



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 financial advice, Deutsche Bank Luxembourg S.A. takes principal adverse impacts on sustainability factors into account, as described in more detail in the following. Principal adverse impacts on sustainability factors are referred to in Article 4 of Regulation (EU) 2019/2088 of November 27, 2019 on sustainability-related disclosures in the financial services sector (the "Disclosure Regulation"). These are more specifically set out in Article 11 of Delegated Regulation (EU) 2022/1288 of April 6, 2022.

Deutsche Bank Luxembourg S.A. in its capacity as financial advisor will take the following principal adverse impacts, as defined by draft implementing legislation, into account, for all financial products as defined by the Disclosure Regulation (portfolio management, alternative investment fund (AIF), insurance-based investment products (IBIP), a pension product, a pension scheme, an undertaking for collective investments in transferable securities (UCITS), pan-European personal pension product (PEPP)^[2] managed by EU legal entities:

- **Exposure to Fossil Fuels**
Industries that derive revenues from the exploration, mining, extraction, distribution or refining of hard, liquid or gaseous fuels (i.e. coal, oil, natural gas)
- **Carbon emissions**
The level of carbon dioxide equivalent that is released by a company, measured in volume and intensity
- **Compliance with United Nations Global Compact principles**
Observing that companies at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption
- **Exposure to controversial weapons**
Industries that derive revenues from the manufacture or selling of controversial weapons (i.e. Anti-Personnel Landmines, Cluster Munitions, Chemical, Biological, Radiological and Nuclear weapons)

EU-based managers or manufacturers of managed financial products (under the Disclosure Regulation, "Financial Market Participants") exceeding on their balance sheet the criterion of the average number of 500 employees during the financial year, will be required to publish a statement on how they address and consider principal adverse impacts. We expect the first statement of Financial Market Participants to be a qualitative statement on how they consider principle adverse impacts in their investment decision making processes. With the publication of the RTS the first quantitative assessments on the indicators are expected to be disclosed by June 30, 2023. After that date we expect that, more and more data will become available to investors and financial advisors.

As part of our advisory due diligence process, we will review the relevant principal adverse impact statements published by the Financial Market Participants, to what extent their measures or strategies to address adverse impacts on sustainability factors are consistent with the bank's requirements. If, in the Bank's view, there are significant discrepancies with the Bank's



requirements, this may result in the manufacturer's products not being considered in the Bank's investment advice. As soon as the managers or manufacturers of managed financial products publish indicators on adverse sustainability factors for their financial products as of June 30, 2023, we will include these in the overall qualitative assessment of these financial products, without providing for thresholds or ranking or weighting of the indicators. A key checkpoint in the assessment processes will be the improvement of a financial product's indicators over time. The enhanced due diligence process will ensure that we have clarity and transparency on the relevant adverse impacts taken into account by the Financial Market Participants and enables us to identify products that do not fulfil our qualitative requirements and therefore may result in us not recommending the respective financial products.