ESG as breaching certain revenue thresholds in business activities, including, but not limited to, tobacco, thermal coal mining, oil sands, nuclear power, civilian firearms, military equipment, coal expansion, oil fuels, gaseous fuels, and power generation.

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

The Reference Index also excludes companies which have missing ESG data.

The Reference Index utilises ESG data provided by ISS ESG. ISS ESG provides expertise across a variety of sustainable and responsible investment issues, including climate change, sustainable development goal linked impacts, human rights, labour standards, corruption and controversial weapons.

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

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, 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".

• **Controversial Weapons Involvement**: The percentage of the financial product's portfolio's market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments.

• **Tobacco involvement**: The percentage of the financial product's portfolio's market value exposed to companies flagged for involvement in tobacco, 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 1% 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.

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? Details:

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 not 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.

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.

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

X

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 DAX ESG Screened Index. The Reference Index is based on the DAX Index (the "Parent Index") which is designed to reflect the performance of the shares of large-capitalisation companies on the Frankfurt Stock Exchange. The Reference Index consists of companies from the Parent Index which meet certain minimum Environmental, Social and Governance ("ESG") standards.

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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

• Assigned an ISS ESG Rating of D- or below;

• Identified as 'Red' by ISS ESG in their Norms Based Screening. ISS ESG's Norms Based Screening assesses companies against their adherence to international norms on human rights, labour standards, environmental protection and anti-corruption established in the UN Global Compact and the OECD Guidelines;

• Identified by ISS ESG as having any involvement in controversial weapons; and/or

• Identified by ISS ESG as breaching certain revenue thresholds in business activities, including, but not limited to, tobacco, thermal coal mining, oil sands, nuclear power, civilian firearms, military equipment, coal expansion, oil fuels, gaseous fuels, and power generation.

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

The Reference Index also excludes companies which have missing ESG data.

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 which breach certain international norm standards (including governance controversies) using ISS-ESG data, 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 have missing ESG data.

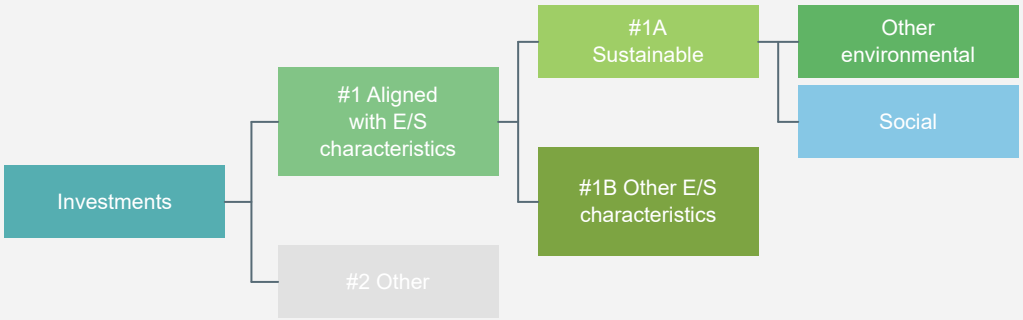
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

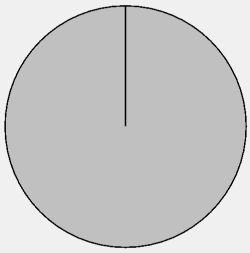
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

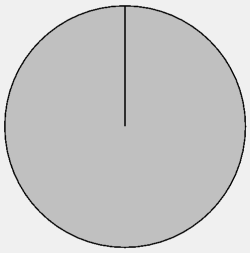
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 DAX ESG Screened 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of the Reference Index.

The financial product may enter into securities lending transactions for efficient portfolio management purposes. Where the financial product enters into securities lending transactions, the collateral received in relation to such transactions shall comply with ESG standards as determined by the relevant investment manager, sub-portfolio manager and/or securities lending agent. Equity collateral conforming to such ESG standards shall be identified by reference to an appropriate developed market ESG equity index and will incorporate as a minimum ESG screens substantially similar to those of 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 the German blue-chip segment comprising large capitalisation companies traded on the Frankfurt Stock Exchange. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

-Assigned an ISS ESG Rating of D- or below;
-Identified as 'Red' by ISS ESG in their Norms Based Screening. ISS ESG's Norms Based Screening assesses companies against their adherence to international norms on human rights, labour standards, environmental protection and anti-corruption established in the UN Global Compact and the OECD Guidelines;
-Identified by ISS ESG as having any involvement in controversial weapons; and/or
-Identified by ISS ESG as breaching certain revenue thresholds in business activities, including, but not limited to, tobacco, thermal coal mining, oil sands, nuclear power, civilian firearms, military equipment, coal expansion, oil fuels, gaseous fuels, and power generation.

