

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:

Deutsche Bank Vermögensmandat uses criteria defined by Institutional Shareholder Services Germany AG (formerly oekom research AG) for guidance

Legal entity identifier (LEI-Code):

7LTFWZYICNSX8D621K8

Environmental and/or social characteristics

Sustainable investment

means an investment in an economic activity that contributes to 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.

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 made **sustainable investments with a social objective**: __ %

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of __ % 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 promoted E/S characteristics, but **did not make any sustainable investments**



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

Certain sustainability criteria are taken into account in the selection of investment instruments for discretionary portfolio management purposes. To this end, the Bank uses reference data supplied by Institutional Shareholder Services Germany AG (formerly oekom research AG) ('ISS'), which helps the Bank to exclude investments in issuers that operate in certain lines of business (subject to defined revenue thresholds) and/or use certain business practices as well as investments in states that engage in certain social and/or environmental practices.

In order to be eligible for investment as part of the discretionary portfolio management, bonds and equities must, as a minimum, not meet any of the exclusion criteria defined for the agreed strategy in relation to selected aspects of sustainability. This determination is made on the basis on the information available to ISS. Private companies or groups of companies should be excluded if the volume of revenue they generate from a problematic business line exceeds the tolerance threshold (target) for that business line or if they use problematic business practices. In addition, state issuers should be excluded if they engage in problematic social or environmental practices.

A separate portfolio is created for each discretionary portfolio management agreement. The dedicated reporting in relation to each discretionary portfolio management agreement discloses the extent to which the relevant portfolio actually took account of the ISS positive list in the period from 1 January 2022 to 31 December 2022.

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

● How did the sustainability indicators perform?

Investors who have entered into a Deutsche Bank Vermögensmandat agreement for discretionary portfolio management services using an investment strategy that applies criteria defined by ISS are provided with a personalised report entitled "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" for their portfolio for 2022. The dedicated reporting in relation to each discretionary portfolio management agreement discloses the extent to which the relevant portfolio was, at specific reference dates in the period from 1 January 2022 to 31 December 2022, invested in instruments that were included on the positive lists compiled by ISS in accordance with the exclusion criteria defined for the agreed investment strategy. Liquidity in the form of account balances, including short-term deposits, was excluded from this calculation.

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

No sustainable investments were made.

Consideration of EU criteria for environmentally sustainable economic activities (EU Taxonomy)

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

This financial product therefore does not contribute to the objectives of 'climate change mitigation', 'climate change adaptation', 'sustainable use and protection of water and marine resources', 'transition to a circular economy', 'prevention and control of pollution' and 'protection and restoration of biodiversity and ecosystems' as defined in the EU Taxonomy.

As the discretionary portfolio management approach currently does not pursue a minimum percentage of sustainable investments that qualify as environmentally sustainable in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation), no data is currently being collected on whether some investments in the portfolio do fully or partially comply with the Taxonomy Regulation.



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

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

Principal adverse impacts on sustainability factors were not taken into account.



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:

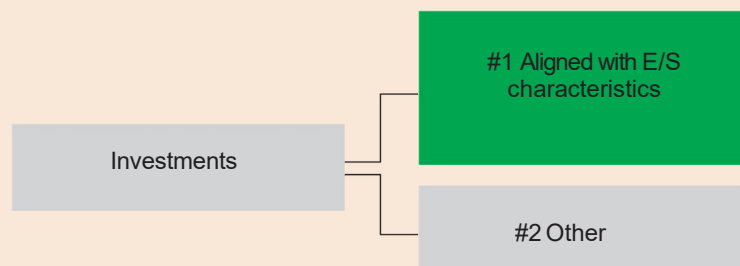
The top investments of a discretionary portfolio management mandate are specific to each individual portfolio. Investors who have entered into a Deutsche Bank Vermögensmandat agreement for discretionary portfolio management services using an investment strategy that applies criteria defined by ISS are provided with a personalised report entitled "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" for their portfolio for 2022, which specifies the portfolio's key investments.



What was the proportion of sustainability-related investments?

● What was the asset allocation?

Asset allocation describes the share of investments in specific assets.



#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 asset allocation used for a discretionary portfolio management mandate is specific to each individual portfolio. Investors who have entered into a Deutsche Bank Vermögensmandat agreement for discretionary portfolio management services using an investment strategy that applies criteria defined by ISS are provided with a personalised report entitled "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" for their portfolio for 2022, which specifies the relative weightings of #1 and #2 in per cent.

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

Relative weighting of portfolio investments by economic sector

The allocation of assets to different economic sectors under a discretionary portfolio management mandate is determined individually for each portfolio. Investors who have entered into a Deutsche Bank Vermögensmandat agreement for discretionary portfolio management services using an investment strategy that applies criteria defined by ISS are provided with a personalised report entitled “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” for their portfolio for 2022, which contains more detailed information on the weighting of assets.

Relative weighting of portfolio investments by economic subsector

The allocation of assets to different economic subsectors under a discretionary portfolio management mandate is determined individually for each portfolio. Investors who have entered into a Deutsche Bank Vermögensmandat agreement for discretionary portfolio management services using an investment strategy that applies criteria defined by ISS are provided with a personalised report entitled “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” for their portfolio for 2022, which contains more detailed information on the weighting of assets.



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

Sustainability criteria are not applied to account balances (incl. short-term deposits) and money market funds.

The proportion of account balances (including short-term deposits) and money market funds is being maintained for short-term liquidity management purposes. The „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“ prepared for each individual discretionary portfolio management agreement for 2022 describes the extent to which the relevant portfolio took account of the ISS positive list in the period from 1 January 2022 to 31 December 2022.

This means that no minimum environmental or social safeguards apply to investments in the category ‘Other’.



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

The Bank uses the latest positive lists provided by ISS as guidance when selecting investment instruments. In order for an issuer to be eligible for inclusion in a positive list, the issuer must not meet any of the exclusion criteria defined for the agreed strategy in relation to selected aspects of sustainability. This determination is made on the basis of the information available to ISS. Private companies or groups of companies should be excluded if the volume of revenue they generate from a problematic business line exceeds the tolerance threshold (target) for that business line or if they use problematic business practices. In addition, state issuers should be excluded if they engage in problematic social or environmental practices.

ISS regularly provides the Bank with updated positive lists. Bonds and equities meet the sustainability criteria defined for the agreed strategy at the point in time when the decision to purchase the investment instrument is made.