

# **Amundi PEA MSCI Emerging Markets ESG Leaders UCITS ETF**

## ***Prospectus and Regulations***

# PROSPECTUS

UCITS subject to European Directive 2009/65/EC

## I. GENERAL FEATURES

► **Name:** Amundi PEA MSCI Emerging Markets ESG Leaders UCITS ETF (the "Fund")

► **Legal form and Member State in which the UCITS has been set up:** French Mutual Fund (FCP)

► **Launch date and scheduled term:** The Fund was approved by the French Market Regulator (AMF) on 28 March 2019 and launched on 25 April 2019 for an anticipated duration of 99 years.

► **Summary of the management offer:**

ISIN code	Allocation of distributable income	Denomination currency	Net asset value calculation frequency	Initial Net Asset Value	Minimum initial subscription	Minimum subsequent subscription	Eligible subscribers
FR0013412020	Accumulation and/or distribution at the discretion of the Management Company	euro	Daily	EUR 20	<u>Primary market</u> 5000 unit(s) <u>Secondary market</u> 1 unit(s)	<u>Primary market</u> 1 unit(s) <u>Secondary market</u> 1 unit(s)	All subscribers

► **Address from which the latest annual and periodic report may be obtained:**

The latest annual report and interim statements will be sent to investors within eight working days upon written request from the unitholder to:

### **Amundi Asset Management**

Amundi ETF

91-93, Boulevard Pasteur

CS 21564

75730 Paris Cedex 15, France

Tel: +33 (0)1 76 32 47 74

Email: [info@amundiETF.com](mailto:info@amundiETF.com)

Further details are available from Amundi Asset Management and on its website [amundiETF.com](http://amundiETF.com).

The AMF website ([amf-france.org](http://amf-france.org)) contains further details on the list of regulatory documents and investor protection regulations.

## II. SERVICE PROVIDERS

► **Management Company:**

Amundi Asset Management (the "Management Company")

A simplified joint-stock company (société par actions simplifiée),

Portfolio Management Company operating under AMF approval no. GP 04000036

Registered office: 91-93, Boulevard Pasteur – 75015 Paris, France

### ► **Depository and Registrar:**

CACEIS Bank (the "Depository"),  
Société Anonyme (a French public limited company),  
Main business: Credit institution providing investment services, approved by the Committee of Credit Establishments and Investment Enterprises (CECEI) on 1 April 2005,  
Registered office: 89-91 rue Gabriel Péri, 92120 Montrouge

With regard to regulatory duties and duties contractually entrusted by the Management Company, the Depository's main tasks are the custody of the UCITS' assets, ensuring that the Management Company's decisions are lawful and monitoring the UCITS' cash flows.

The Depository and Management Company are part of the same group; as such, in accordance with the applicable regulations, they have implemented a policy for identifying and preventing conflicts of interest. If a conflict of interest cannot be avoided, the Management Company and the Depository shall take all necessary measures to manage, monitor and report this conflict of interest.

The description of the delegated custodial duties, the list of the Depository's delegates and sub-delegates and information relating to conflicts of interest that may result from these delegations are available on its website at [www.caceis.com](http://www.caceis.com) or free of charge upon written request.  
Updated information can be provided to unitholders on request.

### ► **Institution responsible for the centralisation of subscription and redemption orders appointed by the Management Company:**

CACEIS Bank,  
Société Anonyme (a French public limited company),  
Registered office: 89-91 rue Gabriel Péri, 92120 Montrouge  
Main business: Bank and investment services provider approved by CECEI on 1 April 2005.

The Depository is also responsible, by delegation from the Management Company, for the Fund's general administration, which includes the centralisation of unit subscription and redemption orders and managing the Fund's unit issue account.

### ► **Independent Auditor:**

DELOITTE & ASSOCIES

6 Place de la Pyramide, 91800 Puteaux

### ► **Delegated Accounting Manager:**

CACEIS Fund Administration,  
Société Anonyme (a French public limited company),  
Registered office: 89-91 rue Gabriel Péri, 92120 Montrouge

CACEIS Fund Administration is a company of the CREDIT AGRICOLE Group specialising in the administrative and accounting management of UCI on behalf of clients inside and outside the Group.

CACEIS Fund Administration has accordingly been appointed by the Management Company as Delegated Accounting Manager for the valuation and accounting of the Fund. CACEIS Fund Administration is responsible for valuing the assets, establishing the Fund's NAV and preparing its periodic financial statements.

### ► **Market-makers:**

As at 25 April 2019, the financial institution acting as Market-maker is:

BNP Paribas Arbitrage  
General Partnership (Société en nom collectif)  
Registered office: 160-162 boulevard Mac Donald – 75019 Paris

## III. OPERATING AND MANAGEMENT PROCEDURES

### III.1 General features

#### ▶ **Characteristics of units:**

ISIN code: FR0013412020

• **Nature of the right attached to the unit class:** each unitholder is entitled to joint-ownership of the Fund's assets proportional to the number of units held.

• **Entry in a register or clarification of fund administration methods:** the Depositary is responsible for fund administration. Units can be cleared through Euroclear France, Clearstream Banking S.A. and Euroclear Bank.

• **Voting rights:** no voting rights are attached to the units; decisions are made by the Management Company. Note: investors will be notified of changes to the Fund's operating arrangements either individually, through the press or by any other means in accordance with current regulations.

• **Form of units:** bearer units.

• **Decimalisation (fractioning), if any:** subscriptions and redemptions are made in whole units.

#### ▶ **Admission of the units to the Euronext Paris NextTrack market:**

Under Article D.214-22-1 of the French Monetary and Financial Code (the "**CMF**"), shares or units of undertakings for collective investment in transferable securities may be listed for trading, provided that these entities have set up a mechanism to ensure that the listed market price of the shares or units does not diverge significantly from a reference price (the "**Benchmark Price**"). The following operating rules developed by Euronext Paris SA apply accordingly to the listing of the Fund's units:

- reservation thresholds are set by applying a 1.5% variation on either side of the Fund's Benchmark Price (see "Benchmark Price" section), as published by Euronext Paris SA. These are updated during each trading session on an estimate basis according to variation of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index;
- trading of the Fund's units on the Euronext Paris NextTrack market will be suspended in the following cases:
  - suspension or halt of the listing or calculation of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index by the index provider;
  - suspension of the market(s) on which the securities comprising the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index are listed;
  - if the listed price of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index is unavailable to Euronext Paris;
  - if Euronext Paris cannot obtain the Fund's NAV for the day and/or publish the Benchmark Price;
  - violation of applicable Euronext Paris rules by a market-maker;
  - failure of Euronext Paris's systems, particularly its IT or electronic systems;
  - if stock market disturbances or difficulties render normal market-making impossible;
  - any other event that prevents the calculation of the Fund's Benchmark Price or the trading of Fund units.

"Market-makers" likewise ensure that the market price of the Fund's units does not diverge by more than 1.5% on either side of the Fund's Benchmark Price, in order to comply with the reservation thresholds set by Euronext Paris SA (see "**Benchmark Price**" section).

▶ **Financial year-end:** last trading day in June of each year.

► **First financial year-end:** last trading day of June 2020.

► **Tax treatment:**

The Fund is eligible for the Plan d'Épargne en Actions ("PEA" reserved for French tax residents) and life insurance policies. The Fund may provide a support vehicle for life insurance policies denominated in units of account.

The UCITS, by its nature, is not subject to taxation. However, unitholders may be taxed on any income distributed by the UCITS or when they sell UCITS units. The tax treatment applicable to amounts distributed by the UCITS or unrealised or realised capital gains or losses will depend on the individual unitholder's tax situation, residence for tax purposes and/or the investment jurisdiction of the UCITS. Any investor who is unsure of their tax situation should consult a tax advisor or a professional investment consultant to determine the tax rules applicable to their particular situation prior to making any investment. Some income distributed by the UCITS to unitholders residing outside France may be subject to withholding tax in France.

Germany: at least 90% of the Fund will be permanently invested in listed shares. For the purposes of interpreting this ratio, shares issued by REITs (as defined by the German Ministry of Finance) or UCIs are not considered as shares.

US tax considerations

The Foreign Account Tax Compliance Act (FATCA), which is part of the US Hiring Incentives to Restore Employment Act (HIRE), requires that non-US financial institutions (foreign financial institutions, or FFIs) report to the IRS (the US tax authorities) any financial information relating to assets held by US taxpayers<sup>1</sup> outside of the United States.

In accordance with FATCA regulations, US securities held by any financial institution that does not adhere to or is considered to be non-compliant with the FATCA law will be subject to a withholding tax of 30% on (i) certain income generated from US sources; and (ii) the gross proceeds from the sale or disposal of US assets.

The Fund falls within the scope of FATCA and, as such, unitholders may be asked to provide certain mandatory information.

The United States has entered into an intergovernmental agreement with several governments in order to implement the FATCA law. In this context, the French and US governments have signed an intergovernmental agreement (IGA).

The Fund complies with the IGA Model 1 agreement between France and the United States of America. It is not anticipated that the Fund (or any Sub-Fund) will be subject to a FATCA withholding tax.

The FATCA law requires the Fund to collect certain information about the identity (including ownership, holding and distribution details) of account holders who are US tax residents, entities that control US tax residents, and non-US tax residents who do not comply with the FATCA provisions or who fail to provide any of the accurate, complete and precise information required under the intergovernmental agreement (IGA).

For this purpose, all potential unitholders agree to provide the Fund, its delegated entity or the promoter with any information requested (including, but not limited to, their GIIN).

In the event of any change in circumstances impacting their FATCA status or their GIIN, potential unitholders shall immediately provide written notice to the Fund, its delegated entity or the promoter.

In accordance with the IGA, this information should be communicated to the French tax authorities, who may in turn share it with the IRS or with other tax authorities.

Investors who fail to document their FATCA status properly, or who refuse to report their FATCA status or to disclose the required information within the prescribed deadline, may be qualified as recalcitrant and be reported to the relevant tax or government authorities by the Fund or their Management Company.

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<sup>1</sup>According to the US Internal Revenue Code, the term "US Person" means an individual who is a US citizen or resident, a partnership or corporation organised in the United States or under the laws of the United States or any State thereof, a trust if (i) a court within the United States has authority under applicable law to hand down orders or judgments concerning substantially all issues regarding the administration of the trust, and (ii) one or more US persons have authority to control all substantial decisions of the trust, or an estate of a decedent who was a citizen or resident of the United States.

