Sustainability-related disclosures for AILIS D-X BLOOMBERG MSCI EURO Government Bond 1-3 Years UCITS ETF

This document provides you with a summary of sustainability-related information available on our website about this financial product. It is prepared in relation to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088. The information disclosed is required by law to help you understand the sustainability characteristics and/or objectives and risks of this financial product.

Legal entity identifier 6367007C7LNG81A0E627

Summary	This Sub-Fund promotes environmental or social characteristics. The Investment Manager identifies the sustainable investments according to SFDR on the basis of UN SDGs as described in more detail below in the section "Methodologies". The Sub-Fund tracks the Bloomberg MSCI Euro Treasury IG 1-3 Years ESG Index (the "Index") for the purpose of attaining the environmental or social characteristics. The Index promotes Environmental and Social characteristics as well as best practices of Corporate Governance using Bloomberg Fixed Income Index Methodology and the Bloomberg MSCI ESG Fixed Income Indices Methodology. The Index is designed to represent the performance of the government bonds issued in the Eurozone, giving more weight to countries having Environment, Social and Corporate Governance (ESG) rating equal or above AA. The tracking error of the Sub-fund's performance vis-à-vis the Index is the indicator used to measure the attainment of the social and environmental characteristics promoted by the Sub-Fund. The Investment Manager employs a binding ESG methodology which aims to build a portfolio where at least 90% of the Fund's assets are invested in securities which are aligned with environmental and social characteristics promoted by the Fund. The remaining portion (<10%) of the portfolio, consisting of cash as well as cash equivalents in place held at the Investment Manager's discretion, will not be aligned with the promoted environmental and social characteristics. To the extent that the Fund may use financial derivative instruments, these will not be used to attain the environmental or social characteristics promoted by the Fund. The Fund does not commit to making sustainable investments within the meaning of the SFDR or the Taxonomy Regulation. The proportion of the Fund's portfolio invested in securities included in the Index will constitute sustainability indicator used to measure the attainment of each of the environmental or social characteristics promoted by the Fund. In terms of minimum environmental and social safeguards, the Index methodology excludes companies that fail to comply with UN Global Compact Principles, in addition to companies that meet the controversial or high ESG risk exclusion criteria. The Fund has designated the Index for the purpose of attaining environmental and social characteristics promoted by the Fund. Please refer to Bloomberg MSCI Euro Treasury IG 1-3 Years ESG Index methodology: www.bloomberg.com/indices.
No sustainable investment objective	This Sub-fund promotes environmental or social characteristics but does not have as its objective sustainable investments.
Environmental or social characteristics of the financial product	The main environmental and social characteristics promoted by the Sub-Fund through the Investment Manager's ESG methodology are the following: • Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy). • Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations). The Sub-fund tracks the Bloomberg MSCI Euro Treasury IG 1-3 Years ESG Index (the "Index") for the purpose of attaining the environmental or social characteristics.
Investment strategy	The Sub-fund is passively managed to track the performance of the Index, while minimising as far as possible the tracking error between the Sub-fund's performance and that of the Index. The Index promotes Environmental and Social characteristics as well as best practices of Corporate Governance using the Bloomberg Fixed Income Index Methodology and the Bloomberg MSCI ESG Fixed Income Indices Methodology. The Sub-fund's investment policy is set out in the Sub-fund Appendix.