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

The Reference Index also excludes companies which have missing ESG data.

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 re-balancing and on the general methodology can be found on www.stoxx.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.

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 Harvest MSCI China Tech 100 UCITS ETF

Legal entity identifier: 254900JWU7JH9ITF5257

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 1% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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 constituents in the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research

- Are assigned an MSCI ESG Rating of CCC

- Have any involvement in controversial weapons

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, and oil sands extraction

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following three components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

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

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 / 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 1% 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.

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? Details:

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 not 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.

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.

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

X

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 MSCI China All Shares Tech Select Screened 100 Index. The Reference Index is based on the MSCI China All Shares Index (the "Parent Index"). The Parent Index is designed to reflect the performance of large and mid-capitalisation segments across China A shares, H shares, B shares, Red chips, P chips and foreign listings (e.g. depositary receipts). The Reference Index consists of companies from the Parent Index which meet certain minimum 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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal and oil sands extraction; and/or

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles.

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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

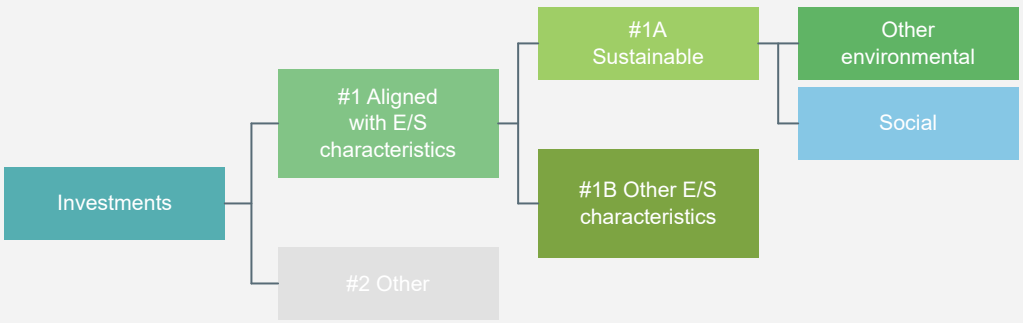
What is the asset allocation planned for this financial product?

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 1% 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).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

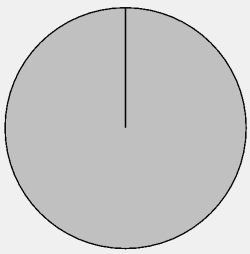
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

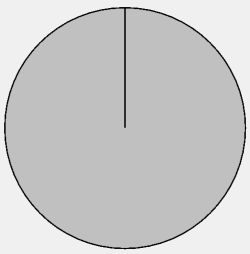
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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 1%.

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 1%.

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.

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 MSCI China All Shares Tech Select Screened 100 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 from the Parent Index 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 replicate the Reference Index by buying all or a substantial number of, the constituents of 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 mid-capitalisation segments across China A shares, H shares, B shares, Red chips, P chips and foreign listings (e.g. depositary receipts). The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research

• Are assigned an MSCI ESG Rating of CCC

• Have any involvement in controversial weapons

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, and oil sands extraction

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers MSCI China A Screened Swap UCITS ETF

Legal entity identifier: 2549003GACL8R9HWHL59

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● ☐ **Yes**	● ○ **X No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	**X** 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 1% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	**X** with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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.

Under the Unfunded Swap structure (as defined below), the financial product invests in transferable securities which include certain minimum ESG screening criteria (the "Substitute Basket") and enters into derivative transactions with one or more swap counterparties ("Swap Counterparties") relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index. The Reference Index selects companies from the Parent Index (as defined below) that meet certain minimum Environmental, Social and Governance ("ESG") standards, by excluding companies from the Parent Index which do not fulfil the following specific ESG criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

The Reference Index uses company ratings and research provided by MSCI ESG Research. In particular, the following four components are utilised:

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

MSCI ESG Business Involvement Screening Research (BISR) aims to enable institutional investors to manage environmental, social and governance (ESG) standards and restrictions.

MSCI Climate Change Metrics

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

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

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 derivative transactions' 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 derivative transactions' market value exposed to companies with a rating of "CCC" as determined by MSCI.

• **Controversial Weapons Involvement**: The percentage of the financial product's derivative transactions' market value exposed to companies with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Tobacco involvement**: The percentage of the financial product's derivative transactions' 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 gain exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

At least 1% of the financial product's net assets value will be exposed to securities with 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 investments that the financial product is economically exposed to in the portfolio.

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 investment exposure 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);

• 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? Details:

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 not 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.