In order to avoid the potential impacts of the foreign passthru payment mechanism and to prevent any withholding on such payments, the Fund or its delegated entity reserves the right to prohibit any subscription to the Fund or the sale of units or shares to any non-participating FFI (NPPFI)<sup>2</sup>, particularly when such a prohibition is considered legitimate and justified for the protection of the general interests of investors in the Fund.

The Fund and its legal representative, the Fund's Depositary and the transfer agent reserve the right, on a discretionary basis, to prevent or remediate the acquisition and/or direct or indirect holding of units in the Fund by any investor who is in breach of the applicable laws and regulations, or where the latter's involvement in the Fund may have detrimental consequences for the Fund or for other investors, including, but not limited to, FATCA sanctions.

To this end, the Fund may reject any subscription or require the mandatory redemption of units or shares in the Fund in accordance with the provisions set out in Article 3 of the Fund's regulations<sup>3</sup>.

The FATCA law is relatively new and its implementation is ongoing. Although the above information summarises the Management Company's current understanding, this understanding may be incorrect, or the way in which FATCA is implemented could change such that some or all investors are subject to the 30% withholding tax.

The provisions herein are not a complete analysis of all the tax rules and considerations and are not tax-related advice, and they shall not be considered as a complete list of all the potential tax-related risks inherent in subscribing to or holding Fund units or shares. All investors should consult their usual advisors regarding the tax aspects and potential consequences of subscribing, holding or redeeming units or shares by virtue of the laws applicable to such investors and, in particular, by virtue of the rules of disclosure or withholding under FATCA concerning investors in the Fund.

- Automatic Exchange of Information (CRS regulations):

France has signed multilateral agreements on the automatic exchange of information relating to financial accounts, based on the Common Reporting Standard (CRS) ("Norme Commune de Déclaration" or NCD in France) as adopted by the Organisation for Economic Co-operation and Development (OECD).

Under the CRS law, the Fund or the Management Company must provide the local tax authorities with certain information about non-resident Unitholders in France. This information is then communicated to the relevant tax authorities.

The information communicated to the tax authorities includes details such as name, address, tax identification number (NIF), date of birth, place of birth (if it appears in the records of the financial institution), account number, account balance or, if applicable, account value at the end of the year and the payments recorded on the account during the calendar year.

Each investor agrees to provide the Fund, the Management Company or their distributors with the information and documentation required by law (including, but not limited to, their self-certification) as well as any additional documentation that may reasonably be required in order to comply with their reporting obligations under the CRS.

Further information on the CRS is available on the OECD website and the websites of the tax authorities in the agreement signatory states.

Any unitholder who does not respond to requests for information or documents by the Fund:

(i) may be held liable for penalties imposed on the Fund that are attributable to the failure of the unitholder to provide the requested documentation, or attributable to the unitholder providing incomplete or incorrect documentation; and (ii) will be reported to the relevant tax authorities for having failed to provide the necessary information for the identification of their tax residence and their tax identification number.

#### **MINIMUM STANDARDS AND EXCLUSION POLICY**

The Management Company applies a Responsible Investment Policy, which consists of a policy of targeted

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<sup>2</sup>NPPFI or non-participating FFI = a financial institution that refuses to comply with FATCA either by refusing to sign a contract with the IRS or by refusing to identify its clients or report to the authorities.

<sup>3</sup>This may also apply to any person (i) who seems to be directly or indirectly in violation of the laws and regulations of any country or any government authority; or (ii) who may, in the opinion of the Fund's Management Company, cause damage to the Fund that it would not have otherwise suffered or incurred.

exclusions according to the investment strategy of a given fund (as described in the "Investment Strategy" section where applicable).

The principal adverse impacts of investment decisions (within the meaning of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector (the "Disclosure Regulation")) are the negative, material or likely-to-be-material effects on sustainability factors that are caused or aggravated by or directly linked to investment decisions. Annex I of the Delegated Regulation supplementing the Disclosure Regulation lists the indicators of the principal adverse impacts.

The Management Company may also consider the principal adverse impacts through its policy of norm-based exclusions. Where applicable, only indicator 14 (Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)) is taken into account. The other indicators and issuers' ESG ratings are not taken into account in the investment process for the funds concerned.

More detailed information on the principal adverse impacts can be found in the Management Company's Sustainable Finance Disclosure Statement available on its website: [www.amundi.com](http://www.amundi.com).

The "do no significant harm" principle only applies to those investments underlying the Fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining part of this Fund do not take into account the EU criteria for environmentally sustainable economic activities.

Investors should be aware that the fiduciary duty and regulatory obligation in passive management is to track an index as closely as possible.

The Management Company must therefore comply with the contractual objective of delivering passive exposure in accordance with the index tracked.

Consequently, the Management Company may be required to invest and/or to remain invested in securities included in an index and affected by serious controversy events, acute sustainability risks or having a significant negative impact on sustainability factors while these events could cause these same securities to be excluded in actively managed funds or in Amundi's ESG ETFs.

## **III.2 Special terms and conditions**

### **► Classification:**

International equities.

The Fund is an index-tracking Fund.

### **► Investment objective:**

The Fund's investment objective is to track the performance in euros of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index (see "Benchmark index" section) as closely as possible, whether the Index rises or falls.

The Fund is managed so as to achieve the smallest difference between the change in its NAV and that of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index (referred to below as the "100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index"), euro-adjusted. The target for maximum tracking error between changes in the Fund's NAV and that of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, euro-adjusted, is 2%.

If the tracking error exceeds 2%, the aim would nevertheless be to remain below 15% of the volatility shown by the euro-adjusted 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index.

### **► Benchmark index:**

The Fund's Benchmark Index is the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index with net dividends reinvested (net return).

The MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index is an equity index calculated and published by the international index provider MSCI Inc. ("MSCI") and has the following characteristics:

a) An investment universe identical to that of the MSCI Emerging Markets Index (the "**Parent Index**") designed to measure the overall performance of emerging markets.

It is made up by combining several MSCI indices representing each of the countries classified as an "emerging country" by MSCI, and covers approximately 85% of the market capitalisations of each of these countries (the "**Investment Universe**").

In April 2023, the following were classified as "emerging countries": Brazil, Chile, China, Columbia, Czech Republic, Egypt, Greece, Hungary, India, Indonesia, Korea, Kuwait, Malaysia, Mexico, Peru, Philippines, Poland, Qatar, Saudi Arabia, South Africa, Taiwan, Thailand, Turkey and United Arab Emirates. The weight of each security in the Parent Index is float-adjusted according to its market capitalisation. Consequently, the number of securities included in the basket constituting the Parent Index may change over time;

b) Exclusion criteria are then applied to the Investment Universe:

- Exclusion of certain activities based on ESG criteria (determined according to the MSCI ESG Research methodology): alcohol, gambling, tobacco, nuclear energy, conventional weapons, nuclear weapons, controversial weapons, civil firearms, thermal coal and unconventional oil and gas;

- Rating of the remaining companies based on their ability to manage ESG risks and opportunities. This rating then determines eligibility for inclusion in the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index:

- Companies that are not already included in the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index must have an MSCI ESG rating greater than or equal to "BB" and an MSCI ESG Controversies rating greater than or equal to "3" to be eligible;
- Existing components of the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index must have an MSCI ESG rating greater than or equal to "BB" and an MSCI ESG Controversies rating greater than or equal to "1" to be eligible.

- The MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index is then built by adopting a "Best-in-Class" approach to the remaining eligible securities in the selected universe: only the securities of companies with the highest ESG ratings and which represent 50% of the market capitalisation in each sector of the Global Industry Classification Standard (GICS) classification of the Parent Index are included in the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index. The Best-in-Class approach aims to favour the best performing companies within a universe, sector or class. With this "Best-in-Class" filter, the Fund follows a committed non-financial approach that reduces the size of the Investment Universe by at least 20% (in terms of number of issuers).

The MSCI ESG rating methodology is based on rules designed to measure companies' resistance to material and persistent ESG risks within their sector. It is based on key ESG issues, focused on the conflict that can exist between a company's core business and issues specific to its business sector, which can generate significant risks or opportunities. Key ESG issues are weighted according to their impact and the longevity of the risk or opportunity. For example, these may include in particular water stress, carbon emissions, workforce management or business ethics.

Over 90% of the securities that make up the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index are subject to non-financial hedging.

The full methodology of the construction of the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index is available on the MSCI website: [msci.com](https://www.msci.com).

The performance tracked is the closing price of the Index.

**• 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index publication**

MSCI official indices are those calculated by MSCI using:

- the official closing prices of the stock exchanges on which the component securities are traded
- the WM Reuters closing (16:00) exchange rates

The 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index closing price is available on the MSCI website: [msci.com](https://www.msci.com).

The 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index is also calculated on each Trading Day.

The 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index is available via Reuters and Bloomberg.

Via Reuters: .dMIEF00000NUS

Via Bloomberg: MXEECCNU

**• 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index revision**

MSCI indices are designed to reflect changes in equity markets as closely as possible. For this reason, they are regularly revised to take account of changes affecting a stock's capitalisation (number of shares and float) or its sector classification.

The main revisions are as follows:

- real-time revisions of major changes in a company's capital structure (merger/acquisition, big rights issues or IPOs etc.);
- quarterly revisions (end of February, May, August and November) to take significant market events into account;
- half-yearly revisions (end of May and November) for rebalancing;
- annual full revision (end of May) of the investment universe of all the countries covered by the indices.

100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index revision rules are published by MSCI and available on the MSCI website: [msci.com](https://www.msci.com).

**Benchmark index applicable to the Fund's investment objective:**

As at the date of the most recent update to this prospectus, the administrator of the MSCI Limited benchmark index was not yet registered in the ESMA register of administrators and benchmark indices.

Pursuant to Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016, the Management Company has put in place a procedure for monitoring the benchmark indices used, which sets out the action to be taken in the event that a benchmark materially changes or ceases to be provided.

**► Investment strategy:**

The Fund is managed "passively".

**1. Strategy employed:**

The UCI qualifies as an Article 8 financial product under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "Disclosure Regulation"). Information on environmental and social characteristics can be found in the appendix to this prospectus.

The principal adverse impacts of investment decisions (within the meaning of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "Disclosure Regulation")) are the negative, material or likely-to-be-material effects on sustainability factors that are caused or aggravated by or directly linked to investment decisions. Annex I of the Delegated Regulation supplementing the Disclosure Regulation lists the indicators of the principal adverse impacts.

