

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:** db PrivatMandat Comfort - Balance ESG

**Legal entity identifier:** 549300J4PYETXVPTVY69

**Environmental and/or social characteristics**

| <b>Did this financial product have a sustainable investment objective?</b>  |  |
|---|--|
| <input checked="" type="radio"/> <input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>  | <input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b>   |
| <input type="checkbox"/> it made <b>sustainable investments with an environmental objective: ___%</b>   | <input checked="" type="checkbox"/> <b>It promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of 30.06% of sustainable investments. <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> |
| <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy<br><br><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | <input type="checkbox"/> It promoted E/S characteristics, but did <b>not make any sustainable investments</b>  |
| <input type="checkbox"/> It made <b>sustainable investments with a social objective: ___%</b>   |  |



### **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?

This sub-fund promoted environmental and social characteristics related to climate, governance and social norms as well as general ESG quality through the avoidance of

- (1) issuers exposed to excessive climate and transition risks,
- (2) companies with the worst DWS Norm Assessment (i.e. as regards compliance with international standards of corporate governance, human rights and labour rights, customer and environmental safety and business ethics),
- (3) companies with very severe unresolved controversies regarding the principles of the United Nations Global Compact (UN Global Compact),
- (4) issuers scored among the worst in terms of environmental, social and governance risks compared to their peer group,
- (5) countries flagged as "not free" by Freedom House,
- (6) companies whose involvement in controversial sectors exceeds a predefined revenue threshold, and/or
- (7) companies involved in controversial weapons.

This sub-fund further promoted a minimum proportion of sustainable investments with a positive contribution to one or several of the United Nations Sustainable Development Goals (UN SDGs).

This sub-fund has not designated a reference benchmark for the purpose of attaining the environmental and/or social characteristics promoted.

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

## How did the sustainability indicators perform?

The attainment of the promoted environmental and social characteristics as well as the sustainable investment was assessed via the application of an in-house DWS ESG assessment methodology as further described in section "What actions have been taken to meet the environmental and/or social characteristics during the reference period?". The methodology applied a variety of assessment approaches that were used as sustainability indicators to assess the attainment of the promoted environmental and social characteristics, which were as follows:

- **DWS Climate and Transition Risk Assessment** was used as indicator for an issuer's exposure to climate and transition risks.  
Performance: No investments in suboptimal assets
- **DWS Norm Assessment** was used as indicator for a company's exposure to norm-related issues towards international standards.  
Performance: No investments in suboptimal assets
- **UN Global Compact-Assessment** was used as indicator for whether a company is directly involved in one or more very severe, unresolved controversies related to the principles of the UN Global Compact.  
Performance: No investments in suboptimal assets
- **DWS ESG Quality Assessment** was used as indicator for comparison of an issuer's environmental, social and governance risks in relation to its peer group.  
Performance: No investments in suboptimal assets
- **Freedom House Status** was used as indicator for the political-civil freedom of a country.  
Performance: No investments in suboptimal assets
- **Exposure to controversial sectors** was used as indicator for a company's involvement in controversial sectors.  
Performance: 0%
- **DWS exclusions for controversial weapons** was used as indicator for a company's involvement in controversial weapons.  
Performance: 0%
- **DWS-Methodology for determining sustainable investments pursuant to Article 2(17) SFDR (DWS Sustainability Investment Assessment)** was used as indicator to measure the proportion of sustainable investments.  
Performance: 30.06%

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:

