SUPPLEMENT 70
18 SEPTEMBER 2026

L&G MARKET NEUTRAL COMMODITIES UCITS ETF

A sub-fund of Legal & General UCITS ETF Plc, an umbrella investment company with variable capital and segregated liability between its Funds.

This Supplement contains information relating to the L&G Market Neutral Commodities UCITS ETF (the "Fund") which is a separate Fund of Legal & General UCITS ETF Plc (the "Company"). This Supplement forms part of and should be read in the context of, and together with, the Prospectus dated 18 September 2026. If you are in any doubt about the action to be taken or the contents of this Supplement, please consult your stockbroker or other financial adviser. Investors should note that this Fund will pursue its investment policy principally through investment in FDIs. Potential investors should consider the risk factors set out in the Prospectus and in this Supplement before investing in this Fund. An investment in the Fund involves certain risks and may only be suitable for persons who are able to assume the risk of losing their entire investment.

FUND DETAILS

Base Currency	USD.
Investment Approach	Index Tracking – Synthetic Replication (Unfunded OTC Swap Model).
Eligible Assets	Total Return Swaps; Equity Securities; Bond Securities (namely government bonds or supranational bonds); forward currency contracts (including non-deliverable forwards), cash; Money Market Funds.
Securities Financing Transactions	Repurchase, Reverse Repurchase: Maximum 100%, Expected 0-100%. TRS Transactions: Maximum 200%, Expected 100-200%.
SFDR	Article 6. The investments underlying the Fund do not take into account the EU criteria for environmentally sustainable economic activities.
Index	Barclays Backwardation Tilt Alpha Capped ex-Precious Metals 1.75x TR Index.
Index Rebalancing	Annually (with the long/short leveraged exposure between the Long Underlying and the Short Underlying (both as defined below) being rebalanced on a monthly basis).
Index Characteristics	The Index represents 175% leveraged exposure to the performance of the Barclays Backwardation Tilt Alpha Capped ex-Precious Metals ER Index (the "Long Underlying") relative to the performance of the Bloomberg Commodity ex-Precious Metals Index (the "Short Underlying"), and the returns on cash collateral to form a "fully collateralised" investment.
Additional Index Details	Further information on the Index methodology, constituents and weightings can be found here.
TER	Unhedged Classes: 0.39%, Hedged Classes: 0.44%.
Minimum Subscription / Redemption Amount	USD 1,000,000, expressed in the class currency of the relevant class.
Initial Offer Price	Approximately USD 10, expressed in the class currency of the relevant class.
Initial Offer Period	Unlaunched Shares in each class will be available at the Initial Offer Price from 9 am UK time on 21 September 2026 to 4:00 pm on 19 March 2027 or such earlier or later date as the Directors may determine and notify to the Central Bank.
Transaction Charges	In respect of each subscription or redemption of Shares, the Manager (or its delegate) may apply Duties and Charges or an Anti-Dilution Levy either as a fixed amount or on an actual cost basis. Any fixed charge shall not exceed 5% of the Net Asset Value of the Shares subscribed for or redeemed.

Capitalised expressions used and not defined in this Supplement shall bear the meanings as set out in the Prospectus.

INVESTMENT OBJECTIVE

The investment objective of the Fund is to provide a long/short exposure to a broad base of futures contracts on physical commodities.

INVESTMENT POLICY

In order to achieve this investment objective, the Fund will seek to track the performance of the Index, before the deduction of the TER and other Fund expenses, as further described under "*Fees and Expenses*" in the Prospectus. It will do so by seeking to be fully exposed to the performance of the Index using "unfunded" total return OTC swaps with one or more counterparties (each, a "**Long Index Swap**"), as described under "*Unfunded OTC Swap Model*" and in Schedule II of the Prospectus.

In tracking the performance of the Index, the Fund may have an indirect exposure to the individual commodities comprised within the Index of up to 20% of its Net Asset Value, which limit may be raised to 35% for a single commodity in exceptional market conditions, including (but not limited to) circumstances in which such commodity occupies a dominant market position.

