



# Statement on principal adverse impacts of investment decisions on sustainability factors

(30 June 2023; supersedes the statement dated 30 December 2022)

Deutsche Bank Luxembourg S.A., 529900FIAMEJDQ8C9097

## Summary

Deutsche Bank Luxembourg S.A., 529900FIAMEJDQ8C9097, 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 Luxembourg S.A..

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022.

This statement is provided under the Sustainable Finance Disclosure Regulation (SFDR) – Regulation (EU) 2019/2088, which defines Financial Market Participants (FMPs) and in scope financial products. Therefore, this disclosure of principal adverse impacts applies to Deutsche Bank Luxembourg S.A.'s business units<sup>1</sup> to the extent it is an investment firm which provides portfolio management to and takes investment decisions for 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 annually by Deutsche Bank AG-wide governance forums in accordance with the Deutsche Bank AG Policy Framework. Deutsche Bank Luxembourg S.A. has implemented the policies as defined by Deutsche Bank AG. Currently, Deutsche Bank Luxembourg S.A. follows a principle-based approach. As the regulatory requirements and associated data change on an ongoing basis, Deutsche Bank Luxembourg S.A. 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.

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<sup>1</sup> Business units within the Legal Entity that are in 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 manufacture the scope of Financial Products as defined by the regulation.



Since 10 March 2021, Deutsche Bank Luxembourg S.A. makes factors relating to the selection of principal adverse impacts transparent against the investment universe, enabling informed decisions in the selection process for the construction of relevant financial products. The focus will be on making the data available within the processes for selection of underlying products for Deutsche Bank Luxembourg S.A.'s managed portfolios. It is of utmost importance that Deutsche Bank Luxembourg S.A., given its fiduciary capacity, makes all investment decisions in the best interests of its clients and, in doing so, takes all financial and risk factors into account. These principal adverse impacts are therefore an additional aspect to be reviewed by Deutsche Bank Luxembourg S.A.'s portfolio managers when making investment decisions but will not automatically outweigh other relevant factors. Deutsche Bank Luxembourg S.A. works with third-party data providers 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 Luxembourg S.A. carries out quantitative reporting in respect of all mandatory principal adverse impacts set out in the SFDR, it considers – in its role as a FMP – selected principal adverse impact indicators within its investment process. Indicators are selected on the basis of data availability, alignment with adverse activities on which the Deutsche Bank Group is particularly focused and the Sustainable Investment Classification Criteria, which set out the standards to be met in the manufacturing of sustainable products. The investment process must allow for robust asset allocation 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**

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**

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)

Deutsche Bank Luxembourg S.A. 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 capital management 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 Luxembourg S.A. discloses data related to principal adverse impact on sustainability factors for products where it acts as a FMP and in scope of the SFDR. The following disclosure is an aggregation of all in scope assets of Deutsche Bank Luxembourg S.A. including volumes managed on external platforms and irrespective whether the clients are subject to MiFID. The data is relevant for the reference period 1 January to 31 December 2022.

At this point of time data availability and data quality for principle adverse impact on sustainability factors of the financial investment universe is 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 data providers to make data accessible and standardized. Deutsche Bank Luxembourg S.A. considers the data is not yet



sufficient to derive well-founded decisions regarding actions to be taken. 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 Luxembourg S.A..

Therefore, for its current quantitative reporting Deutsche Bank Luxembourg S.A. will disclose and monitor its principal adverse impacts of its investment decisions on sustainability factors without deriving any planned actions or applying thresholds for the following reference period to avoid or reduce the principal adverse impacts.

Deutsche Bank Luxembourg S.A. will review its current approach on an annual basis.

The investment universe for which Deutsche Bank Luxembourg S.A. acts as a FMP includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash. For the current reference period, Deutsche Bank Luxembourg S.A. includes information on the coverage, which is represented as a percentage share of the investment universe for which adverse impact data was available as of 31 December 2022. Coverage data helps to understand the mix of investment assets within the portfolio and the limited data availability.

The calculation is based on principal adverse impact data for direct investments into investee companies and sovereigns and indirect investments (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 Deutsche Bank Luxembourg S.A., based on the weighted average across the year.



