

Template 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** UBS (Irl) ETF plc – S&P USA Dividend Aristocrats ESG Elite UCITS ETF  
**Legal entity identifier:** 5493003RY65R3GU0MH74

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___ %	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___ %	<input checked="" type="checkbox"/> with a social objective
	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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p

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

This financial product is passively managed and tracks an index (“Index/Reference Benchmark”). The following characteristics are promoted by the financial product:

- tracks/tracking of a benchmark, and accordingly producing a portfolio, with a sustainability profile (MSCI ESG Score) that is higher than the S&P Composite 1500’s (the “Broad Market Index/Parent Benchmark”) sustainability profile. As described in greater detail below, the MSCI ESG Score measures the most financially significant environmental, social and governance risks and opportunities of companies on the basis of key environmental (climate change, natural capital, pollution & waste and environmental opportunities), social (human capital, product liability, stakeholder opposition and social opportunities) and governance (corporate governance and corporate behavior) themes (the “Key ESG Themes”).
- a Carbon Intensity (1, 2) emissions indicator lower than the Parent Benchmark (MSCI)

The Reference Benchmark designated for the purpose of attaining the characteristics promoted by the financial product is the S&P ESG Elite High Yield Dividend Aristocrats Total Return Net.

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

The above ESG characteristics are measured using the following indicators respectively:

- The MSCI ESG Score

MSCI ESG Scores are provided by MSCI ESG Research and are measured on a scale from 0 (lowest/worst score) to 10 (highest/best score). The MSCI ESG Score is based on the underlying company’s exposure to industry-specific ESG risks and their ability to mitigate those risks relative to their peers. MSCI ESG Scores are also shown as a breakdown of the E, S and G scores, in reference to the different components that are considered for the environmental, social and government pillars. The components are also rated on a scale of 0-10. Based on the individual E, S and G values, a weighted average can be calculated. This is dynamic and takes into account the direct changes of all underlying results, which affect the individual E, S and G values. The MSCI ESG Score measures the most financially significant environmental, social and governance risks and opportunities of companies on the basis of the Key ESG themes. In addition, sectoral differences are taken into account through identifying key industry specific ESG issues relevant to each Key ESG Theme. This assessment of risk and opportunity makes the MSCI ESG Score a rather static measure, as the relative valuation of a sector remains constant over a longer period of time. Companies with the highest ratings are those assessed as best managing their exposures to the

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

above mentioned Key ESG Themes and the associated issues. Each company in the product's portfolio will produce a score which will contribute to the overall MSCI ESG Score of the product's portfolio. The product's MSCI ESG Score will be higher than that of the Parent Benchmark.

- Weighted average carbon intensity (Scope 1+2) MSCI

The weighted average carbon intensity ("WACI") measures a portfolio's exposure to carbon-intensive companies. The WACI metric provides insight into potential risks related to the transition to a lower-carbon economy because companies with higher carbon intensity are likely to face more exposure to carbon related market and regulatory risks. It's the sum product of the portfolio weights and individual carbon intensities (carbon emissions scope 1+2 / USDm sales).

Please note that while the Reference Benchmark and Parent Benchmark are provided by Standard & Poor's, the Investment Manager will rely on data provided by MSCI to calculate the MSCI ESG Score and the weighted average carbon intensity (Scope 1+2) of the financial product and the Parent Benchmark. As a result, there might be a discrepancy between the figures disclosed by the Investment Manager and the Reference Benchmark / Parent Benchmark provider.

- ***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 financial product intends to make sustainable investment by investing at least 90% of its total net assets in securities that are constituents of the Index. The objective of the sustainable investments is to produce a portfolio with a higher MSCI ESG Score and a lower Carbon Intensity (1, 2) emissions indicator than the Broad Market Index.

The indices incorporate the Sustainalytics' Global Standards Screening (GSS), screening out on a timely basis any issuers violating the international norms and standards. The basis of the GSS assessments is the United Nations (UN) Global Compact Principles.

GSS is designed to provide timely and consistent assessments of ESG controversies involving issuers. As of each rebalancing reference date, companies classified as Non-Compliant, according to Sustainalytics, are ineligible for Index inclusion. Companies without Sustainalytics coverage, are also ineligible for Index inclusion until they receive such coverage.

