This document is a Supplement to the Prospectus dated 1 December 2022 issued by AXA IM ETF ICAV (the "ICAV"). This Supplement forms part of, and should be read in conjunction with, the Prospectus.

The value of Shares may go up or down and you may not get back the amount you invested. Investors' attention is drawn to the risk warnings contained in the section headed Risk Factors in the Prospectus and, in particular, to the risk warnings contained in the section of this Supplement entitled "Risk Factors".

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

AXA IM ETF ICAV

(an open-ended Irish collective asset management vehicle which is constituted as an umbrella fund with variable capital and segregated liability between its sub-funds and registered in Ireland with registration number C-469468 and authorised by the Central Bank of Ireland as a UCITS)

SUPPLEMENT

dated 1 December 2022

in respect of

AXA IM ACT CLIMATE EQUITY UCITS ETF

(a sub-fund of the ICAV, the "**Fund**")

The Directors of the ICAV, whose names appear in the Directory in the Prospectus, accept responsibility for the information contained in 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) the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of such information.

THE FUND

Investment Objective

The investment objective of the Fund is to seek long-term capital growth from an actively managed portfolio comprising listed equity and equity-related securities, including companies that are acting positively for the climate by reducing and/or limiting the impact of global warming on economies and societies. **There is no guarantee that the Fund will achieve its investment objective. It is recommended that an investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

Investment Policy

The Fund is a financial product promoting environmental characteristics within the meaning of Article 8 of SFDR.

The Fund will seek to achieve its investment objectives by investing in a global portfolio of listed equity and equity-related securities (being, preferred stock, warrants and Depositary Receipts (both ADRs and GDRs)) that will be listed or traded on global Regulated Markets. The Fund may invest up to 10% in China A shares listed in the Shanghai-Hong Kong Stock Connect and, in aggregate, may invest over 25% of its net assets in equity and/or equity-related securities of companies in emerging markets. Investment in emerging markets and China A shares are subject to the risks described in the Prospectus under the heading "**Risk Factors**".

Investment Strategy

The equity and equity-related securities will be in companies that support in the long term the United Nations Sustainable Development Goals ("**SDGs**") with a focus on the following SDGs: (i) Climate Action (SDG 13) and Affordable and Clean Energy (SDG 7). For further detail on SDGs please refer to the Union Nations website which, as of the date of this Supplement, can be found at: https://sdgs.un.org/goals.

The Fund may invest up to 10% of its net assets in the units/shares of Eligible Collective Investment Schemes where such investments satisfy the requirements of the Central Bank. The Fund may invest up to 10% of its net assets in Money Market Instruments to be held as ancillary liquid assets.

The Fund may use financial derivative instruments ("**FDI**"), including, futures on equity indexes and foreign exchange contracts (including cross currency swap, spot and forward contracts), for efficient portfolio management, investment or hedging purposes. To the extent that the Fund uses FDI, there may be a risk that the volatility of the Fund may increase. However, the Fund is not expected to have an above average risk profile as a result of its use of or investment in FDI. FDI will be used within the limits stipulated by the Central Bank and as described in "**Investment Techniques and Instruments**" in the Prospectus.

The Fund may engage in securities lending subject to the requirements of the Securities Financing Transactions Regulation, the UCITS Regulations and the Central Bank UCITS Regulations. This is more particularly described in the Prospectus under the heading "**Securities Financing Transaction Regulations Disclosure**". Up to 90% of the Fund's net assets may be subject to securities lending arrangements at any time, however the amount subject to securities lending arrangements is not generally expected to exceed 0 – 30% of the Fund's net assets. The Fund will not enter into total return swaps or instruments with similar characteristics neither engage in borrowing of securities or repurchase/reverse agreements within the meaning of the Securities Financing Transactions Regulation.

The initial investment universe for the Fund is the MSCI ACWI Investable Market Index (IMI) (the "Initial Investment Universe"). For further information on the Initial Investment Universe, please refer to the section of this Supplement titled "**The Benchmarks**". For the avoidance of doubt, the Fund is actively managed and there are no restrictions on the extent to which the Fund's portfolio and/or performance may deviate from those of the Initial Investment Universe.

To select securities from the Initial Investment Universe for investment by the Fund, the Investment Manager uses a combination of qualitative and quantitative analysis to seek companies with attractive investment fundamentals (such as the companies' business model, balance sheet solidity, earnings and growth prospects) and primarily focuses on companies whose products and services provide solutions for climate change mitigation while also seeking exposure to companies that, through the quality of their operations, support the targeted SDGs, which is determined by using external and internal SDG-alignment data. In addition, companies whose products and/or services provide solutions for climate change mitigation are identified using external and internal qualitative and quantitative inputs and leverages the Investment Manager's impact assessment approach for listed assets which is detailed on https://www.axa-im.com/who-we-are/impact-investing. The Fund also seeks to invest in companies across all sectors that support the targeted SDGs through the quality of their operations while minimizing negative climate externalities.

