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

Sustainable

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

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

Taxonomy or not.

Product name:

Amundi DAX 50 ESG II UCITS ETF

Legal entity identifier: 529900GFNNJ8CI4K9B60

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:% 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	charac as its o will hav	notes Environmental/Social (E/S) teristics and while it does not have bjective a sustainable investment, it we a minimum proportion of 25_% of hable investments with an environmental objective in economic activities that 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:%			otes E/S characteristics, but will not ny sustainable investments				



What environmental and/or social characteristics are promoted by this financial product?

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

The sub-fund promotes environmental and/or social characteristics by tracking the DAX® 50 ESG (Performance Index) (the "Index"). The sub-fund promotes environmental and/or social characteristics, including through the integration of the environmental, social and governance ("ESG") rating of the ESG section of the data provider Sustainalytics. The DAX® 50 ESG tracks the price performance of the 50 largest and most liquid stocks included in the HDAX® Index. The HDAX® Index comprises all companies included in the DAX®, MDAX® and TecDAX® that are assessed as particularly sustainable based on ESG criteria.

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

The sustainability indicator used is the ESG rating of the DAX $^{\circ}$ 50 ESG (Global Standards Screening of the data provider Sustainalytics). The specificity of the index is to select companies with positive ESG ratings while excluding companies that have a negative impact on certain sustainability factors and meet the exclusion criteria set out below.

The DAX® 50 ESG performance index tracks the performance of the 50 biggest and most liquid equities on the German market that ESG (environmental, social and governance) criteria judge to be particularly sustainable. The investment universe of the DAX® 50 ESG is based on all equities in the HDAX® index. The HDAX® includes all the companies included on DAX®, MDAX® and TecDAX®.

STOXX Ltd. excludes companies that Sustainalytics, its ESG data provider, has assessed as not complying with Global Standards Screening. Global Standards Screening identifies companies that violate, or are at risk of violating, generally recognised standards that are rooted in the principles of the United Nations Global Compact (UNGC), OECD guidelines for multinational enterprises or the United Nations General Principles (UNGP) on Business and Human Rights and their underlying conventions.

Weiterhin werden Unternehmen ausgeschlossen, die bestimmte Kriterien von Sustainalytics hinsichtlich umstrittener Waffen, Tabakproduktion, Thermische Kohle, Kernenergie oder Militärverträgen nicht erfüllen. Detaillierte Informationen zu den Aussschlusskriterien finden Sie unter "Beschreibung des zugrunde liegenden Index des Teilfonds" im Besonderen Teil des Teilfonds im Prospekt.

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?

The objectives of the sustainable investments are to invest in investee companies that seek to meet two criteria:

- 1) follow best environmental and social practices; and
- 2) avoid making products or providing services that harm the environment and society.

In order for the investee company to be deemed to contribute to the above objective it must be a "best performer" within its sector of activity on at least one of its material environmental or social factors.

The definition of "best performer" relies on Amundi's proprietary ESG methodology which aims to measure the ESG performance of an investee company. In order to be considered a "best performer", an investee company must perform with the best top three rating (A, B or C, out of a rating scale going from A to G) within its sector on at least one material environmental or social factor. Material environmental and social factors are identified at a sector level. The identification of material factors is based on Amundi ESG analysis framework which combines extra-financial data and qualitative analysis of associated sector and sustainability themes. Factors identified as material result in a contribution of more than 10% to the overall ESG score. For energy sector for example, material factors are: emissions and energy, biodiversity and pollution, health and security, local communities and human rights. For a more complete overview of sectors and factors, please refer to the Amundi ESG Regulatory Statement available at www.amundi.lu.

To contribute to the above objectives, the investee company should not have significant exposure to activities (e.g. tobacco, weapons, gambling, coal, aviation, meat production, fertilizer and pesticide manufacturing, single-use plastic production) not compatible with such criteria.

The sustainable nature of an investment is assessed at investee company level.

By applying the Amundi's above described Sustainable Investment definition to the Index constituents of this passively managed ETF Product, Amundi has determined that this Product has the minimum proportion of sustainable investments stated in page 1 above. However, please note that Amundi Sustainable Investment definition is not implemented at the Index methodology level.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

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?

To ensure sustainable investments do no significant harm ('DNSH'), Amundi utilises two filters:

The first DNSH filter relies on monitoring the mandatory Principal Adverse Impacts indicators in Annex 1, Table 1 of the COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 ("RTS") where robust data is available (e.g. GHG intensity of investee companies) via a combination of indicators (e.g. carbon intensity) and specific thresholds or rules (e.g. that the investee company's carbon intensity does not belong to the last decile of the sector). Amundi already considers specific Principle Adverse Impacts within its exclusion policy as part of Amundi's Responsible Investment Policy. These exclusions, which apply on the top of the filters detailed above, cover the following topics: exclusions on controversial weapons, violations of UN Global Compact principles, coal and tobacco.