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.

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

[X] 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);

• 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 MSCI China A Inclusion Select Screened Index. The Reference Index is based on the MSCI China A Inclusion Index (the "Parent Index"). The Parent Index is designed to reflect the performance of certain shares of large and medium capitalisation Chinese companies listed on on-shore exchanges such as on the Shanghai and Shenzhen exchanges (so-called "A-Shares") and accessible through the "Stock Connect" framework. The Reference Index consists of companies from the Parent Index which meet certain minimum environmental, social and governance ("ESG") standards.

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, which excludes companies from the Parent Index which do not fulfil specific ESG (environmental, social and governance) criteria:

- Are unrated by MSCI ESG Research;

- Are assigned an MSCI ESG Rating of CCC;

- Have any involvement in controversial weapons;

- Classified by MSCI in their Business Involvement Screening Research as breaching certain revenue thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

- Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas ("GHG") intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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 the Reference Index until they are removed at the subsequent rebalance or review.

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 exposure 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 very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

What is the asset allocation planned for this financial product?

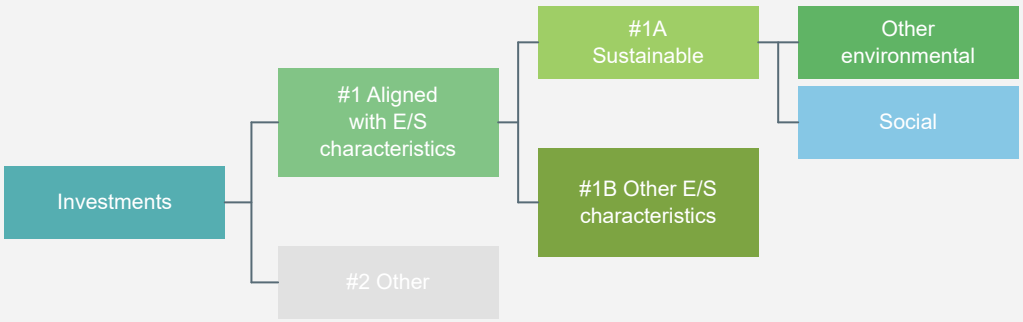
This financial product gains exposure of at least 90% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, at least 1% of the financial product's asset exposure qualifies as sustainable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

Up to 10% of the financial product's asset exposure is not aligned with these characteristics (#2 Other).

Such asset allocation considers only the investments in relation to which the financial product is economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excludes assets held as collateral or as part of the Substitute Basket, in relation to which the financial product is not economically exposed.

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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?

As part of its "Indirect Investment Policy" the financial product uses derivative instruments ("FDIs") for the attainment of its objective, including to attain the environmental and social characteristics promoted by the financial product. Under the Unfunded Swap structure, the financial product invests in the Substitute Basket and enters into derivative transactions with one or more Swap Counterparties on the Reference Index (which incorporates the environmental and social characteristics promoted) in order to obtain the return on such Reference Index (please refer to chapter "Investment Objectives and Policies" in the main part of the Prospectus).

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

Does the financial product invest in fossil gas and/or nuclear energy[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

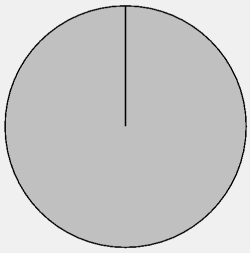
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

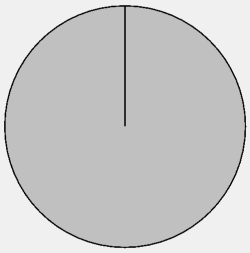
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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 exposure to investments in transitional and enabling activities, as it does not commit to a minimum proportion of environmentally sustainable investment exposure aligned with the EU Taxonomy.

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 exposure allocation to sustainable economic activities that contribute to an environmental objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

What is the minimum share of socially sustainable investments?

The financial product does not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, the share of environmentally and socially sustainable investment exposure will in total be at least 1%.

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 instruments 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 (other than those used to gain exposure to the Reference Index). It may also include that portion of the derivative transactions that are exposed to 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.

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 MSCI China A Inclusion Select Screened 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 from the Parent Index 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 an "Indirect Investment Policy" which means that the financial product will aim to replicate the Reference Index entering into a financial contract (derivative) with Deutsche Bank to swap most subscription proceeds for a return on the Reference Index (a "Funded Swap") and/or by investing in transferable securities and entering into derivative transactions with one or more Swap Counterparties relating to the transferable securities and the Reference Index, in order to obtain the return on the Reference Index (an "Unfunded Swap"). As of the date of this pre-contractual disclosure, the financial product obtains the return on the Reference Index using Unfunded Swaps.

