

Periodic 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 AC Asia ex Japan ESG Swap UCITS ETF  
 Legal entity identifier: 5493008RMHPSOU8YK549

## Environmental and/or social characteristics

### Did this financial product have a sustainable investment objective?

Yes

It made **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

It made **sustainable investments with a social objective**: \_\_\_%

No

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 13.58% of sustainable investments (as at 31.12.2022)

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 promoted E/S characteristics, but **did 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.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The financial product promoted environmental and social characteristics and qualified as a financial product subject to Article 8(1) SFDR by tracking the MSCI AC Asia ex Japan Low Carbon SRI Leaders Capped Index (the "Reference Index") which included environmental and/or social considerations. Under the Unfunded Swap structure (as defined below), the financial product invested in transferable securities which included certain minimum ESG screening criteria (the "Substitute Basket") and entered 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 was 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 applied 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 were independently applied to the constituents of the MSCI AC Asia ex Japan Index (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 were eligible for inclusion in the Reference Index.

#### *Highest ESG Performance Selection Rules*

The Highest ESG Performance Selection Rules were based on the MSCI ESG Leaders Indexes Methodology, which used company ratings and research provided by MSCI ESG Research. In particular, it used the following MSCI ESG Research products: MSCI ESG Ratings, MSCI ESG Controversies Scores and MSCI ESG Business Involvement Screening Research ("BISR").

MSCI ESG Ratings provided research, analysis and ratings of how well companies managed environmental, social and governance risks and opportunities. In addition it provided scores and percentiles indicating how well a company managed each key issue relative to industry peers.

The MSCI ESG Leaders Indexes Methodology was applied on the eligible universe to select the securities with the highest ESG Performance, with the below two exceptions:

- Companies were 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 provided 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 were as defined in the MSCI SRI Indexes Methodology rather than the MSCI ESG Leaders Indexes Methodology. MSCI ESG BISR was 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.

● **How did the sustainability indicators perform?**

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

<b>Indicator</b>	<b>Description</b>	<b>Performance (as at 31.12.2022)</b>
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, or for which no data was available.	0.30%
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, or for which no data was available.	0.30%
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, or for which no data was available.	0.30%
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.	678.37
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, or for which no data was available.	7.10%

● **...and compared to previous periods?**

N/A

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

While the financial product did not have sustainable investment as its objective, it gained exposure to a minimum proportion of its asset value in sustainable investments as defined by Article 2 (17) SFDR.

As at 31 December 2022, 13.58% of the financial product's net assets were exposed to sustainable economic activities that contribute to an environmental and/or social objective, in accordance with Article 2 (17) SFDR. Sustainable economic activities refer to the proportion of an issuer's economic activities that contribute to an environmental objective and/or a social objective, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices.

***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

In accordance with Article 2 (17) SFDR, any such sustainable investment exposure did not significantly harm any environmental or social objectives and such sustainable investment issuers followed good governance practices. Any investment that failed to meet the do no significant harm ("DNSH") thresholds were not considered towards the sustainable investment share of the financial product. Such DNSH thresholds included, but were not 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 were the indicators for adverse impacts on sustainability factors taken into account?*

As part of the DNSH assessment under article 2(17) SFDR, the sustainable investment assessment integrated certain metrics related to principle adverse indicators and the Reference Index of the financial product included criteria to reduce exposure to or to exclude securities which were 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).

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

Any securities that violated the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights were 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 Union 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.

### How did this financial product consider principal adverse impacts on sustainability factors?

As part of the DNSH assessment under article 2(17) SFDR, the sustainable investment assessment integrated certain metrics related to principle adverse indicators and the Reference Index of the financial product included criteria to reduce exposure to or to exclude securities which were 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).



The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 01.01.2022 through 31.12.2022

### What were the top investments of this financial product?

The table below summarises the average top fifteen investment of the financial product as at each quarter-end<sup>1</sup>.

Largest investments	Sector	% Assets	Country
ALIBABA GROUP HOLDING LTD	Consumer Discretionary	11.22%	Cayman Islands
AIA GROUP LTD	Financials	7.55%	Hong Kong
ALIBABA GROUP HOLDING ADR REPRESENTING 1 ORD SHS	Consumer Discretionary	5.48%	Cayman Islands

<sup>1</sup> The financial product changed its investment objective during the period (on 12 May 2022) to replicate the performance of the Reference Index. Before this date, the investment objective of the financial product was to replicate the performance of the MSCI AC Asia ex Japan TR Net index and did not promote environmental and/or social considerations. The top investments shown are the securities to which the financial product was economically exposed (a look-through on the composition of derivative transactions on the Reference Index) and excluded assets held as collateral or as part of the Substitute Basket.

