Information according to Art 10 SFDR

Name of the product: ERSTE ETF US EQUITIES UCITS ETF

Legal entity identifier: 635400YC8GG8JFMQWG63

ISIN: IE000UKN7GP4

a) Summary

For improved readability, for the purpose of this document, "Taxonomy Regulation" means Regulation (EU) 2020/852, "Disclosure Regulation" means Regulation (EU) 2019/2088, and "RTS" means Delegated Regulation (EU) 2022/1288.

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

The Fund applies a broad interpretation of sustainability. Both environmental and social characteristics are promoted. This is ensured by the application of the ESG toolbox of the Investment Manager as part of the investment process.

The sustainable investments, which comprise part of the portfolio of the Fund, do no significant harm to the environmental or social sustainable investment objectives because the Fund invests solely in issuers that are considered to be sustainable or at mini ma do no significant harm based on the sustainable investment process described above. This categorisation sets forth that issuers may have no significant adverse impacts on environmental or social factors, as such a violation would preclude an investment based on the binding ESG characteristics of this investment process.

The investment strategy of this Fund takes into account the principal adverse impacts (PAI) on sustainability factors.

The Investment Manager also exercises an active ownership function when it makes direct investments in securities.

Data from external providers are also used when gathering sustainability related data for internal analyses.

The external data may be incomplete, imprecise, or unavailable at times. The providers of sustainability ratings also take different influences into account and apply different weightings, meaning that a company that is the target of an investment can have different sustainability scores. There is therefore the risk of a security or issuer being assessed incorrectly.

A proprietary rating model called ESGenius is used to limit this risk. In this rating model, the predominant sustainability approaches in the market (ethically oriented approach versus a risk view) are combined into an overall view during the analysis. Combining the different providers reduces any data gaps and also verifies the plausibility of the different approaches.

Due to the investment process and the measures taken to ensure the quality of the data, the Investment Manager assumes that the previously mentioned restrictions will not have a material negative impact on the environmental and social characteristics.

A reference benchmark has been designated to achieve the environmental or social characteristics advertised with the investment fund. This is the Solactive USA Large Cap 250 Base USD Index NTR, an index that serves the purpose of achieving the promoted environmental or social characteristics of the fund.

Information on how the environmental or social characteristics of the fund are promoted can be found in the annex to the prospectus/supplements.

Information on how the environmental or social characteristics were met and information on the overall sustainability-related impact of the Fund can be found in the annual reports of the Fund.

b) No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

The Fund applies a broad interpretation of sustainability. Both environmental and social characteristics are promoted. This is ensured by the application of the ESG toolbox of the Investment Manager as part of the investment process.

Exclusion criteria			ESG analysis / Best in class						
Minimum criteria	Exclusion criteria	Norm-based screening	ESG risk analysis	Best in class	Integration	Engagement	Thematic funds	Focused sustainability impact	Fulfil Austrian ecolabel or FNG label criteria
✓	✓	✓	✓		✓	✓		Not applicable	

The sustainable investments, which comprise part of the portfolio of the Fund, do no significant harm to the environmental or social sustainable investment objectives because the Fund invests solely in issuers that are considered to be sustainable or at minima not do significant harm based on the sustainable investment process described above. This categorisation sets forth that issuers may have no significant adverse impacts on environmental or social factors, as such a violation would preclude an investment based on the binding ESG characteristics of this investment process.

The investment strategy of this Fund takes into account the principal adverse impacts (PAI) on sustainability factors.

The selection of issuers included in the benchmark index and the consideration of PAI are made by the index provider on the basis of the sustainable investment process.

Consideration and reduction of key adverse impacts on sustainability factors (Principle Adverse Impact - "PAI") is accomplished through the following procedures and methods:

- Application of social and/or environmental exclusion criteria.
- All issuers invested in the Fund are analysed and selected before acquisition using a predefined sustainability process. The ESG analysis of each issuer is based on its specific ESG risk profile and the measures taken to mitigate these risks. Based on the results of this analysis, only those issuers with an ESG score of at least the specified minimum score are authorised for investment.

Compliance with the applicable investment universe is monitored on a daily basis. Securities from issuers that no longer meet the sustainability criteria of the index (and the Fund) are removed from the index or sold in the investment fund in the best interests of the investor.

