

This document is a Supplement to the Prospectus dated 28 April 2023 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 19 June 2023

in respect of

AXA IM Euro Credit PAB 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 of investment grade Euro denominated corporate debt securities while maintaining a decarbonization strategy aligned with the carbon emissions of the ICE BofA Euro Corporate Index Paris Aligned (Absolute Emissions) ER00PABA (the “**Benchmark**”). **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 is actively managed in reference to the Benchmark. In order to achieve its investment objective, the Fund invests at least 90% of its net assets in investment grade, EUR denominated, fixed and floating rate debt securities (i.e. rated at least BBB- by Standard & Poor's or equivalent ratings by Moody's or Fitch or, if unrated, judged equivalent to those ratings by the Investment Manager) that are issued by companies that are component securities of the Benchmark, excluding cash and cash equivalent (i.e. bank deposit, eligible money market instruments and money market funds). As a result, the Fund may invest in green, social, sustainability and sustainability linked bonds. While the Benchmark is used by the Investment Manager to determine the initial investment universe of the Fund (the “**Initial Investment Universe**”), the Investment Manager may not invest in all component securities of the Benchmark, will apply screens and other exclusions and will otherwise have general discretion when selecting the Fund's investments to ensure that their characteristics are consistent with the Investment Manager's convictions, as further detailed in the section of this Supplement titled “Investment Strategy”. The Benchmark applies specific targets and exclusionary filters to its parent index, the ICE BofA Euro Corporate Index, to: (i) reduce the carbon emissions of the constituencies by 50% compared to the parent index while following a trajectory toward net zero by the end of 2050 by having an annualised carbon reduction rate of at least 7%; (ii) remove issuers with certain ESG and/or climate-related business involvements; and (iii) apply exclusions related to fossil fuel business involvements. In addition, the Benchmark must always be at least 50% below the carbon level of its parent index.

The Fund is restricted in the extent to which its portfolio holdings can deviate from those of the Benchmark as it widely forms the Initial Investment Universe. Such deviation from the Benchmark is expected to be limited.

The Benchmark qualifies as an EU Paris-aligned Benchmark under Chapter 3a of Title III of Regulation (EU) 2016/1011 to progressively align with the objectives of the Paris Agreement. For further information on the Benchmark, please refer to the section of this Supplement titled “**The Benchmark**”.

Investment Strategy

In addition to investment grade, EUR denominated, fixed and floating rate corporate debt securities, the Fund may invest in callable bonds. The Fund may also invest up to 25% of its net assets (compared to the level of the Benchmark) in investment grade subordinated debt securities (including perpetual bonds, i.e. bonds without a maturity date).

In case of a rating downgrade below investment grade, the Fund may be invested in sub-investment grade securities up to 10% of its net assets. However, the Fund does not invest in securities rated CCC+ or below by Standard & Poor's or equivalent rating by Moody's or Fitch. Ratings are based on the lower of two ratings or the second highest of three ratings depending on how many ratings are available. If securities are unrated, they must be judged equivalent to those ratings by the Investment Manager. In case of a credit downgrade below such minimum, securities will be sold within six months.

The selection of debt securities is not exclusively and mechanically based on their publicly available credit ratings but also on an internal credit or market risk analysis which comprises an analysis of each issuer's business lines and strategy, the quality and experience of the issuer's management, governance, shareholder composition and stability over time, financial accounts, litigation risk and credit ratio analysis, amongst other things. The decision to buy or sell securities is also based on other analysis criteria of the Investment Manager, such as sector analysis, valuation and performance.

As the components of the Benchmark widely form the Initial Investment Universe, the Fund is restricted in the extent to which the components it is expected to invest in can deviate from those of the Benchmark and, in that regard, the deviation of the components of the Fund as compared to those of the Benchmark is expected to be limited. However, the Investment Manager will apply its investment process to the Initial Investment Universe and so the constitution of the portfolio of the Fund is expected to deviate from that of the Benchmark in terms of the level of holdings of any component

The Fund may invest up to 10% of its net assets in the units/shares of Eligible Collective Investment Schemes including money market funds, 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 (which for this Fund are commercial paper, bonds, bills, deposits, certificates of deposit and cash in accordance with the investment restrictions applicable to the Fund) to be held as ancillary liquid assets.

The Fund may use financial derivative instruments ("**FDI**") including credit default swaps (CDS) on indices, interest rate futures, forward currency contracts, swaps and foreign exchange spot transactions 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.