The GSS monitors company involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, with respect to these norms and principles.

Furthermore, the financial product excludes investments in companies involved directly or indirectly in the following business activities: Controversial Weapons, Military Contracting, Thermal Coal, Tobacco, Oil Sands, Shale Energy, Arctic Oil & Gas Exploration, Oil & Gas, Small Arms,

Adult Entertainment, Alcohol, Gambling, Genetically Modified Plants and Seeds, Nuclear Power, Predatory Lending and Palm Oil. By excluding those mentioned business activities, especially those which are considered as climate related (Thermal Coal, Oil Sands, Shale Energy, Arctic Oil & Gas Exploration and Oil & Gas), the Index's carbon emission is significantly reduced.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

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

This financial product is passively managed and tracks an Index. The Index provider implements the screens and exclusions set out above to ensure that the remaining portion of the Index which are sustainable investments do not cause significant harm. As outlined above, the GSS monitors companies to ensure that they are aligned with the UN Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition, the value-based exclusions mentioned in the previous response consider sustainability indicators listed in Table 1 of Annex 1 of Regulation (EU) 2022/1288, such as GHG emissions, Carbon footprint, Violations of UN Global Compact principles and Organisation for Economic and exposure to controversial weapons.

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

Indicators for adverse impacts on sustainability factors mentioned in Table 1 of Annex 1 of Regulation (EU) 2022/1288 are taken into account by the Index provider when applying value-based and norms-based exclusions as set out in the Index methodology and below.

The indices incorporate the Sustainalytics' Global Standards Screening (GSS), screening out on a timely basis any issuers violating the international norms and standards. The basis of the GSS assessments is the United Nations (UN) Global Compact Principles.

GSS is designed to provide timely and consistent assessments of ESG controversies involving issuers. As of each rebalancing reference date, companies classified as Non-Compliant, according to Sustainalytics, are ineligible for Index inclusion. Companies without Sustainalytics coverage, are also ineligible for Index inclusion until they receive such coverage.

The GSS monitors company involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the

UN Guiding Principles on Business and Human Rights, with respect to these norms and principles.

Furthermore, the financial product excludes investments in companies involved directly or indirectly in the following business activities: Controversial Weapons, Military Contracting, Thermal Coal, Tobacco, Oil Sands, Shale Energy, Arctic Oil & Gas Exploration, Oil & Gas, Small Arms, Adult Entertainment, Alcohol, Gambling, Genetically Modified Plants and Seeds, Nuclear Power, Predatory Lending and Palm Oil.

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

The GSS monitors company involvement in notable ESG controversies related to the company's operations and/or products, possible breaches of international norms and principles such as the UN Global Compact, Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, with respect to these norms and principles.

*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

Yes, this financial product is passively managed and tracks an Index, indicators for adverse impacts on sustainability factors mentioned in Table 1 of Annex 1 of Regulation (EU) 2022/1288 are taken into account by the Index provider when applying value-based and norms-based exclusions as set out in the Index methodology and below.

Information regarding how the Fund's environmental or social characteristics are met will be included with the Fund's annual report.

No



### What investment strategy does this financial product follow?

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

This financial product seeks to promote the characteristic(s) described in this annex through Index selection and passive asset management.

This financial product is passively managed and seeks to track the performance and the ESG profile of the Index. Sustainability characteristics and risks are considered as part of the Index selection process. The Index which is stated by the Index provider to be screened against environmental, social or governance criteria and any methodology used by the Index provider to assess sustainability characteristics and risks of the constituents of the Index can be found on the website of the Index provider.

Information on the ESG profile of the Index is available on the S&P Dow Jones Indices internet website by selecting the S&P ESG Elite High Yield Dividend Aristocrats Index from the list of indices and by completing the relevant form on:

<http://supplemental.spindices.com/supplemental-data/europe>

● ***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?***

As described above, the following binding element(s) of the investment strategy are used to select the investments to attain the characteristic(s) promoted by this financial product.

The passive investment strategy employed by this financial product will select investments based on its ability to generate:

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

Characteristic 1):

A sustainability profile (MSCI ESG Score) that is higher than the Broad Market Index's (S&P Composite 1500) sustainability profile

Characteristic 2):

A Carbon Intensity (1 and 2) emissions indicator that is lower than the Parent Benchmark (MSCI)

The calculations do not take account of cash, derivatives and unrated investment instruments.

