



# **Sustainability Related Periodic Disclosure pursuant to Sustainable Finance Disclosure Regulation ("SFDR")**

March 2<sup>nd</sup>, 2026

**KLMN** Invesco MSCI North America Climate ETF

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## Sustainable Finance Disclosure Regulation ("SFDR") (Unaudited)

The following sub-fund is classified as a financial product which promotes environmental and/or social characteristics as described in Article 8 (the "Article 8 Funds" and each, an "Article 8 Fund") of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR"):

Invesco MSCI North America Climate ETF

Article 11(1) of SFDR requires certain information to be disclosed in the audited financial statements where a sub-fund is classified as an Article 8 Fund within the meaning of SFDR. This information is required to be presented in the form of the template set out in the SFDR Annexes to the financial statements for Article 8 Funds of Commission Delegated Regulation (EU) 2023/363 of 31 October 2022 amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 supplementing SFDR. Further information on the environmental and/or social characteristics promoted by the Article 8 Fund during the year can be found in the annex below.

The data used to complete the disclosures set out in the SFDR Annex for the Article 8 Fund is provided by the relevant index provider and other third-party sources. The data used is the data available as at the date at which the disclosures were produced and is based on backward-looking analysis. The analysis is dependent on companies disclosing relevant data and the availability of this data can be limited. Data may also be incomplete, inaccurate and/or contain errors that may not be detected by the Manager and the relevant index provider. It has been observed that the availability and accuracy of data, from the relevant index provider, third party data providers and underlying investee companies, continues to be challenging in some respects. Additionally, there may be further regulatory guidance of relevance to the content of the disclosures that is still to be issued. The disclosures included in the Annex should consequently be read and understood in light of these continuing challenges. There is continual monitoring of the ongoing development and evolution of sustainability-related regulation and associated guidance and the availability of relevant third party and investee companies' data in this regard.

**Template periodic 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:** Invesco MSCI North America Climate ETF (KLMN US) **Legal entity identifier:** 254900XZN35KOMNJE82

## Environmental and/or social characteristics

### Did this financial product have a sustainable investment objective?

Yes

No

- It made **sustainable investments 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

- It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 48.98 % of sustainable investments
  - with an environmental objective in economic activities that 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 made **sustainable investments with a social objective:** \_\_\_\_\_ %

- It promoted E/S characteristics, but **did 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The environmental and social characteristics promoted by the Fund were to gain exposure to large- and mid-capitalization companies located in the United States or Canada, that are part of a broader set of global companies which meet certain environmental and climate criteria relative to their peers. The Fund also reduced exposure to companies involved in certain business activities and those with involvement in very severe ESG controversies.

The Fund achieved this by tracking the MSCI Global Climate 500 North America Selection Index (the "**Reference Index**"), which has a methodology that is consistent with attaining the environmental and social characteristics promoted by the Fund.

The extent to which the Fund tracked Reference Index is reflected by the tracking error figures available in the section "Tracking Error Analysis" of the Annual Report.

The reference period was from the 21st of January 2025 to the 31st of August 2025. All figures are representative of the reference period unless specified otherwise.

*Further information on the attainment of the environmental characteristics promoted by the Fund are set out below. Reported data was sourced from external ESG data vendors including ISS ESG, Sustainalytics, Clarity AI and MSCI.*

#### ● How did the sustainability indicators perform?

The Fund used the following indicator(s) to measure the attainment of the environmental and social

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

characteristics. The figures set out below are representative of the reference period.

Sustainability Indicator	Indicator Performance
Percentage of the Fund portfolio invested in excluded companies involved in controversial business activities and controversies (as defined in the methodology of the Reference Index)	As at each Reference Index rebalance date, the Fund had 0% exposure to excluded companies

● **...and compared to previous periods?**

Not applicable as this is first report for the fund.

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The sustainable investments made by the Fund contributed to environmental objectives such as climate change, water management, pollution prevention, and to social objectives such as good health, wellbeing and gender equality. The Fund achieved those objectives by investing in constituents of the Reference Index. According to Invesco's sustainable investment framework, a certain percentage of constituents of the Reference Index contribute positively to selected Sustainable Development Goals (SDGs) that relate to the above objectives.

● **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

The index methodology of the Reference Index that the Fund tracks took into account principal adverse impacts (PAI) indicators defined in Table 1 of Annex I of the regulatory technical standards for Regulation 2019/2088 (RTS). Securities that didn't meet certain PAI thresholds were excluded from the Reference Index.

**How were the indicators for adverse impacts on sustainability factors taken into account?**

Please see above on how the indicators for adverse impacts on sustainability factors were taken into account.