### db PrivatMandat Comfort - Balance ESG

| Indicators Performance                      | 29/12/2023                          | 30/12/2022 |             |
|---|-------------------------------------|------------|-------------|
| <b>Sustainability indicators</b>            |                                     |            |             |
| Climate and Transition Risk Assessment      | No investments in suboptimal assets | -          |             |
| Climate and Transition Risk Assessment A    | -                                   | 17.01      | % of assets |
| Climate and Transition Risk Assessment B    | -                                   | 12.93      | % of assets |
| Climate and Transition Risk Assessment C    | -                                   | 55.08      | % of assets |
| Climate and Transition Risk Assessment D    | -                                   | 11.07      | % of assets |
| Climate and Transition Risk Assessment E    | -                                   | 0.47       | % of assets |
| Climate and Transition Risk Assessment F    | -                                   | 0.00       | % of assets |
| ESG Quality Assessment                      | No investments in suboptimal assets | -          |             |
| ESG Quality Assessment A                    | -                                   | 59.91      | % of assets |
| ESG Quality Assessment B                    | -                                   | 14.51      | % of assets |
| ESG Quality Assessment C                    | -                                   | 19.33      | % of assets |
| ESG Quality Assessment D                    | -                                   | 3.00       | % of assets |
| ESG Quality Assessment E                    | -                                   | 0.00       | % of assets |
| ESG Quality Assessment F                    | -                                   | 0.00       | % of assets |
| Norm Assessment                             | No investments in suboptimal assets | -          |             |
| Norm Assessment A                           | -                                   | 25.82      | % of assets |
| Norm Assessment B                           | -                                   | 12.10      | % of assets |
| Norm Assessment C                           | -                                   | 31.92      | % of assets |
| Norm Assessment D                           | -                                   | 21.16      | % of assets |
| Norm Assessment E                           | -                                   | 0.00       | % of assets |
| Norm Assessment F                           | -                                   | 0.00       | % of assets |
| Sovereign Freedom Assessment                | No investments in suboptimal assets | -          |             |
| Sovereign Freedom Assessment A              | -                                   | 8.69       | % of assets |
| Sovereign Freedom Assessment B              | -                                   | 1.35       | % of assets |
| Sovereign Freedom Assessment C              | -                                   | 2.28       | % of assets |
| Sovereign Freedom Assessment D              | -                                   | 0.68       | % of assets |
| Sovereign Freedom Assessment E              | -                                   | 0.00       | % of assets |
| Sovereign Freedom Assessment F              | -                                   | 0.00       | % of assets |
| Sustainable investments                     | 36.41                               | 32.60      | % of assets |
| UN Global Compact                           | No investments in suboptimal assets | -          |             |
| <b>Involvement in controversial sectors</b> |                                     |            |             |
| Adult entertainment C                       | -                                   | 0.00       | % of assets |
| Adult entertainment D                       | -                                   | 0.00       | % of assets |
| Adult entertainment E                       | -                                   | 0.00       | % of assets |
| Adult entertainment F                       | -                                   | 0.00       | % of assets |
| Civil firearms C                            | -                                   | 0.00       | % of assets |
| Civil firearms D                            | -                                   | 0.00       | % of assets |
| Civil firearms E                            | -                                   | 0.00       | % of assets |
| Civil firearms F                            | -                                   | 0.00       | % of assets |
| Coal C                                      | -                                   | 0.00       | % of assets |
| Coal D                                      | -                                   | 0.63       | % of assets |
| Coal E                                      | -                                   | 0.00       | % of assets |
| Coal F                                      | -                                   | 0.00       | % of assets |
| Defense (revenue share) C                   | -                                   | 2.38       | % of assets |
| Defense (revenue share) D                   | -                                   | 0.00       | % of assets |
| Defense (revenue share) E                   | -                                   | 0.00       | % of assets |
| Defense (revenue share) F                   | -                                   | 0.00       | % of assets |
| Exposure to controversial sectors           | 0.00                                | -          | % of assets |

| Indicators Performance                      | 29/12/2023 | 30/12/2022 |             |
|---|------------|------------|-------------|
| Gambling C                                  | -          | 4.21       | % of assets |
| Gambling D                                  | -          | 0.00       | % of assets |
| Gambling E                                  | -          | 0.00       | % of assets |
| Gambling F                                  | -          | 0.00       | % of assets |
| Nuclear power C                             | -          | 0.63       | % of assets |
| Nuclear power D                             | -          | 0.00       | % of assets |
| Nuclear power E                             | -          | 0.00       | % of assets |
| Nuclear power F                             | -          | 0.00       | % of assets |
| Oil sands C                                 | -          | 0.00       | % of assets |
| Oil sands D                                 | -          | 0.00       | % of assets |
| Oil sands E                                 | -          | 0.00       | % of assets |
| Oil sands F                                 | -          | 0.00       | % of assets |
| Tobacco C                                   | -          | 0.00       | % of assets |
| Tobacco D                                   | -          | 0.00       | % of assets |
| Tobacco E                                   | -          | 0.00       | % of assets |
| Tobacco F                                   | -          | 0.00       | % of assets |
| <b>Involvement in controversial weapons</b> |            |            |             |
| Anti-personnel mines D                      | -          | 0.00       | % of assets |
| Anti-personnel mines E                      | -          | 0.00       | % of assets |
| Anti-personnel mines F                      | -          | 0.00       | % of assets |
| Cluster munitions D                         | -          | 0.00       | % of assets |
| Cluster munitions E                         | -          | 0.00       | % of assets |
| Cluster munitions F                         | -          | 0.00       | % of assets |
| Depleted uranium weapons D                  | -          | 0.00       | % of assets |
| Depleted uranium weapons E                  | -          | 0.00       | % of assets |
| Depleted uranium weapons F                  | -          | 0.00       | % of assets |
| Involvement in controversial weapons        | 0.00       | -          | % of assets |
| Nuclear weapons D                           | -          | 0.00       | % of assets |
| Nuclear weapons E                           | -          | 0.00       | % of assets |
| Nuclear weapons F                           | -          | 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?"

