

Other information – Not covered by the audit opinion on the annual report

Periodic disclosure for financial products referred to in Article 8, paragraph 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: DWS Top Dividende

Legal entity identifier: 549300NT35E3T04R8Q25

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> it made sustainable investments with an environmental objective: ___%	<input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 20.44 % of sustainable investments.
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It made sustainable investments with a social objective: ___%	<input checked="" type="checkbox"/> with a social objective
<input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments	<input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments



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

To what extent were the environmental and/or social characteristics promoted by this financial product met?

Through this fund, the Company promoted environmental and social characteristics in that it generally considered ESG criteria, for example, by excluding investments in companies with the lowest score with respect to norm-related controversies and/or investments in companies whose activities in controversial sectors generated more than a specific revenue threshold.

In addition, through this fund the Company promoted a minimum proportion of sustainable investments as defined in article 2 (17) of Regulation (EU) on sustainability-related disclosures in the financial services sector (SFDR).

For this fund, the Company had not designated a reference benchmark for the attainment of the promoted environmental and social characteristics.

No derivatives were used to attain the environmental or social characteristics promoted by the fund.

How did the sustainability indicators perform?

Attainment of the promoted environmental and social characteristics as well as the sustainability of the investments was assessed by applying an internal ESG assessment methodology and ESG-specific exclusion threshold values as described in more detail in the section entitled "What actions have been taken to meet the environmental and/or social characteristics during the reference period?". With this methodology, various assessment categories were used as sustainability indicators:

- The **Assessment of norm controversies** served as an indicator for the extent to which norm-related controversies with respect to international standards arise at a company.

Performance: No investments in suboptimal assets

- The **Freedom House Status** served as an indicator for the political rights and civil liberties of a country.

Performance: No investments in suboptimal assets

- The **Exclusion Assessment for controversial sectors** served as an indicator for determining the extent of a company's involvement in controversial sectors.

Performance: 0%

- **Exposure to controversial weapons** served as an indicator for determining the extent of a company's exposure to controversial weapons.

Performance: 0%

- The **Sustainability Investment Assessment** served as an indicator for measuring the proportion of sustainable investments as defined in article 2 (17) SFDR.

Performance: 20.44%

Please see the section entitled "What actions have been taken to meet the environmental and/or social characteristics during the reference period?" for a description of the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted, including the exclusion criteria, and the assessment methodology for determining whether and to what extent assets met the defined environmental and/or social characteristics (including the turnover thresholds defined for the exclusions). This section contains further information on the sustainability indicators.

The values from the DWS front office system are used to calculate the sustainability indicators. This means that there may be minor deviations from the other market values that appear in the annual report, which are derived from the fund accounting system.

...and compared to previous periods?

Attainment of the promoted environmental and social characteristics at portfolio level was measured in the previous years on the basis of the following sustainability indicators:

DWS Top Dividende

Indicators Performance

30/09/2024 29/09/2023

Sustainability indicators

Climate and Transition Risk Assessment	No investments in suboptimal assets	No investments in suboptimal assets	
Norm Assessment	No investments in suboptimal assets	No investments in suboptimal assets	
Sovereign Freedom Assessment	No investments in suboptimal assets	No investments in suboptimal assets	
Sustainable investments	18.32	19.23	% of assets
Involvement in controversial sectors			
Exposure to controversial sectors	0.00	0.00	% of assets
Involvement in controversial weapons			
Involvement in controversial weapons	0.00	0.00	% of assets

The disclosure of the sustainability indicators has been revised compared with previous reports. The assessment methodology is unchanged. Additional information on the currently valid sustainability indicators is provided in the section entitled "What actions have been taken to meet the environmental and/or social characteristics during the reference period?". Information about taking into account the principal adverse impacts on sustainability factors is provided in the section entitled "How did this financial product consider principal adverse impacts on sustainability factors?"

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

The sustainable investments contributed (i) to at least one of the United Nations Sustainable Development Goals (UN SDGs) that have environmental and/or social objectives, such as No poverty, Zero hunger, Good health and well-being, Quality education, Gender equality, Clean water and sanitation, Affordable and clean energy, Decent work and economic growth, Reduced inequalities, Sustainable cities and communities, Responsible consumption and production, Climate action, Life below water and/or Life on land, and/or (ii) to at least one other environmental objective, such as climate change adaptation, climate change mitigation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and/or protection and restoration of biodiversity and ecosystems (as defined in the EU taxonomy).

The extent of the contribution to the individual sustainable investment objectives varied depending on the actual investments in the portfolio.