The mandatory principal adverse impacts of Annex I of the Delegated Regulation are taken into account in the investment strategy through a combination of exclusions (normative and sector-based), integration of the ESG rating into the investment process, engagement and voting.

More detailed information on the principal adverse impacts can be found in the Management Company's Sustainable Finance Disclosure Statement available on its website: [www.amundi.com](https://www.amundi.com).

In accordance with its investment objective and policy, the UCI may invest in economic activity that contributes to an environmental objective within the meaning of Article 5 of the Taxonomy Regulation. It is also expected that the UCI may invest partially in economic activities classified as environmentally sustainable within the meaning of sections 3 and 9 of the Taxonomy Regulation. However, the Fund does not currently make any commitment with regard to a minimum proportion.

The Fund qualifies as an Article 8 financial product under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "Disclosure Regulation"). Information on environmental and social characteristics can be found in the appendix to this prospectus.

The principal adverse impacts of investment decisions under the Disclosure Regulation are the negative, material or likely-to-be-material effects on sustainability factors that are caused or aggravated by or directly linked to investment decisions. Annex I of the Delegated Regulation supplementing the Disclosure Regulation lists the indicators of the principal adverse impacts.

The mandatory principal adverse impacts of Annex I of the Delegated Regulation are taken into account in the investment strategy through a combination of exclusions (normative and sector-based), integration of the ESG rating into the investment process, engagement and voting.

More detailed information on the principal adverse impacts can be found in the Management Company's Sustainable Finance Disclosure Statement available on its website: [www.amundi.com](http://www.amundi.com). In accordance with its investment objective and policy, the Fund may be exposed to economic activity that contributes to an environmental objective within the meaning of Article 5 of the Taxonomy Regulation. It is expected that the Fund may be partially exposed to economic activities classified as environmentally sustainable within the meaning of Articles 3 and 9 of the Taxonomy Regulation.

The Fund is managed using a technique known as "index-tracking", the objective of which is to track changes in the performance of the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index using a synthetic replication method.

To maintain the closest possible correlation with the performance of the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index, the Fund will buy a diversified portfolio of equities (the "Portfolio") and an over-the-counter (OTC) total return swap, a financial derivative instrument which turns the exposure to the securities in the Portfolio into exposure to the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index.

Furthermore, the Fund incorporates sustainability factors into its investment process. Amundi effectively applies a responsible investment policy (the "Responsible Investment Policy") that consists of, on the one hand, a policy of targeted exclusions in line with the investment strategy, and, on the other hand, an ESG rating system made available to the management team (details about this policy are provided in Amundi's Responsible Investment Policy, available on its website [www.amundi.com](http://www.amundi.com)). The Fund may use forward financial instruments for hedging and/or exposure.

The Fund shall observe the investment rules stipulated in Articles R.214-21, R.214-22 and R.214-23 of the French Monetary and Financial Code.

The Portfolio comprising directly held assets described in the "Assets used" section, complies with the provisions of Article R 214-21 of the French Monetary and Financial Code (CMF).

The Fund's exposure to the Index, achieved through the total return swap, may benefit from the exemption ratios applicable to index-linked UCITS under Article R.214-22 of the French Monetary and Financial Code. That Article stipulates that an index may comprise up to 20% equities or debt securities issued by the same entity; this limit may be raised to 35% maximum for a single issuing entity, when such increase is justified by special market circumstances such as the regulated markets where some marketable securities or some money-market instruments are largely dominant.

The Fund is managed using a technique known as "index-tracking", the objective of which is to track changes in the performance of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index using a synthetic replication method of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index.

To maintain the closest possible correlation with the performance of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, the Fund will buy a diversified portfolio of equities (the "Portfolio") and an over-the-counter (OTC) total return swap, a financial derivative instrument which turns the exposure to the securities in the Portfolio into exposure to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index.

The Fund shall observe the investment rules stipulated in Articles R.214-21, R.214-22 and R.214-23 of the French Monetary and Financial Code.

The Portfolio comprising directly held assets described in the "Assets used" section, complies with the provisions of Article R 214-21 of the French Monetary and Financial Code (CMF).

The Fund's exposure to the Index, achieved through the total return swap, may benefit from the exemption ratios applicable to index-linked UCITS under Article R.214-22 of the French Monetary and Financial Code. That Article

stipulates that an index may comprise up to 20% equities or debt securities issued by the same entity; this limit may be raised to 35% maximum for a single issuing entity, when such increase is justified by special market circumstances such as the regulated markets where some marketable securities or some money-market instruments are largely dominant.

## **2. Assets used (except embedded derivatives):**

The Fund's exposure to the MSCI Emerging Markets ESG Leaders Select 5% Issuer Capped Index is achieved through the total return swap.

The Portfolio consists of the Fund's directly held assets as described below.

### **- Equities**

#### **- Initial eligible basket**

Index-linked UCITS managed by the Management Company which achieve their management objective through a total return swap may, in accordance with the ratios provided for by the regulations, hold international equities (from all economic sectors, listed on all markets) including small-cap markets.

The above equities are generally chosen on the basis of criteria:

- of eligibility, in particular:

- belonging to the principal market indices or to the index;
- liquidity (minimum thresholds applied to average daily transaction volumes and market capitalisation);
- rating of the country of the issuer's registered office (requirement for a minimum S&P or equivalent rating);

- diversification, in particular:

- issuer (application of the ratios applicable to the eligible assets in a UCITS as referred to in Article R.214-21 of the French Monetary and Financial Code);
- geographic;
- sector-based.

(the "**Initial eligible basket**")

For further information on the eligibility and diversification criteria referred to above, notably the list of eligible indices, investors are invited to visit the website [www.amundi.com](http://www.amundi.com).

#### **- Filtered eligible basket of the Fund**

The Fund integrates sustainability risk and takes into account the principal adverse impacts of the investments on sustainability factors in its investment process, as explained in more detail in the section of this prospectus on "Sustainability-related disclosures". The Fund will not hold:

(i) Any securities of companies involved in the production or sale of controversial weapons (anti-personnel mines, cluster bombs, chemical, biological and depleted uranium weapons);

(ii) Any securities of companies in violation of international human rights or labour conventions, or which breach, seriously and repeatedly, one or more of the ten principles in the Global Compact (the United Nations Global Compact is "a call to companies everywhere to align their operations and strategies with ten universal principles in the areas of human rights, labour, environment and anti-corruption, and to take steps to progress society's objectives");

(iii) Any securities in companies involved in tobacco production and distribution;

(iv) Any securities in companies heavily exposed to thermal coal mining, nuclear arms or to unconventional oil and gas.

These securities are excluded on the basis of the Amundi Responsible Investment Policy available at [www.amundi.fr](http://www.amundi.fr).

The Fund also follows a non-financial selectivity approach which enables the investment universe to be reduced by at least 20% compared with the initial eligible universe. The limits of the non-financial approach are mentioned in the "Risk profile" section below. Non-financial data covers over 90% of the equities held in the Fund's assets.

Additionally, the Fund will at all times invest at least 75% of its assets in companies with their registered office in a Member State of the European Union, or in another State which is part of the European Economic Area (EEA) and has signed a tax agreement with France containing a clause regarding administrative assistance to prevent fraud and tax avoidance. This minimum level of equity exposure makes the Fund eligible for the Plan d'Épargne en Actions (French Stock Savings Plan).

Investment in undertakings for collective investment in transferable securities ("UCITS") in accordance with Directive 2009/65/EC is limited to 10% of the net assets. For the purposes of these investments the Fund may subscribe units or shares in UCITS managed by the management company or a connected company. The manager will not invest in units or shares in AIFs or other investment funds set up on the basis of foreign law. Where the Fund receives securities as collateral, on the conditions and within the limits of paragraph 8 of this section below, as these are received by the Fund in full ownership, they also constitute balance sheet assets received in full ownership by the Fund. With a view to optimising the management of the Fund in the future, the manager reserves the right to use other instruments within the limits of regulations in order to achieve its investment objective.

The Fund's exposure to the Index is achieved through the total return swap.

The Portfolio consists of the Fund's directly held assets as described below.

At least 90% of the Fund will be permanently invested in listed shares. For the purposes of interpreting this ratio, shares issued by REITs (as defined by the German Ministry of Finance) or UCIs are not considered as shares.

- Interest rate instruments: Up to 25% of the Fund's net assets may be invested in any kind of bond instruments.

Portfolio securities will be selected according to management decision and in compliance with the internal credit risk monitoring policy of the Management Company.

For the purpose of stock-picking, the management does not, neither exclusively nor mechanically, rely on the ratings issued by rating agencies, but bases its buy and sell convictions of a security on its own credit and market analyses. For information, management may specifically deal in securities with minimum ratings of BBB- by S&P and Moody's ("investment grade" rating) at the time of purchase.

The bond issuers selected may be from the private sector or from the public sector (national or local governments etc.), and private sector debt may account for up to 100% of all debt instruments.

Foreign debt instruments will be denominated in the currency of one of the OECD member countries.

In order to meet its investment objective and/or manage intermediate financial flows, the Fund may hold up to 10% of its assets in the following:

- Debt instruments and money market instruments in euros: cash flow will be managed through money market instruments.

Portfolio securities will be selected according to management decision and in compliance with the internal credit risk monitoring policy of the Management Company.

For the purpose of stock-picking, the management does not, neither exclusively nor mechanically, rely on the ratings issued by rating agencies, but bases its buy and sell convictions of a security on its own credit and market analyses. For information, management may specifically deal in securities with minimum ratings of AA by S&P and Moody's.

The bond issuers selected may be from the private sector or from the public sector (national or local governments etc.), and private sector debt may account for up to 100% of all debt instruments. The average maturity of these instruments will not exceed ten years.

### **3. Derivatives:**

The Fund will use OTC derivative financial instruments, including forward financial instruments such as total return swaps that swap the value of equities held by the Fund for the value of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index.