Beyond the specific sustainability factors covered in the first filter, Amundi has defined a second filter, which does not take the mandatory Principal Adverse Impact indicators above into account, in order to verify that the company does not badly perform from an overall environmental or social standpoint compared to other companies within its sector which corresponds to an environmental or social score superior or equal to E using Amundi's ESG rating.

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

The indicators for adverse impacts have been taken into account as detailed in the first do not significant harm (DNSH) filter above:

The first DNSH filter relies on monitoring of mandatory Principal Adverse Impacts indicators in Annex 1, Table 1 of the RTS where robust data is available via the combination of following indicators and specific thresholds or rules:

- Have a CO2 intensity which does not belong to the last decile compared to other companies within its sector (only applies to high intensity sectors), and
- Have a Board of Directors' diversity which does not belong to the last decile compared to other companies within its sector, and
- Be cleared of any controversy in relation to work conditions and human rights.
- \bullet Be cleared of any controversy in relation to biodiversity and pollution.

Amundi already considers specific Principle Adverse Impacts within its exclusion policy as part of Amundi's Responsible Investment Policy. These exclusions, which apply on the top of the filters detailed above, cover the following topics: exclusions on controversial weapons, Violations of UN Global Compact principles, coal and tobacco.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are integrated into our ESG scoring methodology. Our proprietary ESG rating tool

assesses issuers using available data from our data providers. For example the model has a dedicated criteria called "Community Involvement & Human Rights" which is applied to all sectors in addition to other human rights linked criteria including socially responsible supply chains, working conditions, and labor relations. Furthermore, we conduct controversy monitoring on a, at minimum, quarterly basis which includes companies identified for human rights violations. When controversies arise, analysts will evaluate the situation and apply a score to the controversy (using our proprietary scoring methodology) and determine the best course of action. Controversy scores are updated quarterly to track the trend and remediation efforts.

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.



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



Yes, the sub-fund considers all the mandatory Principal Adverse Impacts as per Annex 1, Table 1 of the RTS applying to the sub-fund's strategy and relies on a combination of exclusion policies (normative and sectorial), engagement and voting approaches:

- Exclusion: Amundi has defined normative, activity-based and sector-based exclusion rules covering some of the key adverse sustainability indicators listed by the Disclosure Regulation.
- ESG factors integration: Amundi has adopted minimum ESG integration standards applied by default to its actively managed open-ended funds (exclusion of G rated issuers and better weighted average ESG score higher than the applicable benchmark). The 38 criteria used in Amundi ESG rating approach were also designed to consider key impacts on sustainability factors, as well as quality of the mitigation undertaken are also considered in that respect.
- Engagement: Engagement is a continuous and purpose driven process aimed at influencing the activities or behavior of investee companies. The aim of engagement activities can fall into two categories: to engage an issuer to improve the way it integrates the environmental and social dimension, to engage an issuer to improve its impact on environmental, social, and human rights-related or other sustainability matters that are material to society and the global economy.
- Vote: Amundi's voting policy responds to a holistic analysis of all the long-term issues that may influence value creation, including material ESG issues. For more information, please refer to Amundi's Voting Policy. ,
- Controversies monitoring: Amundi has developed a controversy tracking system that relies on three external data providers to systematically track controversies and their level of severity. This quantitative approach is then enriched with an in-depth assessment of each severe controversy, led by ESG analysts and the periodic review of its evolution. This approach applies to all of Amundi's funds.

For any indication on how mandatory Principal Adverse Impact indicators are used, please refer to
the Amundi ESG Regulatory Statement available at www.amundi.lu.

e Amundi ESG Regulatory Statement available at <u>www.amundi.lu</u> .					
No					



What investment strategy does this financial product follow?

The objective of the investment policy is to track the DAX® 50 ESG (performance index) and to provide investors with a return that is linked to the performance of the DAX® 50 ESG. The sub-fund follows a passive investment strategy.

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

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 sub-fund is a passively managed ETF. Its investment strategy is to replicate the DAX® 50 ESG (performance index) while minimising the related tracking error. In doing so, only companies that are compliant with the Global Standards Screening of the data provider Sustainalytics will be considered. Global Standards Screening identifies companies that violate, or are at risk of violating, generally recognised standards that are rooted in the principles of the United Nations Global Compact (UNGC), OECD guidelines for multinational enterprises or the United Nations General Principles (UNGP) on Business and Human Rights and their underlying conventions. The index rules also exclude companies that do not meet certain criteria related to controversial weapons, tobacco production, thermal coal, nuclear energy or military contracts. The Product strategy is also relying on systematic exclusions policies (normative and sectorials) as further described in Amundi Responsible Investment policy. Details of the index rules and selection criteria are described in the prospectus. The prospectus also provides the website of the index provider where the description of the method used to calculate the underlying index can be found.