Provided it is in its exclusive interest, the Fund may sell protection under credit default swaps in order to acquire a specific credit exposure for investment purposes. The Fund will only enter into OTC credit default swap transactions with highly rated financial institutions specialised in this type of transaction and only in accordance with the standard terms laid down by the ISDA Master Agreement. The maximum exposure of the Fund in terms of inherent commitment to CDS will not exceed 20% of its net assets. Any leverage arising from investment in CDS will be accurately monitored, measured and managed in accordance with the risk management process in place for the Fund.

The Fund will not enter into total return swaps or instruments with similar characteristics neither engage in lending and/or borrowing of securities or repurchase/reverse agreements within the meaning of the Securities Financing Transactions Regulation.

The Investment Manager aims over the long-term to outperform the financial performance net of management fees of the Benchmark and to have absolute carbon emissions less than or equal to the Benchmark by systematically buying and selling investments for the Fund.

The Investment Manager achieves this by applying a 2-step approach to the Initial Investment Universe.

First, the Investment Manager applies an exclusion filter to the Initial Investment Universe, as described in AXA IM's Sectorial Exclusion and ESG Standards Policies by excluding issuers not engaged in a "decarbonisation and transition pathway" to progressively align with the objectives of the Paris Agreement, thereby defining the Fund's eligible investment universe ("**Eligible Investment Universe**"). The "decarbonisation and transition pathway" of the Fund is set by the Benchmark, the carbon emissions is recalculated according to the internal methodology of the Investment Manager using carbon emissions scopes 1, 2 and 3.

Second, the Investment Manager then selects investments from the Eligible Investment Universe based on sector and security strategies determined by the Investment Manager using a top down and bottom-up analysis to determine the sector weightings of the portfolio. Sectors are evaluated based on comprehensive macroeconomic and microeconomic analysis of the market. The security strategy involves using bottom-up analysis which leverages on analysing fundamental factors, including, for example, earning prospects, anticipated cash flow, interest or dividend coverage and payment history,

asset coverage, debt maturity schedules and borrowing requirements. In addition, the Investment Manager will monitor the carbon emissions of the portfolio compared to the carbon emissions of the Benchmark. The Investment Manager monitors carbon emissions of the Fund and of the Benchmark on a pre- and post-trade basis using weighted average absolute carbon emissions scope 1, 2 and 3 data according to its internal methodology combining internal and external data.

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 data used in the investment process is based on ESG methodologies which rely in part on third party data (as set out above), and in some cases is internally developed. The data is 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 and swaps 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.

Base Currency

The Base Currency of the Fund is EUR.

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 BENCHMARK

The Initial Investment Universe is the ICE BofA Euro Corporate Index Paris Aligned (Absolute Emissions) ER00PABA which captures EUR denominated investment grade corporate debt publicly issued in the eurobond or Euro member domestic markets. Qualifying securities must have an investment grade rating (based on an average of Moody's, S&P and Fitch) and at least 18 months to final maturity at the time of issuance. The information set out above is a summary of the principal features of the Benchmark and does not purport to be an exhaustive description. The Benchmark is provided by ICE Data Indices, LLC. At the date of the Supplement, ICE Data Indices, LLC, as administrator of the Benchmark, is not listed on the ESMA register of benchmark administrators and benefits, as UK entity, from the transitional period which is currently scheduled to end on December 31, 2023.

Further information on the Benchmark can be found at: <https://www.theice.com/market-data/indices/fixed-income-indices>.

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 Manager reserves 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. The Minimum Subscription Amount and Minimum Redemption Amount may also be increased at the Manager's discretion provided that the Manager notifies the Shareholders.

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 permitted in respect of the Fund.