The Fund may take positions in the following derivatives:

- Type of markets in which investments are made:

- regulated
- organised
- OTC

• Categories of risk in which the Fund intends to take a position:

- equity risk
- interest rate
- currency
- credit
- volatility

• Types of transactions and description of all operations that must be limited to the achievement of the investment objective:

- hedging
- exposure
- arbitrage
- trading
- other

• Type of instruments used:

- futures: on equities and indices
  - options: on equities and indices
  - total return swaps: on equities and indices.
- The Fund may enter into exchange contracts in two combinations from the following types of flows:
- fixed rate
  - variable rate (indexed to the Eonia, Euribor, or any other market benchmark)
  - performance linked to one or more currencies, equities, stock market indices or listed securities, UCIs or investment funds
  - dividends (net or gross)
  - forward foreign exchange contracts
  - other

• Strategy of using derivatives to achieve the investment objective:

- constructing synthetic exposure to a particular security, business sector and/or to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index through the use of total return swaps.
- management of intermediate cash flows (dividends, subscriptions/redemptions etc.) to reach the desired degree of exposure to a particular security, business sector and/or to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index via the use of futures
- management of intermediate cash flows (dividends, subscriptions/redemptions etc.) to reach the desired degree of exposure to a particular security, business sector and/or to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index via the use of options.

These instruments may be used to hedge up to 100% of the Fund's net assets.

For information purposes, when the Fund is being set up, total return swaps represent approximately 100% of net assets and they represent up to 110% during its life cycle.

The assets held by the Fund and on the performance of which the total return swaps focus are retained by the Depositary.

Total return swaps are kept in position in the Depositary's books.

The commitments arising from derivatives may not exceed 110% of net assets.

#### **4. Securities incorporating derivatives ("embedded derivatives"): None**

The counterparty to the above-mentioned derivative instruments shall not have discretionary power over the composition of the Fund's investment portfolio or over the underlying assets of the derivatives within the limits and conditions set out in the regulations.

The voting rights attaching to the securities to which the Fund is exposed indirectly through the use of forward financial instruments will not be exercised by the banking counterparty.

#### **5. Deposits and liquid assets:**

The Fund may hold up to 20% of its net assets in deposits for a maximum term of twelve months. The deposits are used for cash management purposes and help the Fund achieve its cash management objectives.

#### **6. Borrowing:**

The Fund may temporarily, and in exceptional cases, borrow up to 10% of its net assets in order to optimise its cash flow management.

#### **7. Transactions involving the temporary acquisition and/or disposal of securities: None**

#### **► Information relating to financial guarantees (temporary purchases and sales of securities) and total return swaps:**

Type of collateral:

In the context of temporary purchases and sales of securities and OTC derivative transactions, the Fund may receive collateral of securities and cash.

The discounts that may be applied to the collateral received will take into account the type, the maturity, the credit quality and the currency, as well as the price volatility of the securities and the results of the stress tests performed.

The securities received as collateral must adhere to the criteria defined by the Management Company. They must be:

- liquid;
- transferable at any time;
- diversified in compliance with the eligibility, exposure and diversification rules of the UCITS;
- issued by an issuer that is not an entity of the counterparty or its group.

For bonds, the securities will also be issued by high-quality issuers located in OECD countries whose minimum rating may be AAA to BBB- on the scale of Standard & Poor's or with a rating deemed equivalent by the Management Company. Bonds must have a maximum maturity of 50 years.

The criteria described above are detailed in a Risk Policy available on the Management Company's website at [www.amundi.com](http://www.amundi.com) and may be subject to changes, particularly in the event of exceptional market circumstances.

The discounts that may be applied to the collateral received will take into account the credit quality, the price volatility of the securities and the results of the stress tests performed.

Reuse of cash received as collateral: Cash received as collateral may be reinvested in deposits, government bonds, reverse repurchase agreements or short-term money market UCITS in accordance with the Management Company's Risk Policy.

Reuse of securities received as collateral:

Not authorised: Securities received as collateral may not be sold, reinvested or pledged as guarantee.

#### **► Summary description of the process for selecting intermediaries and any comments:**

The Management Company usually operates through invitation to tender. In this case, a comprehensive request for proposal (total return swap and market making) was issued for a portion of the AMUNDI ETF Fund product line. The Management Company has therefore not undertaken and shall not undertake a formal competitive bidding procedure for this particular Fund that can be tracked and monitored among the potential counterparties

of OTC forward financial instruments, as the counterparty has already been selected during the comprehensive request for proposal. The Fund may carry out these transactions with BNP Paribas SA or any other Company of the BNP Paribas SA group as counterparties or intermediaries.

► **Risk profile:**

*Your money will be invested primarily in financial instruments selected by the Management Company. These financial instruments are subject to market fluctuations.*

Investors are advised that their capital is not guaranteed and may not be returned to them.

The Fund has high volatility due to its exposure to equity markets.

The main risks to which the investor may be exposed through the Fund's investments are as follows:

- Equity risk:

The Fund is exposed as to 100% to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index. However, in the event of adjustments associated with subscriptions/redemptions, exposure may exceed this limit on a residual basis. The Fund is therefore exposed to market risks related to fluctuations in the value of the stocks that make up the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index. Stock market fluctuations can lead to significant changes in net assets, which can adversely affect the Fund's net asset value. The Fund's net asset value may therefore fall significantly. The Fund accordingly has a high degree of equity risk.

- Market risk related to controversies:

Companies that meet the selection criteria of an index may be suddenly and unexpectedly affected by a serious controversy, which may have an impact on the net asset value of the Fund. Where these securities are included in the Index, they may be held until the next Index rebalancing.

- Risk related to changes in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index:

The Fund is exposed among other things to the change, both upwards and downwards, in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index. The Fund is therefore exposed to market risks related to fluctuations in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index. The Fund's value will fall if the value of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index decreases.

- Risk associated with investments in securities issued by emerging countries:

The terms of operation of these markets may deviate from the prevailing standards in major international marketplaces. Market movements may be faster and more abrupt than in developed countries, and securities in these countries may offer less liquidity than large capitalisations in developed countries. As a result, holding these securities may increase the Fund's level of risk and produce larger and faster decreases in the net asset value.

- Factors that may influence the ability of the Fund to track the performance of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index:

The ability of the Fund to track the performance of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index may be affected by the following factors:

- the re-weightings of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, which is tracked by the Fund, may generate transaction and/or trading costs;
- whether there are market fees;
- and/or on account of minor valuation discrepancies that would not be such as to result in the calculation of the Fund's net asset value being suspended. These discrepancies may be due to the temporary unavailability of certain securities in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index or to exceptional circumstances that could have the effect of causing distortions in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, particularly in cases of suspension or temporary disruption in the listing of the securities in the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index.

- Credit risk:

The risk of a deterioration in the credit quality of an issuer or of an issuer defaulting. This deterioration may lead to a fall in the value of a security and thus to a reduction in the net asset value.

- Counterparty risk related to the tracking method selected:

To meet its investment objective the Fund will use OTC forward financial instruments (including total return swaps) negotiated with credit institutions. The Fund will be exposed to the counterparty risk that results from the use of forward financial instruments executed with a credit institution. The Fund is therefore exposed to the risk that the credit institution in question will not be able to honour its commitments in respect of these instruments. Default by the counterparty of a swap (or by any other issuer) may cause the Fund's NAV to fall. Under the current rules, however, the counterparty risk resulting from the use of swaps will be limited to 10% of the Fund's net assets per counterparty at any time.

The Fund may also be exposed to trading difficulties or a temporary inability to trade certain securities in which the Fund invests, in the event of a counterparty defaulting on total return swaps (TRS).

Legal risk:

The use of temporary purchases and sales of securities and/or total return swaps (TRS) may create a legal risk, particularly relating to the swaps.

- Currency risk:

The EUR unit has an exchange rate risk connected with its exposure to the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, resulting from changes in the value of the reference currencies of the securities forming the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index replicated by the Fund. Investors are therefore exposed to exchange rate fluctuations of these currencies against the currency of the unit in which it is invested.

You are exposed to the foreign exchange rate risk between the currencies in which the stocks of the Index are denominated and the currency of the Fund.

The currency risk could extend to 100% of the Fund's net assets.

- Liquidity risk:

The markets to which the Fund is exposed may occasionally be affected by a temporary lack of liquidity. These market disturbances may impact the price terms at which the Fund may have to liquidate, initiate or modify positions, and may therefore lead to a fall in the net asset value.

- Liquidity risk in a listing market:

The Fund's market price may deviate from its Benchmark Price. The liquidity of the Fund's units in a listing market may be affected by any suspension that could, in particular, but not only, be due to:

- i) suspension or halt of the calculation of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index by the Index provider,
- ii) suspension of the market(s) on which the underlying stocks of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index are listed,
- iii) a relevant listing market not being able to obtain or to calculate the Fund's Benchmark Price,
- iv) a violation by a market-maker of the rules applicable in the relevant listing market,
- v) failure of the systems, in particular of IT or electronic systems, in a relevant listing market,
- vi) any other event that prevents the calculation of the Fund's Benchmark Price or the trading of Fund units.

- Index calculation risk:

The Fund replicates an index that is determined and calculated by an index provider. The index provider may face operational risks that could lead to errors in the determination, composition or calculation of the index replicated by the Fund, which could result in losses or shortfalls in the Fund's investments, or a deviation from the objective of the index, as described in the index methodology and the description of the Fund's characteristics.

- ESG Risks

Risk associated with sustainability data

The index provider evaluates the securities to be included and/or weighted in the benchmark index on the basis of ESG criteria and data provided by the index provider or by third parties. The evaluation of the ESG characteristics of the securities by the index provider depends on these criteria and data, which may vary depending on the index provider, and no guarantee can be given regarding their completeness, accuracy or relevance. The management company makes no representations as to the reliability and accuracy of the evaluation of the ESG characteristics of the securities made by the index provider or of the criteria and data used for the evaluation.

While the index providers of the benchmark indices provide descriptions of the objective to be achieved by the benchmark indices, the providers generally give no guarantees and accept no liability in relation to the quality,

accuracy or completeness of the data in compliance with their benchmark indices or their documents on the index methodology, or any guarantees that the indices published will conform to their description in the benchmark index methodologies. Errors in the quality, accuracy or completeness of the data may occur from time to time and may not be identified and rectified for a certain period, particularly for the indices used the least. The impacts of the sustainability risk are likely to evolve over time and new sustainability risks may be identified as further data and information becomes available.

#### Risk associated with regulatory changes relating to the definition of the ESG criteria

Regulatory changes or interpretations relating to the definitions and/or use of the ESG criteria may have a significant negative effect on the Fund's ability to invest in accordance with its investment policies, and on the option for certain categories of investors to invest in funds pursuing an ESG strategy like the Fund.

