SFDR Article 10 Disclosure for Europe Equity Model within Discretionary Portfolio Management mandates

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"Europe Equity Model" refers to a model portfolio used to provide European equity market exposure. The model is developed and maintained outside the US, and the US business utilizes it solely for geographic exposure without applying or managing any ESG-specific investment perspective.

Summary

Equity Portfolios consider 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 the inclusion of an issuer, a financial instrument or an underlying asset in a discretionary mandate which considers ESG criteria is that MSCI ESG Research (UK) Limited and MSCI ESG Research LLC (hereinafter "MSCI") issued an ESG rating of at least "A".

Notwithstanding the above, the following exceptions apply:

- Other issuers: If a corporate issuer is located in the emerging markets as defined by MSCI, the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of 'BBB' or better.

- Investment funds: If the investment fund is listed by MSCI in a peer group with a name containing the term 'emerging markets' or 'high yield', the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of 'BBB' or better.

Moreover, issuers, with the exception of governments and investment funds ("other issuers"), should be excluded if the overall assessment of the issuer according to MSCI's analysis indicates that the issuer's business practices or the manufactured products materially violate national or international norms, laws and/or generally accepted global standards. Issuers should also be excluded if they are active in business areas that are controversial in the bank's view or if they generate significant revenue in these business areas. States should be excluded if the state is labelled as “not free” by Freedom House.

Principal adverse impacts on sustainability factors (“PAIs”) may be considered within the decision-making process for investment funds (with the exception of those that are invested predominantly in investment instruments issued by states) and for investment instruments issued by other issuers other than states.

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.

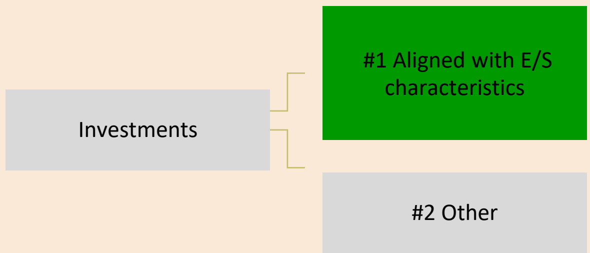
In the investment decision-making process for other issuers, PAIs are considered only to the issuers themselves and in case where an investment instrument from this issuer serves as an underlying asset for another investment instrument. This is done via data provided by MSCI.
In regards of PAI family “Greenhouse gas emissions”, PAIs are currently only taken into account through the exclusion of companies that generate more than 5% of their revenues through the production of thermal coal and/or unconventional oil/gas. In regards of PAI family “Social and employee matters”, PAIs are currently only taken into account through the exclusion of companies that violate the UN Global Compact Principles or the Organization for Economic Co-operation and Development (OECD) Principles for Multinational Enterprises or that are active in the production of and trade in controversial weapons such as weapons systems, anti-personnel landmines, incendiary weapons and cluster munitions.

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

Equity Portfolios consider 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 the inclusion of an issuer, a financial instrument or an underlying asset in a discretionary mandate which considers ESG criteria is that MSCI ESG Research (UK) Limited and MSCI ESG Research LLC (hereinafter “MSCI”) issued an ESG rating of at least “A”.

Notwithstanding the above, the following exceptions apply:

- Other issuers: If a corporate issuer is located in the emerging markets as defined by MSCI, the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of ‘BBB’ or better.

- Investment funds: If the investment fund is listed by MSCI in a peer group with a name containing the term ‘emerging markets’ or ‘high yield’, the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of ‘BBB’ or better.

Moreover, issuers, with the exception of governments and investment funds, should be excluded if the overall assessment of the issuer according to MSCI's analysis indicates that the issuer's business practices or the manufactured products materially violate national or international norms, laws and/or generally accepted global standards. Issuers should also be excluded if they are active in business areas that are controversial in the bank's view or if they generate significant revenue in these business areas. States should be excluded if the state is labelled as “not free” by Freedom House.

PAIs are considered within the decision-making process for investment funds (with the exception of those that are invested predominantly in investment instruments issued by states) and for investment instruments issued by other issuers.