The binding element(s) are calculated at quarter end using the average of all of business days' values in the quarter.

Please note that while the Reference Benchmark and Parent Benchmark are provided by Standard & Poor's, the Investment Manager will rely on data provided by MSCI to calculate the MSCI ESG Score and the weighted average carbon intensity (Scope 1+2) of the financial product and the Parent Benchmark. As a result, there might be a discrepancy between the figures disclosed by the Investment Manager and the Reference Benchmark / Parent Benchmark provider.

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

This financial product invests at least 90% of its total net assets in securities that are constituents of the Index and the Index provider applies ESG ratings on all of the Index constituents. The Index is eliminating at least 20% of the least well-rated securities as against the standard Index universe. It is, therefore, expected that this financial product's resulting ESG rating will be higher than the ESG rating of a financial product tracking a standard index.

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

Assessment of good governance practices of the investee companies are performed by the Index provider.

Sustainalytics assess a company's corporate governance structures, practices and behaviors along six pillars that are deemed crucial for good governance: Board Integrity & Quality, Board Structure, Remuneration, Shareholder Rights, Financial Reporting and Stakeholder Governance.

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



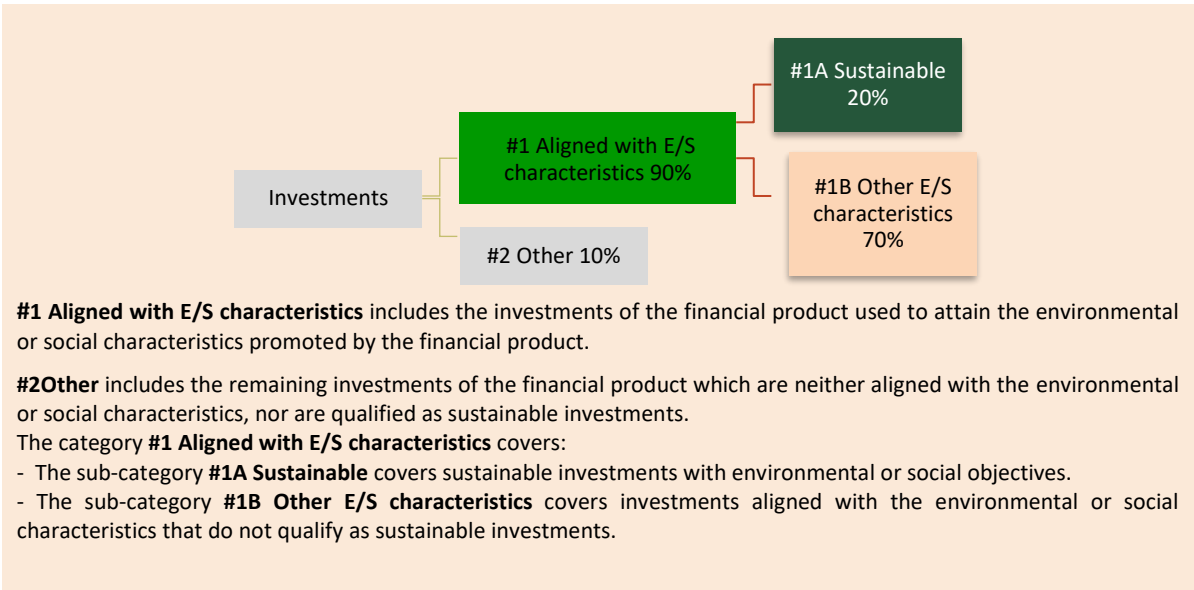
**Asset allocation** describes the share of investments in specific assets.

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The minimum proportion of the investments used to meet the environmental and/or social characteristics promoted by the financial product is 90%. The minimum proportion of sustainable investments of the financial product is 20%.

**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.



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

The financial product tracks an ESG index and may replicate the performance of the Index by the use of derivatives. Derivatives will only be used in case that a) the investment objective cannot be achieved by investments in Index components, in particular in order to reflect the performance of a currency hedge where a sub-fund replicates a currency-hedged index, or b) to generate efficiencies in gaining exposure to the constituents of the Index, in particular where there are legal or practical obstacles to gaining direct access to a market to which the Index refers.