#### Risk of divergence from the criteria relating to investors' minimum ESG standards

Investors may have different interpretations as to what constitute positive or negative ESG characteristics of a company, instrument or portfolio. No representations or otherwise will be made by the company, an instrument or a portfolio in relation to the alignment of the benchmark index and Fund with the criterion relating to investors' minimum ESG standards. Investors are advised to carry out their own checks to ensure that the benchmark index and the Fund conform to their own ESG criteria.

#### Risk associated with ESG classifications or state labels

The Fund may adopt or obtain ESG categorisations (for example under the SFDR rules or the AMF) or state labels (for example Febelfin Belge which proposes to use the full name of the index or the French SRI). Where the Fund follows a benchmark index and ceases to fulfil the requirements of its ESG categorisation or label, it should be brought back in line with its respective indices the next time the index is rebalanced or around that time. At this point, the Fund will be rebalanced based on its respective benchmark indices, subject to any restrictions applicable to the Fund based on its ESG categorisations or labels but which are not applied by the index provider to its benchmark indices (either because these restrictions do not form part of the index methodology or due to an error).

If the Fund is not required to hold a security from its benchmark index in order to comply with a restriction resulting from its ESG categorisation or from its label which its reference index does not comply with, this could increase the tracking discrepancy and tracking error of the Fund. This increase may be aggravated as a result of market volatility. An index provider may find that it is not possible to rebalance a benchmark index to achieve, in an optimal way, all ESG and non-ESG objectives of the benchmark index at the same time and the index provider may choose to relax certain ESG or non-ESG objectives on the basis of its rules in order to carry out this rebalancing. If this takes place, it will have an impact on the Fund's performance which follows the benchmark index when rebalancing takes place.

The rules and standards relating to ESG categorisations and labels are constantly changing. To this extent, these rules may become more stringent and diverge from the index methodologies and from the Fund's investment objectives, policies or strategies, or come into conflict with them. It may not be possible or achievable for a fund to continue to comply with the changing rules while maintaining its existing investment objective, policy and strategy or it may not be in the best interests of the Fund and its shareholders to do so. In such circumstances, the Fund may cease to hold certain ESG categories or certain labels after expiry of the given period to remain compliant with the rules applicable to the ESG categories or labels.

#### Risk associated with index revisions or rebalancing

The index provider can only evaluate the ESG data relating to the securities (including the ratings) and, where applicable, the ESG objectives or constraints which are relevant to the benchmark index when the index is revised or rebalanced. The securities included in the benchmark index may cease to fulfil the ESG criteria but may nevertheless remain within the benchmark index and the Fund until the next time the index is revised or rebalanced by the index provider. Consequently, certain securities in the benchmark index, or the benchmark index as a whole, may not fulfil the ESG objectives or constraints at any time. If the ESG evaluation of a security in the benchmark index or in the Fund changes the management company accepts no liability in relation to this change.

The management company does not monitor the securities in the benchmark index as compared with the ESG objectives or constraints applied by the index provider and is not responsible for changes to the ESG evaluation of a security in the benchmark index between rebalancing.

#### Risk associated with ESG methodologies

Indices comprising an environmental, social and governance ("ESG") component generally use a "best in class" approach or an ESG rating improvement approach. These two approaches relate to an investment universe. Companies with a poor ESG rating may however be included in the composition of the index and the overall ESG rating of the index may be lower than the overall ESG rating of a non-ESG index based on a different investment universe.

Due to the application of ESG criteria to the parent index/investment universe to determine the eligibility for inclusion in the relevant benchmark index, the benchmark index will include a narrower securities universe than the parent index/investment universe and the securities in the benchmark index are also likely to have GICS sector-based and factor-based weightings differing from those of the parent index/investment universe.

The impact of the risk associated with ESG investment is likely to evolve over time, and new risks and sustainability factors may be identified as further data and information relating to ESG factors and impact becomes available. Additionally, the ESG investment methodologies are continuing to develop and the ESG methodology applied by the index provider may change over time.

Investors should note that the analysis on the basis of which a fund is subject to the disclosure requirements for a financial product pursuant to Article 8 of the SFDR regulation is made solely on the basis of the fact that the benchmark index promotes environmental and social characteristics. The company relies solely on the activities undertaken and the information provided by the administrator of the benchmark index or other data providers (where applicable) to carry out this analysis.

#### Sustainable investment risk

The management company takes account of the principal adverse impacts of the investments on the sustainability factors in selecting the index whose performance is tracked.

As stated in the description of the Fund in question, certain funds are set up based on (i) investment policies aiming to promote environmental and social characteristics or (ii) a carbon emissions reduction objective. For these funds, the investment manager in question excludes securities in accordance with the management company's exclusion list as it appears in the Responsible Investment Policy described above.

Certain funds and indexes replicated may have an investment universe based on companies which fulfil specific criteria, including ESG scores, relating to certain sustainable development themes and which demonstrate their commitment to environmental, social and company governance practices. Consequently, the universe for these funds and indices may be smaller than for other funds and indices. Investors should note that the benchmark index is based solely on the analysis of the benchmark index administrator or of other data providers (where applicable) as regards sustainability considerations. No representations are made by the company or any of its service providers in relation to the accuracy, reliability or precision of the data relating to sustainable development or the way in which it is implemented.

The ESG information received from third party data providers may be incomplete, inaccurate or unavailable. Consequently, there is a risk that the benchmark index administrator or other data providers (where applicable) may incorrectly evaluate a security or an issuer, leading to the incorrect inclusion or exclusion of a security in the benchmark index and therefore in the Fund portfolio.

It should also be noted that the analysis of companies' ESG performance may be based on models, estimates and assumptions. This analysis should not be treated as an indication or guarantee of current or future performance.

These funds and indices may (i) under-perform the market as a whole if such investments under-perform the market and/or (ii) under-perform as compared with their parent index or with the universe eligible for the index which does not use the ESG criteria and/or could cause the Fund to sell investments with good current and subsequent performance as a result of concerns relating to ESG criteria. The exclusion or sale of securities of issuers not fulfilling certain ESG criteria of the index methodology or investment universe of the Fund may lead to performance of the index and the Fund differing from that of similar indices and funds which do not have such a Responsible Investment Policy or ESG component in their index methodology and which do not apply ESG selection criteria in selecting investments. The funds will vote by proxy in a way which is consistent with the relevant ESG exclusion criteria, which may not always be compatible with optimisation of the short-term performance of the issuer in question. Further information regarding Amundi's ESG voting policy is available at [www.amundi.com](http://www.amundi.com). Asset selection may be based on a proprietary ESG rating process (such as that of the index provider) based fully or partially on third-party data. Data provided by third parties may be incomplete, inaccurate or unavailable and, consequently, there is a risk that the investment manager may evaluate a security or issuer incorrectly.

#### Sustainability risk:

an environmental, social or governance event or condition that, if it occurs, could have an actual or a potential negative material impact on the value of the investment.

Risks relating to environmental issues include but are not limited to both physical and transition climate risk. The physical risk results from the physical effects of climate change, whether acute or chronic. For example, frequent and severe climatic events may have an impact on products, services and supply chains. The transition risk, whether it relates to a political, technological, market or reputation risk, results from the adaptation to a low carbon emission economy with a view to mitigating climate change.

Risks relating to social issues may include but are not limited to human rights, health and safety, inequality, integration and employment rights.

Risks relating to governance may include but are not limited to risks associated with significant and recurrent breaches of international agreements, corruption, independence of the board of directors, ownership and control, or audit and fiscal management.

These risks may have an impact on the operational efficiency and resilience of an issuer, and on how it is perceived by the public and its reputation, affecting its profitability and, in turn, its capital growth and ultimately the value of the Fund's assets.

#### Sampling of replication of an index

Replication of an index, which involves investing in a portfolio made up of all the securities comprising the index in question, may be costly and is not always possible. In certain circumstances, the fund manager may implement optimisation methodologies, based on techniques such as sampling. It therefore seeks to reproduce the index return, i) by investing in representative transferable securities forming part of the benchmark index, but potentially with different weightings, and/or; ii) by investing in a portfolio of transferable securities that are not necessarily part of the index, or other eligible assets such as derivative financial instruments. The Fund seeks to replicate the performance of the index by pursuing a sampling strategy, but it does not guarantee that it will achieve an exact replication. The Fund may also face increased tracking error risk, which is the risk that, from time to time, the Fund does not exactly replicate the performance of the Index. In addition, the use of a representative sample may lead to divergence from the Fund's global ESG characteristics or from the ESG risk as compared with the benchmark index.

#### Risk associated with calculating ESG scores:

It should be noted that most ESG scores and ratings are not defined in absolute terms, but in relative terms, by comparing a company with a group of peers. As a result, companies generally perceived by the market as having poor ESG practices could potentially be given a good rating if the other companies in their peer group have lower standards than theirs in terms of ESG practices. Companies' ESG rating is calculated by an ESG rating agency on the basis of raw data, models and estimates which are collected/calculated according to methods specific to each participant. Most of them use a variety of vectors and information channels: questionnaires sent to companies, use of information published by the entities concerned by the data or by trusted third parties (press agencies, non-government agencies), use of data produced by other suppliers in the sector through subscriptions or partnerships. The information collected may be added to, clarified or corrected on the basis of exchanges with the companies to which it relates. Rating agencies publish details of their methodology and will provide additional information on request. However, due to the lack of information and to the unique nature of each methodology, the information provided may prove to be incomplete, particularly in relation to the precise description of the variables used to calculate scores, the treatment of gaps in the data and the weighting of the different variables and components of the scores, as well as the calculation methods. There may also be a delay between the date when the data is input and the date when it is used, which may have an impact on the relevance and quality of the data.

▶ **Guarantee or protection:** None

▶ **Eligible subscribers and standard investor profile:**

• **Eligible subscribers:**

All subscribers

• **Standard investor profile:**

The Fund is open to any subscriber, including those investing in a French PEA.

This Fund is intended for investors who seek long-term capital growth and exposure to equity markets in emerging countries, while offering opportunities for short-term arbitrage. The Fund is continuously listed on one or more markets and its units may be traded in the same way as simple stocks. It therefore combines the advantages of a listed security and those of a UCITS. Furthermore, it is eligible for the French stock savings plan (PEA).

The amount that might be reasonably invested in this Fund depends on the investor's personal situation. To determine this amount, investors should consider their personal assets, their current financial needs and the recommended investment period as well as their willingness to accept risks or their wish to invest cautiously. It is also strongly recommended that investors sufficiently diversify their investments so as to avoid exposing themselves entirely to the risks of this Fund.