The qualitative and quantitative analysis used by the Investment Manager to select securities for investment by the Fund uses proprietary policies and information provided by MSCI and ISS Oekom and is applied as described below:

1. companies in respect of which there is no ESG score (either internal or MSCI) nor an ISS Oekom SDG score* are filtered out of the Initial Investment Universe. Then, a first screening of the Initial Investment Universe is applied based on the Investment Manager's sectorial policies and ESG standards (the "**ESG Policies**") (which can be found on: https://www.axa-im.com/our-policies) to remove the lowest-rated and companies involved in certain excluded business activities;

2. the Investment Manager then applies a "negative impact filter" to exclude any security with significant negative contribution across all SDGs. This is determined by reference to data provided by ISS via the ISS Oekom SDG score (in respect of which further information can be found on SDG Solutions Assessment | ISS (issgovernance.com)) or internal assessment; and

3. finally, the Investment Manager uses a bottom-up security selection process whereby it actively selects securities which have a positive contribution to SDGs 7 and 13 by:

   - offering innovative products and solutions to address climate change mitigation leveraging on the Investment Manager's internal "impact framework" based on an analysis of financial and non-financial data, with a focus on companies demonstrating long-term and strong revenue and growth, market innovation, and credible management whereby companies are assessed based on sustainability reports, financial reports, broker research and engagement with a company's management team (the "**Impact Framework**"); and/or

   - supporting the Fund's targeted SDGs based on ISS Oekom score through the quality of their operations and/or product and service.

The Fund may also invest in companies which are not constituents of the Initial Investment Universe. However, any such investment must comply with either: (i) the Impact Framework, and will be analysed in the manner described above; or (ii) are compliant with the Oekom ISS score on the targeted SDGs.

*The current ISS Oekom SDG scoring framework comprises a two-stage process whereby: (i) companies are assigned a score based on their operational impact on the relevant SDGs and a controversy score; and (ii) companies' products and services are assessed against the relevant SDGs to determine the extent to which such products or services impact, either positively or negatively, the relevant SDGs, and assigned a score. The methodology may change over time. The process results in combined scores for companies which are then applied by the Investment Manager to the Initial Investment Universe in the manner set out above, i.e. the "negative impact filter".

The ESG analysis coverage rate within the portfolio is at least 90% of the net assets of the Fund, excluding cash and solidarity assets (i.e. investments in certain French co-operatives, mutual societies, associations or foundations which are approved as such under The French Law of 31 July 2014 on the Social and Solidarity Economy). The ESG scoring methodology is detailed in the Prospectus under the heading "**Sustainability-related Disclosures – ESG Scoring**". Moreover, the security selection process outlined above allows the Investment Manager to bindingly apply at all times an environmental responsible investment 'selectivity' approach that reduces the Initial Investment Universe of the Fund by at least 20% through the exclusion of companies that have the lowest contribution to SDGs 13 and 7.

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data (as set out above), and in some cases are internally developed. The data are subjective and may change over time. Despite several initiatives, the lack of a harmonised definitions of "sustainable investments" may result in ESG metrics applied and ESG scores assigned to the same company by different data providers varying widely. As such, the different investment strategies that use ESG criteria and ESG reporting are difficult to compare with each other. Strategies that incorporate ESG criteria and those that incorporate sustainable development criteria may use ESG data that appear similar but which should be distinguished because their calculation method may be different. The Investment Manager's ESG methodologies described herein may evolve over time to take into account any improvements in data availability and reliability, or any developments of regulations or other external frameworks or initiatives, -among other things-.

More information about the promotion of environmental and/or social characteristics is available in the SFDR Annex to this Supplement.

Currency hedging at Class level

The Manager intends to hedge foreign exchange risk of all Classes that are denominated in a currency other than the Base Currency. The Manager will attempt to mitigate the risk of such fluctuation, by using forward currency contracts subject to the conditions and within the limits laid down by the Central Bank. The Classes identified in the table set-out in the Appendix of this Supplement have "H" in their names. For further information, please see the section "Financial Derivative Instruments" and "Currency Hedged Share Classes" of the Prospectus.

The successful execution of a hedging strategy which mitigates exactly this risk cannot be assured. The implementation of the hedging strategy described above may generate additional costs for the Fund and/or the relevant Share Class.

Performance Benchmark

The Fund is an actively managed exchange traded fund (ETF). The Fund does not seek to replicate the performance of a specified index but does reference the MSCI AC World Total Return Net (the "**Performance Benchmark**") for comparative purposes only. The Investment Manager has full discretion over the composition of the Fund and can take exposure to companies, countries or sectors not included in the Performance Benchmark. There are no restrictions on the extent to which the Fund's portfolio and performance may deviate from those of the Performance Benchmark. The Performance Benchmark is a broad market index which is not aligned with the promotion of environmental characteristics of the Fund, but is used as a reference for its financial objective.

Base Currency

The Base Currency of the Fund is USD.

Taxonomy-related Disclosure

While the Fund is categorised as Article 8 under SFDR and commits to partially investing its assets in sustainable investments contributing to the environmental objective(s) disclosed in the section above titled "Investment Strategy" while not significantly harming any other environmental objectives, the Fund does not commit to investing a minimum amount in underlying investments qualifying as environmentally sustainable under the Taxonomy Regulation. As such, as of the date of this Supplement, the investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation and, as such, the Fund's portfolio alignment with such Taxonomy Regulation is not calculated.

For further details on the Manager's approach to SFDR and the Taxonomy Regulation, please refer to the section of the Prospectus titled "**Sustainability-related Disclosures**".