## DWS ESG-Assessment Scale

In the following assessment categories, the assets received one of six possible scores, with "A" being the best score and "F" being the worst score.

| Criteria | Involvement in controversial sectors *(1) | Involvement in controversial weapons | Norm Assessment *(6)                                | ESG Quality Assessment                     | SDG- Assessment                               | Climat & Transition Risk Assessment      |
|----------|---|--------------------------------------|---|--|---|--|
| <b>A</b> | Non-involvement                           | Confirmed non-involvement            | Confirmed no issues                                 | True leader in ESG (>= 87.5 DWS ESG score) | True SDG contributor (>= 87.5 SDG score)      | True climate leader (>= 87.5 score)      |
| <b>B</b> | Remote involvement                        | Alleged                              | Violations of lesser degree                         | ESG leader (75-87.5 DWS ESG score)         | SDG contributor (75-87.5 SDG score)           | Climate solution provider(75-87.5 score) |
| <b>C</b> | 0% - 5%                                   | Dual-Purpose *(2)                    | Violations of lesser degree                         | ESG upper midfield (50-75 DWS ESG score)   | SDG upper midfield (50-75 SDG score)          | Low transition risk (50-75 score)        |
| <b>D</b> | 5% - 10% (coal: 5% - 10%)                 | Owning *(3)/ Owned *(4)              | Violation of lesser degree                          | ESG lower midfield (25-50 DWS ESG score)   | SDG lower midfield (25-50 SDG score)          | Mod. transition risk (25-50 score)       |
| <b>E</b> | 10% - 25% (coal: 15% - 25%)               | Component Producer *(5)              | High severity or re-assessed highest violation *(7) | ESG laggard (12.5-25 DWS ESG score)        | SDG obstructer (12.5-25 SDG score)            | High transition risk (12.5-25 score)     |
| <b>F</b> | >= 25%                                    | Weapon producer                      | Highest severity / global compact violation *(8)    | True laggard in ESG (0-12.5 DWS ESG score) | Significant SDG obstructer (0-12.5 SDG score) | Excessive transition risk (0-12.5 score) |

\*(1) Revenue share thresholds as per standard scheme. Sub-Granularity available. Thresholds can be individually set.

\*(2) Encompasses e.g.. weapon-carrying systems such as combat aircraft that carry non-controversial weapons as well as controversial ones.

\*(3) Owning more than 20% equity.

\*(4) Being owned by more than 50% of company involved in grade E or F.

\*(5) Single purpose key component.

\*(6) Includes ILO controversies as well as corporate governance and product issues.

\*(7) In its ongoing assessment, DWS takes into account the violation(s) of international standards – observed via data from ESG data vendors – such as the UN Global Compact, but also possible ESG data vendor errors identified, future expected developments of these violations as well as the willingness of the issuer to engage in dialogue regarding corporate decisions in this regard.

\*(8) An F-grade can be considered a reconfirmed violation of the United Nations Global Compact rule framework for corporate behavior.

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 sub-fund partially invested in sustainable investments according to article 2(17) SFDR. Such sustainable investments contributed to at least one of the UN SDGs that related to environmental and/or social objectives, such as the following (non-exhaustive list):

- Goal 1: No poverty
- Goal 2: Zero hunger
- Goal 3: Good health and well-being
- Goal 4: Quality education
- Goal 5: Gender equality
- Goal 6: Clean water and sanitation
- Goal 7: Affordable and clean energy
- Goal 8: Decent work and economic growth
- Goal 10: Reduced inequalities
- Goal 11: Sustainable cities and communities
- Goal 12: Responsible consumption and production
- Goal 13: Climate action
- Goal 14: Life below water
- Goal 15: Life on land

The extent of the contribution to individual UN SDGs varied depending on the actual investments in the portfolio.

DWS determined the contribution to the UN SDGs based on its DWS Sustainability Investment Assessment, in which various criteria were used to assess the potential assets with regard to whether an investment could be considered as sustainable. As part of this assessment methodology, it was determined whether (1) an investment made a positive contribution to one or more UN SDGs, (2) the issuer passed the Do Not Significantly Harm ("DNSH") assessment and (3) the company followed good governance practices.

The DWS Sustainability Investment Assessment used data from several data providers, public sources and/or internal assessments based on a defined assessment and classification methodology to determine whether an investment is sustainable. Investments that made a positive contribution to the UN SDGs were assessed based on revenues, capital expenditure (CapEx) and/or operational expenditure (OpEx), depending on the asset. Where a positive contribution was determined, the investment was deemed sustainable if the issuer passed the DNSH assessment and the company followed good governance practices.

The share of sustainable investments as defined in article 2(17) SFDR in the portfolio was calculated in proportion to the economic activities of the issuers that qualified as sustainable. Notwithstanding the preceding, in the case of use-of-proceeds bonds that qualified as sustainable investment, the value of the entire bond was counted towards the share of sustainable investments.

The sub-fund did currently not commit to target a minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy.