All investors are therefore invited to consult their own financial advisors about their individual situations.

This Fund's units cannot be offered or sold directly or indirectly in the United States of America (including its territories and possessions) to the advantage of a US Person as defined in US "Regulation S" adopted by the Securities and Exchange Commission ("SEC").

The term "US Person" means:

- (a) any individual residing in the United States of America;
- (b) any entity or company organised or incorporated under the laws of the United States;
- (c) any estate of which the executor or the administrator is a US Person;
- (d) any trust of which any trustee is a US Person;
- (e) any branch or subsidiary of a non-US entity located in the United States of America;
- (f) any non-discretionary account (other than an estate or trust) held by a financial intermediary or any other fiduciary, incorporated, or (if an individual) resident in the United States;
- (g) any discretionary account (other than an estate or trust) held by a financial intermediary or any other fiduciary, incorporated, or (if an individual) resident in the United States; and
- (h) any entity or company, if it is
  - (i) organised or incorporated under the laws of any non-US jurisdiction and
  - (ii) formed by a US person principally for the purpose of investing in securities not registered under the US Securities Act of 1933, as amended, unless it is organised or incorporated, and owned, by Accredited Investors (as defined in Rule 501(a) of the Act of 1933, as amended) who are not individuals, estates or trusts.

► **Recommended investment period:**

The minimum recommended investment period is 5 years.

► **Determination and allocation of distributable sums:**

Accumulation and/or distribution at the discretion of the Management Company

► **Distribution frequency:**

If the Management Company decides to distribute a portion or all of the net profit and/or of the net capital gains generated, it may then make one or several payments per year. Distributions will be made by encashment of coupons.

► **Accounting currency:** euro

► **Characteristics of units:**

• **Currency of the units:** euro

• **Initial Net Asset Value:**

EUR 20 per Fund unit.

► **Subscriptions and redemptions:**

As indicated above, the Fund's activity is organised on two markets, one "**primary**" and the other "**secondary**".

The persons wishing to acquire or subscribe units will be required to certify in writing, at the time of any acquisition or subscription of units, that they are not 'US Persons'. Any unitholder who becomes a US person must immediately notify the Fund's Management Company of the change.

• **Subscription and redemption on the primary market:**

On the primary market, new Fund units are subscribed and/or redeemed in return for (i) cash or (ii) in-kind contribution/withdrawal of a basket of equities representative of the composition of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index complete with a "cash adjustment".

In this market, initial subscriptions are only allowed in minimum quantities of 5000 units and subsequent subscriptions are only allowed in minimum quantities of one unit. Redemptions are made in whole units, with a minimum value of EUR 100,000 or equivalent in the currency of the unit per redemption request.

Orders for subscription and redemption of Fund units are cleared by the Depositary between 09:00 and 18:30 (Paris time) each day when the Paris Stock Exchange is open ("**Trading Day**"). Subscription and redemption requests sent after 18:30 (Paris time) on a Trading Day will be processed as orders received between 09:00 and 18:30 (Paris time) on the next Trading Day.

A Trading Day is a working day on which the Fund's NAV can be calculated and published.

The Fund's NAV on a given trading day is calculated using the closing price of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index, euro-adjusted, on that day. The exchange rate used to convert the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index value into euros is the WM Reuters benchmark rate at the final 16:00 GMT fixing on the same day.

Subscriptions/redemptions in cash only

Cash-only orders centralised by the Depositary between 9:00 and 18:30 (Paris time) on a given Trading Day will be executed on the basis of the net asset value of the following Trading Day.

Subscriptions/redemptions made by contributions/withdrawals to/from a basket of equities representing the composition of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index

Orders centralised by the Depositary between 9:00 and 18:30 (Paris time) on a given Trading Day will be executed on the basis of the terms set by the Management Company at 18:30 (Paris time) on the following Trading Day, as follows:

- (1) contribution of a basket of equities reflecting the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index as determined by the Management Company, which the subscriber must deliver, and, where applicable,
- (2) payment of a cash amount in euros to or from the Fund ("cash adjustment") where a subscription/redemption order is for a minimum initial subscription of exactly 5000 units and a minimum subsequent subscription of one unit. Redemptions are made in whole units, with a minimum value of EUR 100,000 or equivalent in the currency of the unit per redemption request. The cash adjustment will be equal to the difference in euros between the net asset value of the Fund units on that date and the value in euros of the equities to be delivered on the next day.

Orders will be executed in accordance with the table below:

D	D	D: the net asset value calculation day	D+2 business days	D+3 business days	D+3 business days
Centralisation before 18:30 of subscription orders <sup>1</sup>	Centralisation before 18:30 of redemption orders <sup>1</sup>	Execution of the order on D at the latest	Publication of the net asset value	Settlement of subscriptions	Settlement of redemptions

<sup>1</sup> Unless any specific timescale has been agreed with your financial institution.

The Delegated Fund Manager reserves the right to refuse the securities offered/requested for all subscriptions/redemptions made by contributions/withdrawals of securities and has 7 days from the date of the deposit/request to indicate its decision.

Subscriptions/redemptions must be paid for/delivered no later than five Trading Days after the calculation and publication of the net asset value.

Requests for subscriptions and redemptions will be made in whole units.

**• Institutions designated to receive subscriptions and make redemptions:**

CACEIS Bank  
Registered office: 89-91 rue Gabriel Péri, 92120 Montrouge

*Investors should note that orders sent to distributors other than the aforementioned institutions should take into account the fact that the cut-off time for the centralisation of orders applies to those distributors with CACEIS Bank.*

*As a result, these promoters may apply their own deadline, earlier than the time mentioned above, to allow them to meet their order transmission deadline to CACEIS Bank.*

• **Listing and trading Fund units on the secondary market:**

The secondary market is the market on which existing Fund units are traded. It includes all the stock markets on which the Fund is or will be admitted for continuous trading.

Purchases and sales on the secondary market do not incur any subscription or redemption fees. Orders for the purchase or sale of units may be placed in any market where the Fund is (or will be) traded, through an approved broker. Placing a stock market order will give rise to costs over which the Management Company has no influence.

There is no minimum amount for purchase/sale orders placed on the secondary market, other than those which may be imposed by the stock market where Fund units are listed.

The price of a unit traded on the secondary market depends on supply and demand and is approximately equal to the Benchmark Price (see the section on "Benchmark Price").

"Market-makers" maintain secondary market liquidity by acting as market counterparties (see "Market-makers" section). They contract with the stock market operators in question to maintain a maximum difference between the highest bid and the lowest offer prices. Their activities ensure that trading in Fund units remains liquid. They also ensure, through arbitrage between the primary and secondary markets, that the Fund's listed market price does not diverge significantly from its Benchmark Price at Indicative NAV.

If the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index listing is halted or suspended, the Fund's listing is suspended at the same time. As soon as listing of the benchmark 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index resumes, the Fund's also resumes, taking account of any change in the Fund's NAV and Benchmark Price since the interruption.

The units acquired on the secondary market cannot generally be resold directly on the primary market. Unitholders must buy and sell units in a secondary market with the assistance of an intermediary (a broker, for example) and may have to bear the corresponding costs. In addition, unitholders may pay more than the current NAV when they buy units and may also receive less than the current NAV when they sell them.

Fund units will be listed on the Euronext Paris market.

The Management Company may apply for these units to be listed on other markets.

Fund units will be listed on Euronext Paris and traded in a product segment dedicated to Trackers: NextTrack.

• **Market-makers:**

As at 25 April 2019, the financial institution acting as Market-maker is:

BNP Paribas Arbitrage  
General Partnership (Société en nom collectif)  
Registered office: 160-162 boulevard Mac Donald – 75019 Paris

"Market-makers" will provide market-making services for Fund units from the date they are listed on the market where the Fund is admitted for trading. They will mainly act as "Market-makers" through their continuous presence on the market, maintaining a buy/sell price range and ensuring adequate liquidity.

Specifically, the financial institutions acting as "Market-makers" that have signed a market-making contract for the Fund have made a commitment to Euronext Paris SA to meet the following conditions for the Fund:

- a maximum total spread of 2% between the offer price and bid price in the centralised order book
- a nominal minimum amount at purchase and sale corresponding to EUR 100,000.

The obligations of the "Market-makers" will immediately be suspended if the value of the 100% MSCI EM EX EGYPT ESG LEADERS SELECT 5% ISSUER CUSTOM CAPPED INDEX Index becomes unavailable or if one of its component securities is suspended. The obligations of the "Market-makers" will generally be suspended in the event of unusual disturbances or difficulties on the stock market in question which prevent standard market-making operations (e.g. listing disturbances etc.).

"Market-makers" must also ensure that the Fund unit's market price does not differ by more than 1.5% either side of the Benchmark Price (see "Benchmark Price" section).

The Management Company may ask "Market-makers" to halt their listing of Fund units should exceptional circumstances arise or should investor interest require it.

### **BUYING AND SELLING CONDITIONS ON THE SECONDARY MARKET**

If the stock market value of the listed Fund's units or shares significantly differs from its Benchmark Price or if the Fund's units or shares have been suspended from trading, investors may be allowed, under the conditions described below, to have their units redeemed in the primary market directly with the listed Fund without the minimum-size requirements described in the "Subscription and redemption fees (applicable solely to primary market trading)" section having to apply thereto

The Management Company shall decide whether to proceed with this type of primary market opening and on the duration of such opening, based on the criteria listed below, the analysis of which shall be used to qualify the materiality of the market disruption:

- Verification that the nature of the suspension or of the significant disruption of the secondary market in one of the potential stock markets is not occasional;
- Link between the market disruption and the traders in the secondary market (such as for example a default of all or part of the Market Makers trading in a given market or a malfunction affecting the operating or IT systems of a given stock market), by conversely excluding, the disruptions, if any, with causes external to the secondary markets of the Fund's units or shares, such as, among other things, an event affecting the liquidity and the valuation of all or part of the components of the Benchmark Index;
- Analysis of any other objective factor that may affect the equal treatment of the Fund's unitholders and/or their interests.

As an exception to the provisions on fees mentioned in the "Subscription and redemption fees (applicable solely to primary market trading)" section, the unit redemption transactions carried out in this case on the primary market shall only be subject to a redemption fee of 1% maximum payable to the Fund and intended to cover the costs related to the transaction paid by the Fund.

