



**Pre-contractual 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**

**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.

**Product Name :** DB ESG Strategic Asset Allocation (SAA) (Plus)      **Legal entity identifier (LEI-Code)** 529900FIAMEJDQ8C9097

**Environmental and/or Social Characteristics**

**Does this financial product have a sustainable investment objective?**

**Yes**
  **No**

<input type="checkbox"/> It will make a minimum of <b>Sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>
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## What environmental and/or social characteristics are promoted by this financial product?

- **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

DB ESG SAA (Plus) considers environmental and social characteristics in selecting financial instruments. However, it does not aim for sustainable investment or contribute to achieving an environmental or social objective in the meaning of EU regulation 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR).

The evaluation of sustainability criteria that are taken into consideration for the investments within the strategy is based exclusively on positive lists provided and updated by MSCI ESG Research (UK) Limited and MSCI ESG Research LLC (all "MSCI").

For funds, MSCI calculates a 'fund ESG quality score', which represents the weighted average of the individual ESG ratings of the assets held in the fund based on the latest inventory of positions published by the fund.

The minimum requirement for the inclusion of an investment fund in a positive list is that MSCI has given it an ESG rating of 'BBB' or higher, if the investment fund is listed by MSCI in a peer group with a name containing the term 'emerging markets' or 'high yield', or if, based on its peer group, the investment fund invests in equities from a country whose public limited companies are included in the MSCI Emerging Markets (EM) index. For any other investment fund, the minimum requirement for inclusion in a positive list is that MSCI has awarded it an ESG rating of 'A' or higher.

In the investment decision making process for investment funds (with the exception of those that are predominantly invested in sovereign bonds or other investment instruments issued by states), principal adverse impacts on sustainability factors ('PAIs') are considered additionally.

According to EU regulation 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR), PAIs should be understood as those impacts of investment decisions that result in negative effects on sustainability factors in environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

At least 51% of the portfolio (excl. liquidity in the form of account balances and shortterm deposits) is aimed to be invested in investment instruments that take into account PAIs based on the criteria defined below.

Currently, PAIs are considered in the investment decision making process as described below:

- In the investment decision making process for investment funds, PAIs are considered only to those funds that are not predominantly invested in sovereign bonds or other investment instruments issued by states. This is done via an exclusion approach based on the information obtained by the investment / fund company or MSCI.

Thereby, investment funds that do not take into consideration at least one indicator of the PAI families

- Greenhouse gas emissions as well as
  - Social and employee matters
- are excluded.

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



- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

No sustainable investments are 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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

- ✘ **Yes**, In the investment decision making process for investment funds (with the exception of those that are predominantly invested in sovereign bonds or other investment instruments issued by states), Principal adverse impacts on sustainability factors ('PAIs') are considered additionally.

At least 51% of the portfolio (excl. liquidity in the form of account balances and short-term deposits) shall be invested in investment instruments that take into account PAIs based on the criteria defined below.

Currently, PAIs are considered in the investment decision making process as described below:

- In the investment decision making process for investment funds, PAIs are considered only to those funds that are not predominantly invested in sovereign bonds or other investment instruments issued by states. This is done via an exclusion approach based on the information obtained by the investment / fund company or MSCI.

Thereby, investment funds that do not take into consideration at least one indicator of the PAI families

- Greenhouse gas emissions as well as
  - Social and employee matters
- are excluded.

Information on the taking into account of the main adverse impacts on sustainability factors can be found in the 'Regulation information on financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and Article 6(1) of Regulation (EU) 2020/852', which are made available as part of year-end reporting or can be retrieved under

**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.



No



## What investment strategy does this financial product follow?

The assets under management are broadly diversified to implement a specific risk return-profile with additional focus on environmental, social or governance (“ESG”) aspects. The objective is to generate performance for the managed assets that is oriented towards that of the capital markets, within the limits of the strategy agreement concluded with the Client and the permissible investment instruments.

For clients who opt for a plus strategy, in the event of falling prices on the capital markets the focus is on limiting losses to the agreed target value over the calendar year (no capital protection). The plus strategy aims for a reduced risk with constant return opportunities. The increased risk tolerance is reflected with a decreased minimum quota for cash and bond investments and bond-related investments.