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

The DNSH assessment was an integral part of the DWS Sustainability Investment Assessment and evaluated whether an issuer with a contribution to a UN SDG caused significant harm to any of these objectives. In case that a significant harm was identified, the issuer failed the DNSH assessment and the investment could not be considered sustainable.

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

As part of the DNSH assessment under article 2(17) SFDR, the DWS Sustainability Investment Assessment systematically integrated the mandatory principal adverse indicators on sustainability factors (dependent on relevance) from Table 1 and relevant indicators from Tables 2 and 3 of Annex I of the Commission Delegated Regulation (EU) 2022/1288 supplementing the Sustainable Finance Disclosure Regulation (SFDR). Taking into account these adverse impacts, DWS had established quantitative thresholds and/or qualitative values to determine if an issuer significantly harmed any of the environmental or social objectives. These values were set based upon various external and internal factors, such as data availability or market developments and could be adapted going forward.

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

As part of its sustainability investment assessment, DWS further evaluated through its DWS Norm Assessment the alignment of a company with international norms. This included checks in relation to adherence to international norms, for example, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact and the standards of the International Labour Organization. Companies with the worst DWS Norm Assessment score (i.e., a letter score of "F") could not be considered sustainable and 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 Union Criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union 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?

The sub-fund considered the following principal adverse impacts on sustainability factors from Annex I of the Commission Delegated Regulation (EU) 2022/1288 supplementing the Sustainable Finance Disclosure Regulation:

- Greenhouse gas (GHG) emissions (no. 1);
- Carbon footprint (no. 2);
- GHG intensity of investee companies (no. 3);
- 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); and
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (no. 14).

For sustainable investments, the principal adverse impacts were also considered in the DNSH assessment as described in section "How were the indicators for adverse impacts on sustainability factors taken into account?".

| Indicators   | Description   | Performance                |
|--|---|----------------------------|
| <b>Principal Adverse Impact</b>  |   |                            |
| PAII - 01. GHG emissions   | Sum of the current value of investments of company i, divided by the investee company's enterprise value and multiplied by company's scope 1+2+3 GHG emissions.                               | 70,300.13 tCO2e            |
| PAII - 02. Carbon Footprint - EUR  | The carbon footprint is expressed as tonnes of CO2 emissions per million EUR invested. The CO2 emissions of an issuer are normalised by its enterprise value including cash (EVIC)            | 234.04 tCO2e / million EUR |
| PAII - 03. Carbon Intensity  | Weighted average carbon intensity scope 1+2+3   | 886.35 tCO2e / million EUR |
| PAII - 04. Exposure to companies active in the fossil fuel sector                          | Share of investments in companies active in the fossil fuel sector  | 10.86 % 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                                      | 3.27 % 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: December 30, 2024

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.



## What were the top investments of this financial product?

### db PrivatMandat Comfort - Balance ESG

| Largest investments                             | Breakdown by sector according to NACE Codes                       | in % of average portfolio volume | Breakdown by country |
|---|---|----------------------------------|----------------------|
| DWS Institutional ESG Euro Money Market Fund IC | K - Financial and insurance activities                            | 4.0 %                            | Luxembourg           |
| Kreditanstalt für Wiederaufbau 20/30.09.30      | K - Financial and insurance activities                            | 2.7 %                            | Germany              |
| DWS Invest ESG European Small/Mid Cap XC        | K - Financial and insurance activities                            | 2.6 %                            | Luxembourg           |
| DWS ESG Glo Emerging Markets Balanced ID        | K - Financial and insurance activities                            | 2.4 %                            | Luxembourg           |
| Microsoft Corp.                                 | J - Information and communication                                 | 1.7 %                            | United States        |
| Alphabet Cl.A                                   | J - Information and communication                                 | 1.6 %                            | United States        |
| DWS Invest ESG Equity Income XD                 | K - Financial and insurance activities                            | 1.4 %                            | Luxembourg           |
| DWS Invest ESG Euro Corporate Bonds IC100       | K - Financial and insurance activities                            | 1.4 %                            | Luxembourg           |
| DWS Invest ESG Global Corporate Bonds ID        | K - Financial and insurance activities                            | 1.3 %                            | Luxembourg           |
| KFW 23/30.01.2029 MTN                           | K - Financial and insurance activities                            | 1.2 %                            | Germany              |
| Norway 15/13.03.25                              | O - Public administration and defence; compulsory social security | 1.2 %                            | Norway               |
| Assicurazioni Generali 20/14.07.31 MTN          | K - Financial and insurance activities                            | 1.1 %                            | Italy                |
| Microsoft 16/08.08.26                           | J - Information and communication                                 | 1.1 %                            | United States        |
| AXA   | K - Financial and insurance activities                            | 1.0 %                            | France               |
| NVIDIA Corp.                                    | C - Manufacturing   | 1.0 %                            | United States        |

for the period from January 01, 2024, through December 30, 2024

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 January 01, 2024, through December 30, 2024



## What was the proportion of sustainability-related investments?

The proportion of sustainability-related investments as of the reporting date was 98.2% of portfolio assets.