THE BENCHMARKS

The Initial Investment Universe is the MSCI ACWI Investable Market Index (IMI) which captures large-, mid- and small-cap companies across developed and emerging markets and covers most of the global equity investment opportunity set. The Performance Benchmark is the MSCI AC World Total Return Net which captures large and mid-cap representation across 23 Developed Markets (DM) and 27 Emerging Markets (EM) countries, as defined by the index provider. The Initial Investment Universe and the Performance Benchmark are, together, the "**Benchmarks**".

The information set out above is a summary of the principal features of the Benchmarks and does not purport to be an exhaustive description. The Benchmarks are provided by MSCI. At the date of the Supplement, MSCI, as administrator of the Benchmarks, is listed on the ESMA register of benchmark administrators which may be found at: https://registers.esma.europa.eu/publication.

Further information on the Benchmarks can be found at: www.msci.com.

PROFILE OF A TYPICAL INVESTOR

A typical Investor would be one who is a private or institutional investor and is seeking long-term capital growth over a recommended holding period of 5 years. Such an Investor is also one that is able to assess the merits and risks of an investment in the Shares of the relevant Class of the Fund.

SHARE CLASSES

Details of the Classes available in the Fund, are set out in the appendix hereto. Additional Classes may be created in accordance with the requirements of the Central Bank.

The Directors reserve the right to differentiate between persons who are subscribing for or redeeming Shares and to waive or reduce the Minimum Subscription Amount and Minimum Redemption Amount for any such person or to refuse an application for the subscription of Shares in their absolute discretion.

DIVIDENDS

Where the ICAV intends to declare dividends with respect to one or more Classes of the Fund, the proposed frequency of such dividend declarations shall be as set out in the table in the section entitled *"Share Classes".*

It is not the intention of the Directors to declare dividends in respect of the Classes identified as "accumulating" classes in this Supplement. The income and earnings and gains of the Funds will be accumulated and reinvested. Any change to this dividend policy shall be set out in an updated version of the Supplement and notified to the Shareholders in advance.

It is intended to declare dividends in respect of the Classes identified as "distributing" classes in this Supplement. Distributions in respect of these Classes will be declared on each Distribution Date in each year provided that if such dates are not Business Days, the declaration date will be the Business Day immediately following such date respectively. The distribution may comprise net income (if any) and/or realised capital gains of the Fund.

The Directors may determine annually, after the end of the relevant accounting year, if and to what extent the Fund will pay dividends. Any dividend payments will be confirmed in writing to the relevant Shareholders.

Please refer to the "Distribution Policy" section in the Prospectus for further information.

DEALING IN SHARES OF THE FUND

Only the ETF Shares issued in respect of this Fund will be listed and/or traded on the Relevant Stock Exchanges. It is envisaged that ETF Shares will be bought and sold by private and institutional investors in the secondary market.

Only Authorised Participants may subscribe for and redeem ETF Shares in the Fund directly with the ICAV in accordance with the section of the Prospectus entitled "**Procedures for Subscriptions and Redemptions**" having regard to the information set out below. For the avoidance of doubt, subscriptions for and redemptions of ETF Shares *in specie* are not permitted in respect of the Fund.

Business Day	means a day on which banks, markets and exchanges are open for business in Ireland and the USA and such other days as the Directors shall determine.
Dealing Day	means, unless otherwise determined by the Directors and notified in advance to Shareholders, each Business Day excluding Christmas Eve (24 December) and New Year's Eve (31 December); an up-to-date dealing calendar specifying the Fund's Dealing Days will be available from the Manager.
Initial Offer Period	means the period beginning at 9.00 a.m. (Dublin time) on 17 May 2022 and terminating at 5.00 p.m. (Dublin time) on 16 November 2022 or such other period determined by the Directors in accordance with the requirements of the Central Bank.
Minimum Redemption Amount	means 150,000 Shares.
Minimum Subscription Amount	means 150,000 Shares.
Redemption Fee	Up to 3%.
Settlement Time	means, in respect of subscriptions, three Business Days after the relevant Dealing Day (unless otherwise stipulated by the Manager or its delegate); and, in respect of redemptions, three Business Days after the relevant Dealing Day (unless otherwise agreed with the Manager or its delegate).
Subscription Fee	Up to 3%.
Trade Cut-Off Time	means 4:00 p.m. (Paris time) on the Dealing Day or such earlier or later time as may be determined by the Manager or the Investment Manager at their discretion with prior notice to Authorised Participants, which is the cut-off time in respect of any Dealing Day for receipt of applications for subscriptions and redemptions in the Fund.
Valuation Day	means one Business Day following the Dealing Day where the Net Asset Value per Share is calculated.
Valuation Point	means 11:59 p.m. (Irish time) on the Valuation Day or such time as the Directors, in consultation with the Manager, may decide and notify to Shareholders in advance, this time being the time of reference where all relevant available market closing prices are retrieved for NAV calculation..

As set out in the Prospectus, under the heading "**Conversion of Shares**", Shareholders may apply to convert their Shares in the Fund for another Class of Shares in the Fund with the prior consent of the Directors. The minimum dealing amounts set out above do not apply to conversions of Shares. As of the date of the Supplement. As of the date of the Supplement, Shareholders are not permitted to seek conversion of their Shares in the Fund with Shares in another Fund.

FEES AND EXPENSES

A TER will be paid out of the assets of each Class to the Manager. The TER for each for each Class is set out under the heading "TER" in the table included in the appendix hereto.