Business Day	means all normal business days in Ireland inclusive of all public /bank holidays other than the following – New Year’s Day holiday; Good Friday and Easter Monday; Christmas Day and St. Stephen’s Day holidays. In addition, Labour Day, National Day and Assumption Day in France are not Business Days.
Creation Units	means 100,000 Shares
Dealing Day	means, unless otherwise determined by the Directors and notified in advance to Shareholders, each Business Day. Business Days will not be Dealing Days where the Fund’s underlying investment markets are closed; or where markets relevant to the Benchmark are closed; when, at the discretion of the Manager, such closure results in a substantial portion of the Fund that may not be appropriately traded. Business Days may also not be Dealing Days where the relevant market operator(s) or exchange(s) close the market(s) for trading and/or settlement (such closure may be made with little or no notice to the Manager). The Manager maintains an up-to-date dealing calendars for the Fund, available from the Manager and on www.axa-im.com .
Distribution Date	once per year as notified in advance to Shareholders by the Manager
Initial Offer Period	means the period beginning at 9.00 a.m. (Dublin time) on 20 June 2023 and terminating at 5.00 p.m. (Dublin time) on 19 December 2023 or such other period determined by the Directors in accordance with the requirements of the Central Bank.
Minimum Redemption Amount	means 100,000 Shares.
Minimum Subscription Amount	means 100,000 Shares.
Redemption Fee	Up to 3%.
Settlement Time	means, in respect of subscriptions, two Business Days after the relevant Dealing Day (unless otherwise stipulated by the Manager or its delegate); and, in respect of redemptions, two 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 3:00 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 the Business Day, which also equates to 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.
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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:

Interest rate risk: This corresponds to the risk of depreciation in rate-based instruments over either the short or medium term stemming from interest rate variations. For purposes of illustration, the price of a fixed-rate bond tends to decrease as interest rates increase.

The Fund is particularly exposed to bonds and other debt securities; in the event of a rise in interest rates, the value of assets invested at a fixed rate may fall.

Credit risk: In the event of default or deterioration of the quality of private bond issuers (for example, a reduction in rating), the value of debt securities in which the Fund is invested may fall. In such case, the Net Asset Value of the Fund may fall.

Risk related to investments in high yield instruments: The Fund may be exposed to a risk related to investments in high yield financial instruments. These instruments present higher default risks than those of the investment grade category. In case of default, the value of these instruments may decrease significantly, which would affect the Net Asset Value of the Fund.

Lower-rated securities generally tend to reflect short-term corporate and market developments to a greater extent than higher-rated securities which respond primarily to fluctuations in the general level of interest rates. There are fewer investors in lower-rated securities and it may be harder to buy and sell such securities at an optimum time: accordingly, such securities carry liquidity risk

Derivatives Risk and Leverage: The Fund may use both listed and OTC derivatives for investment or hedging purposes. These instruments are volatile and may be subject to various types of risks, including but not limited to market risk, liquidity risk, credit risk, counterparty risk, legal risk and operations risks. In addition, the use of derivatives can involve significant economic leverage and may, in some cases, involve significant risks of loss. Furthermore, investments in OTC derivatives may have limited secondary markets liquidity and it may be difficult to assess the value of such a position and its exposure to risk. For these reasons, there can be no guarantee that strategies using derivatives instruments will meet their expected target.

Counterparty risk: This is the risk of default (or counterparty’s failure to perform any of its obligations) of any counterparties of the Fund to any OTC financial derivatives transactions.

The counterparty's default (or the counterparty's failure to perform any of its obligations) under these transactions may have a material adverse effect on the Net Asset Value of the Fund.

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 status for the Fund pursuant to Section 2 para. 6 and 7 of the German Investment Tax Act 2018 is "bond fund".

Investors should consult their own professional advisers as to the implications of the Fund maintaining "bond fund" status pursuant to 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 Euro Credit PAB 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
EUR Acc ETF	EUR	Unhedged	New	EUR 10	Accumulating	N/A	Up to 0.20%
USD (H) Acc ETF	USD	Hedged	New	USD 10	Accumulating	N/A	Up to 0.23%
EUR Dis ETF	EUR	Unhedged	New	EUR 10	Distributing	annual	Up to 0.20%
USD (H) Dis ETF	USD	Hedged	New	USD 10	Distributing	annual	Up to 0.23%

Environmental and/or social characteristics

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 40% 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

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

It will make a minimum of **sustainable investments with a social objective:** ____%

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**

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.



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 issuers considering their engagement in a decarbonization and transition pathway and by taking into account Environmental, Social and Governance (“ESG”) factors, including the exclusion of securities of issuers that do not meet requirements for inclusion in ICE BofA Euro Corporate Index Paris Aligned which qualifies as an EU Paris-aligned Benchmark under the EU Benchmark Regulation (“BMR”) and adjustments to security weightings so as to financially outperform the financial performance net of management fees of the benchmark over the long-term and keep the absolute carbon emission level less than or equal to the absolute carbon emission of the PAB index mentioned above

The Financial Product also promotes other specific environmental and social characteristics, namely:

- the preservation of 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 Labour Organization's (ILO) Conventions or the OECD guidelines for Multinational Enterprises.