Proportion of sustainability-related investments for the previous years:

29/12/2023: 96.41 %

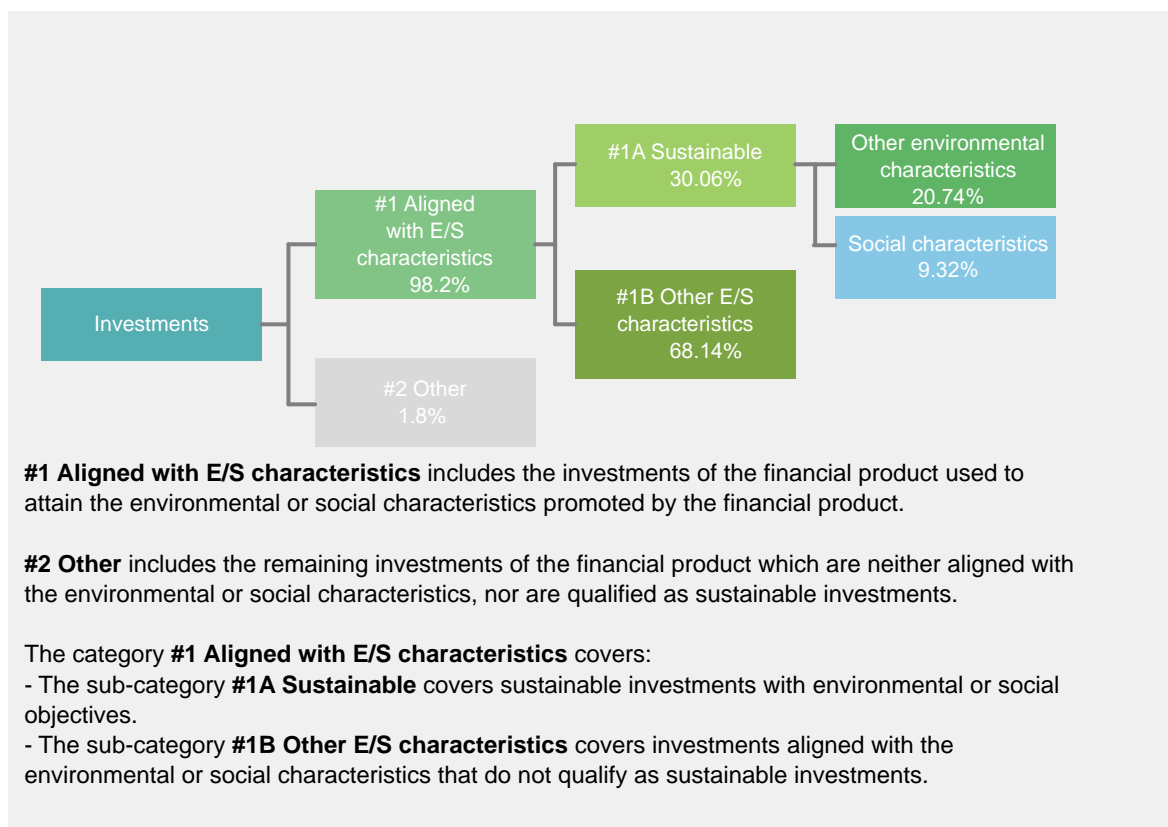
30/12/2022: 99.11 %

**Asset allocation** describes the share of investments in specific assets.

## What was the asset allocation?

This sub-fund invested 98.2% of its net assets in investments that were aligned with the promoted environmental and social characteristics (#1 Aligned with E/S Characteristics). Within this category, 30.06% of the net assets of the sub-fund qualified as sustainable investments (#1A Sustainable). The proportion of sustainable investments with environmental objectives that do not comply with the EU taxonomy was 20.74% and the proportion of socially sustainable investments was 9.32%. The actual share of sustainable investments with an environmental target that did not comply with the EU taxonomy and socially sustainable investments depended on the market situation and the investable investment universe.

1.8% of the net assets of the sub-fund were invested in all eligible assets for which either the DWS ESG assessment methodology was not applied or whose ESG data coverage was incomplete (#2 Other). Within this share, investments of up to 20% of the net assets of the sub-fund were tolerated in assets for which there was incomplete data coverage in terms of the ESG valuation approaches and exclusions described above. This tolerance did not apply to the assessment of good governance practices (using the DWS standards assessment).