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

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

There is no minimum committed rate for the sub-fund.

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

We rely on Amundi ESG scoring methodology. Amundi's ESG scoring is based on a proprietary ESG analysis framework, which accounts for 38 general and sector-specific criteria, including governance criteria. In the Governance dimension, we assess an issuer's ability to ensure an effective corporate governance framework that guarantees it will meet its long-term objectives (e.g. guaranteeing the issuer's value over the long term). The governance sub-criteria considered are: board structure, audit and control, remuneration, shareholders' rights, ethics, tax practices and ESG strategy.

Amundi ESG Rating scale contains seven grades, ranging from A to G, where A is the best and G the worst rating. G-rated companies are excluded from our investment universe.

Each corporate security (shares, bonds, single name derivatives, ESG equity and fixed income ETFs) included in investment portfolios has been assessed for good governance practices applying a normative screen against UN Global Compact (UN GC) principles on the associated issuer. The assessment is performed on an ongoing basis. Amundi's ESG ratings Committee monthly reviews lists of companies in breach of the UN GC leading to rating downgrades to G. Divestment from securities downgraded to G is carried out by default within 90 days.

Amundi Stewardship Policy (engagement and voting) related to governance complements this approach.

What is the asset allocation planned for this financial product?

90 % of the sub-fund's securities and instruments will meet the promoted environmental or social characteristics in accordance with the binding elements of the Index methodology. Furthermore, the sub-fund commits to have a minimum of 25 % of Sustainable Investments as per the below chart.

Taxonomy-aligned #1A Sustainable Min 0% Min 25% Other environmental #1 Aligned with Min 0% E/S characteristics Min 90% #1B Other E/S characteristics Investments Social Min 0% #2 Other Max 10%

#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.

#20ther 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?

Derivatives are not used to attain the environmental and social characteristics promoted by the subfund.

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

The sub-fund has no minimum share of investments with an environmental objective that are aligned with the EU Taxonomy.

		he financial product invest in fossil gas and/or nuclear energy related activities that comply he EU Taxonomy¹?					
		Yes:					
		☐ In fossil gas		In nuclear energy			
X	N	0					

Asset allocation describes the share of investments in specific assets.

Taxonomyaligned activities are expressed as a share of:

-turnover reflecting the share of revenue from green activities of investee

-capital expenditure

companies

(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.

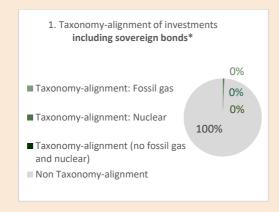
To comply with the EU Taxonomy, the criteria for fossil gas include limitation on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

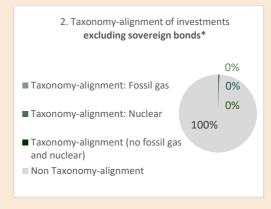
¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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.

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





- * For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.
- What is the minimum share of investments in transitional and enabling activities?

The sub-fund has no minimum proportion of investment in transitional or enabling activities.





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

The sub-fund has no minimum defined minimum share.



What is the minimum share of socially sustainable investments?

The sub-fund has no minimum defined minimum share.



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

This category can be composed of cash, derivatives and companies on which there is no extra financial coverage.



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 DAX® 50 ESG has been designated as a reference benchmark to determine whether the subfund is aligned with the environmental and/or social characteristics that it promotes.

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

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote. According to applicable regulations to index sponsors (including BMR), index sponsors should define appropriate controls/diligence when defining and/or operating index methodologies of regulated indexes.

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

The investment objective of the sub-fund is to track both the upward and downward evolution of the Index, while minimising the difference between the return of the sub-fund and the return of the Index.

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

The DAX® 50 ESG is an equity index based on the HDAX®, which comprises all companies included in the DAX®, MDAX® and TecDAX®. The DAX® 50 ESG selects from the investment universe of the HDAX® 50 companies that are assessed as particularly sustainable on the basis of ESG criteria (environmental, social and corporate governance) and excludes companies that have a negative impact on certain sustainability factors and meet certain exclusion criteria.

Where can the methodology used for the calculation of the designated index be found? https://qontigo.com/products/dax-50-esg-en/



Where can I find more product specific information online?

More product-specific information can be found on the website:

www.amundietf.com