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 regards of PAI family “Greenhouse gas emissions”, PAIs are currently only taken into account through the exclusion of companies that generate more than 5% of their revenue through the production of thermal coal and/or unconventional oil/gas. In regards of PAI family “Social and employee matters”, PAIs are currently only taken into account through the exclusion of companies that violate the UN Global Compact Principles or the Organization for Economic Co-operation and Development (OECD) Principles for Multinational Enterprises or that are active in the production of and trade in controversial weapons such as weapons systems, anti-personnel landmines, incendiary weapons and cluster munitions. In the investment decision-making process for other issuers, PAIs are considered only to the issuers themselves and in case where an investment instrument from this issuer serves as an underlying asset for another investment instrument. This is done via data provided by MSCI.

In the investment decision-making process for investment funds, PAIs are considered only to those funds that are not invested 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.

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 Equity Portfolio is a regionally diversified, actively managed equity portfolio with additional consideration of 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.

The Equity Portfolio 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 (with the exception of those that are invested predominantly in investment instruments issued by states) and investment instruments issued by other issuers, in addition PAIs are considered for PAI families "Greenhouse gas emissions" and "Social and employee matters".

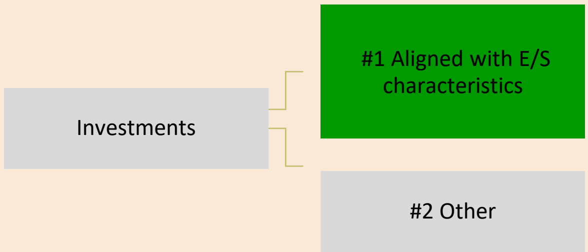
Account balances and short-term deposits are held exclusively at Deutsche Bank Trust Company Americas ESG criteria are not applied to these assets. If the Bank believes that special market conditions prevail, account balances and short-term deposits may account for a substantial part of the assets under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

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.

MSCI uses a scoring model identifying and estimating considerable ESG related chances and risks, which considers characteristics of good governance. In addition, issuers will be excluded if they operate in areas of business that the Bank deems critical or if they generate significant revenues in such areas.

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. In the investment decision-making process for other issuers and investment funds that do not invest predominantly in investment instruments issued by states, PAI factors are considered for PAI families “Greenhouse gas emissions” and “Social and employee matters” as described above.

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.

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 other issuers this is done via data provided by MSCI that considers exclusion criteria in the positive lists

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 Equity ESG Portfolio will preferentially invest in investment instruments that meet certain ESG criteria. In order to assess whether a financial instrument meets the ESG criteria, ratings and assessments of MSCI are used.

The minimum requirement for an issuer, financial instrument, or underlying asset to be included in the above-mentioned positive list is an ESG rating from MSCI of at least “A” (on a scale where “AAA” is MSCI's best rating for sustainability and “CCC” its worst).

Notwithstanding the above, the following exceptions apply:

- Other issuers: If a corporate issuer is located in the emerging markets as defined by MSCI, the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of ‘BBB’ or better.

- Investment funds: If the investment fund is listed by MSCI in a peer group with a name containing the term ‘emerging markets’ or ‘high yield’, the minimum requirement for the inclusion in a positive list is that MSCI has given it an MSCI ESG rating of ‘BBB’ or better.

Special provisions for derivative transactions: When executing derivative transactions, the counterparty of the derivative transaction (the stock exchange) does not require an MSCI ESG rating, i.e. it is permitted to execute derivative transactions with stock exchanges that have no MSCI ESG rating or an MSCI ESG rating below “A” and that are consequently not included on any positive list. It is also permitted to invest in derivative contracts that use as an underlying instrument one or multiple indices, even if no MSCI ESG rating is available for the relevant indices or if their MSCI ESG rating is lower than “A” and they are consequently not included on any positive list. Other underlying instruments of derivative contracts (or issuers of such underlying instruments), for which MSCI has prepared a positive list, must meet the minimum requirement of an MSCI ESG rating of “A” or higher.

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 other issuers and investment funds that do not invest predominantly in investment instruments issued by states, PAI factors are considered for PAI families “Greenhouse gas emissions” and “Social and employee matters” as described above.

For other issuers this is done via data provided by MSCI that considers exclusion criteria in the positive lists.

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 Bank bases its selection of investment instruments on the updated positive lists drawn up by MSCI, taking into account the MSCI ESG minimum rating and the exclusion criteria specified by the Bank.

In the investment decision-making process for other issuers and investment funds that do not invest predominantly in investment instruments issued by states, PAI factors are considered for PAI families “Greenhouse gas emissions” and “Social and employee matters” as described above.

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.

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 Trust Company Americas 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.