## In which economic sectors were the investments made?

### db PrivatMandat Comfort - Balance ESG

| NACE-Code | Breakdown by sector according to NACE Codes                          | in % of portfolio volume |
|-----------|--|--------------------------|
| B         | Mining and quarrying   | 1.5 %                    |
| C         | Manufacturing  | 14.9 %                   |
| D         | Electricity, gas, steam and air conditioning supply                  | 1.4 %                    |
| F         | Construction   | 0.2 %                    |
| G         | Wholesale and retail trade; repair of motor vehicles and motorcycles | 4.6 %                    |
| H         | Transporting and storage   | 1.4 %                    |
| I         | Accommodation and food service activities                            | 0.1 %                    |
| J         | Information and communication  | 8.9 %                    |
| K         | Financial and insurance activities                                   | 42.5 %                   |
| L         | Real estate activities   | 1.0 %                    |

| NACE-Code   | Breakdown by sector according to NACE Codes                   | in % of portfolio volume |
|---|---|--------------------------|
| M   | Professional, scientific and technical activities             | 4.5 %                    |
| N   | Administrative and support service activities                 | 0.4 %                    |
| O   | Public administration and defence; compulsory social security | 11.4 %                   |
| Q   | Human health and social work activities                       | 0.9 %                    |
| R   | Arts, entertainment and recreation                            | 0.5 %                    |
| NA  | Other   | 5.8 %                    |
| <b>Exposure to companies active in the fossil fuel sector</b> |   | <b>10.9 %</b>            |

As of: December 30, 2024



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

Due to a lack of reliable data the sub-fund did not commit to invest a minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy. Therefore, the promoted minimum percentage of environmentally sustainable investments aligned with the EU Taxonomy was 0% of the sub-fund's net assets. However, it may occur that part of the investments' underlying economic activities were 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 Taxonomy<sup>1</sup>?**

Yes:

In fossil gas

In nuclear energy

No

The sub-fund did not take into account the taxonomy-conformity of investments in the fossil gas and/or nuclear energy sectors. Nevertheless, it might have occurred that as part of the investment strategy the sub-fund also invested in issuers that were also active in these areas.

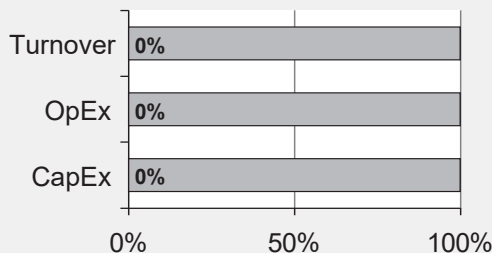
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for 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.

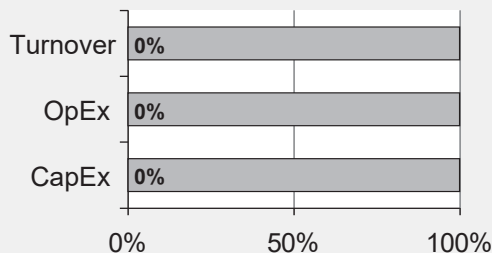
The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product 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%        |
| <b>Taxonomy-aligned</b>               | <b>0.00%</b> |
| 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%        |
| <b>Taxonomy-aligned</b>               | <b>0.00%</b> |
| 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?

The sub-fund did not have a minimum share of investments in transitional or enabling activities, as it did not commit to a minimum proportion of environmentally sustainable investments aligned with the EU Taxonomy.

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?

The share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy was 20.74%.

Shares of sustainable investments in previous reporting periods:

| reporting period | sustainable investments (total) | with environmental objective | socially sustainable |
|------------------|---------------------------------|------------------------------|----------------------|
| 29/12/2023       | 36.41%                          | 26.16%                       | 10.25%               |
| 30/12/2022       | 32.60%                          | --                           | --                   |



What was the share of socially sustainable investments?

The share of socially sustainable investments was 9.32%.

Shares of sustainable investments in previous reporting periods:

| reporting period | sustainable investments (total) | with environmental objective | socially sustainable |
|------------------|---------------------------------|------------------------------|----------------------|
| 29/12/2023       | 36.41%                          | 26.16%                       | 10.25%               |
| 30/12/2022       | 32.60%                          | --                           | --                   |



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

This sub-fund promoted a predominant asset allocation in investments that were aligned with environmental and social characteristics (#1 Aligned with E/S characteristics). In addition, this sub-fund invested 1.8% of the sub-fund's net assets into investments for which either the DWS ESG assessment methodology was not applied or for which ESG data coverage was incomplete (#2 Other). Within this share, investments of up to 20% of the sub-fund's net assets were tolerated in assets for which there was no complete data coverage with respect to the above described ESG assessment approaches and exclusions. This tolerance did not apply to the assessment of good governance practices (by means of the DWS Norm Assessment).

These other investments could have included all asset classes as foreseen in the specific investment policy, including deposits with credit institutions and derivatives.

Other investments could have used by the portfolio management for performance, diversification, liquidity and hedging purposes.

Minimum environmental or social safeguards were not or only partially considered for this sub-fund within the other investments.



