

30 June 2024 (supersedes the statement dated 19 October 2023)

Deutsche Bank AG, 7LTWFZYICNSX8D621K86 Summary

Deutsche Bank AG, 7LTWFZYICNSX8D621K86, considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Deutsche Bank AG.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

This statement is provided under the Sustainable Finance Disclosure Regulation (SFDR) – Regulation (EU) 2019/2088, which defines financial market participants (FMPs) and inscope financial products. Therefore, this disclosure of principal adverse impacts applies to Deutsche Bank AG business units¹ to the extent it is an investment firm which provides portfolio management to EU clients.

Principal adverse impacts are defined by the European Commission as "negative, material, or likely to be material effects on sustainability factors that are caused, compounded by, or directly linked to investment decisions and advice performed by the legal entity". The principal adverse impacts, including their identification, prioritisation, and any action to be taken to manage exposure to them, will be reviewed by Deutsche Bank wide governance forums in accordance with the Deutsche Bank Policy Governance Framework. Currently, Deutsche Bank AG follows a principle-based approach. As the regulatory requirements and associated data change on an ongoing basis, Deutsche Bank AG is fully committed to integrating a more thorough and exhaustive principal adverse impact framework into its discretionary portfolio management services in alignment with such developments.

Since 10 March 2021, Deutsche Bank AG makes data relating to selected principal adverse impacts transparent for the investment universe, enabling informed decisions in the selection process for the construction of relevant financial products. The focus is on making the data available within the processes for selection of underlying products for Deutsche Bank AG's managed portfolios. It is of the utmost importance that Deutsche Bank AG, given its fiduciary capacity, make all investment decisions in the best interests of its clients and, in doing so, take all financial and risk factors into account. Considering principal adverse impacts is therefore an additional aspect to be reviewed by Deutsche Bank AG's portfolio managers when making investment decisions, but not automatically outweighing other relevant factors. Deutsche Bank AG works with third-party data providers to help it to obtain the required data and monitor its investable product universe. This enables it to include information on the principal adverse impacts across the applicable universe on a monthly basis.

While Deutsche Bank AG carries out quantitative reporting in respect of all mandatory principal adverse impacts set out in the SFDR, it considers – in its role as a financial market participant – prioritised principal adverse impact indicators within its investment process. Indicators are selected on the basis of data availability, alignment with adverse activities on which Deutsche Bank is particularly focused and the ESG

cation across different regions, asset classes and sectors, which means that principal adverse impacts are not always applicable, or data is not readily available for all of the securities invested in.

The prioritised principal adverse impacts are as follows:

— Greenhouse gas (GHG) emissions

— Exposure to fossil fuels

Investment Classification Criteria, which set out the standards to be met in the manufacturing of ESG investment prod-

ucts. The investment process must allow for robust asset allo-

Industries that derive revenues from the exploration, mining, extraction, distribution or refinement of solid, liquid or gaseous fuels (i.e., coal, oil, natural gas)

Carbon emissions

The carbon dioxide equivalents released by a company, measured by volume and intensity

Social and employee matters

Compliance with United Nations Global Compact principles

At a minimum, companies need to fulfil fundamental responsibilities in the areas of human rights, labour, the environment and anti-corruption

Exposure to controversial weapons

Companies that have an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. An industry tie includes ownership, manufacture or investment

Deutsche Bank AG will continue to monitor its exposure to adverse sustainability indicators and, where applicable, may adapt its strategy in accordance with publication of each annual quantitative statement.

As standards regarding the consideration of sustainability criteria are still emerging and reporting frameworks have not yet come into force, data is currently not always available from the investee companies, the bank's issuers or third-party data providers, especially with regard to the adverse impacts on sustainability factors.

Description of the principal adverse impacts on sustainability factors

Deutsche Bank AG discloses data related to principal adverse impact (PAI) on sustainability factors for products where it acts as a financial market participant and in the scope of the SFDR. The following disclosure is an aggregation of all inscope assets of Deutsche Bank AG including branches that may not serve EU clients². The data is relevant for the reference period 1 January to 31 December 2023.