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 the shares of certain shares of large and medium capitalisation Chinese companies listed on on-shore exchanges such as on the Shanghai and Shenzhen exchanges (so-called "A-Shares") and accessible through the "Stock Connect" framework. The Reference Index excludes companies from the Parent Index which do not fulfil the following specific ESG criteria:

• Are unrated by MSCI ESG Research;

• Are assigned an MSCI ESG Rating of CCC;

• Have any involvement in controversial weapons;

• Are classified by MSCI in their ESG Business Involvement Screening Research as breaching certain thresholds in controversial activities, including, but not limited to, tobacco, conventional weapons, nuclear weapons, civilian firearms, thermal coal, unconventional and/or arctic oil and gas extraction, and palm oil; and

• Have an MSCI ESG Controversies Score of 0 and/or fail to comply with the United Nations Global Compact principles, or have an insufficient MSCI ESG Controversies Score related to certain biodiversity and/or environmental controversies.

The Reference Index also includes a carbon emission reduction rule, whereby if having applied the above exclusions, the Greenhouse Gas (“GHG”) intensity of the Reference Index has been insufficiently reduced compared to the Parent Index, constituents are excluded by descending order of GHG intensity until a relevant reduction threshold is achieved as determined by MSCI Climate Change Metrics.

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing and on the general methodology behind the MSCI indices can be found on http://www.msci.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.

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.

Product name: Xtrackers World Green Tech Innovators UCITS ETF

Legal entity identifier: 254900SDD2Y5ZUFVYD25

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

● ● Yes	● ○ X No
It will make a minimum of **sustainable investments with an environmental objective:** __%	X 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 2% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	X with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	X 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**

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.

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

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

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

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

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

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

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

MSCI Climate Change Metrics

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

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

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

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

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 2% 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.

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 principal adverse indicators and the financial product includes criteria to reduce exposure to or to exclude securities which are negatively aligned with the following principal adverse indicators:

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

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

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

The EU Taxonomy sets out a "do not 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.

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.

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

X Yes, the financial product considers the following principle adverse impacts on sustainability factors from Annex I of the 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 achieve a positive mid to long-term investment performance through investments in large and medium-capitalisation listed global equities which facilitate the development and application of green technologies.

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

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

The composition of the financial product will be screened against an ESG database where companies which breach the following ESG standards, among others, will be excluded from the investment universe:

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

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

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

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

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

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

MSCI Climate Change Metrics

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

The Proposed Allocation will be provided by the Allocation Agent on each Asset Allocation Date or at other times where the Allocation Agent wishes to update the Proposed Allocation based on economic and/or other indicators. While the financial product seeks to ensure compliance with the above ESG standards at each Asset Selection Date or review date, between these dates, securities which no longer meet these criteria may remain included in the portfolio of the financial product until it is possible and practicable to divest such positions.

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 financial product will not invest in companies with very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

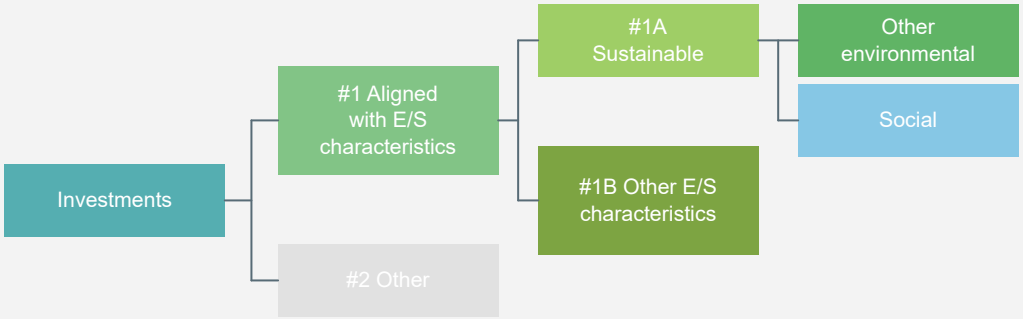
What is the asset allocation planned for this financial product?

This financial product invests at least 80% 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 2% of the financial product's assets qualify as sustainable investments (#1A Sustainable).

Up to 20% of the investments are not aligned with these characteristics (#2 Other).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 portfolio rebalance to gain market exposure. Any exposures obtained through the use of FDIs for these ancillary purposes will be aligned with the investment objective of the financial product and would conform to ESG standards substantially similar to those of this financial product, or would fall within the quoted percentage of the investments that are not aligned with the promoted environmental and social characteristics (#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. 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

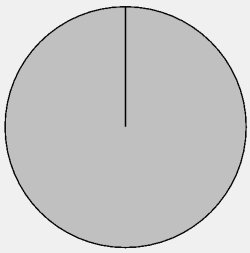
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

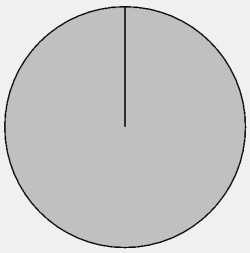
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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?