The Company determined the contribution to a sustainable investment objective on the basis of the proprietary Sustainability Investment Assessment, which used data from one or more ESG data providers, public sources and/or internal assessments. The positive contribution of an investment to an environmental and/or social objective was measured based on the revenues that a company generated with the actual economic activities that make this contribution (activity-based approach). Where a contribution was determined to be positive, the investment was deemed sustainable if the issuer was positively rated in the DNSH assessment (Do No Significant Harm) and the company followed good governance practices.

The proportion of sustainable investments as defined by article 2 (17) SFDR in the portfolio was thus calculated in proportion to the issuers' economic activities that were classed as sustainable (activity-based approach). In a departure from the above, in the event of use-of-proceeds bonds that were classed as sustainable investments, the value of the entire bond was counted towards the proportion of sustainable investments in the portfolio.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investments that were made for this fund were assessed to determine that they do not cause significant harm to an environmental or social sustainable investment objective. To this end, the indicators for the principal adverse impacts on sustainability factors (by relevance) described below were considered. Where significant harm was identified, the investment could not have been classed as sustainable.

How were the indicators for adverse impacts on sustainability factors taken into account?

With the Sustainability Investment Assessment, the mandatory PAI indicators (by relevance) from Table 1 and the relevant indicators from Tables 2 and 3 in Annex I of the Commission Delegated Regulation (EU) 2022/1288 supplementing the Disclosure Regulation were systematically integrated. Taking these principal adverse impacts into account, the Company had set quantitative thresholds and/or defined qualitative values to determine whether environmental or social sustainable investment objectives were significantly harmed. These values were defined based on various external and internal factors, such as data availability or market trends, and may have been adjusted over time.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Sustainable investments' compliance with, for example, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights was evaluated using the Assessment of norm controversies (described in more detail below). Companies with the lowest score ("F") in norm controversies were excluded as an investment.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union Criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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.

How did this financial product consider principal adverse impacts on sustainability factors?

For the fund, the Company considered the following principal adverse impacts on sustainability factors from Annex I of the Commission Delegated Regulation (EU) 2022/1288 supplementing the Disclosure Regulation:

- Exposure to companies active in the fossil fuel sector (no. 4)
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (no. 10)
- Exposure to controversial weapons (no. 14)

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Indicators	Description	Performance
Principal Adverse Impact		
PAII - 04. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	24.52 % of assets
PAII - 10. Violations of UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0 % of assets
PAII - 14. Exposure to controversial weapons	Share of investments in investee companies involved in the manufacture or selling of controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	0 % of assets

As of: September 30, 2025

The Principal Adverse Impact Indicators (PAIIs) are calculated on the basis of the data in the DWS back office and front office systems, which are primarily based on the data of external ESG data providers. If there is no data on individual PAIIs for individual securities or their issuers, either because no data is available or the PAII is not applicable to the particular issuer or security, these securities or issuers are not included in the calculation of the PAII. With target fund investments, a look-through of the target fund holdings is performed if appropriate data is available. The calculation method for the individual PAI indicators may change in subsequent reporting periods due to evolving market standards, a change in the treatment of securities of certain types of instruments (such as derivatives) or as a result of regulatory clarifications.

Moreover, improved data availability may have an effect on the reported PAIIs in subsequent reporting periods.

The values from the DWS front office system are used to calculate the PAIIs. This means that there may be minor deviations from the other market values that appear in the annual report, which are derived from the fund accounting system.



What were the top investments of this financial product?

DWS Top Dividende

Largest investments	Breakdown by sector according to NACE Codes	in % of average portfolio volume	Breakdown by country
Agnico Eagle Mines	B - Mining and quarrying	3.7 %	Canada
Taiwan Semiconductor Manufacturing Co.	C - Manufacturing	3.1 %	Taiwan
Shell	M - Professional, scientific and technical activities	2.8 %	United Kingdom
TotalEnergies	M - Professional, scientific and technical activities	2.3 %	France
Nextera Energy Inc.	D - Electricity, gas, steam and air conditioning supply	2.2 %	United States
Johnson & Johnson	C - Manufacturing	2.2 %	United States
Enbridge	D - Electricity, gas, steam and air conditioning supply	2.1 %	Canada
Hannover Rück Reg.	K - Financial and insurance activities	2.0 %	Germany
AXA	K - Financial and insurance activities	2.0 %	France
Deutsche Telekom	J - Information and communication	2.0 %	Germany
AbbVie	C - Manufacturing	2.0 %	United States
DNB Bank	K - Financial and insurance activities	1.9 %	Norway
WEC Energy Group	D - Electricity, gas, steam and air conditioning supply	1.9 %	United States
Nestlé	M - Professional, scientific and technical activities	1.8 %	Switzerland
XTRACKERS IE PHYSICAL GOLD ETC 23.04.80	K - Financial and insurance activities	1.8 %	Ireland

for the period from October 01, 2024, through September 30, 2025

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is:
for the period from October 01, 2024, through September 30, 2025



What was the proportion of sustainability-related investments?