The index methodology directly excluded a number of companies involved in certain business activities. Through the removal of companies involved in thermal coal and oil sands the index reduced its exposure to greenhouse gas emissions. The methodology also excluded companies involved in controversial weapons and those facing very severe ESG controversies, as assessed via MSCI Controversy Scores. The index also excluded any companies where data isn't available to make such assessments.

MSCI Controversy Scores consider controversies in a number of different areas, including, but not limited to biodiversity & land use, energy & climate change, toxic emissions & waste, operational waste, discrimination & workforce diversity, and governance structures. Any company that violates the UN Global Compact receives a very severe MSCI Controversy Score.

**Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights was captured in the index methodology of the Fund, with the result that securities were excluded from the investible universe if they were deemed not to be in alignment.

The index methodology excluded companies facing severe ESG controversies, as assessed via MSCI Controversy Scores. As part of their research MSCI consider global standards screening, in particular specific international norms and standards including both the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**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.

*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 Union 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 investments must also not significantly harm any environmental or social objectives.*



#### **How did this financial product consider principal adverse impacts on sustainability factors?**

As noted above, the index methodology considered principal adverse impacts on sustainability factors, primarily through a set of exclusion criteria corresponding to the indicators that are defined in Table 1, Annex I of the RTS.

The below table shows the PAI scores for the Fund, - figures are representative of the reference period:

Adverse sustainability indicator	PAI	Data	Coverage	Metric
<b>Greenhouse gas emissions</b>	1.GHG emissions	25,616.22	100.03	Scope 1 fund financed emissions (tonnes of CO2 equivalent)
		7,364.71	100.03	Scope 2 fund financed emissions (tonnes of CO2 equivalent)
		745,644.25	100.03	Scope 3 fund financed emissions (tonnes of CO2 equivalent)
		778,625.18	100.03	Total financed emissions (Scope 1 + Scope 2 + Scope 3) (tonnes of CO2 equivalent)
	2. Carbon footprint	349.68	100.03	Fund level carbon footprint (Scope 1 + Scope 2 + Scope 3) (per Million EUR invested)
	3. GHG intensity of investee companies	1,097.75	100.03	Fund level total emission intensity- Scope 1+2+3 (per Million EUR revenue)
	4. Exposure to companies active in the fossil fuel sector	1.52	100.03	% of the fund exposed to any fossil fuels revenue
	5. Share of non-renewable energy consumption	49.14	76.76	Adjusted weighted average of all issuers in the fund's share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources (%)
	5. Share of non-renewable energy production	25.51	43.12	
	6. Energy consumption intensity per high impact climate sector			Adjusted weighted average energy consumption of issuers in the fund in GWh per million EUR of revenue of investee companies, per high impact climate sector
	Agriculture, forestry & fishing	1.69	0.11	
	Construction	0.11	0.29	
	Electricity, gas, steam & air conditioning Supply	4.74	0.91	
	Manufacturing	0.14	38.04	
	Mining & quarrying	1.34	3.13	
Real Estate activities	0.55	2.31		
Transportation & storage	2.41	2.08		
Water supply, sewerage, waste management & remediation activities	0.50	0.53		
Wholesale & Retail	0.07	3.13		

<b>Biodiversity</b>	trade & repair of motor vehicles & motorcycles			
	7. Activities negatively affecting biodiversity-sensitive areas	8.33	100.03	Share of investments in the fund of investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
<b>Water</b>	8. Emissions to water	0.00	0.00	Adjusted weighted average per issuer in the fund's emissions to water generated by investee companies per million EUR invested (tonnes)
<b>Waste</b>	9. Hazardous waste and radioactive waste ratio	2.15	99.72	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average
<b>Social and employee matters</b>	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) guidelines for multinational enterprises	0.00	100.03	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD guidelines for multinational enterprises
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD guidelines for multinational enterprises	63.69	100.03	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD guidelines for multinational enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD guidelines for multinational enterprises
	12. Unadjusted gender pay gap	18.35	4.04	Weighted average of all issuers' in the portfolio unadjusted gender pay gap of investee companies
	13. Board gender diversity	35.98	99.88	Weighted average of all issuers in the portfolio ratio of female to male board members in investee companies, expressed as a percentage of all board members
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	0.00	99.94	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

*Invesco Capital Management LLC does not estimate any data, however certain data sourced from external providers may contain estimated data.*



**What were the top investments of this financial product?**

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: From the 21st of January 2025 to the 31st of August 2025. Figures are representative of the reference period.