HONG KONG EXCHANGES AND CLEARING ORD	Financials	3.79%	Hong Kong
DBS GROUP HOLDINGS ORD	Financials	3.16%	Singapore
BAIDU CLASS A INC	Communication Services	2.08%	Cayman Islands
NETEASE INC	Communication Services	2.06%	Cayman Islands
TAIWAN SEMICONDUCTOR MANUFACTURING	Information Technology	2.00%	Taiwan
WUXI BIOLOGICS CAYMAN INC	Health Care	1.76%	Cayman Islands
NIO AMERICAN DEPOSITARY SHARES REP	Consumer Discretionary	1.53%	Cayman Islands
BANK RAKYAT INDONESIA (PERSERO)	Financials	1.26%	Indonesia
SINGAPORE TELECOMMUNICATIONS ORD	Communication Services	1.15%	Singapore
TENCENT HOLDINGS LTD	Communication Services	1.09%	Cayman Islands
SAMSUNG ELECTRONICS LTD	Information Technology	1.07%	South Korea
KAKAO CORP	Communication Services	0.93%	South Korea



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

## What was the proportion of sustainability-related investments?

### ● *What was the asset allocation?*

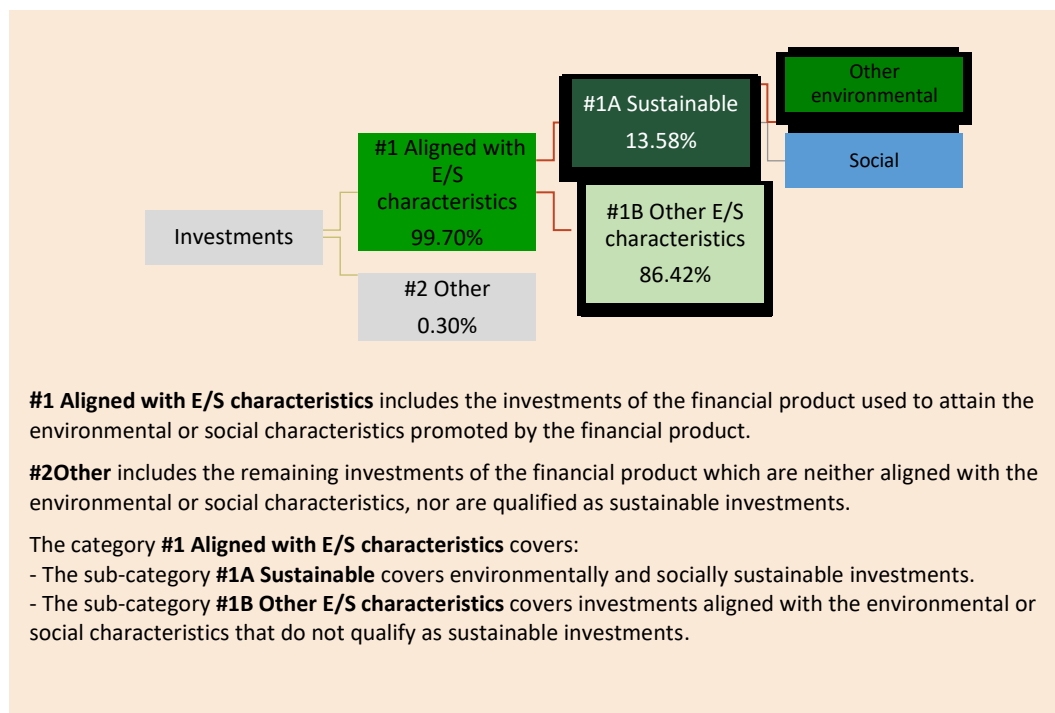
As at 31 December 2022, this financial product gained exposure of 99.70% of its net assets to securities that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics). Within this category, 13.58% of the financial product's asset exposure qualified as sustainable investments (#1A Sustainable).

0.30% of the investments were not aligned with these characteristics (#2 Other).

Such asset allocation considered only the investments in relation to which the financial product was economically exposed (such as the derivative transactions on the Reference Index and ancillary liquid assets) and excluded assets held as collateral or as part of the Substitute Basket, in relation to which the financial product was not economically exposed.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



● ***In which economic sectors were the investments made?***

The table below summarises the GICS sector investments of the financial product’s asset exposure as at 31 December 2022.

Sector (GICS)	Financial Product’s Assets
Financials	31.49%
Communication Services	17.82%
Consumer Discretionary	17.06%
Information Technology	9.80%
Materials	5.67%
Consumer Staples	5.38%
Industrials	4.87%
Health Care	2.90%
Utilities	2.12%
Real Estate	2.09%
Energy	0.80%
Other / Unmapped	0.00%

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 waster management rules.