At this point in time, data availability and data quality for principle adverse impact on sustainability factors of the financial investment universe are still evolving. This is due to various factors including, but not limited to, alignment and applicability of reporting standards for investee companies and sovereign issuers, evolving methodologies for calculation of sustainability indicators and ongoing efforts in the market and by data providers to make data accessible and standardised. Deutsche Bank AG considers the data is not yet sufficient to derive

¹ Business units within the legal entity that fall under the scope of the SFDR are limited to the Private Bank. The Corporate Bank and Investment Bank divisions do not meet the definition of FMP or create the scope of financial products as defined by the regulation.

² Branches in Singapore and Hong Kong offer portfolio management services but do not serve EU clients. As a branch of an EU Entity, the assets are included for quantitative PAI reporting.



well-founded decisions regarding actions to be taken. It is possible that, as data availability and quality improve, the effect on principal adverse impacts could increase organically beyond the control of Deutsche Bank AG.

Additionally, following the targeted consultation of SFDR in September 2023 there is potential for further changes to the regulation that may invalidate any actions set. Therefore, for its current quantitative reporting Deutsche Bank AG will continue to disclose and monitor its principal adverse impacts of its investment decisions on sustainability factors but without deriving any planned actions or applying thresholds for the following reference period to avoid or reduce the principal adverse impacts.

Deutsche Bank AG will review its current approach on an annual basis.

The investment universe for which Deutsche Bank AG acts as a financial market participant includes all assets including investee companies, sovereign issuers, indirect investments (funds), derivatives, commodities and cash. Following evolving guidelines, Deutsche Bank AG updated its approach to calculation of adverse impacts to consider only the applicable investments that are relevant to that indicator³. This change in methodology means that year on year numbers are not directly comparable and so, to aid this, additional "memo" values have been included in the table with proxy values for 2022 based on the updated methodology further enable a more consistent year on year comparison⁴. Further information is also included in the explanation column for each adverse impact where necessary.

For the current reference period, Deutsche Bank AG includes information on the coverage, which is represented as a percentage share of the applicable investments for which adverse impact data was available.

The coverage values also reflect the change in methodology where in 2022 this was shown as a share of all investments, but for 2023 onwards reflects as a share of the applicable investments only. The full investment universe for Deutsche Bank AG in 2023 consisted of 77.34% investments into investee companies, 12.54% investments into sovereigns and supranationals, and 10.12% investments into other instruments for which adverse impacts are not currently applicable.

The calculation for the impact value is based on principal adverse impact data for investee companies and sovereigns and indirect investment products (Funds) sourced from a third-party data provider assessed against four snapshots of the assets managed during the reference period (31 March / 30 June / 30 September / 31 December).

Annual impact is the consolidated figure for all branches in scope for Deutsche Bank AG, based on the weighted average of the assets under management for the reported year. The number disclosed is an absolute value of impact, and variations in year-on-year values can also be linked to changes in the volume of assets.

³ The applicable investment universe is determined by the adverse impact indicator but will be limited to investee companies and indirect investments (Funds) for indicators applicable to investee companies, and to sovereign issuers and indirect investments (Funds) for indicators applicable to sovereigns. All non applicable assets, such as derivatives, commodities, and cash are excluded. In 2022, coverage values were representative also of the asset mix, including those not relevant for the adverse impacts.

⁴ Due to the significant methodology changes in the calculation of adverse impacts, additional "memo" values have been included for Y2022 in order to show a more comparable year on year change. These have been calculated based on 2022 holdings, but against 2023 adverse impact data, therefore should not be considered as an exact representation of Y2022 and only a guide. The updated methodology also includes adjustments to the value of investments in each snapshot to align with the year-end enterprise value. This is designed to offset market volatility's effect on PAIs that link to a company's enterprise value (PAIs 1,2,8 and 9). This has only been applied to equity instruments due to limitations in data and lack of clarity on other asset types.