In such exceptional primary market opening cases, the Management Company will post on its website [amundi.tf.com](http://amundi.tf.com) the procedure to be followed by investors wishing to redeem their units in the primary market. The Management Company will also provide said procedure to the stock market operator that lists the Fund's units.

#### **► Date and frequency of NAV calculation:**

Daily

#### **► Location and terms of publication and communication of net asset value:**

The net asset value is calculated and published each day on which the Euronext Paris stock exchange is open or if one of the markets on which the Fund is listed for trading is open (in particular the Borsa Italiana, the Deutsche Börse, the London Stock Exchange and the SIX Swiss Exchange), except for days on which the markets listing the securities that make up the index are closed, provided that the orders placed on the primary and secondary markets can be covered.

The net asset value of the Fund is available on request from the Management Company and on its website [amundi.tf.com](http://amundi.tf.com).

Furthermore, on the days the NAV is published, a Benchmark Price (see "Benchmark Price" section) in euros will be published by Euronext Paris.

► **Costs and fees:**

• **Subscription and redemption fees:**

*Subscription and redemption fees are levied by addition to the subscription price paid by the investor or subtraction from the redemption price. Fees are retained by the Fund to offset the costs incurred by the Fund in investing or liquidating the amounts involved. Fees not accruing to the UCITS, are allocated to the Management Company, the promoter etc.*

- On the primary market:

<b>Fees paid by the investor, charged at subscription and redemption</b>	<b>Basis</b>	<b>Interest rates</b>
Subscription fee not retained by the Fund	Net asset value X number of units	10% on each subscription request
Subscription fee retained by the Fund	Net asset value X number of units	None
Redemption fee not retained by the Fund	Net asset value X number of units	10% on each redemption request
Redemption fee retained by the Fund	Net asset value X number of units	None

**Exemption:**

The Management Company and BNP Paribas Arbitrage and BNP Paribas SA are exempt from paying subscription or redemption fees not retained by the Fund.

The nature of these fees is detailed in the section describing subscription and redemption arrangements.

- On the secondary market:

Purchases and sales on the secondary market do not incur any subscription or redemption fees. Orders for the purchase or sale of units may be placed in any stock market where the Fund is traded, through an approved broker. Nevertheless, placing a stock market order will trigger costs over which the Management Company has no influence (e.g. broker's commission on stock-market orders to buy or sell units charged by the investor's broker).

The distribution of this Prospectus may be subject to restrictions in certain countries, as may the purchase or sale of Fund units. This Prospectus is not an offer or solicitation by any person in any country where such offer or solicitation would be illegal or where the person making it would not meet the applicable statutory conditions or directed to any person to whom it would be illegal to make such a solicitation.

• **Administrative and management fees:**

*These fees cover all expenses billed directly to the Fund, except for transaction costs.*

*Part of the management fee may be passed on to the promoters with whom the Management Company has entered into marketing agreements. These promoters may or may not belong to the same group as the Management Company. These fees are calculated on the basis of a percentage of the financial management fees and are invoiced to the Management Company*

*In addition to these fees, there may be:*

- *performance fees. These reward the Management Company when the Fund exceeds its objectives. They are therefore billed to the Fund;*
- *fees related to securities financing transactions.*

*For more details of the fees actually billed to the Fund, refer to the key information document.*

<b>Fees charged to the UCITS</b>	<b>Basis</b>	<b>Rate structure</b>
Actual fixed rate	Net assets	0.3% incl. taxes

Administrative and management fees will be charged directly to the Fund's income account. The following costs may be added to the fees charged to the Fund, as detailed above:

- Exceptional legal costs related to recovery of the debts of the Fund;

- Costs related to fees payable by the Management Company to the AMF in connection with managing the Fund.

### **Counterparty selection policy**

The Management Company implements a counterparty selection policy, in particular when entering into total return swaps (TRS) on behalf of the Fund.

The list of eligible counterparties is approved by the Management Company at ad-hoc meetings of "Best execution committees" (the "**Eligible Counterparties**").

The Eligible Counterparties are selected on the basis of several criteria relating to the execution services (including in particular price, liquidity, speed and cost) in accordance with their relative importance having regard to the type of order or financial instrument.

Financial institutions of an OECD country with a minimum rating ranging from AAA to BBB- on Standard & Poor's rating scale or with a rating deemed equivalent by the Management Company are selected when setting up the transaction.

In addition to the above, the Management Company applies its best selection and execution policy. For further information regarding this policy and in particular the relative importance of the various execution criteria per asset class, please visit our website: [www.amundi.com](http://www.amundi.com).

#### **• Commission in kind:**

The Management Company receives no commission in kind either for itself or for third parties.

#### **Warning:**

The tax treatment applicable to any amounts distributed by the Fund or to its unrealised or realised capital gains or losses depends on the tax laws applicable to the individual investor's tax position and country of tax residence and/or on the jurisdiction in which the Fund holds assets.

Some income distributed by the Fund to unitholders residing outside France may be subject to withholding tax in France. We recommend that you consult your tax adviser on this issue.

In addition, investors should be aware that the directive on taxation of savings income imposes certain fiscal obligations on the Fund's representatives and agents and certain Fund holders.

Other regulations imposing similar obligations are expected to be introduced in jurisdictions outside the European Union. In principle, under that Directive, and potentially under comparable regulations that might be adopted elsewhere, the payment of interest (which may include the proceeds of the sale, redemption or repurchase of Fund units by certain unitholders) may in certain circumstances be disclosed to the local tax authorities.

Investors are invited to refer to the Fund's Annual Report for further information.

## **IV. COMMERCIAL INFORMATION**

Unitholders are informed of any changes affecting the Fund in accordance with the procedures defined by the AMF, the French financial market regulator: by individual notification or by any other method (financial notice, interim report, etc.).

Financial notices may be published in the press and/or on the website <https://about.amundi.com> in the News section.

The Fund's prospectus, latest annual and periodic documents, and the Fund's NAV are sent within one week upon written request from the investor to:

Amundi Asset Management – Amundi ETF – 91-93, Boulevard Pasteur – CS 21564 – 75730 PARIS Cedex 15, France

The Management Company provides investors with information on how the criteria for compliance with social, environmental and governance quality objectives are taken into account in its investment policy on its website at [amundi.com](http://amundi.com) and in the Fund's annual report.

The transparency policy is available on request from the Management Company and on its website [amundieff.com](http://amundieff.com) and information about the asset composition of the Fund is available on request from the Management Company and on its website [amundieff.com](http://amundieff.com) where it is published with a delay of at least three stock market days.

In addition, the Management Company may directly or indirectly send the breakdown of Fund assets to unitholders who are classified as professional investors by the ACPR, the AMF or equivalent European authorities, for the sole purpose of calculating regulatory requirements under the Solvency II Directive. If applicable, this information must be disclosed once more than 48 hours has passed since the publication of the net asset value.

Further details are available from the Management Company and at [amundiETF.com](http://amundiETF.com).

## **SUSTAINABILITY DISCLOSURES**

### **REGULATION (EU) 2019/2088 ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (the "Disclosure Regulation")**

Pursuant to the Disclosure Regulation, the Management Company is required to describe the manner in which it integrates sustainability risks (as defined below) into its investment decisions, as well as the results of the assessment of the likely impacts of sustainability risks on the returns of the funds it manages.

The impacts of sustainability risks can be numerous and varied depending on other specific risks, the regions and/or the asset class to which the funds are exposed. In general, when an asset is exposed to sustainability risk, this can have a negative impact on its value and result in its total loss, which could negatively affect the net asset value of the funds concerned.

The likely impacts of sustainability risks must be assessed for each fund. More detailed information can be found in the "Risk Profile" section of the Prospectus.

**"Sustainability factors"** means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**"Sustainability risk"** means an environmental, social or governance (ESG) event or condition that, if it occurs, could have an actual or a potential material negative impact on the value of the investment. Sustainability risks can either represent a risk in themselves or have impacts on other risks, such as market risks, operational risks, liquidity risk or counterparty risk, by contributing significantly to the Fund's exposure to those risks. Assessing the likely impacts of sustainability risks on a fund's performance is complex and may be based on ESG data that is difficult to obtain, incomplete, estimated, obsolete and/or inaccurate. Even when this data has been identified, there is no guarantee that it has been properly assessed.

Sustainability risks are related, among other things, to "climate" events resulting from climate change ("Physical Risks") or the company's response to climate change ("Transition Risks"), which could lead to unexpected losses that may affect the investments made by the funds. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changes in customer behaviour etc.) or a lack of governance (e.g. significant and repeated breaches of international agreements, problems of corruption, product quality and safety, sales practices etc.) can also incur sustainability risks.

By implementing an exclusion policy for issuers with practices that are considered controversial from an environmental, social and/or governance perspective for some of its investment strategies, the Management Company aims to mitigate sustainability risks. Moreover, when a fund follows an extra-financial approach (selection, theme, impact etc.), sustainability risks can be further mitigated. In both cases, please note that there is no guarantee that the sustainability risks are fully neutralised. More information about the integration of sustainability risks into investment decision-making processes can be found on the Management Company's website: [www.amundi.com](http://www.amundi.com).

Sustainability risks cannot influence investment decisions for ETF Funds whose investment objective is to replicate the performance of an index because the Fund is exposed to the index components or invested directly in those components.

### **REGULATION (EU) 2020/852 ON THE ESTABLISHMENT OF A FRAMEWORK TO FACILITATE SUSTAINABLE INVESTMENTS (the "Taxonomy Regulation")**

The Taxonomy Regulation aims to identify economic activities that are considered environmentally sustainable. It identifies these activities according to their contribution to six broad environmental objectives:

(i) climate change mitigation, (ii) climate change adaptation, (iii) sustainable use and protection of water and marine resources, (iv) transition to the circular economy (waste, prevention and recycling), (v) pollution prevention and control, (vi) protection of healthy ecosystems.

For the purpose of establishing the environmental sustainability of an investment, an economic activity is considered environmentally sustainable if it makes a substantial contribution to one or more of the six

environmental objectives, does not significantly harm one or more of the environmental objectives ("do no significant harm" or "DNSH" principle), is carried out in accordance with the minimum safeguards set out in Article 18 of the Taxonomy Regulation, and complies with the technical review criteria that have been established by the European Commission under the Taxonomy Regulation.