All PAIs from Table 1 of the RTS, that apply to the investment fund were taken into account. The investment fund also takes the following PAIs from Tables 2 and 3, Annex I of the RTS into account:

- Indicator 8 (Table 2) - Exposure to areas of high water stress (share of investments in investee companies with sites located in areas of high water stress without a water management policy)
- Indicator 14 (Table 3) - Number of identified cases of severe human rights issues and incidents (number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis)

Sustainable investments are made by applying the exclusion criteria described above and taking into account the ESG analysis of issuers following the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. The relevant criteria include:

A) The Investment Manager's company-wide minimum standards:

1. Promoting environmental characteristics:

- Exclusion of investments in coal and peat

2. Promoting social characteristics:
   - Exclusion of investments in controversial weapons;

B) the Fund's exclusion criteria, which include:

1. the criteria set out in Art. 12(a)-(c) of Reg (EU) 2020/1818 (i.e. those excluded by the Climate Transition Benchmarks), as well as

2. additional criteria defined by the Investment Manager on a discretionary basis to

a) Promote environmental characteristics:

- Exclusion of issuers responsible for severe and/or systematic violations of environmental laws and massive destruction of natural habitat as defined for the purpose of the UN Global Compact

b) Promote social characteristics:

- Exclusion of issuers in violation of Labour Rights based on five ILO core labour standards:
  - Child labour
  - Forced labour
  - Discrimination at Work
  - Health and Safety at Work
  - Freedom of Association
- Exclusion of issuers involved in severe and/or systematic bribery and fraud as defined for the purpose of the UN Global Compact
- Exclusion of conventional weapons

c) Environmental or social characteristics of the financial product

Both environmental and social characteristics are promoted by the Fund.

The Fund promotes the following key environmental characteristics pertaining to the reduction of the environmental of the investments held by the Fund as well as the avoidance of environmental risks:

- the carbon footprint and the mitigation of climate change in general, and
- the responsible use of water as a resource,
- for the protection of biodiversity
- the responsible management of waste and other emissions.

The Fund promotes the following key social characteristics:

- Social factors such as:
  - the exclusion of any investments in companies that produce or deal in controversial weapons.
  - the promotion of human rights and exclusion of issuers complicit in human rights violations.
  - the promotion of good working conditions, for example in the areas of workplace safety and training, and the exclusion of issuers that are complicit in labour law violations, in particular of the core standards of the International Labour Organisation (**ILO**).

- the promotion of diversity and the exclusion of issuers that practice discrimination.
- the avoidance of corruption and fraud.

- The promotion of good corporate governance:
  - the independence of supervisory bodies
  - management remuneration
  - good accounting practices
  - the protection of shareholder rights

d) Investment strategy

The management of Sustainability Risks forms an important part of the ESG analysis process implemented by the Investment Manager. In this screening process, issuers of securities are assessed in terms of their environmental, social, and corporate governance risks. This analysis is completed on the basis of internal evaluation and using external research.

All issuers must comply with the exclusion criteria of the Fund in order to be eligible for investment by the Fund:

These criteria are:

A) The Investment Manager's company-wide minimum standards:

1. Promoting environmental characteristics:

- Exclusion of investments in coal and peat

2. Promoting social characteristics:

- Exclusion of investments in controversial weapons;

B) the Fund's exclusion criteria, which include:

3. the criteria set out in Art. 12(a)-(c) of Reg (EU) 2020/1818 (i.e. those excluded by the Climate Transition Benchmarks), as well as

4. additional criteria defined by the Investment Manager on a discretionary basis to

a) Promote environmental characteristics:

- Exclusion of issuers responsible for severe and/or systematic violations of environmental laws and massive destruction of natural habitat as defined for the purpose of the UN Global Compact

b) Promote social characteristics:

- Exclusion of issuers in violation of Labour Rights based on five ILO core labour standards:

  - Child labour
  - Forced labour
  - Discrimination at Work
  - Health and Safety at Work
  - Freedom of Association

- Exclusion of issuers involved in severe and/or systematic bribery and fraud as defined for the purpose of the UN Global Compact

- Exclusion of conventional weapons

The Investment Manager may employ defined thresholds and operationalisation to facilitate the application of the exclusion criteria in terms of an identification limit and to ensure that the criteria have the desired effect.