Adverse sust			Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period ⁷				
Indicators ap	ndicators applicable to investments in investee companies									
Climate and	other related enviror	nment-related indica	tors							
			Y2023	Y20228						
Green- house gas emissions	1. GHG Emissions	Scope 1 GHG emissions	1.530,805 (90.14%)	957,735 (46.16%) Memo: 1.240,042 (90.60%)	Explanations for changes in year on year PAI values are attributable to a variety of reasons and so are summarised collectively:	At this point of time data availability and data quality for principle adverse impact on sustainability factors is still evolving. This is due to various factors including but not limited to, alignment and applica-				
		0	tons CO2e	tons CO2e	Entity calculations:	bility of reporting standards for				
		Scope 2 GHG emissions	326,271 (90.14%)	193,613 (46.16%) Memo: 250,514 (90.60%)	The bank approach for 2023 changed to consider only the investments applicable for the given adverse impact.	investee companies and sovereign issuers, evolving methodologies for calculation of sustainability indicators and ongoing efforts in the market and data providers to make data accessible and standardized. It is possible that as data availability and quality improve the impact on principal adverse impacts could increase organically and beyond the control of Deutsche Bank AG. Additionally, following the targeted consultation of the SFDR regulation in September 2023 there is potential for further changes to the regulation that may invalidate any actions set. Therefore, for its current quantitative reporting Deutsche Bank AG will continue to disclose and monitor its principal adverse impacts of its investment decisions on sustainability factors but without deriving any planned actions or applying thresholds for the following reference period				
			tons CO2e	tons CO2e	Data quantity and					
		Scope 3 GHG emissions Total GHG emissions	8.151,062 (90.11%)	4.501,848 (46.16%)	quality: Changes in company reporting and increase in available data. Standardised data for- matting completed by data providers to en- sure consistency in val- ues. Data update cy- cles also differ across PAIs, due to variances in investee company reporting timeframes, and sourcing from data providers. The third party data provider also observed and applied several data updates/ correc- tions Changes in methodol-					
				Memo: 7,430,810 (90.58%)						
			tons CO2e	tons CO2e						
			10,008,142 (90.13%)	5.653,197 (46.16%)						
				8.921,365 (90.59%)						
			tons CO2e	tons CO2e						
	2. Carbon footprint	Carbon footprint	487.20 (90.07%)	494.24 (73.00%)						
				Memo: 467.34 (90.54%)						
			tons CO2e/ EUR M	tons CO2e/ EUR M	ogy for PAIs: PAI 1 : GHG emissions In Y2023, data for indi-					
	of investee of	GHG intensity of investee companies	921.34 (95.42%)	961.07 (73.74%)	rect investments were included for the first time. These are proxy					
				Memo: 849.34 (94.29%)	values based on emis- sions per EUR million invested due to a lack of ready information on					
			tons CO2e/ EUR M Revenue	tons CO2e/ EUR M Revenue	actual investor share for these products					
	companies active min the fossil fuel ni	Share of invest- ments in compa- nies active in the fossil fuel sector	10.32 (94.85%)	8.98 (81.09%)						
				Memo: 11.02 (93.74%)						
			per cent	per cent						



Adverse sustainability indicator	Metric	Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period?
		Y2023	Y2022 ⁸		
5. Share of non-renewable energy consumption and production	Share of non- renewable energy consump- tion and non- renewable ener- gy production of investee compa- nies from non- renewable ener- gy sources com- pared to renewa- ble energy sources, ex- pressed as a per- centage	63,79 (70.9%) per cent	72.84 (68.85%) Memo: 63.52 (68.26%) per cent		
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh culture, per forest-ry, and EUR of revenue of investee companies, per high impact climate sector NACE Code B: Manufacturing NACE Code C: Manufacturing NACE Code D: Electricity, gas, steam and air conditioning supply NACE Code E: Water supply; sewerage; waste manage-ment and remediation action action action action in culture in condition in culture in condition in culture in condition in culture in culture, derivative, and culture, forest-ry, and culture, fishing ry, and	GwH/million EUR revenue 0.78 (88.28%) GwH/million EUR revenue 0.67 (88.28%) GwH/million EUR revenue 1.59 (88.28%) GwH/million EUR revenue 1.82 (88.28%) GwH/million EUR revenue	0.80 (65.70%) Memo: 0.78 (86.77%) GwH/million EUR revenue 8.89 (65.70%) Memo: 1.00 (86.77%) GwH/million EUR revenue 0.75 (65.70%) Memo: 0.68 (86.77%) GwH/million EUR revenue 4.97 (65.70%) Memo: 1.62 (86.77%) GwH/million EUR revenue 2.28 (65.70%) Memo: 1.63 (86.77%) GwH/million EUR revenue		