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

This sub-fund followed a multi-asset strategy as the principal investment strategy. The sub-fund invested primarily in fixed and floating rate securities, equities, convertible bonds, shares of money market, bond and equity funds and dividend-right certificates. At least 35% of the net assets of the sub-fund were invested in fixed and floating rate securities, money market and near money market funds, bond funds, mixed funds, deposits with credit institutions, money market instruments, convertible bonds, warrant-linked bonds and dividend-right certificates, as well as inflation-indexed investments, certificates on investments whose underlying instruments were bonds such as bond indices and bond baskets, as well as asset-backed securities, including mortgage-backed securities. At least 25% of the sub-fund's assets were invested in equities. Investment in certificates and derivatives on hedge fund, commodity and commodity futures indices was limited to a maximum of 15%. Please refer to the special section of the sales prospectus for further details of the principal investment strategy. The sub-fund's assets were primarily invested in assets that fulfilled the defined standards for the promoted environmental and social characteristics, as set out in the following sections. The strategy of the sub-fund in relation to the promoted environmental and social characteristics was an integral part of the DWS ESG assessment methodology and was continuously monitored through the investment guidelines of the sub-fund.

#### **DWS ESG assessment methodology**

The sub-fund aimed to achieve the promoted environmental and social characteristics by assessing potential assets through an in-house DWS ESG assessment methodology, regardless of their economic prospects for success, and by applying exclusion criteria based on this assessment. The DWS ESG assessment methodology was based on the DWS ESG database, which used data from several ESG data providers, public sources, and/or internal assessments to arrive at derived overall scores. Internal assessments took into account factors such as an issuer's future expected ESG developments, plausibility of data with regard to past or future events, the willingness to engage in dialogue on ESG matters, and ESG-related decisions of a company.

The DWS ESG database derived coded scores within different assessment approaches, as detailed below. Individual assessment approaches were based on a letter scale from "A" to "F." Each issuer received one of six possible scores, with "A" representing the highest score and "F" representing the lowest score on the scale. Within other assessment approaches, the DWS ESG database provided separate assessments, including those related to revenues earned from controversial sectors or the degree of involvement in controversial weapons. If an issuer's score in one assessment approach was deemed insufficient, the sub-fund was prohibited from investing in that issuer or that asset, even if this issuer or asset would generally be eligible according to the other assessment approaches.

The DWS ESG database used, among others, the following assessment approaches to evaluate whether issuers/assets complied with the promoted environmental and social characteristics and whether companies in which investments were made applied good governance practices:

#### **• DWS Climate and Transition Risk Assessment**

The DWS Climate and Transition Risk Assessment evaluated issuers in the context of climate change and environmental changes, for example, with respect to greenhouse gas reduction and water conservation. Issuers that contributed less to climate change and other negative environmental changes or were less exposed to these risks received better scores. Issuers with an excessive climate and transition risk profile (i.e., a letter score of "F") were excluded as an investment.

#### **• DWS Norm Assessment**

The DWS Norm Assessment evaluated the behavior of companies, for example, within the framework of the principles of the UN Global Compact, the standards of the International Labour Organization, and behavior within generally accepted international standards and principles. The DWS Norm Assessment examines, for example, human rights violations, violations of workers' rights, child or forced labor, adverse environmental impacts, and business ethics. The assessment considers violations of the aforementioned international standards. These were assessed using data from ESG data providers and/or other available information, such as the expected future developments of these violations as well as the willingness of the company to engage in a dialogue on related business decisions. Companies with the worst DWS Norm Assessment score (i.e., a letter score of "F") were excluded as an investment.

#### **• UN Global Compact Assessment**

In addition to the DWS Norm Assessment, companies were excluded if they were directly involved in one or more very severe, unresolved controversies related to the principles of the UN Global Compact.

#### **• DWS ESG Quality Assessment**

The DWS ESG Quality Assessment distinguished between companies and sovereign issuers.

For companies, the DWS ESG Quality Assessment allowed for a peer group comparison based on cross-vendor consensus on the overall ESG assessment (best-in-class approach), for example, concerning the handling of environmental changes, product safety, employee management, or corporate ethics. The peer group for companies was made up from the same industry sector. Companies that scored higher in this comparison received a better score, while companies that scored lower in the comparison received a worse score. Companies with the lowest score relative to their peer group (i.e., a letter score of "F") were excluded as an investment.

For sovereign issuers, the DWS ESG Quality Assessment assessed a country based on numerous ESG criteria. Indicators for environmental aspects were, for example, handling of climate change, natural resources, and vulnerability to disasters; indicators for social aspects included the attitude to child labor, equality, and prevailing social conditions; and indicators for good governance were, for example, the political system, the existence of institutions, and the rule of law. In addition, the DWS ESG Quality Assessment explicitly considered the civil and democratic liberties of a country. Sovereign issuers with the lowest score in the peer group comparison (separate groups for developed countries and emerging markets) (i.e., a letter score of "F") were excluded as an investment.