Indicators applicable to investments in investee companies					
Adverse sustainability indicator	Metric	Impact Y2022	Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>	
<b>Climate and other related environment-related indicators</b>					
Greenhouse gas emissions	1. GHG Emissions	Scope 1 GHG emissions	28,673.68 tons CO <sub>2</sub> e	36.37% coverage  Disclosure for PAI 1 only includes direct investments due to limited data available to include required investor share for indirect investments	Disclosure and ongoing review As prioritised PAIs, data relating to total GHG emissions, Carbon footprint and GHG intensity and Fossil Fuel Activity is shared with FMPs against the investment universe used in the selection process  Investment decisions are made in the best interest of clients and take all financial and risk factors into account. PAIs will not automatically outweigh other relevant factors.
		Scope 2 GHG emissions	6,231.92 tons CO <sub>2</sub> e		
		Scope 3 GHG emissions	203,934.27 tons CO <sub>2</sub> e		
		Total GHG emissions	238,839.86 tons CO <sub>2</sub> e		
	2. Carbon Footprint	Carbon Footprint	504.33 tons CO <sub>2</sub> e / EUR M	67.93% coverage	
3. GHG Intensity of investee companies	GHG intensity of investee companies	949.10 tons CO <sub>2</sub> e / EUR M Revenue	68.06% coverage		

<sup>2</sup> Explanation includes the coverage which is based on the percentage of the investment universe for which data was available for the adverse impact indicator. The investment universe includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash.

<sup>3</sup> for its current quantitative reporting Deutsche Bank Luxembourg S.A. will not include planned actions or apply thresholds for the following reference period, due to data limitations and evolution.



Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact Y2022		Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	7.37	percent	69.29% coverage <sup>4</sup> (value changed from 77.29% to 69.29% to reflect the coverage within indirect investments on 20 October 2023)	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	69.95	percent	62.38% coverage  Data is disclosed as a single data point combining share of non-renewable energy consumption and non-renewable energy production	Disclosure and ongoing review
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies,	NACE code <sup>5</sup> A : 0.85	GWh/million EUR revenue	57.84% coverage  NACE code A: Agriculture, forestry, and fishing	Disclosure and ongoing review

<sup>4</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.

<sup>5</sup> NACE is the abbreviation for „Nomenclature Générale des Activités Économiques dans les Communautés Européennes“ and describes the statistical classification of economic activities within the EU.



Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact Y2022		Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
		per high impact climate sector	NACE code B : 2.51	GwH/million EUR revenue	57.84% coverage  NACE code B: Mining and quarrying	Disclosure and ongoing review
			NACE code C : 0.81	GwH/million EUR revenue	57.84% coverage  NACE code C: Manufacturing	Disclosure and ongoing review
			NACE code D : 3.61	GwH/million EUR revenue	57.84% coverage  NACE code D: Electricity, gas, steam and air conditioning supply	Disclosure and ongoing review
			NACE code E : 1.32	GwH/million EUR revenue	57.84% coverage  NACE code E: Water supply; sewerage; waste management and remediation activities	Disclosure and ongoing review
			NACE code F : 0.15	GwH/million EUR revenue	57.84% coverage  NACE code F: Construction	Disclosure and ongoing review



Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact Y2022		Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
			NACE code G : 0.39	GwH/million EUR revenue	57.84% coverage  NACE code G: Wholesale and retail trade; repair of motor vehicles and motorcycles	Disclosure and ongoing review
			NACE code H : 2.33	GwH/million EUR revenue	57.84% coverage  NACE code H: Transporting and storage	Disclosure and ongoing review
			NACE code L: 0.41	GwH/million EUR revenue	57.84% coverage  NACE code L: Real estate activities	Disclosure and ongoing review
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	0.01	percent	69.29% coverage <sup>6</sup> (value changed from 77.29% to 69.29% to reflect the coverage within indirect investments on 20 October 2023)	Disclosure and ongoing review

<sup>6</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.