The Financial Product has designated the ICE BofA Euro Corporate Index Paris Aligned (Absolute Emissions) (the "Benchmark") as a reference benchmark. The Benchmark qualifies as an EU Paris-aligned Benchmark under Chapter 3a of Title III of Regulation (EU) 2016/1011 to progressively align with the objectives of the Paris Agreement.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

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

The attainment of the environmental and social characteristics promoted by the Financial Product and described above is measured with the following sustainability indicator: the weighted average absolute Carbon Emission scope 1, 2 and 3 of the Financial Product compared to its Benchmark.

The weighted average absolute Carbon Emission of the Financial Product and of its Benchmark are defined as absolute emission expressed in metric tonnes of CO₂ equivalent. The absolute Carbon Emission of the Benchmark is calculated according to the internal methodology of the Investment Manager combining internal and external data using scopes 1, 2 and 3.

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 invest in instruments qualifying as sustainable investments 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 according to a best-in-universe selectivity approach consisting of giving priority to the issuers best rated from a non-financial viewpoint irrespective of their sector of activity to be considered as a sustainable asset and demonstrate a contribution to an environmental and/or social factor(s), 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 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,

b. 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. Further information on the qualitative analysis performed by the Investment Manager can be found in the Investment Manager's "Approach to SFDR Sustainable Investment for Traditional Asset Classes" which is available on the Investment Manager's website linked below.

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.

3. Investments in Green, Social or Sustainability Bonds (GSSB), Sustainability Linked Bonds:

a. GSSB are instruments which aim to contribute to various sustainable objectives by nature. As such, investments in bonds issued by corporates and sovereigns that have been identified as green bonds, social bonds or sustainability bonds in Bloomberg data base are considered as "sustainable investments" under AXA IM's SFDR framework (which is available on the Investment Manager's website linked below).

b. With regards to Sustainability Linked Bonds, an internal framework was developed to assess the robustness of those bonds that are used to finance general sustainable purpose. As these instruments are newer leading to heterogeneous practices from issuers, only Sustainability Linked Bonds that get a positive or neutral opinion from AXA IM's internal analysis process are considered as "sustainable investments". This analysis framework

is available [here](#) and draws on the International Capital Market Association (ICMA) sustainability-linked bond principles with a stringent proprietary approach based on the following defined criteria: (i) issuer’s sustainability strategy and key performance indicators relevance and materiality, (ii) Sustainability performance target’s ambition, (iii) bond characteristics and (iv) sustainability performance target’s monitoring & reporting. The ICMA sustainability-linked bond principles are voluntary guidelines to be adhered to by issuers of such bonds. The guidelines and the principles are available on <https://www.icmagroup.org>

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.

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 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. The Investment Manager’s 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:

- **Environmental:**

Relevant AXA IM policies	PAI indicator
Climate Risk policy	PAI 1: Green House Gas (GHG) emissions (scope 1, 2, & 3 starting 01/2023)
Ecosystem Protection & Deforestation policy	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
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
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

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? Details:

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 Labour 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.

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.

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 investments 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 policies	PAI indicator
Climate and other environment related indicators		PAI 1: Green House Gas (GHG) emissions (scope 1, 2 & 3 starting 01/2023)
	AXA Group energy policy AXA Group Ecosystems conversion & Deforestation policy	PAI 2: Carbon Footprint
		PAI 3: GHG intensity of investee companies
	AXA Group energy 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
	AXA Group Ecosystems conversion & Deforestation policy	PAI 7: activities negatively affecting biodiversity sensitive area
Social and employee respect for human rights, anti-corruption and anti bribery matters	Voting and Engagement policy with systematic voting criteria linked with board gender diversity	PAI 13: Board Gender diversity
	AXA’s ESG “minimum standards” rules based on ESG and controversy scores and Human rights policy	PAI 10: Violation of UN global compact principles & OECD guidelines for Multinational Enterprises
	Controversial weapons policy	PAI 14: Exposure to controversial weapons

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.

(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 Financial Product promotes environmental and/or social characteristics through the application of several exclusion policies and the consideration of issuers' engagement in a decarbonization and transition pathway.

