


DWS Investment Management Americas, Inc.
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FX Global Code: Statement of Adherence

We refer to the FX Global Code as published by the Global Foreign Exchange Committee as set out at the time of this statement at: https://www.globalfxc.org/docs/fx_global.pdf (the "Code").


DWS Investment Management Americas, Inc., on behalf of the accounts and funds on whose behalf it participates in Global Foreign Exchange Markets ("DIMA"), has reviewed the content of the FX Global Code ("Code") and acknowledges that the Code represents a set of principles generally recognised as good practice in the wholesale foreign exchange market ("FX Market"). DIMA confirms that it acts as a Market Participant as defined by the Code, and is committed to conducting its FX Market activities ("Activities") in a manner consistent with the principles of the Code. To this end, DIMA has taken appropriate steps, based on the size and complexity of its Activities, and the nature of its engagement in the FX Market, to align its Activities with the principles of the Code.

DWS Investment Management Americas, Inc.



By: George Cutrambone
Its: Director

DWS Investment Management Americas, Inc.



By: John Millette
Its: Chief Legal Officer

Date: December 12, 2018