This section should be read in conjunction with the section headed "**Fees, Costs and Expenses**" in the Prospectus.

RISK FACTORS

Investment in the Fund carries with it a degree of risk including, but not limited to, the risks described in the "**Risk Factors**" section of the Prospectus.

Moreover, the Fund is subject to the additional risk described below:

Concentration risk: The Fund strategy leads the Fund to have a limited capacity to diversify its investments. Such high concentration of the Fund might have adverse consequences when the companies in which it invests become less valued or less liquid.

Given the investment strategy of the Fund and its risk profile, the likely impact of sustainability risks on the Fund's returns is expected to be low.

SFDR classification: The classification of the Fund under SFDR may be subject to adjustments and amendments, since SFDR has come into force recently only and certain aspects of SFDR may be subject to new and/or different interpretations than those existing at the date of this Supplement. As part of the ongoing assessment and current process of classifying its financial products under SFDR, the ICAV reserves the right, in accordance with and within the limits of applicable regulations and of the Fund's legal documentation, to amend the classification of the Fund from time to time to reflect changes in market practice, its own interpretations, SFDR-related laws or regulations or currently-applicable delegated regulations, communications from national or European authorities or court decisions clarifying SFDR interpretations. Investors are reminded that they should not base their investment decisions on the information presented under SFDR only.

RISK MANAGEMENT

The ICAV will use the commitment approach for the purposes of calculating global exposure for the Fund. The Fund's total exposure will be limited to 100% of Net Asset Value using the commitment approach.

While it is not the Manager's intention to leverage the Fund, any leverage resulting from the use of FDIs will be done in accordance with the UCITS Regulations.

Further detail on the calculation of global exposure is set out in the financial derivative instrument risk management process of the Fund ("**RMP**"). The RMP employed enables the Manager to accurately measure, monitor and manage the various risks associated with FDI, including leverage.

TAXATION

German Investment Tax Act

The ICAV seeks to maintain "equity fund" status for the Fund pursuant to Section 2 para. 6 and 7 of the German Investment Tax Act 2018.

Investors should consult their own professional advisers as to the implications of the Fund maintaining "equity fund" status pursuant to the German Investment Tax Act 2018.

As at the date of this Fund Supplement, at least 51% of the Fund's assets will be continuously invested in equity assets as defined in Section 2. para. 8 of the German Investment Tax Act 2018.

RELEVANT STOCK EXCHANGES

Application has been made in respect of the ETF Shares to Deutsche Börse Xetra for admission to trading.

Neither the admission of the ETF Shares to trading on the regulated market of Deutsche Börse Xetra nor the approval of the listing particulars pursuant to the listing requirements of the Deutsche Börse Xetra shall constitute a warranty or representation by Deutsche Börse Xetra as to the competence of service providers to or any other party connected with the ICAV, the adequacy of information contained in the listing particulars or the suitability of the ICAV or the Fund for investment purposes.

It is intended that the Shares will be listed and admitted for trading on a number of other stock exchanges but the ICAV does not warrant or guarantee that such listings will take place or continue to exist.

APPENDIX TO THE SUPPLEMENT OF THE

AXA IM ACT CLIMATE EQUITY UCITS ETF

SHARE CLASSES OF THE FUND

Share Class	**Class Currency**	**Hedged/Unhedged**	**Initial Offer Period Status**	**Initial Offer Price per Share**	**Distribution Policy**	**Distribution Frequency**	**TER**
USD Acc ETF	USD	Unhedged	New	USD 10	Accumulating	N/A	Up to 0,70%
EUR (H) Acc ETF	EUR	Hedged	New	EUR 10	Accumulating	N/A	Up to 0,70%

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph of Regulation (EU) 2020/852

Product name: AXA IM ACT Climate Equity UCITS ETF (the "Financial Product")

Legal entity identifier: 213800AUELP1Q8L9OD42

Environmental and / or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ YES	☒ NO
☐ It will make a minimum of **sustainable investments with an environmental objective:** %	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50.0 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** %	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The environmental and social characteristics promoted by the Financial Product consist of investing in companies that are acting positively for the climate by reducing and/or limiting the impact of global warming on economies and societies.

The Financial Product also promotes other specific environmental and social characteristics, namely:
- the preservation of the climate with exclusion policies on coal and oil sand activities;
- the protection of ecosystem and prevention of deforestation;
- better health with exclusion policies on tobacco; and
- labour rights, society and human rights, business ethics, anti-corruption with exclusion policies on companies in violation of international norms and standards such as the United Nations Global Compact Principles, International Labor Organization’s (ILO) Conventions or the OECD guidelines for Multinational Enterprises.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this Financial Product.