Largest Investments	Sector	% Assets	Country
NVIDIA CORP	Information Technology	6.64%	United States
MICROSOFT CORP	Information Technology	6.07%	United States
APPLE INC	Information Technology	5.75%	United States
AMAZON.COM INC	Consumer Discretionary	3.66%	United States
META PLATFORMS-A	Communication Services	2.72%	United States
ALPHABET INC-A	Communication Services	2.23%	United States
BROADCOM INC	Information Technology	2.14%	United States
TESLA INC	Consumer Discretionary	1.76%	United States
ALPHABET INC-C	Communication Services	1.44%	United States
JPMORGAN CHASE	Financials	1.42%	United States
VISA INC-CLASS A	Financials	1.17%	United States
ELI LILLY & CO	Health Care	1.06%	United States
NETFLIX INC	Communication Services	0.95%	United States
MASTERCARD INC-A	Financials	0.93%	United States
EXXON MOBIL CORP	Energy	0.88%	United States



### What was the proportion of sustainability-related investments?

See below field

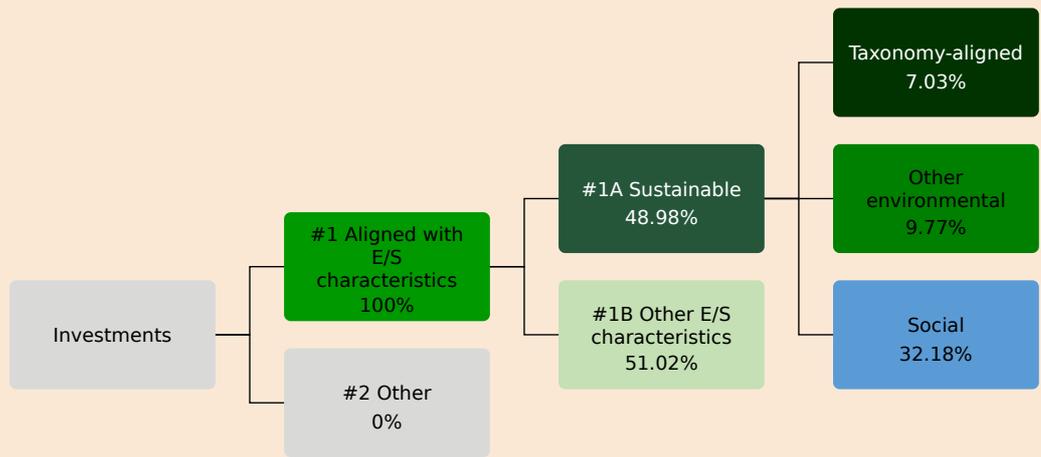
**Asset allocation** describes the share of investments in specific assets.

#### ● What was the asset allocation?

100% of the Fund's NAV was invested in investments that aligned with the environmental and social characteristics of the Fund.

0% of the Fund's NAV was invested in financial derivative instruments for hedging and/or efficient portfolio management purposes; or was held as cash for ancillary liquidity purposes.

48.98% of the Fund's NAV was invested in sustainable investments.



**#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.

● **In which economic sectors were the investments made?**

GICS Sector Breakdown - figures are representative of the reference period

Sector (GICS)	Weight %
Financials	14.56
Communication Services	9.28
Consumer Discretionary	10.40
Information Technology	31.96
Industrials	8.83
Consumer Staples	5.00
Energy	3.98
Real Estate	2.83
Health Care	9.28
Materials	2.68
Utilities	1.20
<b>Total</b>	<b>100.00</b>

GICS Level 4 breakdown for Energy Sector

Sub-Industry Code	Sub-Industry Name	Weight
10101010	Oil & Gas Drilling	0.00
10101020	Oil & Gas Equipment & Services	0.32
10102010	Integrated Oil & Gas	1.43
10102020	Oil & Gas Exploration & Production	1.07
10102030	Oil & Gas Refining & Marketing	0.00
10102040	Oil & Gas Storage & Transportation	1.16
10102050	Coal & Consumable Fuels	0.00
<b>Total</b>		<b>3.98</b>

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Although the Fund does not commit to a minimum of sustainable investments aligned with the EU Taxonomy the extent to which the Fund as a whole was aligned with the EU Taxonomy was calculated for the reference period. 7.03% (Turnover) of the Fund's portfolio was aligned with the EU Taxonomy. The figures are representative of the reference period.