The financial product may namely enter into a range of index related swaps (excluding funded swaps) and derivative instruments (futures, forwards, currency swaps, p-notes, options, warrants and foreign exchange contracts) in order to replicate the Index.



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

The minimum extent that investments underlying this financial product are sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%.



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

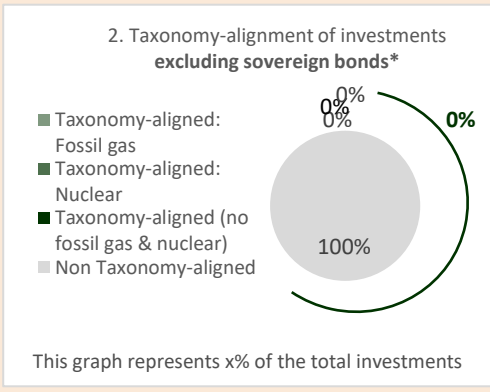
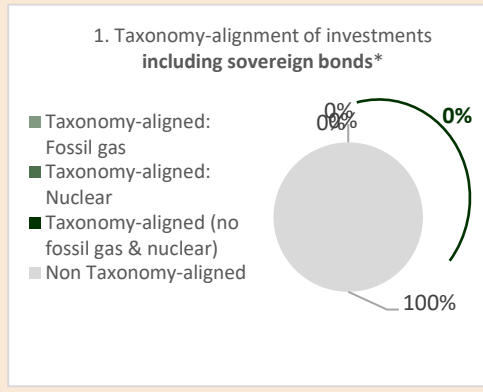
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

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.

● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

- Yes:
  - In fossil gas     In nuclear energy
- No

**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.**



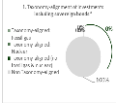
\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

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

<sup>1</sup> 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.

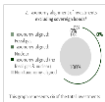
Not applicable

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 targets a minimum proportion of 20% sustainable investment as stated in the asset allocation of this annex.



### What is the minimum share of socially sustainable investments?

The financial product targets a minimum proportion of sustainable investment, these investments have both environmental and social objectives however there are no specific minimum proportions for each of these categories.



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

Included in “#2 Other” are cash and unrated instruments for the purpose of liquidity and portfolio risk management relative to the benchmark weighting. This category may also include securities for which relevant data is not available.



### 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?

The Reference Benchmark designated for the purpose of attaining the sustainable objective of the financial product is the S&P ESG Elite High Yield Dividend Aristocrats Total Return Net.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

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

The financial product has initially selected the Reference Benchmark for its relevance to its investment strategy and the attainment of the characteristics it seeks to promote. The Index rebalances on an annual basis. More details on the index methodology applied by the Index provider can be found below.

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

The alignment of the investment strategy with the methodology of the Index is ensured on a continuous basis as the Index provider rebalances the Index on a regular basis and the Investment Manager will track the Index in line with the limits set out in the investment policy of Fund.

The financial product has initially selected the Reference Benchmark for its relevance to its investment strategy and the attainment of the characteristics it seeks to promote.

The investment strategy of the fund is to track the benchmark's return and its characteristics, including ESG characteristics, as closely as reasonably possible.

The investment strategy is to fully replicate the Index and to minimize the tracking error. The investment manager reviews the Index methodology when the product is set up and the Index provider may be contacted if the Index methodology is no longer in line with the investment strategy of the financial product.

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

The Broad Market Index is the S&P Composite 1500. The Index is an equity index calculated, maintained and published by international index supplier S&P Dow Jones Indices and is denominated in USD. It measures the performance of large and midcapitalised U.S. companies.

The Index measures the performance of high dividend yielding / ESG-scoring companies that meet sustainability criteria as defined in this methodology, and meet the eligibility criteria defined in the S&P High Yield Dividend Aristocrats Index. Constituents are selected from eligible companies in the S&P Composite 1500 that have followed a managed-dividends policy of increasing or maintaining dividends for at least 20 consecutive years. Constituents are weighted by indicated dividend yield.

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

The methodology of the construction of the Index can be found in the fund supplement.

<https://www.spglobal.com/spdji/en/indices/strategy/sp-esg-elite-high-yield-dividend-aristocrats/#overview>



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

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

[www.ubs.com/etf](http://www.ubs.com/etf)