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

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The attainment of the environmental and social characteristics promoted by the Financial Product as described above is measured with the following sustainability indicators:

Product & Services and/or Operations Score on UN Sustainable Development Goals (SDG) 7, 13

The Financial Product aims at supporting the UN SDG that target climate change mitigation. Consequently, the Financial Product is measuring the attainment of this objective through the measurement of the SDG Product and Services Score for SDG 7 – Affordable and Clean Energy, SDG 13 – Climate Action on its assets and its benchmark MSCI AC World Total Return Net (the “Benchmark”). This score is provided by an external data provider and is assessed through analysis of products and services of investee companies and may be supplemented by qualitative internal analysis. Scores range from -10 (significant negative impact) to +10 (significant positive impact). Methodology to calculate the score across the 2 SDGs is defined by the external data provider and follows the rules: (a) if both 2 SDGs have positives scores, then the score retained is the maximum positive score, (b) if both 2 SDGs have negatives scores, then the worst score is retained, (c) if the scores on the 2 SDGs are a mix of positive and negative, then the score retained is the highest score (positive) plus the lowest (negative) score.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The Financial Product intends to partially invest in instruments qualifying as sustainable investments with various social and environmental objectives (without any limitation) by assessing the positive contribution of investee companies through at least one of the following dimensions:

1. **UN Sustainable Development Goals alignment (SDG)** of investee companies as reference framework, considering companies which contribute positively to at least one SDG either through the Products and Services they offer or the way they carry their activities (“Operations”). To be considered as a sustainable asset, a company must satisfy the following criteria:

a. the SDG scoring related to the “products and services” offered by the issuer is equal or above 2, corresponding to at least 20% of their revenues being derived from a sustainable activity, or
b. using a best in universe approach consisting of giving priority to the issuers best rated from a non-financial viewpoint irrespective of their sector of activity, the SDG scoring of the issuer’s operations is on the better top 2.5%, except in consideration to the SDG-5 (gender equality), SDG 8 (decent work), SDG 10 (reduced inequalities), SDG 12 (Responsible Production and Consumption) and SDG 16 (peace & justice), for which the SDG scoring of the issuer’s Operation is on the better top 5%. For SDG 5, 8, 10 and 16 the selectivity criteria on issuer’s “Operations” is less restrictive as such SDGs are better addressed considering the way the issuer carries their activities than the Products and Services offered by the investee company. It is also less restrictive for SDG 12 which can be addressed through the Products & Services or the way the investee company carries their activities.

The quantitative SDG results are sourced from external data providers and can be overridden by a duly supported qualitative analysis performed by the Investment Manager.

2. **Integration of issuers engaged in a solid Transition Pathway** consistently with the European Commission’s ambition to help fund the transition to a 1.5°c world - based on the framework developed by the Science Based Targets Initiative, considering companies which have validated Science-Based targets.

Those methodologies may evolve in the future to take into account any improvements for example in data availability and reliability, or any developments of, but not limited to, regulations or other external frameworks or initiatives.

The Financial Product does not take into consideration the criteria for environmentally sustainable economic activities under the EU Taxonomy.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

The application of the Do No Significant Harm Principle for the sustainable investments the Financial Product partially intends to make means that an investee company cannot qualify as sustainable if it meets any of the criteria listed below:

- The issuer causes harm to any of the SDGs when one of its SDG scores is below –5 based on a quantitative database from an external provider on a scale ranging from +10 corresponding to 'significantly contributing' to -10 corresponding to 'significantly obstructing', unless the quantitative score has been qualitatively overridden.
- The issuer is in the Investment Manager's sectorial and ESG standards ban lists (as described below), which consider among other factors the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
- The issuer has a CCC (or 1.43) or lower ESG rating according to the Investment Manager's ESG scoring methodology. The ESG score is based on ESG scoring from external data provider as primary inputs assessing data points across Environment, Social and Governance (ESG) dimensions. AXA IM analysts can complement with a fundamental and documented ESG analysis in case of lack of coverage or disagreement on the ESG rating provided that it is approved by the Investment Manager dedicated internal governance body.

Indicators for principal adverse impacts on sustainability factors are considered, including through the application of the Investment Manager's exclusion and stewardship policies.

- ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Financial Product takes into account Principal Adverse Impacts ("**PAIs**") indicators to ensure that the sustainable investments are not harming significantly any other sustainability objectives under SFDR.

PAIs are mitigated through sectorial exclusion policies and the Investment Manager's ESG standards (as described below) that are applied bindingly at all times by the Financial Product, as well as through the filters based on UN Sustainable Development Goals scoring.

Where relevant, stewardship policies are an additional risk mitigation on principal adverse impacts through direct dialogue with companies on sustainability and governance issues. Through the engagement activities, the Financial Product will use its influence as an investor to encourage companies to mitigate environmental and social risks relevant to their sectors.

Voting at general meetings is also an important element of the dialogue with investee companies in order to foster sustainably long-term value of the companies in which the Financial Product invests and mitigate adverse impacts.

Exclusion Policies:

- **Environment:**

Relevant AXA IM policies	**PAI indicator**
Climate Risk policy Ecosystem Protection & Deforestation policy	PAI 1: Green House Gas (GHG) emissions (scope 1, 2, & 3 starting 01/2023)
	PAI 2: Carbon Footprint
	PAI 3: GHG intensity of investee companies
Climate Risk policy	PAI 4: Exposure to Companies active in the fossil fuel sector

Climate Risk policy (engagement only)	PAI 5: Share of non-renewable energy consumption and production
Climate risk policy (considering an expected correlation between GHG emissions and energy consumption)[1]	PAI 6: Energy consumption intensity per high impact climate sector
Ecosystem Protection & Deforestation policy	PAI 7: Activities negatively affecting biodiversity sensitive areas