Indicators applicable to investments in investee companies					
Adverse sustainability indicator		Metric	Impact Y2022	Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	3.78 tons / EUR M invested	7.78% coverage	Disclosure and ongoing review
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	91.78 tons / EUR M invested	24.83% coverage Impact is based on hazardous waste	Disclosure and ongoing review
Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters					
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD)	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	17.66 percent	69.30% coverage <sup>7</sup> (value changed from 77.29% to 69.30% to reflect the coverage within indirect investments on 20 October 2023)	Disclosure and ongoing review  As a prioritised PAI, data relating to UNGC violations is shared with FMPs against the investment universe used in the selection process

<sup>7</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.



Indicators applicable to investments in investee companies					
Adverse sustainability indicator		Metric	Impact Y2022	Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
	Guidelines for Multinational Enterprises				Investment decisions are made in the best interests of clients and take all financial and risk factors into account. PAIs will not automatically outweigh other relevant factors.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	36.10 percent	68.81% coverage <sup>8</sup> (value changed from 77.11% to 68.81% to reflect the coverage within indirect investments on 20 October 2023)	Disclosure and ongoing review

<sup>8</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.



Indicators applicable to investments in investee companies					
Adverse sustainability indicator		Metric	Impact Y2022	Explanation <sup>2</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>3</sup>
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	14.17 percent	22.68% coverage	Disclosure and ongoing review
	13. Board Gender Diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	32.86 percent	68.77% coverage	Disclosure and ongoing review
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.03 percent	69.29% coverage <sup>9</sup> (value changed from 77.29% to 69.29% to reflect the coverage within indirect investments on 20 October 2023)	<p>Disclosure and ongoing review</p> <p>As a prioritised PAI, data relating to controversial weapons exposure is shared with FMPs against the investment universe used in the selection process</p> <p>Investment decisions are made in the best interests of clients and take all financial and risk factors into account. PAIs will not automatically outweigh other relevant factors</p>

<sup>9</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.



Indicators applicable to investments in sovereigns and supranationals						
Adverse sustainability indicator		Metric	Impact Y2022		Explanation <sup>10</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>11</sup>
Environmental	15. GHG Intensity	GHG intensity of investee countries	313.10	† CO <sub>2</sub> e / M EUR GDP	9.67% coverage	Disclosure and ongoing review
Social	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	5.00	Count of Countries	11.46% coverage Numbers are presented as an aggregation across branches and an average of 4 holding snapshots, it is possible not to include a whole number.	Current data provided by third party data provider only considers countries subject to EU sanctions. Subject to clarification on scope of "social violations" this may need expanding  Disclosure and ongoing review
			0.28	M EUR Violations / M EUR Total Sovereign	11.46% coverage Interpretation of relative exposure is investment into sanction sovereigns as a share of all investments into sovereigns	

<sup>10</sup> Explanation includes the coverage which is based on the percentage of the investment universe for which data was available for the adverse impact indicator. The investment universe includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash.

<sup>11</sup> for its current quantitative reporting Deutsche Bank Luxembourg S.A. will not include planned actions or apply thresholds for the following reference period, due to data limitations and evolution.



Indicators applicable to investments in real estate assets					
Adverse sustainability indicator		Metric	Impact Y2022	Explanation <sup>12</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>13</sup>
Fossil Fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	No disclosure	The percentage of assets exposed to Real Estate based on NACE code L are 0.99%	Identifying potential PAI data sources that can supply real estate data
Energy efficiency	18. Exposure to energy-inefficient real estate assets	share of investments in energy inefficient real estate assets	No disclosure	Due to limited/no data on real estate assets from data providers, no impact can be provided for PAI 17 and 18.	

<sup>12</sup> Explanation includes the coverage which based on the percentage of the investment universe for which data was available for the adverse impact indicator. The investment universe includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash.

<sup>13</sup> for its current quantitative reporting Deutsche Bank Luxembourg S.A. will not include planned actions or apply thresholds for the following reference period, due to data limitations and evolution.



Additional climate and other environment-related indicators					
Adverse sustainability indicator		Metric	Impact Y2022	Explanation <sup>14</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>15</sup>
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	33.93 percent	68.87% coverage <sup>16</sup> (value changed from 77.23% to 68.87% to reflect the coverage within indirect investments on 20 October 2023)	Disclosure and ongoing review

<sup>14</sup> Explanation includes the coverage which based on the percentage of the investment universe for which data was available for the adverse impact indicator. The investment universe includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash.