While the financial product does not have sustainable investment as its objective, it will invest a minimum proportion of its assets in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy of at least 1%.

What is the minimum share of socially sustainable investments?

While the financial product does not have sustainable investment as its objective, it will invest a minimum proportion of its assets in sustainable investments with a social objective of at least 1%.

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.

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.

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

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.

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.

Product name: Xtrackers World Small Cap Green Tech Innovators UCITS ETF

Legal entity identifier: 254900IZP2554DREV972

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: __%**	☒ 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 2% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ 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**

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.

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

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

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

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

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

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

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

MSCI Climate Change Metrics

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

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

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

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

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 2% 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.

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 principal adverse indicators and the financial product includes criteria to reduce exposure to or to exclude securities which are negatively aligned with the following principal adverse indicators:

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

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

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

The EU Taxonomy sets out a "do not 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.

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.

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

X Yes, the financial product considers the following principle adverse impacts on sustainability factors from Annex I of the 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 achieve a positive mid to long-term investment performance through investments in small capitalisation listed global equities which facilitate the development and application of green technologies.

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

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

The composition of the financial product will be screened against an ESG database where companies which breach the following ESG standards, among others, will be excluded from the investment universe:

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

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

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

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

MSCI ESG Ratings

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

MSCI ESG Controversies

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

MSCI ESG Business Involvement Screening Research

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

MSCI Climate Change Metrics

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

The Proposed Allocation will be provided by the Allocation Agent on each Asset Allocation Date or at other times where the Allocation Agent wishes to update the Proposed Allocation based on economic and/or other indicators. While the financial product seeks to ensure compliance with the above ESG standards at each Asset Selection Date or review date, between these dates, securities which no longer meet these criteria may remain included in the portfolio of the financial product until it is possible and practicable to divest such positions.

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 financial product will not invest in companies with very severe controversies (including governance controversies) using the MSCI ESG Controversies data, and companies that have an MSCI ESG Rating (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold or do not have an MSCI ESG Rating.

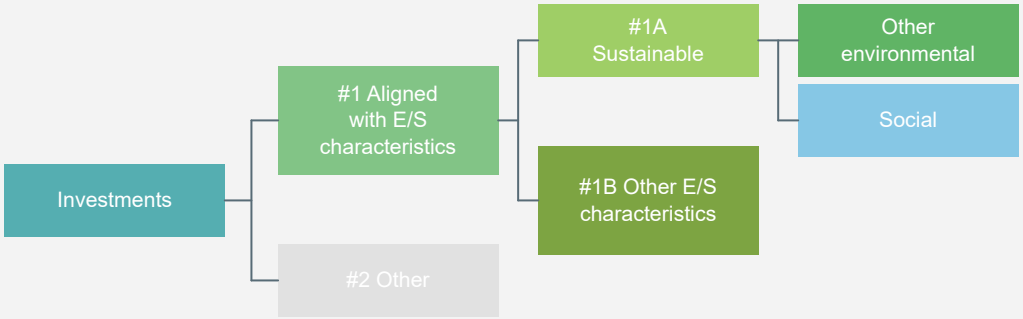
What is the asset allocation planned for this financial product?

This financial product invests at least 80% 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 2% of the financial product's assets qualify as sustainable investments (#1A Sustainable).

Up to 20% of the investments are not aligned with these characteristics (#2 Other).

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 portfolio rebalance to gain market exposure. Any exposures obtained through the use of FDIs for these ancillary purposes will be aligned with the investment objective of the financial product and would conform to ESG standards substantially similar to those of this financial product, or would fall within the quoted percentage of the investments that are not aligned with the promoted environmental and social characteristics (#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. 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

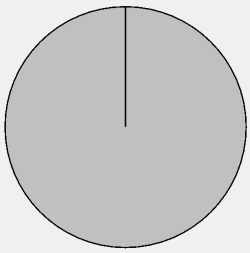
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

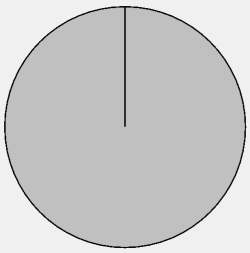
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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?

While the financial product does not have sustainable investment as its objective, it will invest a minimum proportion of its assets in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy of at least 1%.