- **Social and Governance:**

Relevant AXA IM policies	PAI indicator
Voting and Engagement policy with systematic voting criteria linked with board gender diversity	PAI 13: Board Gender diversity
ESG standards policy: violation of international norms and standards	PAI 10: Violations of UN Global Compact principles & OECD Guidelines for multinational enterprises
ESG standards policy: violation of international norms and standards (considering an expected correlation between companies non-compliant with international norms and standards and the lack of implementation by companies of processes and compliance mechanisms to monitor compliance with those standards)[2]	PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles & OECD Guidelines for multinational enterprises
Controversial weapons policy	PAI 14: Exposure to controversial weapons

Filter based on UN SDGs:
The Investment Manager also relies on the SDG pillar of its sustainable investment framework to monitor and take into account adverse impacts on those sustainability factors by excluding investee companies which have a SDG score under – 5 on any SDG (on a scale from + 10 corresponding to 'significant contributing impact ' to – 10 corresponding to 'significant obstructing impact'), unless the quantitative score has been qualitatively overridden following a duly documented analysis by the Investment Manager's Core ESG & Impact Research. This approach enables us to ensure investee companies with the worst adverse impacts on any SDG are not considered as sustainable investments.
Data availability and quality is lower for the time being on certain sustainability factors related to biodiversity as an example, which may impact the coverage for the following PAI indicators: emissions to water (PAI 8), hazardous and radioactive waste ratio (PAI 9) and unadjusted gender pay gap (PAI 12). Those sustainability factors are part of the 17 objectives targeted by the United Nations SDGs (more specifically they are covered through SDG 5 "Gender equality", SDGs 6 "Clean water and sanitation", SDG 8 "Economic growth", SDG 10 "Reduced inequalities", SDG 12 "Responsible production and consumption" and SDG 14 "Life below water") and the Investment Manager's framework there enables to mitigate the worst impacts pending the increase on data availability and quality.

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

The Financial Product doesn't invest in companies which cause, contribute or are linked to violations of international norms and standards in a material manner. Those standards focus on Human Rights,

[1] The approach used to mitigate the PAI indicators through this exclusion policy will evolve as the improvement in data availability and quality enables us to use the PAI more effectively. Not all high impact climate sectors are targeted by the exclusion policy for the time being.
[2] The approach used to mitigate the PAI indicators through this exclusion policy will evolve as the improvement in data availability and quality enables us to use the PAI more effectively.

Society, Labor and Environment. The Investment Manager relies on an external provider's screening framework and excludes any companies that have been assessed as "non compliant" to UN's Global Compact Principles, International Labor Organization's (ILO) Conventions, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

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

Any other sustainable investment must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

☒ Yes

☐ No

Principal adverse impacts are considered with both (i) qualitative and (ii) quantitative approaches:
(i) Qualitative approach to consider principal adverse impact is based on exclusion and, where relevant, stewardship policies. Exclusion policies as part of the Investment Manager's ESG standards cover the most material sustainability factors' risks and are applied bindingly on a continuous basis. Where relevant, stewardship policies are an additional risk mitigation on principal adverse impacts through direct dialogue with companies on sustainability and governance issues. Through its engagement activities, the Financial Product will use its influence as an investor to encourage companies to mitigate environmental and social risks relevant to their sectors. Voting at general meetings is an important element of the dialogue with investee companies in order to foster sustainably long-term value of the companies in which the Financial Product invest and mitigate adverse impacts.

Through those exclusion and stewardship policies the Financial Product takes into consideration potential negative impact on those specific PAI indicators:

	Relevant AXA IM policies	PAI indicator
Climate and other environment related indicators	Climate Risk policy	PAI 1: Green House Gas (GHG) emissions (scope 1, 2 & 3 starting 01/2023)
	Ecosystem protection & Deforestation policy	
	Climate Risk policy	PAI 2: Carbon Footprint
	Ecosystem protection & Deforestation policy	
	Climate Risk policy	PAI 3: GHG intensity of investee companies
	Ecosystem protection & Deforestation policy	
	Climate Risk policy	PAI 4: Exposure to companies active in the fossil fuel sector
	Climate risk policy (engagement only)	PAI 5: Share of non-renewable energy consumption and production
	Ecosystem protection & Deforestation policy	PAI 7: activities negatively affecting biodiversity sensitive area
Social and employee respect for human rights, anti-corruption and anti bribery matters	ESG standard policy / violation of international norms and standards	PAI 10: Violation of UN global compact principles & OECD guidelines for Multinational Enterprises
	Voting and engagement policy with systematic voting criteria linked with board gender diversity	PAI 13: Board gender diversity
	Controversial weapons policy	PAI 14: Exposure to controversial weapons

(ii) PAIs are also considered quantitatively through the PAI indicators' measurement and reported annually in the SFDR annex in the periodic reporting. The objective is to provide transparency to investors on significant negative impact on other sustainability factors. The Investment Manager measures all the mandatory PAI indicators.

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Companies in respect of which there is no ESG score (either internal or MSCI) nor an ISS Oekom SDG score are filtered out of the Initial Investment Universe. Then, the Investment Manager selects investments by applying an extra-financial approach by defining the eligible universe after application of the exclusion filters as described in AXA IM's Sectorial Exclusion and ESG Standards Policies.

In line with the objective described above, the Financial Product seeks to promote environmental characteristics by investing in companies that support on the long run the United Nations Sustainable Development Goals ("SDGs") with a focus on Climate Action (SDG 13) and Affordable and Clean Energy (SDG 7).