Adverse sustainability indicator		Metric	Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period ⁷
			Y2023	Y20228		
		NACE Code F: Con- struc- tion	0.16 (88.28%) GwH/million EUR revenue	0.26 (65.70%) Memo: 0.14 (86.77%) GwH/million EUR revenue		
		NACE Code G: Whole- sale and re- tail trade; repair of mo- tor ve- hicles and motor- cycles	2.98 (88.28%) GwH/million EUR revenue	0.43 (65.70%) Memo: 4.97 (86.77%) GwH/million EUR revenue		
		NACE Code H: Trans- porting and stor- age	0.66 (88.28%) GwH/million EUR revenue	0.90 (65.70%) Memo: 0.87 (86.77%) GwH/million EUR revenue		
		NACE Code L: Real estate activi- ties	0.56 (88.28%) GwH/million EUR revenue	0.86 (65.70%) Memo: 0.57 (86.77%) GwH/million EUR revenue		
Bio- diversity	7. Activities neg- atively affecting biodiversity- sensitive areas	Share of invest- ments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies nega- tively affect those areas	13.07 (95.27%) per cent	0.04 (81.09%) Memo: 11.45 (94.13%) per cent	PAI 7: Activities negatively affecting biodiversity sensitive areas Data provider methodology change to consider broader array of factors that can contribute to negative activites in biodiversity-sensitive areas	
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.29 (0.92%) tons/EUR M invested	6.44 (10.70%) Memo: 0.32 (1.04%) tons/EUR M invested	PAI 8: Emissions to Water Data changes in re- ported values to con- sider only polluting emissions	



Adverse sustainability indicator		Metric	Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period ⁷
			Y2023	Y2022 ⁸		
Waste	9. Hazardous waste ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	5.93 (37.87%) tons/EUR M invested	2099.60 (30.56%) Memo: 5.12 (37.92%) tons/EUR M invested		
Indicators fo	or social and employe	e, respect for humar	rights, anti-corr	ruption and anti-l	bribery matters	
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of invest- ments in investee companies that have been in- volved in viola- tions of the UNGC principles or OECD Guide- lines for Multina- tional Enterprises	0.12 (95.40%) per cent	17.38 (81.09%) Memo: 0.22 (94.27%) per cent	PAI 10: Violations of UNGC and OECD Adjusted methodology to only look at violations as per data provider methodology (prior numbers considered also unconfirmed violations)	See comments above for Deutsche Bank AG approach to actions
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of invest- ments in investee companies with- out policies to monitor compli- ance with the UNGC principles or OECD Guide- lines for Multina- tional Enterprises or grievance complaints han- dling mecha- nisms to address violations of the UNGC principles or OECD Guide- lines for Multina- tional Enterprises	0.37 (94.86%) per cent	45.20 (80.60%) Memo: 0.42 (93.75%) per cent	PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UNGC and OECD Data provider change in methodology to consider a broad array of public disclosed policies	
	12. Unadjusted gender pay gap	Average unad- justed gender pay gap of inves- tee companies	9.66 (15.66%)	12.79 (19.79%) Memo: 9.15 (14.24%)		
	13. Board Gender Diversity	Average ratio of female to male board members in investee com- panies	35.78 (93.93%)	34.60 (74.41%) Memo: 35.60 (93.26%)		
			per cent	per cent		
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of invest- ments in investee companies in- volved in the manufacture or selling of contro- versial weapons	0.05 (95.21%) per cent	0.03 (81.43%) Memo: 0.04 (94.07%) per cent		



Adverse sustainability indicator		Metric	Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period ⁷					
			Y2023	Y2022 ⁸							
Indicators ap	Indicators applicable to investments in sovereigns and supranationals										
Environ- mental	15. GHG Intensity	GHG intensity of investee countries	273.94 (80.06%) t CO2e/M EUR GDP	346.82 (8.99%) Memo: 300.54 (84.57%) t CO2e/M EUR GDP	See comments above for general explanations	See comments above for Deutsche Bank AG approach to actions					
Social and employee matters	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	8.24 (80.06%) Count of Countries ⁹ 6.93 (80.06%) Violations/ Total Sovereign	7.71 (9.07%) Memo: 8.00 (84.57%) Count of Countries ⁹ 0.49 (9.07%) Memo: 6.72 (84.57%) Violations/ Total Sovereign	PAI 16: Investee Countries subject to social violations Data provider only considers countries subject to EU sanctions. Change in methodology for reporting relative number. Previously considered the % of AuM invested in sanc- tioned countries. New approach considers the % of sanctioned countries as a share of all unique countries invested in						
Fossil Fuels	17. Exposure to fossil fuels through real estate assets	Share of invest- ments in real es- tate assets in- volved in the extraction, stor- age, transport or manufacture of fossil fuels	(1.36%)	(1.18%)	Due to limited/no data on real estate assets from data providers, no impact can be provided for PAI 17 and 18 ¹⁰	Identifying potential PAI data sources that can supply real estate data					
Energy	18. Exposure to energy-ineffi- cient real estate assets	share of invest- ments in energy inefficient real estate assets	(1.36%)	(1.18%)							
			per cent	per cent							



