DB Strategic Asset Allocation (SAA) (Plus)

Contents

Summary

DB 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 minimum requirement for an investment fund listed by MSCI in a peer group with a name containing the term “emerging markets” or “high yield” is an ESG score of “BBB”. An ESG rating from MSCI of at least “A” is a minimum requirement for all other investment funds.

In the investment decision-making process for investment funds (with the exception of those that are invested predominantly in 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.

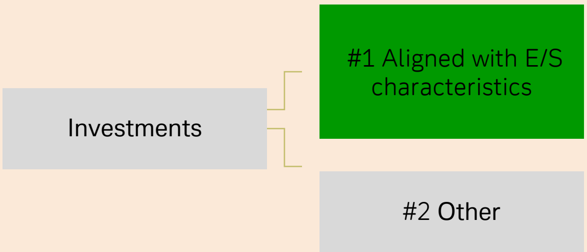
In the investment decision-making process for investment funds, PAIs are considered only to those funds that are not predominantly invested in sovereign bonds or other investment instruments issued by states. This is done via an exclusion approach based on the information obtained by the investment /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

What asset allocation is planned for this financial product?



#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.

Any ESG criteria do not apply to account balances (including short-term deposits). When investing, account balances (incl. short-term deposits) may also account for up to 100% of the assets subject to management in what the bank considers to be special market situations.

As soon as an investment instrument no longer meets the ESG criteria, the bank will give priority to selling this investment instrument while safeguarding the interests of the customer. Compliance with the above ESG criteria within financial portfolio management is controlled by portfolio management. The portfolio composition is reviewed by internal quality management in relation to a reporting date in the quarter.

In financial portfolio management, only investment instruments are taken into account for which, in the bank's view, sufficient data are available to assess the ESG criteria. If data is not available, the bank does not make any estimates. The bank has carefully selected the data provider MSCI and is in constant exchange with MSCI on developments in data quality.

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

DB 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 minimum requirement for an investment fund listed by MSCI in a peer group with a name containing the term “emerging markets” or “high yield” is an ESG score of “BBB”. An ESG rating from MSCI of at least “A” is a minimum requirement for all other investment funds.

In the investment decision-making process for investment funds (with the exception of those that are invested predominantly in investment instruments issued by states), 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.

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.

Investment strategy

The assets under management are broadly diversified to implement a specific risk return-profile 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 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 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.

The Bank uses exclusively the updated positive lists for the selection of investment instruments, which consider the a.m. MSCI ESG minimum rating, 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 (including short-term deposits) are held exclusively with Deutsche Bank (Suisse) SA Any ESG criteria are not applied here. In the case of investments, the account balances (including short-term deposits) may also account for up to 100% of the assets subject to management in special market situations in the opinion of the bank.

As soon as an investment instrument no longer meets the ESG criteria, the bank will give priority to selling this investment instrument while safeguarding the interests of the customer.

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 invest predominantly in investment instruments issued by states, this is done via an exclusion approach based on the information obtained by the investment / fund company or MSCI.

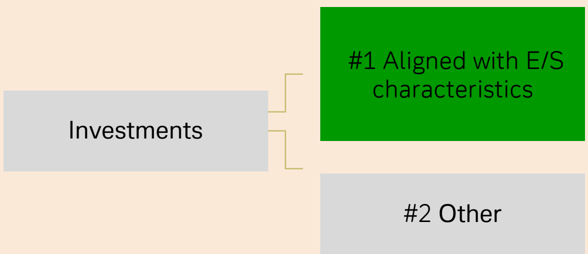
Data, especially with regard to the consideration of PAIs, is currently not always available to the Bank and MSCI from the investment/fund companies or the respective issuers. If data is available from the investment/fund companies, it is used and checked for plausibility on the basis of MSCI data. If 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.

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

Proportion of investments

What asset allocation is planned for this financial product?



#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.

Financial portfolio management approach does not pursue sustainable investments, nor does it take into account the EU criteria for environmentally sustainable economic activities. Compliance with EU taxonomy criteria can vary greatly over time. Sustainable investments under the Disclosure Regulation to achieve environmental or social objectives can also vary widely.

When assessing whether environmental and social characteristics have been met, the investment instruments invested are taken into account. In the case of investment instruments issued by companies or states, issuers and underlying of the investment instruments are valued. In the case of investment funds, the total assets of the fund's shall be considered. This means that not every portfolio component within the fund assets has to meet the environmental and social characteristics.

Monitoring of environmental or social characteristics

The Bank uses exclusively the updated positive lists for the selection of investment instruments, which consider the a.m. MSCI ESG minimum rating, as well as the mentioned exclusions.

The positive lists will be updated by MSCI regularly. If any investment instrument does no longer fulfil the ESG criteria, the Bank will make reasonable effort to sell the position, whilst safeguarding the Client's interests at all times.

For investment funds that do not invest predominantly in investment instruments issued by states, this is done via an exclusion approach based on the information obtained by the investment / fund company or MSCI.

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.

The portfolio composition is reviewed by an internal quality management system based on a reporting date in the quarter. An external check for compliance with the ESG criteria does not take place.

Methodologies

The positive lists will be updated by MSCI regularly. In the investment decision-making process for other issuers and 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.

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.

Data sources and processing

In the context of discretionary portfolio management, the DB SAA (Plus) will preferentially invest in investment instruments that meet certain ESG criteria. The rating and assessments of MSCI is used to assess whether a financial instrument meets the ESG criteria.

MSCI uses a scoring model intended to identify and measure significant ESG opportunities and risks to determine the rating. This includes aspects of corporate governance. Regardless of the above-mentioned ESG rating, the investment strategy additionally applies exclusion criteria provided by MSCI as agreed between the bank and MSCI.

In the investment decision-making process for investment funds that do not invest predominantly in investment instruments issued by states, PAIs factors 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.

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.

Limitations to methodologies and data

MSCI's compliance in not monitored with respect to ESG and exclusion criteria. It cannot be guaranteed the accuracy of MSCI's assessment, or the accuracy and completeness of the positive list generated by MSCI, but will use information from MSCI as a basis. No influence on disruptions to MSCI's analysis and preparation for research is made.

Due to emerging standards in the area of the consideration of ESG criteria and an ongoing legal framework, data are not yet available from the capital management companies, but also from the respective issuers of the Bank and MSCI, in particular with regard to the consideration of adverse effects on sustainability factors.

If no data from the investment/fund companies is available, MSCI data will be used as the basis for assessment.

As the Bank considers MSCI as the sole data provider and does not verify the accuracy and completeness of the assessments and positive lists provided by MSCI, restrictions on the fulfilment of the ESG criteria could arise.

In order to minimize the aforementioned limitation, the Bank has carefully selected the data provider MSCI and is in constant exchange with MSCI on developments in data quality.

Due diligence

The positive lists will be updated by MSCI regularly. If any investment instrument does no longer fulfil the ESG criteria, the Bank will make reasonable effort to sell the position, whilst safeguarding the Client's interests at all times.

For investment funds that do not invest predominantly in investment instruments issued by states, this is done via an exclusion approach based on the information obtained by the investment / fund company or MSCI.

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.

The portfolio composition is reviewed by an internal quality management system based on a reporting date in the quarter. An external check for compliance with the ESG criteria does not take place.

Engagement policies

Where Deutsche Bank (Suisse) SA acts as Financial Market Participant for financial products in scope of the Disclosure Regulation, we do not engage directly with investee companies and so do not influence business activity or risks.