The Long Underlying and the Short Underlying provide exposure to a diversified portfolio of commodity futures across the energy, industrial metals, livestock, and agriculture sectors.

Each commodity component included in the Long Underlying is also included in the Short Underlying; however, the weighting of a commodity component and the maturity and rolling frequency of the commodity futures contracts selected for that component are expected to differ between them.

The returns of the Long Underlying and the Short Underlying comprise: (i) the "spot" return reflecting day-to-day changes in commodity futures prices; and (ii) the "roll" return resulting from periodically replacing maturing futures contracts with longer dated contracts. The Index reflects the relative performance of the Long Underlying and the Short Underlying together with a collateral return, which may include investments in U.S. Treasury Bills or other market-standard alternatives, including rates derived from secured overnight financing transactions. Where the prices of futures positions in the distant delivery months are lower than in the nearer delivery months, the market for futures contracts is said to be in "backwardation". Conversely, where the prices of futures positions in the distant delivery months are higher than in the nearer delivery months, the market for futures contracts is said to be in "contango". The presence of contango in commodity markets may result in negative roll yields, as futures contracts are rolled into higher-priced, longer dated contracts.

For each commodity, the Long Underlying selects futures contracts based on favourable implied roll yield and/or momentum characteristics and assigns higher weights to commodity futures exhibiting higher levels of backwardation or lower levels of contango. This selection and weighting process is not a feature of the Short Underlying.

As the Long Underlying and the Short Underlying comprise substantially the same commodity universe, exposure to individual commodities is largely offset between them. Accordingly, the Index is designed to maintain a market-neutral position, with returns driven primarily by differences in contract selection, rolling methodology and weighting between the Long Underlying and the Short Underlying, rather than by broad movements in commodity prices.

RISK MANAGEMENT

The Investment Manager uses relative value-at-risk to assess the global exposure of the Fund on a daily basis.

The Fund may utilise the *"Reverse Repurchase Agreement"* model and the *"Short Basket Swap"* model, each as described in the "*Unfunded OTC Swap Model*" section in the Prospectus, or a combination of the two models.

The actual level of leverage at any given time will vary according to the degree to which the Fund is invested in each of the respective models at such time, as well as the incremental leverage arising

within the Index. Accordingly, the Fund is expected to be leveraged between 450% and a maximum of 560% of its Net Asset Value at any given time.

PROFILE OF A TYPICAL INVESTOR

It is expected that investors in the Fund will be sophisticated investors (and/or informed investors who have taken professional advice) who: (i) are familiar with commodity futures contracts and understand the concepts "rolling", "backwardation" and "contango" and the impact that these concepts may have on the performance of the Index; (ii) understand the risks associated with an investment in the Fund; and (iii) are able to bear the risk of losing their entire investment over the medium to long term.

RISK FACTORS

Investors are referred to "*Risk Factors*" and Schedule II of the Prospectus and should consider all relevant risk factors prior to investing in the Fund. Investors should consider, in particular those relating to Shares, Index Tracking-Related Risks, Investing in FDIs, Commodities and Commodities Future Risks.

INDEX DISCLAIMER

Neither the Index Provider nor any of its affiliates (collectively "**Barclays**") is the issuer or producer of L&G Market Neutral Commodities UCITS ETF (the "**Fund**") and Barclays has no responsibilities, obligations or duties to investors in the Fund. Barclays Backwardation Tilt Alpha Capped ex-Precious Metals 1.75x TR Index (the "Index") is a trademark owned by the Index Provider and, together with any component indices and index data, is licensed for the benefit of Legal & General UCITS ETF PLC as the issuer or producer of the Fund (the "Issuer").