Adverse sustainability indicator		Metric	Impact (Coverage) ⁵		Explanation ⁶	Actions taken, and actions planned and targets set for the next reference period ⁷
			Y2023	Y2022 ⁸		
Additional cli	imate and other envi	ronment-related ind	icators			
Green- house gas emissions	4. Investments in companies without carbon emission reduction initiatives	Company's car- bon emission re- duction initia- tives aimed at aligning with the Paris Agreement	24.26 (93.42%)	39.73 (81.43%) Memo: 23.18 (92.77%) per cent	See comments in previous tables for general explanations	See comments in previous ta- bles for Deutsche Bank AG ap- proach to actions
Additional in	dicators for social an	d employee, respect	for human right	s, anti-corruptior	and anti-bribery matters	
Social and employee matters	14. Number of identified cases of severe human rights issues and incidents	Number of Severe and Very Severe Human Rights Issues and Incidents	0.00 (92.46%) cases/M EUR invested	0.00 (74.52%) Memo: 0.00 (92.54%) cases/M EUR invested	See comments in previous tables for general explanations	See comments in previous tables for Deutsche Bank AG approach to actions

⁵ Coverage is included as voluntary additional information. It is based on the percentage of the applicable investment universe for which data was available for the adverse impact indicator. The applicable investment universe is determined by the adverse impact indicator but will be limited to investee companies and indirect investments (Funds) for indicators applicable to investee companies, and to sovereign issuers and indirect investments (Funds) for indicators applicable to sovereign. All non applicable assets, such as derivatives, commodities, and cash are excluded.

Explanation has been consolidated across all adverse impacts to highlight the general changes in data that need to be considered when considering year on year comparisons for its current quantitative reporting Deutsche Bank AG will not include planned actions or apply thresholds for the following reference period, due to data limitations and regulatory

evolution.

8 Due to the significant methodology changes in the calculation of adverse impacts, additional "memo" values have been included for Y2022 in order to show a more comparable year on year change. These have been calculated based on 2022 holdings, but against 2023 adverse impact data, therefore should not be considered as an exact representation of Y2022 and only a guide.

Numbers are presented as an aggregation across branches and an average of 4 holding snapshots, it is possible not to include a whole number.
 Coverage is provided as a reference on % of portfolio exposed to Real Estate activities (NACE Code L).



Description of policies to identify and prioritize principal adverse impacts on sustainability factors

Deutsche Bank has established a robust governance structure, helping to manage, measure and monitor sustainability activities across the bank. This governance structure includes a number of forums devoted entirely to sustainability. The most senior is the Group Sustainability Committee, which was created in 2020. Chaired by the Chief Executive Officer and the Chief Sustainability Office (Vice Chair), it consists of Management Board members, the heads of Deutsche Bank business divisions and certain infrastructure functions.

Deutsche Bank AG applies an overarching approach to the management of sustainability, which is set out in various group-level policies and procedures.

As the regulatory requirements and data change on an ongoing basis, Deutsche Bank AG – where it acts as a financial market participant – does not have a single defined policy relating to principal adverse impacts. Where relevant, however, they are covered by existing procedure documents. Deutsche Bank AG is fully committed to integrating a more thorough and exhaustive principal adverse impact framework into its discretionary portfolio management services in alignment with such developments.

Frameworks for Deutsche Bank AG where it acts as a financial market participant describe the core processes, responsibilities, governance structures and monitoring environment. These stipulate that portfolio managers be provided with selected principal adverse impact information alongside the investment universe, enabling them to make informed decisions in the selection process for the composition of relevant managed portfolios. The focus is on making the data available within the processes for the selection of underlying products for Deutsche Bank AG's managed portfolios. It is of the utmost importance that Deutsche Bank AG, given its fiduciary capacity, make all investment decisions in the best interests of its clients and, in doing so, take all financial and risk factors into account. Considering these principal adverse impacts is therefore an additional aspect to be reviewed by Deutsche Bank AG's portfolio managers when making investment decisions, but will not automatically outweigh other relevant factors.