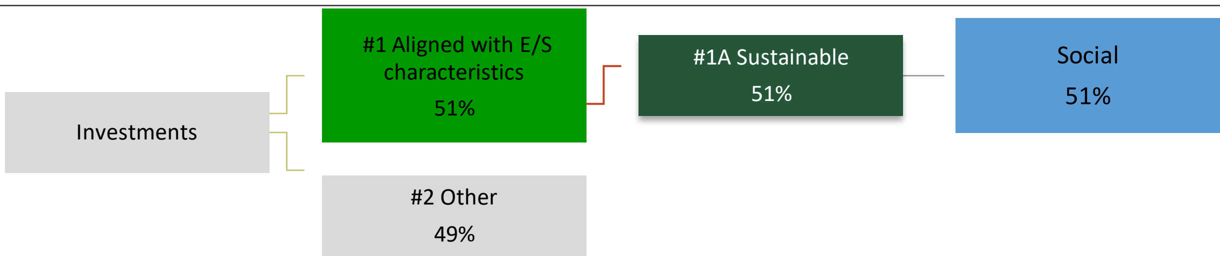
C) The Investment Manager's ESG Analysis

In addition, a proprietary rating model called ESGenius is used by the Investment Manager to assess Sustainability Risk and limit its impact on the Fund. In this rating model, the predominant sustainability approaches on the market (ethically oriented approach versus a risk view) are combined into an overall score that is assigned to each investment. Combining the different providers reduces any data gaps and also verifies the plausibility of the different approaches.

A minimum ESGenius Score of 30/100 is required for an issuer to be investable for the Fund.

The good governance practices of investee companies are assessed by the Investment Manager based on compliance with the exclusion criteria, the minimum ESGenius score, and the assessment of compliance with the principles of the UN Global Compact, as described in this section.

e) Proportion of investments



The Fund invests at least 51 % of the fund assets in sustainable investments in accordance with Article 2 number 17 of the Disclosure Regulation. This is ensured through compliance with the Fund's sustainability approach.

Under the investment strategy described in lit. b), investments classified under #1 are held in direct risk positions in companies.

Other types of exposures, such as derivatives, cash holdings are classified under #2 and must not exceed 49% of the fund's assets.

While the Fund may invest in investee companies involved in fossil gas or nuclear energy activities provided their compliance with the ESG requirements described under lit. b, there is no specific target for environmentally sustainable fossil gas and nuclear energy activities.

f) Monitoring of environmental or social characteristics

The ESG criteria are complied with continuously in terms of the environmental, social, and ethical exclusion criteria as well as in relation to the ESG analysis for direct investments in securities and investments in investment funds (indirect investments) that are managed by the Investment Manager or its group companies. This is ensured by the quarterly review and updating of the eligible investment universe of the Fund. Securities from issuers, which's ESG standard no longer meet the mentioned sustainability criteria are divested in the best interests of the investors. Due to the passive approach of the investment fund, this is done after each semi-annual index rebalancing.

The monitoring of environmental or social characteristics is ensured by the investment process applied and a daily review of the investment fund by Risk Management.

g) Methodologies

Methods of Integration of sustainability risks into the investment decision-making process:

The management of Sustainability Risks forms an important part of the investment process implemented by the Investment Manager. The Investment Manager adopts the following strategies when integrating sustainability risks into the investment decision making process.

The Investment Manager assesses the interaction of these Sustainability Risks with the other risk categories that may impact the Fund in order to measure and evaluate the overall impact on the Fund.

A proprietary rating model called ESGenius (which is described in further detail in the Annex) is used by the Investment Manager to assess Sustainability Risk and limit its impact on the Fund. In this rating model, the predominant sustainability approaches on the market (ethically oriented approach versus a risk view) are combined into an overall score that is assigned to each investment.

In addition, the Investment Manager verifies the compliance of all investee companies with the fund's exclusion criteria, as listed under lit. b, in order to ensure the promotion of the environmental and social characteristics of the investment product.

Combining data provided by different external ESG providers reduces any data gaps and also verifies the plausibility of the different approaches.

The Investment Manager can act as an active shareholder through engagement dialogues with investee companies in respect of the environmental and social characteristics promoted by the Fund (as listed above).

h) Data sources and processing

In addition to internal research based on information published by the issuers, data from external providers are also used when gathering sustainability-related data for the sustainability analysis.

The following data sources and providers are used, among others:

- MSCI ESG
- ISS ESG
- FactSet TrueValueLabs
- Sustainalytics
- ESGPlus

The careful selection of data providers and the consideration of data from different data providers ensures maximum data quality. For the investment funds that are managed by the Investment Manager, the data used are aggregated and analysed using the Investment Manager's proprietary sustainability approach (ESGenius) and/or additional research approaches of the Investment Manager. ESG data from the listed data providers may contain temporary estimates to a limited extent, depending on the type of sustainability-related data.

i) Limitations to methodologies and data

The Fund's reference index is calculated using a whitelist based on the sustainable analysis and investment process. Therefore, the same restrictions apply with regard to methods and data as for discretionary investments, which are assessed and controlled as follows:

The external data may be incomplete, imprecise, or temporarily unavailable. The providers of sustainability ratings also take different influences into account and apply different weightings, meaning that a company that is the target of an investment can have different sustainability scores. There is therefore the risk of a security or issuer being assessed incorrectly.