The Investment Manager aims over the long-term to outperform the financial performance net of management fees of the Benchmark and be less than or equal to the absolute carbon emission of the Benchmark by systematically buying and selling investments for the Financial Product by applying the following ESG approach to its net assets excluding cash and cash equivalent (i.e. bank deposit, eligible money market instruments and money market funds): defining the eligible universe after application of a first exclusion filter as described in AXA IM's Sectorial Exclusion and ESG Standards Policies, excluding issuers not engaged in a decarbonization and transition pathway to progressively align with the objectives of the Paris Agreement and excluding fossil fuels using the Benchmark definition.

In addition, the Financial Product promotes environmental and/or social characteristics by investing in securities part of the components of the Benchmark by at least 90% of its net assets excluding cash and cash equivalent (i.e. bank deposit, eligible money market instruments and money market funds).

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. The Investment Manager bindingly applies at all times a first exclusion filter, encompassing areas such as Controversial Weapons, Climate risks, Soft Commodities (commodities based on food, agriculture or the marine) and Ecosystem Protection & Deforestation. The Financial Product also applies the AXA IM's Environmental, Social and Governance standards policy ("ESG Standards") integrating the ESG Standards in the investment process by applying specific sectorial exclusions 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 of this Prospectus, 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 ESG analysis coverage rate within the portfolio is at least 90% of the net assets of the Financial Product, excluding cash and solidarity assets.

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

3. The Financial Product commits to keep an absolute carbon emission less than or equal to the absolute carbon emission of the Benchmark using the Investment Manager’s methodology.

The ESG data (of which ESG score or SDG score wherever relevant) 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?

There is no committed minimum rate to reduce the scope of the investments considered.

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?

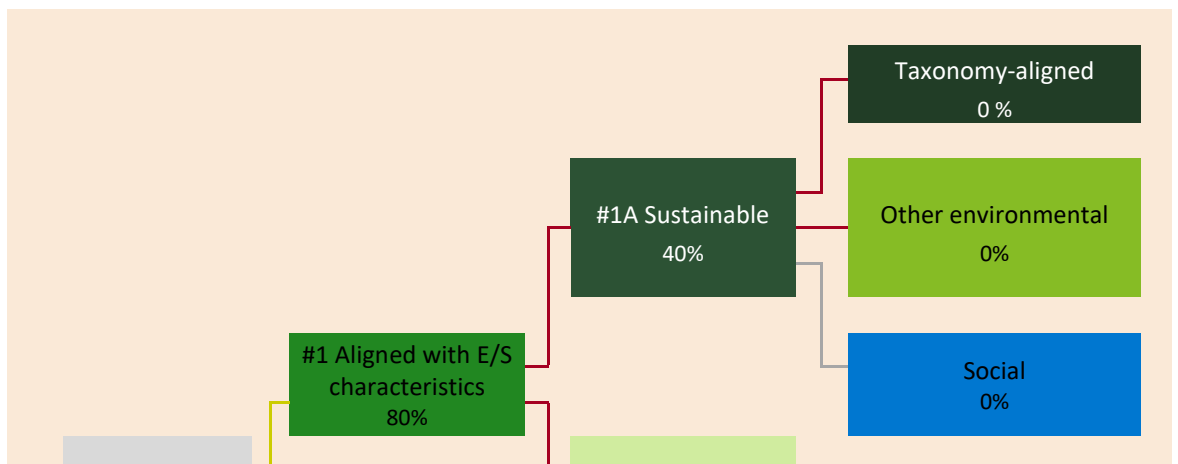
The Financial Product doesn’t invest in companies which cause, contribute or are linked to violations of international norms and standards in a material manner. Those standards focus on Human Rights, Society, Labour and Environment. The Investment Manager relies on an external provider’s screening framework and excludes any companies that have been assessed as “non-compliant” to UN’s Global Compact Principles, International Labour 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 implemented a comprehensive active ownership strategy – engagement and voting – where AXA IM 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.

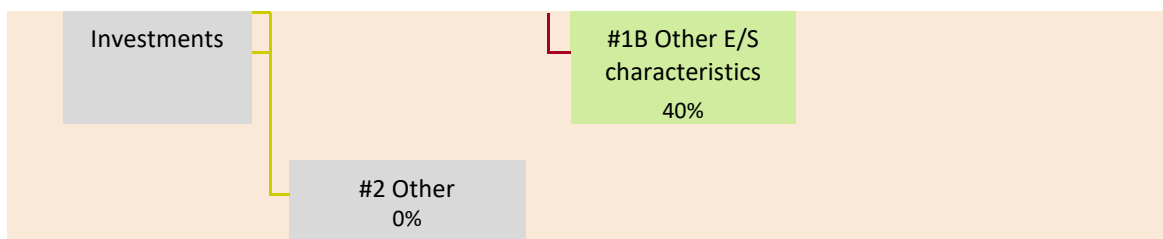
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

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.