For financial products that follow an ESG investing approach, Deutsche Bank AG has additionally specified a ESG Classification Criteria Procedure (first issued 2021) that has to be adhered to. Deutsche Bank AG, in its role as a financial market participant, uses third-party data providers to exclude or set threshold limits on exposure to industries or practices that are aligned with select adverse sustainability indicators.

Deutsche Bank AG, in its role as a financial market participant, identifies and prioritises select principal adverse impact indicators within its investment process. The selection of indicators is determined via data availability, alignment with adverse activities within the focus by Deutsche Bank, and the ESG Investment Classification Criteria, which set out standards to be met for portfolio management that considers ESG criteria. The investment process must allow for a robust allocation

across different regions, asset classes and sectors, and, as such, principal adverse impacts are not always applicable or data is not readily available for all securities invested in. Deutsche Bank AG will continue to monitor its exposure to adverse sustainability indicators and, where applicable, may adapt its strategy in accordance with the publication of each annual quantitative statement.

Deutsche Bank also regularly performs an assessment to determine the materiality of non-financial topics for the bank and its stakeholders. As part of this assessment, Deutsche Bank assesses actual and potential positive and negative impacts as well as actual and potential risks and opportunities for environmental, social and governance topics in terms of Deutsche Bank's business activities, business relations, and products and services.

For the assessment of principal adverse impacts on sustainability factors, Deutsche Bank AG relies on data provided by third-party data providers. These providers expose data as reported by investee companies, or investment fund managers. If no data from the investee company or investment fund company is available, the third-party data provider may provide estimated data which can be used.

Deutsche Bank AG does not guarantee that this information is correct or complete. Furthermore, Deutsche Bank AG cannot guarantee the correctness of the third-party data provider's assessment. Deutsche Bank AG also has no influence on any disruptions to the third-party data provider's analysis and research preparation.

As the standards and the regulatory framework regarding the consideration of sustainability criteria are still evolving, data on the consideration of principal adverse impacts is not always available and there may still be restrictions on the consideration of the principal adverse impacts.

To minimise these restrictions, Deutsche Bank AG has carefully selected its third-party data provider and maintains close contact with regard to changes in the quality of the data.

Engagement policies

Where Deutsche Bank AG acts as a financial market participant for financial products within the scope of the Disclosure Regulation, it does not currently engage directly with investee companies and therefore does not influence their business activities or risks.

References to international standards

Deutsche Bank is embedding sustainability into its policies, processes and products, focusing on four dimensions: sustainable finance, policies and commitments, people and operations as well as thought leadership and stakeholder engagement. Making progress in these dimensions will enable Deutsche Bank to maximise its contribution to the achievement of the Paris Climate Agreement's targets and the United Nations (UN) Sustainable Development Goals.



To underpin its long-standing commitment to sustainability, Deutsche Bank follows internationally recognised principles for sustainable business and banking conduct and formally endorses universal sustainability frameworks and initiatives such as:

- the 10 principles of the UN Global Compact
- the Principles for Responsible Banking
- convened by the United Nations Environment Programme Finance Initiative the UN Guiding Principles on Business and Human Rights
- Signatory of the Net-Zero Banking Alliance

A full list and further details of the standards adhered to can be found at Deutsche Bank Policies & Commitments (db.com).

By taking into account certain internationally recognized standards, such as the conventions of the United Nations Global Compact Principles, setting a maximum involvement within certain sectors, e.g. thermal coal and/or unconventional oil/gas and by excluding activities in connection to e.g. controversial weapons such as landmines, cluster munitions, biological and chemical weapons, Deutsche Bank AG where acting as a financial market participant, indirectly aligns its portfolio management that considers ESG criteria to certain principal adverse impacts.

Within portfolio management services, Deutsche Bank AG collaborates with third-party data providers for data related to sustainability factors of investee companies for direct as well as indirect investments. For portfolio management that considers ESG criteria this includes, but is not limited to, assessing whether the investee universe has exposure to UN Global Compact or OECD Violations (PAI 10), and Controversial weapons (PAI 14).

For portfolio management services, Deutsche Bank AG is invested in developing net-zero aligned forward-looking climate scenarios, which are aligned to the Paris Climate Agreement. However, currently Deutsche Bank AG does not consider climate-scenarios in the investment decision process.