Proportion of investments	The Sub-fund is passively managed and in accordance with its investment policy 90% of the Sub-fund's portfolio consists of investments aiming at tracking the Index. The remaining assets (10% corresponding to box #2 Other) may be invested in debt securities other than those referred to in the core policy, money market instruments and financial derivative instruments which may be held for hedging and efficiency portfolio management purposes, cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes. Since the Sub-fund invests mostly in government bonds, the concept of minimum environmental and social safeguards does not apply.
Monitoring of environmental or social characteristics	The Sub-fund is passively managed to track the performance of the Index, while minimising as far as possible the tracking error between the Sub-fund's performance and that of the Index. The Index promotes Environmental and Social characteristics as well as best practices of Corporate Governance using the Bloomberg Fixed Income Index Methodology and the Bloomberg MSCI ESG Fixed Income Indices Methodology.
Methodologies	The Fund has designated the Index for the purpose of attaining environmental and social characteristics promoted by the Fund. Please refer to Bloomberg MSCI Euro Treasury IG 1-3 Years ESG Index methodology: www.bloomberg.com/indices.
Data sources and processing	The data sources used to attain the relevant environmental or social characteristics are detailed in the Index methodology.
Limitations to methodologies and data	There is a risk that the index provider may make errors, such as incorrect assessment of the screen criteria described in the Investment Policy and/or include incorrect/exclude correct constituents in the screening process. ESG scoring and screening is subject to inherent methodological limits. Any assessment of ESG criteria by an Index is based on the data provided by third parties. Such assessments are dependent upon information and data that may be incomplete, inaccurate or unavailable, which could cause incorrect assessment of an issuer's ESG performance. In particular there may be potential inconsistencies, inaccuracy or a lack of availability of required ESG data, particularly where this is issued by external data providers. These limitations may include but are not limited to issues relating to: - Missing or incomplete data from companies (for example, relating to their capacity to manage their Sustainability Risks) which have been used as input for any scoring model; - The quantity and quality of ESG data to be processed; and - The identification of relevant factors for the ESG analysis. ESG data may be based on certain assumptions, forecasts, projections, views and opinions which may be based on current market trends or anticipated future events. To assess company involvement in different activities and to estimate revenue shares as accurately as possible, data providers strive to obtain information directly from companies and issuers. Sources of data include annual reports, regulatory filings, sustainability reports, press releases, investor presentations, company websites, and other company disclosures. Given the developing and innovative nature of data models, methodologies and assumptions and the inherent uncertainty in predicting forward looking events, it cannot be guaranteed that the ESG data is always accurate or correct or that the ESG data will satisfy the aims or requirements of any specific client or investor. Furthermore, there may be data that cannot be sourced due to the lack of availability of data sources.
Due diligence	The Investment Manager oversees external vendors, including index providers, in line with its third party risk management program. The Investment Manager engages with index providers regularly for service level reviews and also undertakes targeted reviews of index providers' processes, systems & systems controls, data, quality controls & IT security.
Engagement policies	With the aim of preventing, containing and managing the main adverse impacts of investment decisions on sustainability factors, the Management Company conducts engagement actions - both individual and collective with other investors - and exercises its voting rights on the issuers in its portfolio, in order to create awareness and orient the issuers' behaviors towards specific sustainability issues, according to the times and methods formalized in its "Engagement Policy" and in the "Strategy for the exercise of the attendance and voting rights attached to the financial instruments held by the UCITS under management". In this case, the Company informs the issuer about the identified criticalities, directing its decisions towards their immediate reduction. If these actions are not addressed in an effective and timely manner by the issuer, the Company evaluates to initiate specific reduction or disposal initiatives, even of a progressive nature, of the investment in these issuers. The initiatives carried out and the decisions taken regarding these activities are reported and formalized in order to guarantee a thorough traceability of the decision-making processes and outcomes.

Designated reference benchmark	The Index has been designated as a reference benchmark for the purpose of attaining the Sub-fund's environmental and social characteristics. The Sub-fund tracks the performance of the index "Bloomberg MSCI Euro Treasury IG 1-3", while minimising as far as possible the tracking error between the Sub-fund's performance and that of the Index. The Index, which constitutes the "Exposed Strategy", is published by Bloomberg, acting as benchmark administrator (the "Benchmark Administrator") and it is a fixed income index designed to represent the performance of the government bonds issued in the Eurozone, giving more weight to countries having Environment, Social and Corporate Governance (ESG) rating equal or above AA. The Bloomberg ticker symbol for the Index is TBC. The Bloomberg MSCI Euro Treasury IG 1-3 Years ESG Index is based on the flagship Bloomberg Euro Treasury Index. The Index promotes Environmental and Social characteristics as well as best practices of Corporate Governance using Bloomberg Fixed Income Index Methodology and the Bloomberg MSCI ESG Fixed Income Indices. The Index is designed to represent the performance of the government bonds issued in the Eurozone, giving more weight to countries having Environment, Social and Corporate Governance (ESG) rating equal or above AA. The Index rebalances on a monthly basis without any additional costs for the Sub-fund. The Benchmark Administrator's Index methodology, composition, revision rules and additional information concerning the underlying components of the Index are available on www.bloomberg.com/indices.