



INFORMATION ABOUT POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISKS

DWS INVESTMENT GMBH

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1 / Introduction

This statement provides a summary of internal policies and procedures applied by DWS Investment GmbH [LEI-Code 549300K0BHJ9BX9J8J87] – DWS – as a member of DWS Group¹ regarding the integration of sustainability risks into discretionary investment decisions for financial products, namely UCITS², AIFs³ and portfolio management mandates⁴. In addition, it provides a summary of internal policies and procedures applied by DWS regarding the integration of sustainability risks when providing investment advice. This information shall be published to comply with the disclosure requirements laid down in Article 3 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector, the so-called Disclosure Regulation (“Disclosure Regulation”).

¹ DWS Group means DWS Group GmbH & Co. KGaA and its subsidiaries consisting of any companies of which DWS Group GmbH & Co. KGaA is the direct or indirect parent company with majority participations (equity or voting capital share of more than 50 %), including branches and representative offices.

² UCITS means Undertakings for Collective Investment in Transferable Securities according to the Directive 2009/65/EC on the coordination of laws, regulations and administrative provisions relating to Undertakings for Collective Investment in Transferable Securities (UCITS) as amended from time to time.

³ Alternative Investment Funds according to the Directive 2011/61/EU on Alternative Investment Fund Managers as amended from time to time.

⁴ Portfolio management (as defined in the Directive 2014/65/EU on Markets in Financial Instruments as amended from time to time) managing portfolios in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more financial instruments.

2 / Sustainability risk definition

2.1 Sustainability risk definition

Under the Disclosure Regulation, sustainability risk is a potential negative impact to the value of an investment induced by sustainability factors. Hereby, sustainability factors include environmental, social and governance events or conditions that could either be of an “outside-in” nature (such as physical climate or transition matters) or be in direct relation to the financial impact of “inside-out” effects caused by DWS group, its employees, investee companies or any other related stakeholder.

2.2. Potential impacts of sustainability risks on the return of a financial product

Sustainability risks can lead to a significant deterioration in the financial profile, liquidity, profitability, or reputation of the assets of a financial product. Unless sustainability risks are already expected and considered in the valuations of the relevant financial product's assets, they may have a significant negative impact on the expected/estimated market price and/or the liquidity of the investment and thus on the return of the financial product. Potential impacts on the return of a financial product may depend on various aspects, how the investment policy and asset universe of the product are related to or impacted by sustainability events or conditions.

3 / Sustainability governance

DWS, as a member of DWS Group, is represented in the sustainability governance of DWS Group.

Sustainability governance at DWS Group starts with the DWS Executive Board, which has the overall responsibility for managing the business activities of DWS Group. This includes the responsibility for managing sustainability-related risks and opportunities. To enable a focus on sustainability topics, the Executive Board has delegated its responsibility for the implementation of the sustainability strategy to the DWS Group Sustainability Committee, which reports to the DWS Executive Board regularly and as required. The committee is mandated to implement the sustainability strategy as approved by the DWS Executive Board on fiduciary and corporate levels across business and infrastructure areas and legal entities.

The responsibility for approving key risk management principles, risk appetite metrics, and thresholds related to sustainability risks and adverse impacts has been assigned to the DWS Risk and Control Committee. The DWS Reputational Risk Committee is responsible for evaluating and monitoring matters which might trigger potential reputational risk. Further details on DWS Group's sustainability governance set-up can be found in DWS Group's Sustainability Statement integrated in the Annual Report 2025. The various DWS Group's divisions are responsible for setting up, maintaining, and reviewing policies, processes, and frameworks through which the sustainability strategy is implemented in the divisional processes.

4 / Sustainability risk integration into investment decision-making processes

The integration of sustainability risks into investment decision-making processes is governed by internal procedures and is tailored to accommodate unique characteristics of individual financial products.

The types of DWS's financial products encompass:

- Actively managed investment funds (UCITS and AIFs) and portfolio management mandates - the “Actively Managed Portfolio Business” spanning traditional classes including equity, fixed-income securities, cash, investment funds and alternative investments in form of tradable investments,
- Passively managed investment funds (UCITS and AIFs) and portfolio management mandates - the “Passively Managed Portfolio Business” spanning traditional asset classes.

4.1. Actively managed portfolio business

In DWS's actively managed investment funds (UCITS and AIFs) and portfolio management mandates for traditional asset classes, sustainability risks are considered at multiple stages of the respective investment decision-making processes, such as in issuer analysis, portfolio construction, portfolio implementation, and ongoing portfolio monitoring. Sustainability factors potentially inducing sustainability risks may comprise e.g., greenhouse gas emissions, labour standards, anti-bribery and anti-corruption measures.

Sustainability risks do not, in themselves, preclude investments. Instead, they are evaluated alongside a broad spectrum of factors and risks within the overall context of each investment case. However, where sustainability-related investment guidelines apply, they may directly impose specific investment restrictions.

