

## **Xtrackers**

### **Country Supplement Additional Information for Shareholders in Ireland**

This Supplement contains specific information for Shareholders in Ireland investing in a Sub-Fund of Xtrackers (the **Company**), an umbrella type open-ended investment company with variable capital and segregated liability between sub-funds of the Company (the **Sub-Funds**) governed by the laws of Luxembourg and authorised by the Commission de Surveillance du Secteur Financier of Luxembourg as a UCITS pursuant to the Regulations.

**This Supplement forms part of and should be read in conjunction with the general description of the Company contained in the Prospectus of the Company dated 18 March 2024 (the Prospectus).**

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in the Prospectus and this Supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this Supplement.

**Dated 18 March 2024**

## **Facilities Agent**

The Company has appointed DWS Investment GmbH as facilities and paying agent (the **Facilities Agent**) of the Company in Ireland.

The Facilities Agent shall provide the following facilities to Shareholders at Mainzer Landstrasse 11-17, 60329 Frankfurt am Main, Germany:

1. the compliance with the provisions of the laws and regulations of Ireland, applicable to the Facilities Agent;
2. the making public of such information as may be required by applicable laws and regulations;
3. the availability of the following documents in the English language to be inspected free of charge and copies to be obtained free of charge:-
  - (i) the Articles of Incorporation of the Company in its current form;
  - (ii) the current Prospectus, supplements, simplified prospectus or key investor information document, as applicable, and any addenda or amendments thereto of the Company;
  - (iii) the annual and half-yearly reports of the Company most recently prepared and published; and
  - (iv) any other documents required to be made available in accordance with applicable laws and regulations of Ireland.

Shareholders can contact the Facilities Agent by sending an email to [Xtrackers@dws.com](mailto:Xtrackers@dws.com)

## **Issue and Redemption of Shares, Subscription and Payment Procedure**

Applications for Shares and redemptions as well as for conversions may be made to the Registrar and Transfer Agent in Luxembourg at the address below:

State Street Bank International GmbH, Luxembourg Branch  
49 avenue J.F. Kennedy  
L-1855 Luxembourg  
Grand Duchy of Luxembourg

## **Marketing in Ireland**

It is the current intention of the Company to market its shares to institutional clients such as asset managers, private banks, family offices, stockbrokers, wealth managers and advisers. At present, it is not intended to market directly to retail investors, however retail investors may invest through the brokers or wealth advisers.

## **Publications**

The Company may arrange for the publication of the Net Asset Value per Share in one or more leading financial newspapers in such countries where the Sub-Funds are distributed to the public and may notify the relevant stock exchanges where the Shares are listed.

The Net Asset Value per Share may also be available on the following website:

[www.Xtrackers.com/en-gb/](http://www.Xtrackers.com/en-gb/).

## **Irish Taxation**

### **(Tax information updated as of 14 November 2023)**

The following information is based on the law in force in Ireland as of the date of this Supplement. This summary deals only with Shares held as capital assets by Irish resident Shareholders and does not address special classes of Shareholders such as dealers in securities or persons that may be exempt from tax such as Irish pension funds and charities. This summary is not exhaustive and Shareholders are advised to consult their own tax advisors with respect to the taxation consequences of the ownership or disposition of Shares.

### **The Company**

It is the intention of the Directors to conduct the affairs of the Company so that it is neither resident in Ireland for tax purposes nor carrying on a trade in Ireland through a branch or agency. Accordingly, the Company will not be subject to Irish corporation tax.

### **Irish Shareholders**

#### **(a) Tax generally**

Shares in the Company are likely to constitute a "material interest" in an offshore fund for the purposes of Chapter 4 of Part 27 of the Taxes Consolidation Act 1997.

#### **(b) Reporting of acquisition**

An Irish resident or ordinarily resident person acquiring Shares in the Company is required to disclose details of the acquisition in his annual tax return. Where an intermediary in the course of carrying on a business in Ireland acquires Shares in the Company it must report details of the acquisition to the Irish Revenue Commissioners.

#### **(c) Income and capital gains**

An Irish resident corporate Shareholder will be liable to corporation tax at 25% on income distributions received from the Company except where the corporate shareholder holds the Shares as part of its trading activities in which case the rate of corporation tax applicable will be that applicable to trading income.

An Irish resident corporate Shareholder which disposes of Shares in the Company will be liable for corporation tax at a rate of 25% on the amount of any gain arising, except where the corporate shareholder holds the Shares as part of its trading activities in which case the rate of corporation tax applicable will be that applicable to trading income. It should be noted that no indexation allowance is available in respect of the gain.

Where an Irish resident or ordinarily resident person who is not a company holds Shares in the Company and receives an income distribution from the Company, that Shareholder will be liable to income tax at 41%, on the amount of such distribution.