For ESG selectivity purposes, the Initial Investment Universe will be the Benchmark. In the selection process the Financial Product primarily focuses on companies whose products and services offer solutions for climate change mitigation while also seeking exposure to companies that, through the quality of their operations, support the targeted SDGs, which is determined by using external and internal SDG-alignment data to measure company contributions to the targeted SDGs.

In addition, companies whose products and/or services provide solutions for climate change mitigation are identified using external and internal qualitative and quantitative inputs and leverages the Investment Manager's impact assessment approach for listed assets which is detailed on https://www.axa-im.com/who-we-are/impact-investing. The Fund also seeks to invest in companies across all sectors that support the targeted SDGs through the quality of their operations while minimizing negative climate externalities.

The Financial Product is also managed using a socially responsible investment (SRI) approach and the binding elements of the investment strategy described below.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Financial Product bindingly applies at all times the following elements described below.

1. Companies in respect of which there is no ESG score (either internal or MSCI) nor an ISS Oekom SDG score are filtered out of the Initial Investment Universe. Then, the Investment Manager bindingly applies at all times AXA IM's sectorial policies and ESG standards as a first exclusion filter which are (i) encompassing areas such as Controversial Weapons, Climate risks, Soft Commodities and Ecosystem Protection & Deforestation and (ii) excluding specific sectors such as tobacco and white phosphorus weapons and by excluding investments in securities issued by companies in violation of international norms and standards such as the United Nations Global Compact Principles or the OECD guidelines for Multinational Enterprises; as well as investments in companies which are involved in severe ESG-related incidents and investments in issuers with a Low ESG quality (which is, as of the date hereof, below 1.43 (on a scale of 0 to 10) – such number being subject to regular review and adaptation). Instruments issued by countries where serious specific categories of violations of Human Rights are observed are also banned;

2. The Investment Manager then applies a "negative impact filter" to exclude any security with significant negative contribution across all SDGs. This is determined by reference to data provided by ISS via the ISS Oekom SDG score (in respect of which further information can be found on SDG Solutions Assessment | ISS (issgovernance.com)) or internal assessment; 3. The Investment Manager uses a bottom-up security selection process whereby it actively selects securities which have a positive contribution to the SDGs 7 and 13 by:

- offering innovative products and solutions to address climate change mitigation leveraging on the Investment Manager's internal "impact framework" based on an analysis of financial and non-financial data, with a focus on companies demonstrating long-term and strong revenue and growth, market innovation, and credible management whereby companies are assessed based on sustainability reports, financial reports, broker research and engagement with a company's management team (the "Impact Framework"); and/or
- supporting the Financial Product's targeted SDGs based on ISS Oekom score through the quality of their operations and/or product and service;

4. Moreover, the security selection process outlined above allows the Investment Manager to bindingly apply at all times an environmental responsible investment 'selectivity' approach that reduces the Initial Investment Universe, composed of equities of worldwide companies of any market capitalization, of the Financial Product by at least 20% through the exclusion of companies that have the lowest contribution to SDGs 13 and 7;

5. The ESG analysis coverage rate within the portfolio is at least 90% of the net assets of the Financial Product, excluding cash and solidarity assets; and

6. The Financial Product invests at least 50% in Sustainable assets as defined by the application of the AXA IM sustainable investment frameworks.

The ESG data used in the investment process are based on ESG methodologies which rely in part on third party data, and in some cases are internally developed. They are subjective and may change over time. Despite several initiatives, the lack of harmonised definitions can make ESG criteria heterogeneous. As such, the different investment strategies that use ESG criteria and ESG reporting are difficult to compare with each other. Strategies that incorporate ESG criteria and those that incorporate sustainable development criteria may use ESG data that appear similar but which should be distinguished because their calculation method may be different. AXA IM's ESG different methodologies described herein may evolve in the future to take into account any improvements in data availability and reliability, or any developments of regulations or other external frameworks or initiatives - among others.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The Initial Investment Universe is reduced by at least, 20% through the investment strategy described above.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

- ***What is the policy to assess good governance practices of the investee companies?***

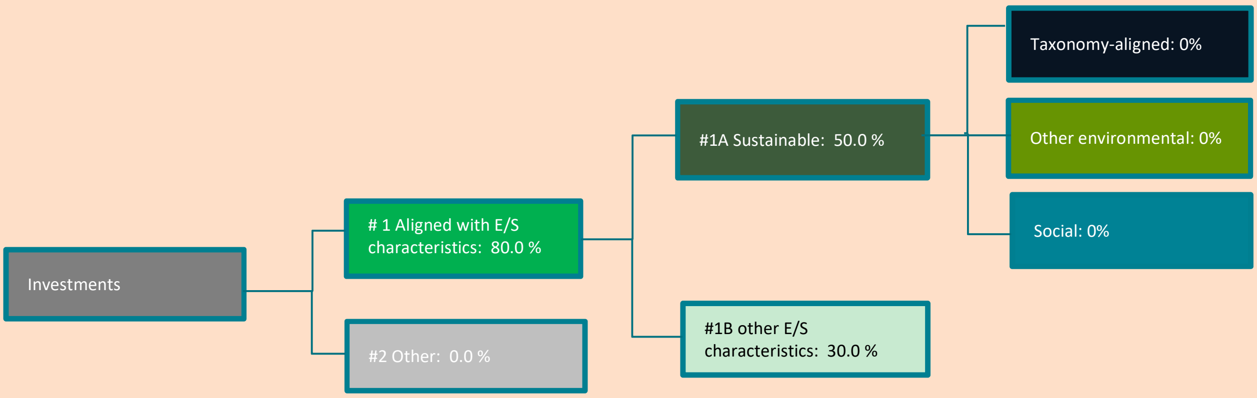
The Financial Product doesn't invest in companies which cause, contribute or are linked to violations of international norms and standards in a material manner. Those standards focus on Human Rights, Society, Labour and Environment. The Investment Manager relies on an external provider's screening framework and excludes any companies that have been assessed as "non compliant" to UN's Global Compact Principles, International Labor Organization's (ILO) Conventions, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).