The proportion of sustainability-related investments as of the reporting date was 91.44% of portfolio assets.

Proportion of sustainability-related investments for the previous years:

30/09/2024: 92.77 %

29/09/2023: 95.20 %

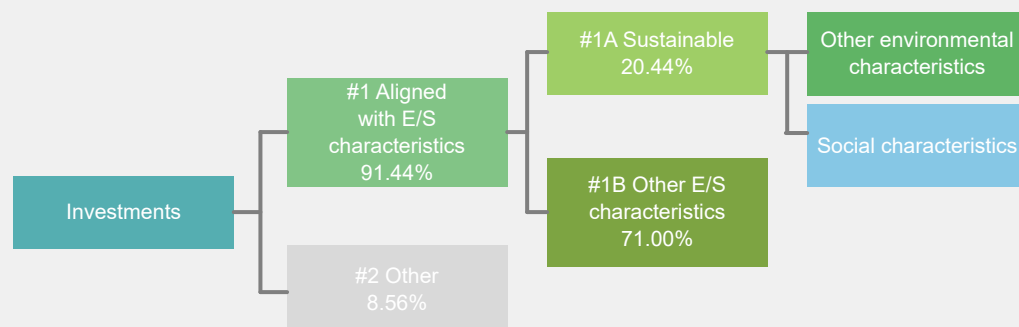
Asset allocation

describes the share of investments in specific assets.

What was the asset allocation?

This fund invested 91.44% of its assets in investments that were aligned with the promoted environmental and social characteristics and/or complied with the criteria for sustainable investments (#1 Aligned with E/S characteristics).

8.56% of the fund's assets have been invested in assets that were not assessed with the ESG assessment methodology or for which ESG data coverage was not complete (#2 Other), as described in more detail in the section entitled "What investments were included under "#2 Other", what was their purpose and were there any minimum environmental or social safeguards?".



#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.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

In which economic sectors were the investments made?

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NACE-Code	Breakdown by sector according to NACE Codes	in % of portfolio volume
B	Mining and quarrying	8.8 %
C	Manufacturing	23.0 %
D	Electricity, gas, steam and air conditioning supply	9.0 %
H	Transporting and storage	1.3 %
J	Information and communication	4.4 %
K	Financial and insurance activities	26.1 %
M	Professional, scientific and technical activities	14.3 %
N	Administrative and support service activities	1.2 %
O	Public administration and defence; compulsory social security	8.8 %
Q	Human health and social work activities	1.7 %
NA	Other	1.4 %
Exposure to companies active in the fossil fuel sector		24.5 %

As of: September 30, 2025



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

For the fund, the Company did not commit to targeting a minimum percentage of E/S investments aligned with the EU Taxonomy. Therefore, the promoted minimum percentage of E/S investments aligned with the EU Taxonomy was 0% of the fund's assets. However, some of the economic activities that the investments were based on may have been aligned with the EU Taxonomy.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are economic activities for yet low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

Yes:

In fossil gas

In nuclear energy

No

For the fund, the Company did not take into account the Taxonomy alignment of companies that were active in the fossil gas and nuclear energy sectors.

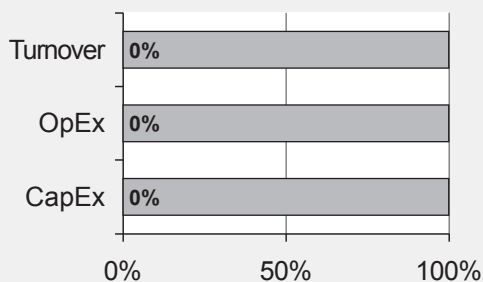
¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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 the green operational activities of investee companies.

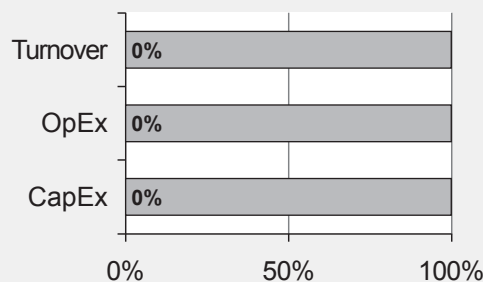
The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product 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.