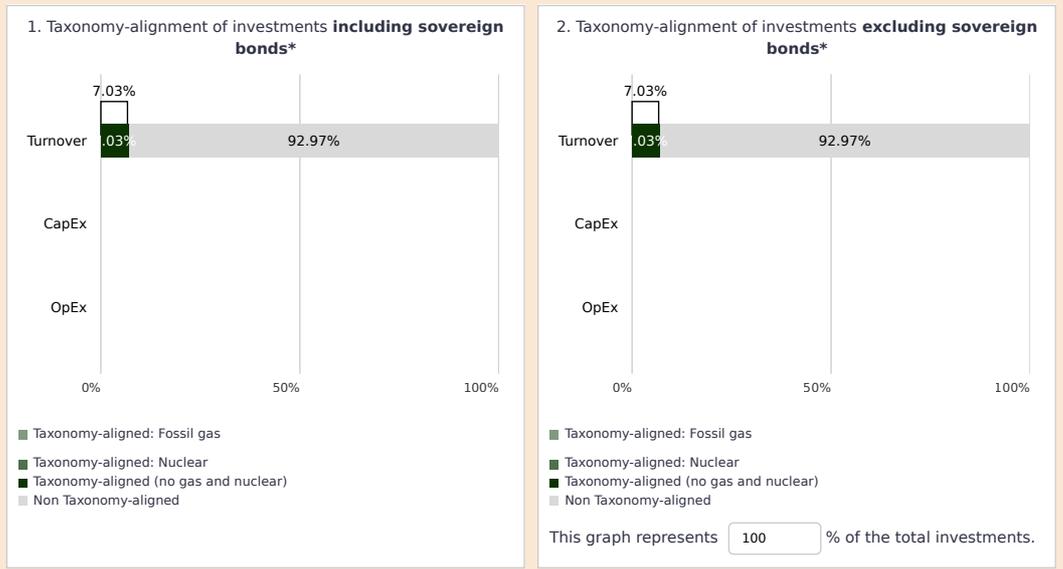
**Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

Yes

In fossil gas       In nuclear energy

No

The graphs below show in green the percentage of investments that were 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.

**What was the share of investments made in transitional and enabling activities?**

The below table shows the share of investments in transitional and enabling activities. The figures are representative of the reference period.

	Aligned
Enabling	0.99%
Transition	0.05%

'Aligned' means % of revenues of the investments of the Fund that are aligned to the EU Taxonomy.

**How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Not applicable as this is first report for the fund.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2022/852.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

9.77% of the Fund’s NAV was invested in sustainable investments with an environmental objective that was not aligned with the EU Taxonomy.



**What was the share of socially sustainable investments?**

32.18% of the Fund’s NAV was invested in socially sustainable investments.



**What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

Investments included under this category are financial derivative instruments for hedging and/or efficient portfolio management purposes and cash for ancillary liquidity. No minimum environmental or social safeguards are applied in relation to these instruments.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

The Fund achieved the environmental and social characteristics by tracking the Reference Index, which has a methodology that is consistent with attaining the environmental and social characteristics promoted by the Fund.

Please refer to the section “How did the sustainability indicators perform” above for further information.



**How did this financial product perform compared to the reference benchmark?**

See tables completed in below sections.

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

● **How does the reference benchmark differ from a broad market index?**

The Reference Index differs from a broad market index because it provides exposure to the broader global equity markets, comprising large- and mid-capitalization companies in the United States or Canada, that meet certain environmental and climate criteria relative to their peers.

● **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

As the Fund fully replicates the performance of the Reference Index, the sustainability indicators performed similarly for the Fund and Reference Index:

Sustainability Indicator	Fund Indicator Performance	Reference Index Indicator Performance
Percentage of the Fund portfolio invested in excluded companies involved in controversial business activities and controversies (as defined in the methodology of the Reference Index)	As at each Reference Index rebalance date, the Fund had 0% exposure to excluded companies	As at each rebalance date, the Reference Index had 0% exposure to excluded companies

● **How did this financial product perform compared with the reference benchmark?**

As the Fund achieves the environmental and social characteristics by tracking the Reference Index, which has a methodology that is consistent with attaining the environmental and social characteristics promoted by the Fund, the performance of the Fund is aligned with that of the Reference Benchmark. Please see above for the performance of the sustainability indicators compared with the Reference Benchmark.

● **How did this financial product perform compared with the broad market index?**

The MSCI North America Index acts as a relevant broad market index. The sustainability indicators for the Fund and this broad market index differed as below:

<b>Sustainability Indicator</b>	<b>Fund Indicator Performance</b>	<b>Broad Market Benchmark Indicator Performance</b>
Percentage of the Fund portfolio invested in excluded companies involved in controversial business activities and controversies (as defined in the methodology of the Reference Index)	As at each Reference Index rebalance date, the Fund had 0% exposure to excluded companies	The Broad Market benchmark had 5.15% exposure to excluded companies at the latest Reference Index rebalance date