The DB ESG SAA (Plus) is based on a restricted investment universe, since credit balances incl. short term deposits and ETF are permitted as investment instruments only.

The DB ESG SAA (Plus) will preferentially invest in investment instruments that meet the ESG criteria and take into consideration PAIs of the PAI families “Greenhouse gas emissions” and “Social and employee matters”, as specified in the section above.

## ● What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Bank uses exclusively the updated positive lists for the selection of investment instruments, which consider the a.m. minimum MSCI ESG rating of „A“, resp. “BBB” for Emerging Market or High Yield investments, as well as the mentioned exclusions.

In the investment decision making process for investment funds that do not invest predominantly in investment instruments issued by states, in addition PAIs are considered for PAI families “Greenhouse gas emissions” and “Social and employee matters”.

Account balances and short-term deposits are held exclusively at Deutsche Bank Luxembourg S.A.. ESG criteria are not applied to these assets. If the Bank believes that special market conditions prevail, account balances and short-term deposits may account for a substantial part of the assets under management. In these special market conditions, up to 100% of the assets may therefore be held in non-ESG compliant investment instruments. (All strategies).

The positive lists will be updated by MSCI regularly. In the investment decision making process for investment funds that do not invest predominantly in investment instruments issued by states, PAIs are considered for PAI families “Greenhouse gas emissions” and “Social and employee matters” as described above.

For investment funds that do not predominantly invest in states, it takes place using an exclusion approach based on information provided by asset management firms, investment or funds companies or MSCI.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance .



Data, especially with regard to the consideration of PAIs, is currently not always available to the Bank and MSCI from the investment/fund companies or the respective issuers. If data is available from the investment/fund companies, it is used and checked for plausibility on the basis of MSCI data. If no data from the investment/fund companies is available, MSCI data will be used as the basis for assessment.

If any investment instrument does no longer fulfil the ESG criteria, reasonable effort will be made to sell the position, whilst safeguarding the Client's interests at all times.

● **What is the policy to assess good governance practices of the investee companies?**

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

For the selection of investment instruments, the positive lists from MSCI, which consider the a.m. minimum MSCI ESG rating of "A", resp "BBB" for Emerging Market or High Yield investments, as well as the mentioned exclusions, are used exclusively.

MSCI uses a scoring model identifying and estimating considerable ESG related chances and risks, which considers characteristics of good governance.

In the investment decision making process for investment funds that do not invest predominantly in investment instruments issued by states, PAIs are considered for PAI family "Social and employee matters".

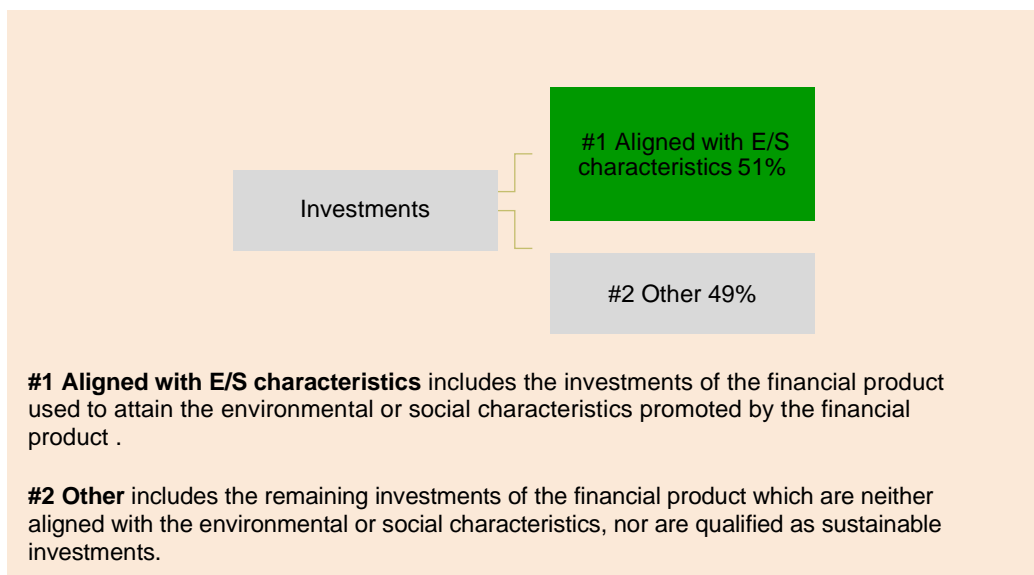
In addition, MSCI will not include issuers other than sovereigns and investment funds in the establishment of a positive list when they are active in critical business areas, from the point of view of the bank, or generate significant turnover in these business areas.