<sup>15</sup> for its current quantitative reporting Deutsche Bank Luxembourg S.A. will not include planned actions or apply thresholds for the following reference period, due to data limitations and evolution.

<sup>16</sup> Please note that compared to 30 June 2023 figures may have changed, since enhancements were applied to the calculation methodology, which has in some instances led to different outcomes.



Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters						
Adverse sustainability indicator		Metric	Impact Y2022		Explanation <sup>17</sup>	Actions taken, and actions planned and targets set for the next reference period <sup>18</sup>
Human Rights	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis	0.00	cases/M EUR invested	69.07% coverage	Disclosure and ongoing review

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

Deutsche Bank AG (and DB Luxembourg S.A. as its subsidiary) has established a robust governance, 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 AG's business divisions and certain infrastructure functions. Deutsche Bank Luxembourg S.A. has implemented the policies as defined by Deutsche Bank AG.

Deutsche Bank Luxembourg S.A. 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 Luxembourg S.A. - where it acts as a FMP - does not have a single defined policy relating to principal adverse impacts. Where relevant, however, they are covered by existing procedure

<sup>17</sup> Explanation includes the coverage which based on the percentage of the investment universe for which data was available for the adverse impact indicator. The investment universe includes all assets including investee companies, sovereign issuers, indirect investments (Funds), derivatives, commodities, and cash.

<sup>18</sup> for its current quantitative reporting Deutsche Bank Luxembourg S.A. will not include planned actions or apply thresholds for the following reference period, due to data limitations and evolution.



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

For financial products that follow a sustainable investment approach, Deutsche Bank Luxembourg S.A. has additionally specified a Sustainable Classification Criteria Policy (published 2021) that has to be adhered to. Deutsche Bank Luxembourg S.A. in its role as a FMP uses third-party data providers to exclude or set threshold limits on exposure to industries or practices that are aligned to select adverse sustainability indicators.

Deutsche Bank Luxembourg S.A. in its role as a FMP identifies and prioritizes selected principal adverse impact indicators within its investment process. The selection of indicators is determined via data availability, alignment to adverse activities in focus by Deutsche Bank Group, and the Sustainable Investment Classification Criteria which sets out standards to be met for portfolio management that considers sustainability 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 Luxembourg S.A. 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 Luxembourg S.A. 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 Luxembourg S.A. assesses any potential significant risks that are very likely to





have or will have a severe negative impact on a material non-financial topic in terms of Deutsche Bank Luxembourg S.A.'s business activities, business relations, and products and services.

For the assessment of principal adverse impacts on sustainability factors, Deutsche Bank Luxembourg S.A. relies on data provided by capital management companies, investment funds and a third-party data provider. If no data from the capital management company or investment fund company is available, data from a third-party data provider is used.

Deutsche Bank Luxembourg S.A. does not guarantee that this information is correct or complete. Furthermore, Deutsche Bank Luxembourg S.A. cannot guarantee the correctness of the third-party data provider's assessment. Deutsche Bank Luxembourg S.A. 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 Luxembourg S.A. 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 Luxembourg S.A. acts as a FMP 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 Group 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 Group to maximize 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 Group follows internationally recognized 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 UN Principles for Responsible Banking and
- the UN Guiding Principles on Business and Human Rights
- Member of United Nations Environment Programme Finance Initiative
- Signatory of Net-Zero Banking Alliance

A full list and further details of the standards adhered to can be found at [Deutsche Bank Memberships, Commitments and International Guidelines \(db.com\)](#)

By adhering to 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 weapons systems, nuclear weapons, anti-personnel landmines, incendiary weapons and cluster munitions, Deutsche Bank Luxembourg S.A. where acting as a FMP, indirectly aligns its ESG investment strategies to certain principal adverse impacts.

Within portfolio management services, Deutsche Bank Luxembourg S.A. collaborates with third-party data providers for data related to sustainability factors of investee companies for direct as well as indirect investments. For ESG investment strategies 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 Luxembourg S.A. is invested in developing net-zero aligned forward-looking climate scenarios, which are aligned to the Paris Climate Agreement. However, currently Deutsche Bank Luxembourg S.A. does not consider climate-scenarios in the investment making decision process.