What is the minimum share of socially sustainable investments?

While the financial product does not have sustainable investment as its objective, it will invest a minimum proportion of its assets in sustainable investments with a social objective of at least 1%.

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.

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.

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

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.

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.

Product name: Xtrackers Zurich ESG Allocation Equities UCITS ETF

Legal entity identifier: 254900K4DN3QBZCSNE95

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes	**X No**
It will make a minimum of **sustainable investments with an environmental objective: _%**	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 __% of sustainable investments
in economic activities that qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	with a social objective
It will make a minimum of **sustainable investments with a social objective: _%**	X It promotes E/S characteristics, but **will not make any sustainable investments**

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.

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 exchange traded funds ("**Constituent ETFs**") 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 a diversified portfolio of Constituent ETFs which meet certain minimum environmental, social, and governance ("**ESG**") standards.

Investment Universe

To be included in the initial investment universe (the "**Initial Investment Universe**") for the Reference Index, ETFs must fulfill certain requirements as determined by the Index Administrator:

- Classified as an equity UCITS ETF;
- Discloses under Article 8 or 9 of the Sustainable Finance Disclosure Regulation ("**SFDR**");
- Must meet or exceed set minimum Assets Under Management criteria ("**AuM**");
- Must meet or exceed set minimum number of portfolio holdings; and
- Being issued by certain ETF providers or their successors.

Research Universe Selection and Security Weighting

Data Provider
After the application of the Initial Investment Universe requirements, the Reference Index utilises inputs from Zürich Beteiligungs-Aktiengesellschaft (Deutschland) (the "**Data Provider**") for the selection of the Constituent ETFs that will be included in the Reference Index. The Data Provider, or its group entities, is part of the Zurich Insurance Group and is a data provider with experience and expertise in ETF selection and sustainable data.

Research Universe Selection
ETFs from the Initial Investment Universe must meet the following criteria to be included in the Data Provider's research universe (the "**Research Universe**"):

- *Risk-Return Assessment Score:* Companies must have a Risk-Return Assessment Score above a certain threshold.

The Risk-Return Assessment Score is a score from 0-10 that is assigned to an ETF and determined by a research group of the Data Provider. The research group is composed of employees from the portfolio management, markets, and ESG teams, as well as the heads of the Unit Linked Strategy, New Propositions & Investment Solutions, and Platform & Sustainability departments of the Data Provider.

The determination of the Risk-Return Assessment Score is based on the following characteristics:
- Relative attractiveness of the regional exposure within the Research Universe from the perspective of a Euro-denominated investor;
- AuM of ETFs with similar regional exposure in the Initial Investment Universe;
- Sustainability strategy alignment with the sustainability standards of the Data Provider. These standards are published on the website of the Data Provider and are outlined in the Data Provider's sustainability report.

ESG Standards: ETFs that do not align with the sustainability standards of the Data Provider are excluded from the Research Universe. The sustainability standards of the Data Provider exclude ETFs which:

- Fail to meet minimum ESG Fund Rating requirements;
- Fail certain disclosure requirements;
- Are unrated or missing coverage;
- Do not apply criteria to exclude investments which fail to meet minimum ESG Rating requirements;
- Do not apply criteria to exclude investments which have any involvement in controversial or nuclear weapons;
- Do not apply criteria to exclude investments which do not comply with the United Nations Global Compact principles;
- Do not apply criteria to exclude companies with severe ESG controversies; and
- Do not apply criteria to exclude investments classified as breaching certain thresholds in

controversial activities, including, but not limited to, conventional weapons, civilian firearms, tobacco, adult entertainment, gambling-related activities, nuclear power generation, unconventional oil and gas, coal involvement, crude oil involvement, gas involvement and power generation from fossil fuels.

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

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

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

• **Fund Exposure to Worst-in-Class issuers**: The percentage of the financial product's portfolio's market value exposed to funds, and/or companies within these funds, with a rating of "CCC" as determined by MSCI.

• **Fund Controversial Weapons Involvement**: The percentage of the financial product's portfolio's market value exposed to funds, and/or companies within these funds, with ties to cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments as determined by MSCI.

• **Fund Exposure to Fossil Fuels:** The percentage of the financial product's portfolio's market value exposed to funds, and/or companies within these funds, flagged for involvement in fossil fuels as determined by MSCI, and includes companies deriving revenue from thermal coal extraction, unconventional and conventional oil and gas extraction, oil refining, as well as revenue from thermal coal based power generation, liquid fuel based power generation, or natural gas based power generation.

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?

N/A - Given the financial product does not intend to make sustainable investments, it is not expected that the financial product will be invested in sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2(17) of 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 issuers 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?