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

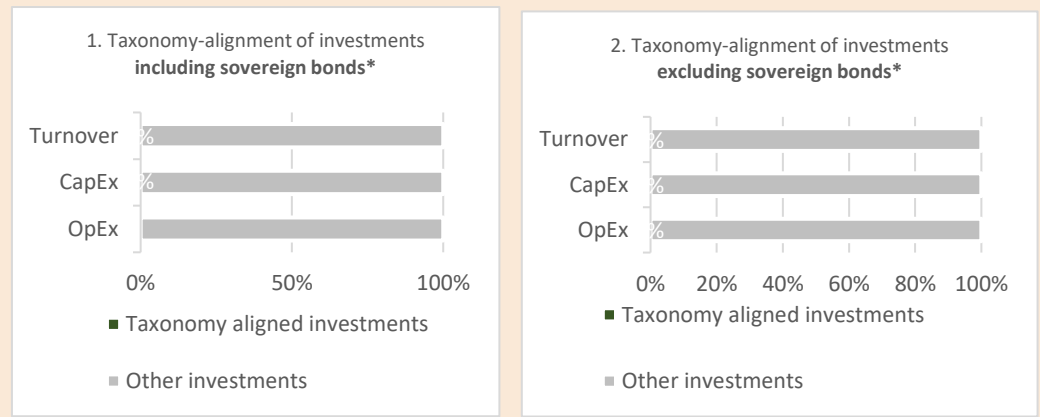
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



### To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A – Due to a lack of reliable data, there was no minimum proportion for sustainable investments with an environmental objective that were consistent with the EU Taxonomy. For this reason, the share of environmentally sustainable investments in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) is considered to be 0% of the financial product’s assets. It may, however, have been the case that some sustainable investments were nevertheless compliant with the environmental objective of the Taxonomy Regulation.

*The graphs below show in green the percentage of investments that were 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

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>2</sup>?**

Yes:  
 In fossil gas       In nuclear energy

No. However, there is a lack of reliable data in relation to fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. On this basis,

<sup>2</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.



although it is considered that no relevant investments were made, it is possible the financial product may have made some investments in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy.

● **What was the share of investments made in transitional and enabling activities?**

N/A – Due to a lack of reliable data, there was no minimum proportion for sustainable investments with an environmental objective that were consistent with the EU Taxonomy. For this reason, the share of investments in transitional and enabling activities in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) is considered to be 0% of the financial product’s assets. It may, however, have been the case that some sustainable investments were in transitional and enabling activities.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The financial product did not intend to make a minimum exposure allocation to sustainable economic activities that contribute to an environmental objective. However, as at 31 December 2022 the share of environmentally and socially sustainable investment exposure was 13.58% in total.



**What was the share of socially sustainable investments?**

The financial product did not intend to make a minimum exposure allocation to sustainable economic activities that contribute to a social objective. However, as at 31 December 2022 the share of environmentally and socially sustainable investment exposure was 13.58% in total.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

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

As at 31 December 2022, the investment exposure included under “#2 Other” included securities which have been recently downgraded by the relevant ESG data provider but could not be removed from the Reference Index until the next Reference Index rebalance.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



## What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The Reference Index promoted 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. In order to seek to achieve the investment objective, the financial product adopted an "Indirect Investment Policy" which means that the financial product aimed 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"). During the period the financial product obtained the return on the Reference Index using Unfunded Swaps.

Active engagement with investee issuers, using proxy voting and engagement to drive change for the benefit of clients is a key part of DWS Group's approach to sustainable investment. DWS applied an Engagement Policy and Corporate Governance & Proxy Voting Policy. For further information regarding the proxy voting activities of the financial product, please visit <https://funds.dws.com/en-lu/about-us/corporate-governance/>.



## How did this financial product perform compared to the reference benchmark?

The financial product has designated the MSCI AC Asia ex Japan Low Carbon SRI Leaders Capped Index as the reference benchmark. Please see below for the performance comparison between the financial product and the reference benchmark.

### ● *How does the reference benchmark differ from a 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

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

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.

● ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

<b>Indicators (as Described Above)</b>	<b>Performance of the financial product (as at 31.12.2022)</b>	<b>Performance of the benchmark (as at 31.12.2022)</b>
Exposure to Very Severe Controversies	0.30%	0.30%
Exposure to Worst-in-Class issuers	0.30%	0.30%
Controversial Weapons Involvement	0.30%	0.30%
Greenhouse Gas Intensity	678.37	678.37
Exposure to Fossil Fuels	7.10%	7.10%

● ***How did this financial product perform compared with the reference benchmark?***

	<b>Financial product</b>	<b>Benchmark</b>
Performance (during the period 01.01.2022 to 31.12.2022)	-20.05%	-20.41%

● ***How did this financial product perform compared with the broad market index?***

	<b>Financial product</b>	<b>Broad market index</b>
Performance (during the period 01.01.2022 to 31.12.2022)	-20.05%	-19.67%