



Statement on consideration of the principal adverse impacts on sustainability factors when providing investment and insurance advice

30 December 2022 (supersedes the statement dated 10 March 2021)

When providing investment and insurance advice, Deutsche Bank AG ('the Bank') considers the principal adverse impacts on sustainability factors, which are explained below. The principal adverse impacts on sustainability factors are dealt with in Article 4 of Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation – SFDR). These principal adverse impacts on sustainability factors are specified in more detail in Article 11 of Delegated Regulation (EU) 2022/1288 of 6 April 2022.

In its capacity as an investment and insurance advisor, the Bank takes the following principal adverse impacts on sustainability factors into account for all finance products managed by EU legal entities within the meaning of the SFDR managed portfolios, alternative investment funds (AIF), insurance-based investment products (IBIP), pension products, pension schemes, undertakings for collective investments in transferable securities (UCITS), pan-European personal pension products (PEPP)¹:

— Exposure to fossil fuels

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

— Compliances 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

Industries that derive revenues from the manufacture or sale of controversial weapons (i.e. anti-personnel mines, cluster munitions, chemical, biological, radiological and nuclear weapons)

EU managers or manufacturers of managed financial products (financial market participants as defined by the SFDR) that, at the reporting date, meet the criterion of having on average more than 500 employees during the financial year are required to publish a statement on their strategy for considering and addressing the principal adverse impacts. We expect financial market participants' first statement to be a mainly qualitative statement on how they consider principal adverse impacts in their investment decision-making processes. The first quantitative assessments of the indicators are expected to be disclosed by 30 June 2023. We expect that more and more data will become available to investors and financial advisors after that date.

As part of our advisory due diligence process, we will review the principal adverse impact statements published by financial market participants and note where their actions and strategies to consider adverse impacts on sustainability factors align with those of the Bank. If, in the opinion of the Bank, a statement contains significant departures from the requirements laid down by the Bank, this may lead to us excluding the relevant manufacturer's products from the Bank's investment advice. Where managers or manufacturers of managed financial products publish indicators of adverse sustainability factors for their financial products from 30 June 2023 onwards, we will incorporate these into our overall qualitative assessment of these financial products. We have not defined any thresholds, rankings or weightings for the indicators in this regard. A key issue for consideration in the assessment processes is whether the indicators for a financial product improve over time. The enhanced due diligence process provides the basis for more clarity and transparency regarding the principal adverse impacts that financial market participants consider in their investment decisions. This enables us to identify products that do not meet our quality requirements and can result in us not recommending those financial products.

¹ Not all of these products are currently included in our advisory business.