1. Taxonomy-alignment of investments including sovereign bonds*



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

2. Taxonomy-alignment of investments excluding sovereign bonds*



Taxonomy-aligned: Fossil gas	0.00%
Taxonomy-aligned: Nuclear	0.00%
Taxonomy-aligned (no gas and nuclear)	0.00%
Taxonomy-aligned	0.00%
Non Taxonomy-aligned	100.00%

This graph represents 100% of the total investments.

*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What was the share of investments made in transitional and enabling activities?

For the fund, the Company did not commit to a minimum proportion of investments in transitional activities and enabling activities.

How did the percentage of investments that are aligned with the EU Taxonomy compare with previous reference periods?

The promoted proportion of environmentally sustainable investments in accordance with Regulation (EU) 2020/852 (Taxonomy Regulation) was 0% of the fund's assets in the current as well as previous reference periods. It may, however, have been the case that some sustainable investments were nevertheless aligned with an environmental objective of the Taxonomy Regulation.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the Regulation (EU) 2020/852.

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

For the fund, the Company had not defined a minimum percentage for environmentally or socially sustainable investments. The total proportion of environmentally and socially sustainable investments was 20.44% of the fund's assets.

Shares of sustainable investments in previous reporting periods:

reporting period	sustainable investments (total)	with environmental objective	socially sustainable
30/09/2024	18.32%	--	--
29/09/2023	19.23%	--	--



What was the share of socially sustainable investments?

For the fund, the Company had not defined a minimum percentage for environmentally or socially sustainable investments. The total proportion of environmentally and socially sustainable investments was 20.44% of the fund's assets.

Shares of sustainable investments in previous reporting periods:

reporting period	sustainable investments (total)	with environmental objective	socially sustainable
30/09/2024	18.32%	--	--
29/09/2023	19.23%	--	--



What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

91.44% of the fund's assets were aligned with the promoted environmental and social characteristics and/or complied with the criteria for sustainable investments (#1 Aligned with E/S characteristics). 8.56% of the fund's assets have been invested in assets that could not be assessed via the ESG assessment methodology or for which ESG data coverage was not complete (#2 Other). Complete ESG data coverage was required to assess direct investments in companies with respect to good governance practices.

The investments under "#2 Other" comprised all the asset classes provided for in the relevant investment policy, such as bank balances and derivatives. These investments have been used by the portfolio management to optimize the investment performance and for risk diversification, liquidity and hedging purposes.

For the fund's investments classified as "#2 Other", environmental or social minimum safeguards were not taken into account or were only taken into account partially.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

This fund followed a strategy based on equities.

Further details of the investment strategy could be found in the special section of the sales prospectus and the Special Terms and Conditions of Investment.

91.44% of the fund's assets were invested in assets that complied with the promoted environmental and social characteristics and/or the criteria for sustainable investments described in the following sections. The portfolio's compliance with the binding elements of the investment strategy for the attainment of the promoted environmental and social characteristics was continually examined within the framework of the monitoring of the investment guidelines of the fund.

ESG assessment methodology

The Company sought to attain the promoted environmental and social characteristics for the fund by assessing potential investments with a proprietary ESG assessment methodology irrespective of their economic prospects of success and by applying exclusion criteria based on this assessment.

The ESG assessment methodology used a proprietary data processing program that used the data from one or multiple ESG data providers, public sources and/or internal assessments to derive combined scores. The methodology for determining these combined scores have been based on various approaches. For example, a particular data provider had been prioritized. Alternatively, the assessment had been based on the lowest value ("worst-of" principle) or on an average approach. The internal assessments may take into account factors such as an issuer's expected future ESG development, the plausibility of the data with respect to past or future events, the willingness to engage in dialogue on ESG matters and/or a company's ESG-related decisions. In addition, internal ESG assessments for investee companies may have considered the relevance of the exclusion criteria for the company's specific market sector.

The data processing program used, for example, the following assessment categories to evaluate compliance with the promoted ESG characteristics and to determine whether the investee companies followed good governance practices. The assessment categories included, for example, the use of exclusions on the basis of the revenue earned from controversial sectors or on the basis of the exposure to these controversial sectors. With some assessment categories, issuers received one of six possible scores, with "A" being the highest score and "F" being the lowest score on the scale. If one of the assessment categories results in the exclusion of an issuer, the Company may not invest in this issuer.

Depending on the investment universe, the portfolio composition and the positioning in certain sectors, the assessment categories described below have been more or less relevant; this was reflected in the number of actually excluded issuers.