N/A - Given the financial product does not intend to make sustainable investments, it is not expected that the financial product will be invested in sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2(17) of SFDR.

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

N/A - Given the financial product does not intend to make sustainable investments, indicators for adverse impacts on sustainability factors have not been taken into account for the purposes of determining sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2(17) of SFDR.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

N/A - Given the financial product does not intend to make sustainable investments, it is not expected that the financial product will be invested in sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2(17) of SFDR. Nonetheless, the investment objective of the financial product is to track the performance before fees and expenses of the Reference Index, which excludes funds that do not apply criteria to exclude any securities violating the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The EU Taxonomy sets out a "do not 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.

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.

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

X

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 Solactive Zurich ESG Allocation Equities Index which is designed to reflect the performance of a diversified portfolio of equity exchange-traded funds which meet certain minimum environmental, social, and governance ("**ESG**") standards .

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 is designed to reflect the performance of a diversified portfolio of equity exchange-traded funds ("**Constituent ETFs**") which meet certain minimum environmental, social, and governance ("**ESG**") standards.

Investment Universe

To be included in the initial investment universe (the "**Initial Investment Universe**") for the Reference Index, ETFs must fulfill certain requirements as determined by the Index Administrator:

- Classified as an equity UCITS ETF;
- Discloses under Article 8 or 9 of the Sustainable Finance Disclosure Regulation ("**SFDR**");
- Must meet or exceed set minimum Assets Under Management criteria ("**AuM**");
- Must meet or exceed set minimum number of portfolio holdings; and
- Being issued by certain ETF providers or their successors.

Research Universe Selection and Security Weighting

Data Provider
After the application of the Initial Investment Universe requirements, the Reference Index utilises inputs from Zürich Beteiligungs-Aktiengesellschaft (Deutschland) (the "Data Provider") for the selection of the Constituent ETFs that will be included in the Reference Index. The Data Provider, or its group entities, is part of the Zurich Insurance Group and is a data provider with experience and expertise in ETF selection and sustainable data.

Research Universe Selection
ETFs from the Initial Investment Universe must meet the following criteria to be included in the Data Provider's research universe (the "**Research Universe**"):

- *Risk-Return Assessment Score:* Companies must have a Risk-Return Assessment Score above a certain threshold.

The Risk-Return Assessment Score is a score from 0-10 that is assigned to an ETF and determined by a research group of the Data Provider. The research group is composed of employees from the portfolio management, markets, and ESG teams, as well as the heads of the Unit Linked Strategy, New Propositions & Investment Solutions, and Platform & Sustainability departments of the Data Provider.

The determination of the Risk-Return Assessment Score is based on the following characteristics:
- Relative attractiveness of the regional exposure within the Research Universe from the perspective of a Euro-denominated investor;
- AuM of ETFs with similar regional exposure in the Initial Investment Universe;
- Sustainability strategy alignment with the sustainability standards of the Data Provider. These standards are published on the website of the Data Provider and are outlined in the Data Provider's sustainability report.

ESG Standards: ETFs that do not align with the sustainability standards of the Data Provider are excluded from the Research Universe. The sustainability standards of the Data Provider exclude ETFs which:

- Fail to meet minimum ESG Fund Rating requirements;
- Fail certain disclosure requirements;
- Are unrated or missing coverage;
- Do not apply criteria to exclude investments which fail to meet minimum ESG Rating requirements;
- Do not apply criteria to exclude investments which have any involvement in controversial or nuclear weapons;
- Do not apply criteria to exclude investments which do not comply with the United Nations Global Compact principles;
- Do not apply criteria to exclude companies with severe ESG controversies; and
- Do not apply criteria to exclude investments classified as breaching certain thresholds in controversial activities, including, but not limited to, conventional weapons, civilian firearms, tobacco, adult entertainment, gambling-related activities, nuclear power generation, unconventional oil and gas, coal involvement, crude oil involvement, gas involvement and power generation from fossil

fuels.

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

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 funds, and/or companies within these funds, with very severe ESG controversies (including governance controversies) and that have an ESG Fund Rating and ESG Quality Assessment (which assesses, amongst other things, how well companies manage governance risks and opportunities) below a certain threshold, as determined by the Data Provider.

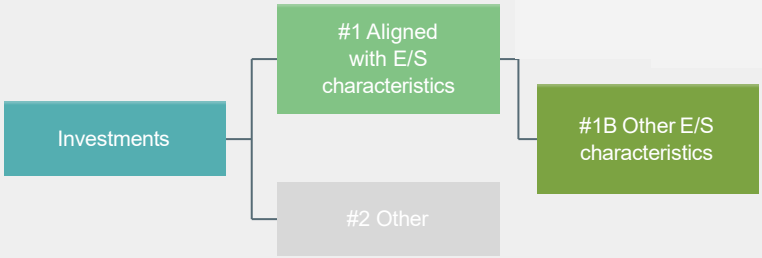
What is the asset allocation planned for this financial product?