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

**What is the asset allocation planned for this financial product?**

A minimum of 51 percent of the investments made for the portfolio should contribute to attaining the environmental and social characteristics that the product promotes. The product is not geared towards investments that qualify as sustainable under the SFDR.





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

Taxonomy-aligned activities are expressed as a share of :  
 - **turnover** reflecting the share of revenue from green activities of investee companies  
 - **Capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy  
 - **Operational expenditure (OpEx)** reflecting green operational activities of investee companies.

**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 .

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Derivatives may be used without any further limitation as long as they are based on ESG indices or underlying securities that are aligned to the minimum criteria mentioned before or used for hedging purposes.

In case they do not comply with, they are limited to 15% (nominal) of the portfolio.

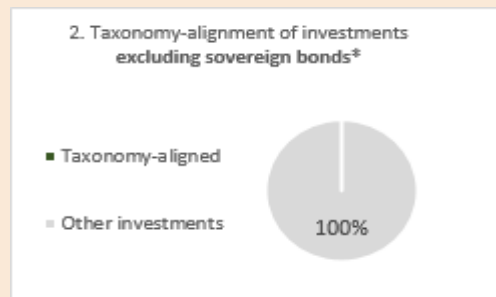
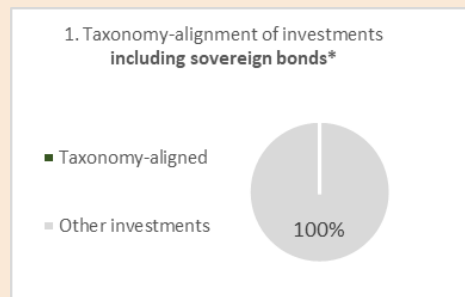


● **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with EU Taxonomy<sup>1</sup>?**

Yes  In fossil gas  In nuclear energy  
 No

The two graphs below show in green the minimum percentage of investments that are 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 is the minimum share of investments in transitional and enabling activities?**

The financial portfolio management does not aim for a minimum proportion of sustainable investments with an environmental objective, which is classified as an ecological sustainable according to EU Taxonomy Regulation ((EU) 2020/852). Thus, there is no aim to have a minimum proportion of investments into enabling or transitional activities.

<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 an 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.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy ?

The financial portfolio management does not aim for a minimum proportion of sustainable investments with an environmental objective that are not-aligned with the EU Taxonomy Regulation ((EU) 2020/852).



## What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

Account balances as well as short-term deposits are permitted as non ESG compliant investments. They are being maintained for short-term liquidity management purposes. The share of account balances (including short-term deposits) can vary greatly depending on the market situation and should average around 5%.

If the Bank believes that special market conditions prevail, account balances and short term deposits may account up to 100% of the assets under management.

Unless the use of forward contracts is excluded, there is no requirement for an MSCI ESG rating when conducting forward transactions for the counterparty to the forward transaction (exchanges). In addition, investments in forward contracts whose underlying is one or more indices may also be made where MSCI does not provide an MSCI ESG rating or an MSCI ESG rating of 'A' for those indices and therefore they are not subject to a positive list.

Derivatives, which do not have an ESG index or securities considering the minimum criteria as an underlying, are allowed for hedging purposes without any further limitation. They are limited to 15% (nominal) of the portfolio if they are used as long positions..

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

The Bank does not strive for participation in sustainable investments within the meaning of Article 2 (17) of the EU Disclosure Regulation EU (2019/2088).



## Where can I find more product specific information online? More product-specific information can be found on the website:

[https://deutschewealth.com/en/articles/regulatory\\_information.html](https://deutschewealth.com/en/articles/regulatory_information.html)

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.