• **Freedom House status**

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

• **Exposure to controversial sectors**

Investments in companies that were involved in certain business areas and business activities in controversial areas ("controversial sectors") were excluded. Companies were excluded from the portfolio as follows, according to their share of total revenues generated in controversial sectors.

Revenue thresholds for exclusion of controversial sectors:

- Manufacturing of products and/or provision of services in the defence industry: at least 5%
- Manufacturing and/or distribution of civil handguns or ammunition: at least 5%
- Manufacturing of tobacco products: at least 5%
- Manufacturing of products in and/or provision of services for the gambling industry: at least 5%
- Manufacturing of adult entertainment: at least 5%
- Manufacturing of palm oil: at least 5%
- Nuclear power generation and/or uranium mining and/or uranium enrichment: at least 5%
- Extraction of crude oil: at least 10%
- Unconventional extraction of crude oil and/or natural gas (including oil sand, oil shale/shale gas, Arctic drilling): more than 0%
- Coal mining: at least 1%
- Power generation from coal: at least 10%
- Coal mining and oil extraction: at least 10%
- Power generation from and other use of fossil fuels (excluding natural gas): at least 10%
- Mining and exploration of and services in connection with oil sand and oil shale: at least 10%

The sub-fund excluded companies with coal expansion plans, such as additional coal mining, coal production or coal usage, based on an internal identification methodology.

The aforementioned coal-related exclusions only applied to so-called thermal coal, i.e., coal that was used in power stations for energy production.

• **DWS exclusions for controversial weapons**

Companies were excluded if they were identified as manufacturers or manufacturers of key components of anti-personnel mines, cluster munitions, chemical and biological weapons, nuclear weapons, depleted uranium weapons or uranium munitions. In addition, the shareholdings within a group structure could also be taken into consideration for the exclusions. Furthermore, companies that were identified as manufacturers or manufacturers of key components of incendiary bombs containing white phosphorus were excluded.

• **DWS Use of Proceeds Bond Assessment**

Deviating from the assessment approaches described above, an investment in bonds of excluded issuers was nevertheless permitted if the particular requirements for use-of-proceeds bonds were met. In this case, the bond was first checked for compliance with the ICMA Principles for green bonds, social bonds, or sustainability bonds. In addition, a defined minimum of ESG criteria was checked in relation to the issuer of the bond, and issuers and their bonds that do not meet these criteria were excluded.

Issuers were excluded based on the following criteria:

- Companies and sovereign issuers with the worst DWS ESG Quality Assessment score in the peer

group comparison (i.e., a letter score of “F”);

- Sovereign issuers labelled as “not free” by Freedom House;
- Companies with the worst DWS Norm Assessment score (i.e., a letter score of “F”);
- Companies that were directly involved in one or more very severe, unresolved controversies related to the UN Global Compact;
- Companies with involvement in controversial weapons; or
- Companies with identified coal expansion plans

#### • **DWS Target Fund Assessment**

The DWS ESG database assessed target funds in accordance with the DWS Climate and Transition Risk Assessment, DWS Norm Assessment, UN Global Compact Assessment, DWS ESG Quality Assessment, the Freedom House Status and with respect to investments in companies that were considered to be manufacturers or manufacturers of key components of anti-personnel mines, cluster munitions, chemical and biological weapons (the shareholdings within a group structure were taken into consideration accordingly). The assessment methods for target funds were based on examining the entire target fund portfolio, taking into account the investments within the target fund portfolio. Depending on the respective assessment approach, exclusion criteria (such as tolerance thresholds) that result in exclusion of the target fund were defined. Accordingly, assets may be invested within the portfolios of the target funds that were not compliant with the DWS standards for issuers.

#### • **Non-ESG assessed asset classes**

Not every asset of the sub-fund was assessed by the DWS ESG assessment methodology. This applied in particular to the following asset classes:

Derivatives were currently not used to attain the environmental and social characteristics promoted by the sub-fund and were therefore not taken into account for the calculation of the minimum proportion of assets that complied with these characteristics. However, derivatives on individual issuers could only be acquired for the sub-fund if the issuers of the underlyings complied with the DWS ESG assessment methodology.

Deposits with credit institutions were not evaluated via the DWS ESG assessment methodology.

#### **DWS methodology for determining sustainable investments was defined in article 2 (17) SFDR (DWS Sustainability Investment Assessment)**

Further, for the proportion of sustainable investments DWS measured the contribution to one or several UN SDGs via its DWS Sustainability Investment Assessment which evaluated potential investments in relation to different criteria to conclude that an investment could be considered as sustainable as further detailed in section “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 applied ESG investment strategy did not pursue a committed minimum reduction of the scope of the investments.

The assessment of the good governance practices of the investee companies was based on the DWS Norm Assessment. Accordingly, the assessed investee companies followed good governance practices.



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

This sub-fund has not designated a specific reference benchmark to determine its alignment with the environmental and/or social characteristics it promotes.

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