Barclays' only relationship with the Issuer in respect of the Index is the licensing of the Index, which is administered, compiled and published by the Index Provider without regard to the Issuer or the Fund or investors in the Fund. Additionally, Legal & General UCITS ETF PLC as issuer or producer of the Fund may for itself execute transaction(s) with Barclays in or relating to the Index in connection with the Fund. Investors acquire the Fund from Legal & General UCITS ETF PLC and investors neither acquire any interest in the Index nor enter into any relationship of any kind whatsoever with Barclays upon making an investment in the Fund. The Fund is not sponsored by Barclays.

The Index Provider role is performed by Barclays Index Administration ("BINDA"). BINDA is a distinct function within the Index Provider. As the administration function providing Barclays' indices, BINDA operates independently from the Index Provider's sales, trading and structuring desks and investment managers. Notwithstanding the foregoing, potential conflicts of interest exist as a consequence of the Index Provider operating index administration alongside its other businesses.

Please note the following in relation to Barclays' indices:

- The Index Provider may act in multiple capacities with respect to a particular index including, but not limited to, functioning as index sponsor, index administrator, calculation agent, licensing agent, and/or publisher.
- Sales, trading or structuring desks in the Index Provider may launch products linked to the performance of an index. These products are typically hedged by the Index Provider's trading desks. In hedging an index, a trading desk may purchase or sell constituents of that index. These purchases or sales may affect the prices of the index constituents which could in turn affect the level of that index.
- The Index Provider may establish investment funds that track an index or otherwise use an index for portfolio or asset allocation decisions.

The Index Provider has in place a control framework designed to avoid or otherwise appropriately manage conflicts of interest and ensure the independence of BINDA and the integrity of Barclays' indices. Where permitted, and subject to appropriate restrictions, BINDA personnel interact with trading and structuring desk personnel regarding current market conditions and prices, although decisions made by BINDA are independent and not improperly influenced by trading and structuring desk personnel. Additional information about the Index Provider's index administration control framework is available upon request to BINDA at barclaysindexadministration@barclays.com.

The Index Provider is under no obligation to continue the administration, compilation and publication of the Index or the level of the Index. While the Index Provider currently employs the methodology ascribed to the Index (and application of such methodology shall be conclusive and binding), no assurance can be given that market, regulatory, juridical, financial, fiscal or other circumstances (including, but not limited to, any changes to or any suspension or termination of or any other events affecting any constituent within the Index) will not arise that would, in the view of the Index Provider, necessitate an adjustment, modification or change of such methodology. In certain circumstances, the Index Provider may suspend or terminate the Index. The Index Provider has appointed the Calculation Agent to calculate and maintain the Index. While the Index Provider is responsible for the operation of the Index certain aspects have thus been outsourced to the Calculation Agent.

Neither Barclays nor the Index Provider
(a) makes any representation or warranty, express or implied to the Issuer or any member of the public regarding the advisability of investing in transactions generally or the ability of the Index to track the performance of any market or underlying assets or data; or
(b) has any obligation to take the needs of the Issuer into consideration in administering, compiling or publishing the Index.

Barclays has no obligation or liability in connection with administration, marketing or trading of the Fund.

BARCLAYS DOES NOT GUARANTEE, AND SHALL HAVE NO LIABILITY TO THE PURCHASERS AND TRADERS, AS THE CASE MAY BE, OF THE TRANSACTION OR TO THIRD PARTIES FOR THE QUALITY, ACCURACY AND/OR COMPLETENESS OF THE INDEX OR ANY DATA INCLUDED THEREIN OR FOR INTERRUPTIONS IN THE DELIVERY OF THE INDEX. BARCLAYS MAKES NO EXPRESS OR IMPLIED WARRANTIES, AND HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE INDEX INCLUDING, WITHOUT LIMITATION, THE INDICES, OR ANY DATA INCLUDED THEREIN. IN NO EVENT SHALL BARCLAYS HAVE ANY LIABILITY FOR ANY SPECIAL, PUNITIVE, INDIRECT, OR CONSEQUENTIAL DAMAGES, OR ANY LOST PROFITS, EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES SAVE TO THE EXTENT THAT SUCH EXCLUSION OF LIABILITY IS PROHIBITED BY LAW.

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