A proprietary rating model called ESGenius is used to limit this risk. In this rating model, the predominant sustainability approaches in the market (ethically oriented approach versus a risk view) are combined into an overall view during the analysis. Combining the different providers reduces any data gaps and also verifies the plausibility of the different approaches.

Due to the investment process and the measures taken to ensure the quality of the data, the Investment Manager assumes that the previously mentioned restrictions will not have a material negative impact on the environmental and social characteristics.

j) Due diligence

The Investment Manager has drawn up procedures for fulfilling its due diligence obligations relating to the underlying assets.

The due diligence procedure consists primarily of

- the regular review of quantitative requirements and limits in risk management using
- positive lists and/or
- negative lists
- additional supporting (quantitative) evaluations in risk management for verifying the plausibility of assumptions and further (relevant) information for management
- the review of the processes and documentation as part of the regular OP risk, ICS, and compliance audits

Procedures for taking the relevant financial and sustainability risks into account have been integrated into the Investment Manager's processes.

k) Engagement policies

The Investment Manager understands active ownership to mean its responsibility to not only take sustainability criteria into account when selecting securities, but to also be an active investor that engages with the companies to promote measures that serve social responsibility, environmental protection, and enhanced transparency.

The Investment Manager differentiates between engagement, in other words formal and informal dialogue with companies, and the exercise of voting rights at annual general meetings.

Engagement
As a committed investor, EAM seeks active dialogue with the management of relevant companies as part of its sustainability process where it holds direct investments. This puts the spotlight on weaknesses in the management of environment, social, and governance aspects and is intended to serve as a way to find a joint solution for improvement. Engagement is not only a question of responsibility but also contributes to minimising risks and can thus improve long-term investment success. EAM can exclude companies that consistently refuse to enter into dialogue from the investment universe.

EAM employs three engagement strategies:

Local engagement: Promoting the integration of ESG criteria in management decisions of local and/or domestic companies through investor meetings/personal discussions.

Collaborative engagement: Combination of ESG interests with other investors to have a more powerful voice, especially with international corporate groups. International sustainability networks such as PRI and CRIC and the engagement service of a research services provider are used for this.

ESG dialogues: Promotion of the integration of ESG risks in management decisions of international companies via dialogues at the executive management level.

Voting
Voting, i.e. the exercise of voting rights associated with directly held shares, is a central pillar of the active ownership approach.

l) Fixed reference value

A reference value has been designated to achieve the environmental or social characteristics advertised with the investment fund.

The investment strategy makes reference to an index.
This is the Solactive USA Large Cap 250 Base USD Index NTR, an index that serves the purpose of achieving the promoted environmental or social characteristics of the fund.

The index used as a reference benchmark is calculated in accordance with a whitelist. Issuers that are not included on this sustainable whitelist are not are not eligible for inclusion in the index. The index is aligned with environmental and social characteristics on an ongoing basis as follows:

- All issuers are assessed for compliance with the defined exclusion criteria.
- An ESG analysis process provides a comprehensive ESG analysis of each issuer based on its specific ESG risk profile and the measures taken to mitigate these risks. Based on the results of this analysis, only those issuers that achieve a score of at least 30 out of a possible 100 points are approved for investment as part of a best-in-class approach.

The combination of these selection processes results in the index's sustainable whitelist, which is used by the index provider to calculate the index

This significantly improves the environmental and social characteristics of the issuers included in the index compared to a broad market index that is not subject to a sustainable investment process used to create the whitelist.

The investment fund passively replicates the index. With the exception of the use of derivatives for hedging and liquidity management, no investments are made in issuers that are not included in the index.

Further information on the methodology can be found on the index provider’s website at https://solactive.com/index/DE000SL0QGD1.

m) Information referred to in Article 8 of the Disclosure Regulation

Information on how the environmental or social characteristics of the fund are promoted can be found in the annex to the prospectus or the information for investors pursuant to § 21 AIFMG.

n) Information referred to in Article 11 of the Disclosure Regulation

Information on how the environmental or social characteristics were met and information on the overall sustainability-related impact of the Fund can be found in the annual reports of the investment fund.