In addition, ensuring good governance practices is also addressed by the engagement policies. The Investment Manager has implemented a comprehensive active ownership strategy – engagement and voting – whereby it acts as stewards of investments made on the clients' behalf. The Investment Manager views engagement as a means for investors to influence, shape and shift investee company policies and practices to mitigate risks and secure long-term value. Governance practices of companies are engaged at first level by the portfolio managers and dedicated ESG analysts when meeting companies' management team. It is through the long-term investor status and in-depth knowledge of the investment targets that the Investment Manager feels legitimate to engage in a constructive but demanding dialogue with them.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

The Financial Product aims to plan its asset allocation as presented in the graph below. This planned asset allocation might deviate on a temporary basis.



#1 Aligned with E/S characteristics includes the investments of the Financial Product used to attain the environmental or social characteristics promoted by the Financial Product.

#2 Other includes the remaining investments of the Financial Product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
-The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
-The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The planned minimum proportion of the investments of the Financial Product used to meet the environmental or social characteristics promoted by the Financial Product is 80.0 % of the Financial Product Net Asset Value.

The planned minimum proportion of sustainable investments of the Financial Product where that Financial Product commits to making sustainable investments is 50.0 % of the Financial Product Net Asset Value.

The remaining "Other" investments will represent a maximum of 20% of the Financial Product Net Asset Value.

- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?***

Derivatives are not used to attain the environmental or social characteristics promoted by the Financial Product except single names derivatives that apply exclusion policies.

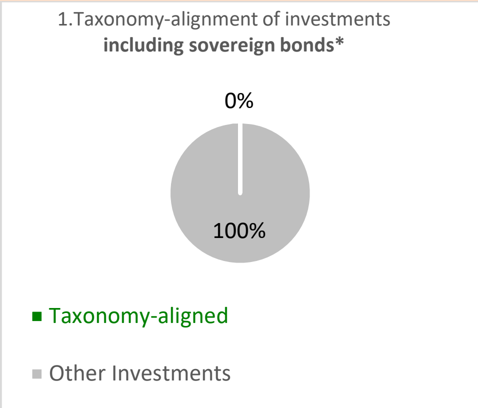
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

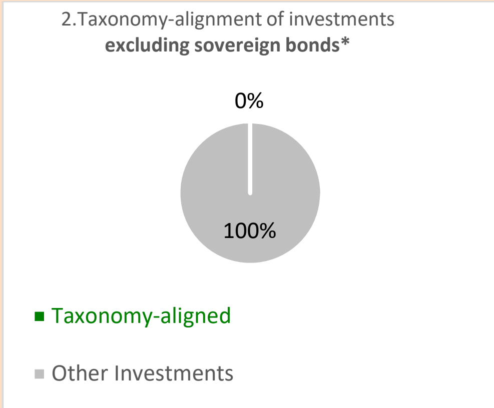
The Financial Product does not take into consideration the criteria of the EU Taxonomy environmental objectives. The financial Product is not considering the “do not significantly harm” criteria of the EU Taxonomy.

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

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

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy-alignment in relation to all the investments of the Financial Product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the Financial Product other than sovereign bond.





* *For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

- ***What is the minimum share of investments in transitional and enabling activities?***

The minimum share of investments in transitional and enabling activities is up to 0.0 % of the Financial Product Net Asset Value.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0.0 % of the Financial Product Net Asset Value.

What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with social objective is 0.0 % of the Financial Product Net Asset Value.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The “other” assets may consist in:

- cash and cash equivalent investments being bank deposit, eligible money market instruments and money market funds used for managing the liquidity of the Financial Product and
- other instruments eligible to the Financial Product and that do not meet the Environmental and/or Social criteria described in this appendix. Such assets may be equity and debt instruments, derivatives investments and investment collective schemes that do not promote environmental or social characteristics and that are used to attain the financial objective of the Financial Product and/or for diversification and/or hedging purposes.

Environmental or social safeguards are applied and assessed on all “other” assets except on: (i) non single name derivatives; (ii) on Eligible Collective Investment Schemes managed by other management companies; and (iii) cash and cash equivalent investments described above.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

The designated Benchmark is a broad market index which is not aligned with the environmental and/or social characteristics promoted by the Financial Product.

Where can I find more product specific information online?

More information can be found on the AXA IM fund center following that link: Funds - AXA IM Global (axa-im.com)

More details on AXA IM sustainable investment frameworks are available on Sustainable Finance | SFDR | AXA IM Corporate (axa-im.com)