• Exclusion Assessment for controversial sectors

Companies that were active in particular branches of industry and were exposed to business activities in controversial areas ("controversial sectors") were excluded as followed, depending on the proportion of total revenues that the companies generated in controversial sectors:

- a. Production and/or sale of civil handguns or munition: 5% or more,
- b. Production of tobacco products: 5% or more,
- c. Mining of oil sands: 5% or more,
- d. Companies that generated 25% or more of their revenues from the mining of thermal coal and from coal-based power generation as well as companies with thermal coal expansion plans, such as additional coal generation, production or use. Companies with thermal coal expansion plans were excluded based on an internal identification methodology. In the event of exceptional circumstances, such as measured imposed by a government to overcome challenges in the energy sector, the Company may decide to temporarily suspend applying the coal-related exclusions to individual companies/geographical regions.

- **Assessment of norm controversies**

The assessment of norm controversies involved evaluating the behavior of companies with regard to generally accepted international standards and principles for responsible business practices, including in relation to the principles of the United Nations Global Compact, the UN Guiding Principles for Business and Human Rights, the standards of the International Labour Organization, and the OECD Guidelines for Multinational Enterprises. Among other things, these standards and principles address human rights violations, workers' rights violations, child or forced labor, negative environmental impacts, and ethical business conduct. The assessment of norm controversies evaluated reported infringements of the international standards mentioned above. Companies with the lowest score ("F") in norm controversies were excluded as an investment.

- **Freedom House Status**

Freedom House is an international non-governmental organization that classifies countries by their degree of political freedoms and civil liberties. Based on the Freedom House Status, countries rated as "not free" were excluded as an investment.

- **Exclusion Assessment for controversial weapons**

Companies were excluded if they were identified as being involved in the manufacture or distribution of controversial weapons or key components of controversial weapons (anti-personnel mines, cluster munitions and/or chemical and biological weapons). The exposures within a Group structure might have been taken into account for the exclusions.

- **Assessment of use-of-proceeds bonds**

This assessment was specially designed for this type of financial instrument. An investment in use-of-proceeds bonds was only permitted if the following criteria were complied with. Firstly, all use-of-proceeds bonds were checked for compliance with the Climate Bonds Standards, comparable industry standards for green bonds, social bonds or sustainability bonds, such as the ICMA Principles, or the EU standard for green bonds, or for whether the bonds have undergone an independent audit. Secondly, certain ESG criteria were applied in relation to the issuer of the bond. This may result in issuers and their bonds being excluded as an investment.

[In particular, investments in use-of-proceeds bonds were prohibited if the following criteria apply to the issuers:

- a. Sovereign issuers classed as "not free" by Freedom House;
- b. Companies with the lowest score ("F") in norm controversies, as stated above;
- c. Companies that produce tobacco products: 5% or more;
- d. Companies that have an exposure to controversial weapons, as stated above; or
- e. Companies with identified thermal coal expansion plans, as stated above.

- **Assessment of investment fund units (target fund)**

Target funds were assessed based on the companies within the target fund and were permitted if these companies meet the criteria for the assessment of norm issues and the exposure to controversial weapons (anti-personnel mines, cluster munitions and/or chemical and biological weapons). Investments in companies with the lowest score ("F") in norm controversies were permitted up to a certain threshold. In view of the tolerance threshold, the variety of data providers and methods, the available data coverage and the regular rebalancing of the target fund portfolio, this fund may have an indirect position in certain assets that would have been excluded from direct investment or for which there was no data coverage or incomplete data coverage.

Sustainability Investment Assessment

In addition, the Company measured the contribution to one or multiple UN SDGs and/or other environmentally sustainable objectives in order to determine the proportion of sustainable investments. This was carried out via the proprietary Sustainability Investment Assessment, with which potential investments were assessed on the basis of various criteria regarding whether an investment could have been classed as sustainable, as described in more detail in the section entitled “What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?”.

The ESG investment strategy used did not provide for a mandatory minimum reduction of the scope of the investments.

The assessment of good governance practices of the investee companies (including assessments with respect to sound management structures, employee relations, remuneration of staff and tax compliance) was a component of the assessment of norm controversies that evaluated whether the behavior of a company complied with generally accepted international standards and principles for responsible business practices. Companies with the lowest score (“F”) in norm controversies were excluded as an investment.



How did this financial product perform compared to the reference sustainable benchmark?

For this fund, the Company had not defined a reference benchmark for establishing whether it was aligned with the environmental and social characteristics it promoted.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.