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).

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

Asset allocation describes the share of investments in specific assets.

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.

#2 Other 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 environmentally sustainable economic activities. 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[1] related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.

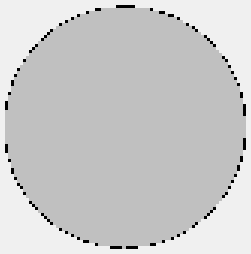
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

[1] 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.

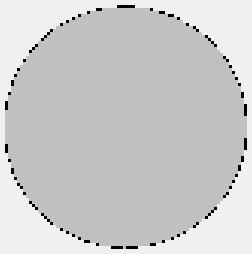
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments **excluding sovereign bonds***



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no fossil gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

**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.

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.

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.

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.

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 Solactive Zurich ESG Allocation Equities 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 including only funds that disclose under Article 8 or 9 of the Sustainable Finance Disclosure Regulation and excluding funds which do not fulfill 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 attempt to replicate the Reference Index by buying all, or a substantial number of, the Constituent ETFs of the Reference Index. The financial product may also invest from time to time directly in transferable securities, money market instruments, other collective investment schemes, or other eligible assets, which will however 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 is designed to reflect the performance of a diversified portfolio of equity exchange-traded funds ("**Constituent ETFs**") which meet certain minimum environmental, social, and governance ("**ESG**") standards.

Investment Universe

To be included in the initial investment universe (the "**Initial Investment Universe**") for the Reference Index, ETFs must fulfill certain requirements as determined by the Index Administrator:

- Classified as an equity UCITS ETF;
- Discloses under Article 8 or 9 of the Sustainable Finance Disclosure Regulation ("**SFDR**");
- Must meet or exceed set minimum Assets Under Management criteria ("**AuM**");
- Must meet or exceed set minimum number of portfolio holdings; and
- Being issued by certain ETF providers or their successors.

Research Universe Selection and Security Weighting

Data Provider
After the application of the Initial Investment Universe requirements, the Reference Index utilises inputs from Zürich Beteiligungs-Aktiengesellschaft (Deutschland) (the "Data Provider") for the selection of the Constituent ETFs that will be included in the Reference Index. The Data Provider, or its group entities, is part of the Zurich Insurance Group and is a data provider with experience and expertise in ETF selection and sustainable data.

Research Universe Selection
ETFs from the Initial Investment Universe must meet the following criteria to be included in the Data Provider's research universe (the "**Research Universe**"):

- *Risk-Return Assessment Score:* Companies must have a Risk-Return Assessment Score above a certain threshold.

The Risk-Return Assessment Score is a score from 0-10 that is assigned to an ETF and determined by a research group of the Data Provider. The research group is composed of employees from the portfolio management, markets, and ESG teams, as well as the heads of the Unit Linked Strategy, New Propositions & Investment Solutions, and Platform & Sustainability departments of the Data Provider.

The determination of the Risk-Return Assessment Score is based on the following characteristics:
- Relative attractiveness of the regional exposure within the Research Universe from the perspective of a Euro-denominated investor;
- AuM of ETFs with similar regional exposure in the Initial Investment Universe;
- Sustainability strategy alignment with the sustainability standards of the Data Provider. These standards are published on the website of the Data Provider and are outlined in the Data Provider's sustainability report.

ESG Standards: ETFs that do not align with the sustainability standards of the Data Provider are excluded from the Research Universe. The sustainability standards of the Data Provider exclude ETFs which:

- Fail to meet minimum ESG Fund Rating requirements;
- Fail certain disclosure requirements;
- Are unrated or missing coverage;
- Do not apply criteria to exclude investments which fail to meet minimum ESG Rating requirements;
- Do not apply criteria to exclude investments which have any involvement in controversial or nuclear weapons;
- Do not apply criteria to exclude investments which do not comply with the United Nations Global Compact principles;
- Do not apply criteria to exclude companies with severe ESG controversies; and
- Do not apply criteria to exclude investments classified as breaching certain thresholds in controversial activities, including, but not limited to, conventional weapons, civilian firearms, tobacco, adult entertainment, gambling-related activities, nuclear power generation, unconventional oil and gas, coal involvement, crude oil involvement, gas involvement and power generation from fossil fuels.

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

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

Additional information on the Reference Index, its composition, ESG criteria, calculation and rules for periodical review and re-balancing 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.