In accordance with the current state of the Taxonomy Regulation, the Management Company currently ensures that investments do not significantly undermine any other environmental objective by implementing exclusionary policies in relation to issuers with controversial environmental and/or social and/or governance practices.

Notwithstanding the above, the "do no significant harm" principle only applies to those investments underlying the Fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining part of this Fund do not take into account the EU criteria for environmentally sustainable economic activities.

### **Additional information on the non-financial analysis in accordance with AMF Position DOC-2020-03 on "information to be provided by collective investment schemes incorporating non-financial approaches"**

#### 1. Contractual commitments of the counterparty in total return swap (TRS) contracts.

Within the framework of implementation of the investment strategy, the Fund enters into a total return swap (TRS) contract set up with a banking counterparty. In accordance with the provisions of the FBF-AMAFI Charter on the synthetic hedging of ESG funds to which the banking counterparty has subscribed, the total return swap (TRS) contract enabling the performance of balance sheet assets to be swapped against the performance of the Benchmark Index is governed by contractual clauses ensuring there is no deterioration of the non-financial characteristics of the Fund's exposure caused by the hedging method used by the counterparty.

#### 2. Information for unitholders regarding the lack of exercise of the voting rights for the securities to which the Fund is exposed

The voting rights attaching to the securities to which the Fund is exposed in the course of synthetic replication of the Benchmark Index will not be exercised by the banking counterparty.

## **V. INVESTMENT RULES**

The Fund shall comply with the investment rules laid down by European Directive 2009/65/EC of 13 July 2009. The Fund will comply with the legal ratios decreed by the French Monetary and Financial Code – Regulatory Part.

The legal investment rules applicable to the Fund are those which govern UCITS, up to 10% of whose assets are invested in other UCIs, as well as those applicable to its AMF classification "International equities".

The main financial instruments and management techniques used by the Fund are listed in Chapter III.2 "Special Provisions" of the Prospectus. Amendments to the French Monetary and Financial Code will be taken into consideration by the Management Company in managing the Fund as soon as they are implemented.

AMUNDI PEA MSCI EMERGING MARKETS ESG LEADERS UCITS ETF (THE "FUND") IS NOT SPONSORED, ENDORSED, SOLD OR PROMOTED BY MSCI INC. ("MSCI"), OR BY ANY OF ITS SUBSIDIARIES, OR BY ITS INFORMATION PROVIDERS, OR BY ANY OF THE ENTITIES INVOLVED IN THE ESTABLISHMENT, CALCULATION OR CREATION OF THE MSCI INDICES (JOINTLY REFERRED TO AS "THE MSCI PARTIES"). THE MSCI INDICES ARE THE EXCLUSIVE PROPERTY OF MSCI AND ARE SERVICE MARKS OF MSCI OR ITS AFFILIATES. THE MSCI INDICES HAVE BEEN LICENSED FOR USE FOR CERTAIN PURPOSES BY AMUNDI ASSET MANAGEMENT. NONE OF THE MSCI PARTIES MAKES ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, TO THE ISSUER OR OWNERS OF THIS FUND OR ANY OTHER PERSON OR ENTITY REGARDING THE ADVISABILITY OF INVESTING IN FUNDS GENERALLY OR IN THIS PARTICULAR FUND 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 INDICES WHICH ARE DETERMINED, COMPOSED AND CALCULATED BY MSCI WITHOUT REGARD TO AMUNDI ASSET MANAGEMENT, THIS FUND OR THE UNITHOLDERS OF THIS FUND OR TO ANY OTHER PERSON OR ENTITY. NONE OF THE MSCI PARTIES HAS ANY OBLIGATION TO TAKE THE NEEDS OF AMUNDI ASSET MANAGEMENT, THE UNITHOLDERS OF THIS FUND OR ANY OTHER PERSON OR ENTITY INTO CONSIDERATION IN DETERMINING, COMPOSING

OR CALCULATING THE MSCI INDICES. THE MSCI PARTIES ARE NOT RESPONSIBLE FOR AND DO NOT DETERMINE THE LAUNCH DATE, PRICE, OR QUANTITY OF THE FUND UNITS, OR THE CHOICE OR APPLICATION OF THE FORMULA TO ESTABLISH THE NET ASSET VALUE OF THE FUND. FURTHERMORE, NONE OF THE MSCI PARTIES HAS ANY OBLIGATION OR LIABILITY TO THE ISSUER OF THIS FUND, UNITHOLDERS OF THIS FUND OR ANY OTHER PERSON OR ENTITY IN CONNECTION WITH THE ADMINISTRATION, MANAGEMENT OR MARKETING OF THIS FUND.

ALTHOUGH MSCI SHALL OBTAIN INFORMATION FOR INCLUSION IN OR FOR USE IN THE CALCULATION OF THE MSCI INDICES 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 THE RESULTS TO BE OBTAINED BY THE ISSUER OF THE FUND, OWNERS OF THE 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. FURTHERMORE, 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 OR OTHER DAMAGES (INCLUDING LOST PROFITS) EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

## **VI. OVERALL RISK**

Commitment calculation method.

## **VII. ASSET VALUATION AND ACCOUNTING RULES**

### **▶ Principle**

General accounting conventions are applied in compliance with the following principles:

- "going concern" basis,
- consistency of accounting methods from year to year,
- periodicity.

The standard method for recognising assets in the accounts is the historic cost method, except for portfolio valuation.

### **▶ Asset valuation rules**

The net asset value of the units is calculated taking into account the following valuation rules:

- Marketable securities traded on a regulated French or foreign market are valued at market price. Market price valuation is carried out under arrangements specified by the Management Company. Securities contributed to or held by the Fund are valued at their latest market price.
- Differences between the market prices used to calculate the NAV and the historic cost of the securities in the portfolio are recognised in an account "Estimation Differences".

However:

- Any marketable securities, the price of which is not found on the valuation date or the price of which has been adjusted are valued at their probable trading value under the responsibility of the Management Company. The Independent Auditor is informed of these valuations and their justification when conducting audits.
- Negotiable debt instruments and similar securities not traded on a significant scale are valued using an actuarial method; the rate used is the rate of equivalent securities issues adjusted, when necessary, by a difference that is representative of the intrinsic features of the security issuer. However, negotiable debt instruments with a residual maturity of three months or less will be valued according to the linear method,

unless they are particularly volatile. The procedures for using these rules are set by the Management Company. In accordance with the instructions of the AMF, negotiable debt instruments (other than Treasury Notes) are valued as indicated below:

- securities with 3 months or less (short-term): valued at cost price, with any spread of the discount or listing, on the remaining life;
- securities with over 3 months and 1 year or less: valued at the Euribor rate published in the Official List, plus or minus a margin, according to the issuer's signature;
- securities with over 1 year: valued at the equivalent BTAN rate, plus or minus a margin, according to the issuer's signature.

- Treasury notes are valued at the market rate, provided daily by Banque de France.

- UCITS units or shares are valued at the last known net asset value.

- Securities that are not traded on a regulated market are valued at their probable trading value under the responsibility of the Management Company. Their valuation is based on their assets and yield, taking into account the prices used in recent major transactions.

- Transferable securities covered by a temporary sale or purchase contract are valued in accordance with the legislation in force, and the methods used are determined by the Management Company.

Securities received under repurchase agreements are recorded in the buy portfolio in the section entitled "Debt representing securities received as part of repurchase agreements" at the amount stated in the contracts, plus any interest receivable. However, if their maturity exceeds 3 months, these securities are valued at the current value of the contract (market value).

Securities lent under repurchase agreements are posted in long portfolios at their stock market price. Interest receivable and payable for repurchase transactions is calculated pro rata. Liabilities representing securities lent under repurchase agreements are posted in short portfolios at the value set forth in the agreement, plus any accrued interest due. On settlement, the interest received and paid is shown as debt revenues. However, if their maturity exceeds 3 months, these securities are valued at the current value of the contract (market value).

Loaned securities are valued at market price. The consideration received for the loan is recorded as debt revenues. Accrued interest is included in the stock market value of the securities lent.

- Futures and options traded on French or foreign organised markets are valued at the market price employing the methods determined by the Management Company. Contracts on forward markets are valued at the settlement price.

Valuation of collateral:

Collateral is valued daily at market price (mark-to-market method). The discounts that may be applied to the collateral received will take into account the credit quality, the price volatility of the securities and the results of the stress tests performed. Margin calls are made daily, unless otherwise stipulated in the framework contract covering these transactions or if the Management Company and the counterparty have agreed to apply a trigger threshold.

- OTC futures, options or swaps, authorised under the regulations applicable to UCITS are valued at market price or at an estimated value employing the methods determined by the Management Company. Interest rate and/or currency swap contracts are valued at their market value based on the price calculated by discounting future cash flows (principal and interest), at the market interest rates and/or currency rates. This price is adjusted for credit risk.

### ► Recognition method

Securities entering and leaving the portfolio are recognised excluding costs.

Revenues are recognised when received.

Revenues consist of:

- income from transferable securities;
- dividends and interest received on foreign securities, at the foreign currency rate;
- cash proceeds in foreign currency, loan income, and revenue from lending of securities and other investments.

The following deductions are made from these revenues:

- management fees;
- financial expenses and charges on the lending and borrowing of securities and other investments.

Off-balance sheet commitments:

Futures contracts are entered at their market value as off-balance sheet commitments at the settlement price. Options are converted into their underlying equivalent. OTC interest rate swaps are valued on the basis of the nominal value, plus or minus the corresponding estimation difference.

#### ► **Income accruals account**

Income accrual accounts ensure fair allocation of income among unitholders, regardless of the subscription or redemption date.

### **VIII. REMUNERATION**

The Management Company has adopted the remuneration policy of the Amundi Group, to which it belongs.

The Amundi Group has implemented a remuneration policy adapted to its organisation and its activities. This policy is designed to regulate practices regarding the different remunerations of employees authorised to make decisions, exercise control functions or take risks within the Group.

This remuneration policy has been defined with regard to the Group's economic strategy, objectives, securities and interests, to the management companies which are part of the Group, to the UCITS managed by the Group's companies and their unitholders. The objective of this policy is to discourage excessive risk-taking by specifically running contrary to the risk profile of the UCITS managed.

Furthermore, the Management Company has implemented suitable measures in order to prevent conflicts of interest.

The remuneration policy is adopted and overseen by the Board of Directors of Amundi, the parent company of the Amundi Group.

The remuneration policy is available on the amundi.com website or free of charge upon written request from the Management Company.

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