Where an Irish resident or ordinarily resident person who is not a company disposes of a Share, a liability to Irish tax at the 41% will arise on the amount of the gain. No indexation allowance is available and the death of a Shareholder would constitute a deemed disposal of a Share.

There is a deemed disposal and reacquisition at market value for the purposes of Irish tax of Shares held by an Irish resident or ordinarily resident investor on a rolling 8-year basis where the Shares are acquired on or after 1 January 2001. This deemed disposal takes place at market value so that Irish resident or ordinarily resident Shareholders will be subject to tax at the rate of 41% for individuals or 25% for a corporate Shareholder on the increase in value of their Shares at 8-year intervals commencing on the 8<sup>th</sup> anniversary of the date of acquisition of the Shares.

To the extent that any tax arises on such a deemed disposal such tax will be taken into account to ensure that any tax payable on the subsequent encashment, redemption, cancellation or transfer of the relevant Shares does not exceed the tax that would have arisen had the deemed disposal not occurred.

### **Anti-avoidance provision**

There is an anti-avoidance provision imposing higher rates of tax on Irish resident investors in "personal portfolio investment undertakings" (**PPIU**). A PPIU is a fund in which the investor, or a person connected with the investor, has a right under the terms of the fund or any other agreement, to influence the selection of the assets of the fund. If a fund is treated as a PPIU the Irish resident investor can suffer tax at rates of up to 60% on amounts received from the fund (or 80% where details of the payments/disposals are not correctly indicated in the shareholder's annual tax return), or on the rolling 8 year deemed disposal.

Specific exemptions apply where the ability to select the property invested in has been clearly identified in the offshore fund's marketing and promotional material and the investment is widely marketed to the public.

### **Withholding obligation on paying agents**

If any dividend is paid through an encashment agent established in Ireland such an agent would be obliged to deduct tax from such dividend at the rate of 25% and account for this to the Revenue Commissioners. The recipient of the dividend would be entitled to claim a credit for the sum deducted by the paying agent against his tax liability for the relevant year.

### **Stamp duty**

Transfers for cash of Shares in the Company will not be subject to Irish stamp duty.

### **Gift and inheritance tax**

A gift or inheritance of Shares in the Company received from a person who is resident or ordinarily resident in Ireland or received by such a person will be within the charge to Irish capital acquisitions tax. Capital acquisitions tax is charged at a rate of 33% above a tax free threshold which is determined by the amount of the benefit and of previous benefits within the charge to capital acquisitions tax, and the relationship between the person treated as disposing of such shares and the successor or donee. Tax chargeable on a gain arising on a deemed disposal by an individual on their death shall be treated as an amount paid in respect of capital gain tax for the purposes of crediting such amount paid against gift or inheritance tax arising on such a death.

### **Transfers between Sub-Funds**

The Directors have been advised that in the Republic of Ireland the exchange of Shares in one Sub-Fund for Shares in another Sub-Fund of an umbrella scheme will not in itself constitute a disposal of such Shares and will not give rise to a charge to tax.

### **Foreign Account Tax Compliance Act (FATCA)**

To the extent that the Company may be a Reporting Luxembourg Financial Institution for the purposes of the intergovernmental agreement between the USA and the Government of the Grand Duchy of Luxembourg with respect to FATCA, the Company may require all shareholders including Irish resident or ordinarily resident Shareholders to provide evidence of their tax residence to enable the Company to comply with its automatic exchange of information obligations under FATCA. Further information on FATCA can be

found in this Prospectus under the heading "General Taxation" dealing with the taxation of the Company in Luxembourg.

### **Common Reporting Standard (CRS)**

On 21 July 2014 the Standard for Automatic Exchange of Financial Account Information in Tax Matters (the Standard) was published, involving the use of two main elements, the Competent Authority Agreement and the Common Reporting Standard. The goal of CRS is to provide for the annual automatic exchange between governments of financial account information reported to them by local financial institutions (which may include the Company) relating to investors tax resident in participating countries to assist in the efficient collection of tax. Ireland and Luxembourg are participating jurisdictions for CRS purposes. As such to the extent that the Company may be within the scope of CRS it may require Irish resident or ordinarily resident Shareholders to provide information required to enable the Company to comply with its automatic exchange of information obligations under CRS. Such obligations may involve the reporting by the Company of certain information on Shareholders to the Luxembourg tax authorities who may in turn exchange that information with their counterparts in participating jurisdictions (which in the case of Irish Shareholders may be the Irish Revenue Commissioners). Further information on CRS can be found in this Prospectus under the heading "General Taxation" dealing with the taxation of the Company in Luxembourg.