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

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

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% of the Financial Product Net Asset value.

The planned minimum proportion of sustainable investments of the Financial Product where that Financial Products commits to making sustainable investments is 40% 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.

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

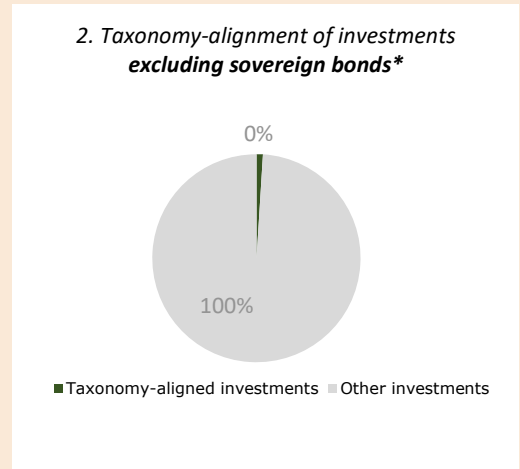
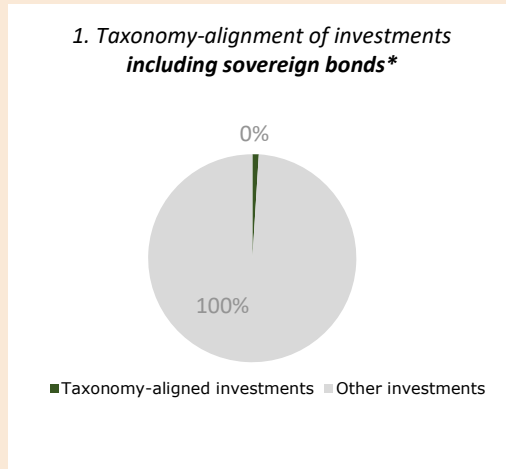
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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.

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 bonds.



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

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

- Yes
- In fossil gas In nuclear energy
- No

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% 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% of the Financial Product Net Asset Value.

What is the minimum share of sustainable investments with a social objective?

The Minimum share of sustainable investments with social objectives is 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 or 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.

are environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

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 company and (iii) on 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 sustainable investment objective.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The Benchmark is aligned with the environmental or social characteristics of the Financial Product by taking into account Environmental, Social and Governance (“ESG”) factors, including the exclusion of securities of issuers that do not meet requirements for inclusion in ICE BofA Euro Corporate Index Paris Aligned which qualifies as an EU Paris-aligned Benchmark under the EU Benchmark Regulation (“BMR”) and adjustments to security weightings so as to financially outperform the financial performance net of management fees of the Benchmark over the long-term and be less than or equal to the absolute carbon emission of the Benchmark.

- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

The investment strategy aims to keep an absolute carbon emission less than or equal to the absolute carbon emission of the Benchmark, applies several exclusion policies, as well as fossil fuels exclusion, and considers issuers’ engagement in a decarbonization and transition pathway.

- *How does the designated index differ from a relevant broad market index?*

The Benchmark applies specific targets and exclusionary filters to its parent index, the ICE BofA Euro Corporate Index, to: (i) reduce the carbon emission of the constituencies by 50% compared to the parent index while following a trajectory toward net zero by the end of 2050 by having an annualised carbon reduction rate of at least 7%; (ii) remove issuers with certain ESG and/or climate-related business involvements; and (iii) apply exclusions related to fossil fuel business involvements. In addition, the Benchmark must always be at least 50% below the carbon level of its parent index.

- *Where can the methodology used for the calculation of the designated index be found?*

Details on the Benchmark, including its methodology, components and performance, are available on www.theice.com/market-data/indices/fixed-income-indices.



Where can I find more product specific information online?

More information can be found on the AXA IM fund centre following that link: [Funds - AXA IM Global \(axa-im.com\)](https://www.axa-im.com/funds)

More details on AXA IM sustainable investment frameworks are available on [Sustainable Finance | SFDR | AXA IM Corporate \(axa-im.com\)](https://www.axa-im.com/sustainable-finance)