The DWS ESG Engine, a proprietary software tool, is the centerpiece in the process to integrate sustainability risks into investment decision-making processes for traditional asset classes. It is a multi-source ESG data aggregation, structuring and processing device, which allows a consolidated and qualified ESG analysis, based on the ESG inputs from several ESG data providers, public sources and/or DWS internal assessments and research. DWS ESG Engine output includes e.g. assessments on climate risk, norm-based controversies, and overall issuer sustainability profiles. The ESG Engine is seamlessly embedded within the portfolio management platform, BRS® Aladdin, ensuring efficient access to ESG data and its effective utilization in investment strategies.

Further sources of information facilitating integration of sustainability risk comprise third-party research, company disclosures, general news flow, and insights gained through dialogue/engagement⁵ with corporate issuers.

4.2. Passively managed portfolio business

In DWS's passively managed investment funds (UCITS and AIFs) and portfolio management mandates, excluding commodity indices, sustainability risks are primarily integrated during the product conception phase, encompassing index selection, the setup of model portfolios for Active ETFs, and the definition of sustainability-related product attributes.

⁵ Insights through engagement with corporate issuers are only available to Investment Professionals within DWS Investment GmbH, DWS Investment S.A., DWS International GmbH and DWS CH AG.

For index selection, DWS also works in conjunction with index administrators and index calculation agents to embed rules relating to certain sustainability risks into the construction of new indexes. For financial products individually set up for clients and where those clients have not yet finalised the choice of their benchmarks, DWS typically asks about the client's consideration of sustainability factors when selecting indices and determining investment policies.

5 / Sustainability risk integration in investment advice

Within its classic ongoing investment advice mandates business⁶, DWS provides ongoing investment advice in accordance with an advisory agreement concluded with the relevant client. The investment advisory universe of DWS for classic ongoing investment advice includes a broad range of financial instruments, e.g., equities, fixed-income securities, structured securities as well as UCITS and AIFs. DWS also provides ongoing investment advice based on so-called model portfolios.

Alongside other factors and risks, DWS integrates sustainability risks into its classic ongoing investment advice mandates and into model portfolio setups. The DWS ESG Engine, supplemented by additional sources of information, supports the integration processes.

⁶ Advisory Services are assets hold or managed by a third party on which we provide, on the basis of contract, advice of an ongoing nature including regular or periodic assessment, monitoring and/or review.

6 / Sustainability Risk integration in the risk management process

6.1 Approach and Objective

Complementary to sustainability-related investment guidelines the risk management function of DWS has established independent oversight processes related to sustainability risks. The framework for traditional liquid investments aims to provide additional governance which is integrated into overall investment risk management policies and procedures within DWS Group. It aims to raise sustainability risk awareness across involved parties and to provide transparency through highlighting identified sources of elevated levels of sustainability risk. To achieve this, selected sustainability-related sources of risk per fund are identified, and observations are made transparent and where deemed required evaluated with all relevant stakeholders.

6.2 Risk Analysis and Reporting

For each fund, based on its investment objective and risk profile, sustainability risk appetite levels related to selected sustainability risk indicators are defined. Such indicators may amongst others include high concentrations of issuers showing a poor sustainability risk profile or the exposure of such issuers in comparison with the relevant reference benchmark.

The risk management function monitors and reports the risk indicators related to the individual funds and identified exceedances or other relevant observations are reviewed regularly with stakeholders from the investment and product divisions. The reports include sustainability risk metrics as well as selected market risk metrics to provide a holistic overview for each fund.

Where deemed necessary, fund managers or asset class responsible persons are informed, and corresponding investment rationale or actions may be requested by the risk management function. Key results of the oversight process are also reported to the Risk and Control Committee of DWS Group as well as the impacted legal entity Boards.

6.3 Integration into other investment risk management processes

In addition to the above, selected sustainability risk indicators are also integrated in other investment risk management processes, such as counterparty risk management or concentration risk management. Within such processes, selected sustainability risk indicators are considered as additional indicators in the evaluation of the individual issuers.

Version history

Date	Explanation of changes
07.05.2026	<ul style="list-style-type: none"> • Reference to the SFDR definition of sustainability risk • Refinement of Section 2 • Refinement of Section 3 • Amendments to the content and level of detail of Sections 4.1, 4.2, reflecting updated internal sustainability risk integration procedures • Deletion of Section 4.3 given that OAP Business is in scope of the Sustainability Risk Integration into Liquid Investment Processes IP and the information is already covered in Section 4.1 • Refinement of Section 5
15.09.2024	Amendments in the content and depth of section 3 and section 4.1
15.03.2024	Amendments in the content and depth of section 3 and section 4.1.1 based on an updated version of the ESG Integration Policy for Active Investment Management.