
Disclosure Statement

Operating Principles for Impact Management

1 Statement by the authorized executive

The DWS Sustainable Investments (SI) is a group on the DWS² platform. The SI team, through its more than 20 years of history, creates solutions for institutional, private investors, development banks, and governments, that share common social and environmental investment objectives and seek attractive financial returns.

Since its inception, US\$1.8 billion in private capital has been deployed into sustainable investment opportunities. Today, the funds managed by SI team are with global investments ranging from sustainable agriculture to renewable energy, energy efficiency, and investing in companies that envisage innovative energy production and saving solutions. The SI Team represents experienced global investing capabilities that include several regionally-focused strategies in Europe, Africa, and Asia.

SI represents DWS as a key thought partner and active participant in a wide variety of industry groups representing the cutting edge of impact and sustainable investing. Deutsche Bank AG (DB) has received an accreditation from the **Green Climate Fund**, which manages country pledges of over US\$10 billion to address climate change. DWS SI acting on DB's behalf is developing a new fund strategy. SI funds also map to and are registered with the **United Nations Sustainable Development Goals (SDGs)** - 17 goals, each connecting to a global challenge, created and adopted by 193 countries in 2015.

In 2019, DWS SI Joined more than 80 asset managers in signing on to the **Operating Principles for Impact Management**, which provide best practices for managing assets for impact; investors increasingly expect to see a commitment to these principles.

DWS Sustainable Investments is pleased to affirm hereby its adoption of the Impact Principles.

This Disclosure Statement applies to

- _ Country-Specific Clean Energy Fund
- _ Country-Specific Environment Fund
- _ Sustainable Agriculture Strategy
- _ Sustainable Energy Strategy

Covered assets of these investments as of end of September 2021 represent US\$722.43 million.



Andrew Pidden

Head of Sustainable Investments, DWS

¹ Prepared and valid as of November 29, 2021, subject to change without further notice.

² DWS is the brand name under which DWS Group GmbH & Co. KGaA and its subsidiaries operate their business activities. Clients will be provided DWS products or services by one or more legal entities that will be identified to clients pursuant to the contracts, agreements, offering materials or other documentation relevant to such products or services.

2 Statement of alignment to each principle

Principle 1

Define strategic impact objective(s), consistent with the investment strategy.

The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.

Country-Specific Clean Energy Fund

The Fund is a dedicated fund aiming to help corporates efficiently execute on their clean energy commitments in greening the value chain through investments in renewable energy assets.

The Fund finds its impact echoing 3 of the 17 UN Sustainable Development Goals (SDGs):

- i. **Goal 7** – Ensure access to affordable, reliable, sustainable and modern energy for all.

The Fund invests in the development of clean energy assets, contributing to an increasing share of power supply from clean power sources. The Fund's investment activity also facilitates the fund flows into the emerging economy.

- ii. **Goal 11** – Make cities and human settlements inclusive, safe, resilient and sustainable.

The Fund's portfolio generates clean electricity that feeds into the local grid and supplies the daily power needs of the surrounding industries, which directly and indirectly benefit the local communities and citizens on access to green power and enjoying a cleaner environment.

- iii. **Goal 13** – Take urgent action to combat climate change and its impacts.

The presence of a clean energy power plant represents the replacement of a potential fossil fuel alternative that reduces the CO2 emissions from electricity sold.

Country-Specific Environment Fund

The Country-Specific Environment Fund is dedicated to mitigating climate change, controlling pollution and improving energy efficiencies through investments in non-publicly listed companies involved in the renewable energy, clean technology, water and waste sectors in the emerging economy.

SUSTAINABLE ENERGY



The Fund has been contributing effectively to 4 of the 17 SDGs:

i. **Goal 6** – Ensure availability and sustainable management of water and sanitation for all.

The Fund has closed an investment in a company specializing in wastewater treatment and solid waste treatment that has supplied wastewater and solid waste treatment equipment and services in more than 30 countries and for more than 20 years. The company is the exclusive long-term supplier of sewage treatment systems and solar power systems for United Nations. The quantity of sewage processed by the systems delivered by the company is consistently monitored as part of the Fund’s reporting activity.

ii. **Goal 7** – Ensure access to affordable, reliable, sustainable and modern energy for all.

Energy is a central to nearly every major challenge and opportunity the world faces today. The UN SDGs target to increase renewable energy share in the global energy mix and improve global energy efficiency. The Fund has included several companies specializing in renewable energy-related businesses and energy efficiency management into the Fund’s pipeline. The Fund also has closed an investment in a company that supplies integrated solar power generation systems to the United Nations. The number and the power generation capacity of solar power generation systems delivered by the company are consistently monitored as part of the Fund’s reporting activity. Based on this data and average utilization hours, we can estimate the green power generated from the systems delivered by the invested Company and calculate the corresponding environmental impact.

iii. **Goal 11** – Make cities and human settlements inclusive, safe, resilient and sustainable.

The Fund places sustainable city lives as a priority while making investment decisions. The Fund has closed an investment in a company specializing in wastewater treatment and solid waste treatment and the quantity of solid waste processed by the systems delivered by the company is consistently monitored. The Fund has also closed another investment in a company involved in air pollution control in 2021.

iv. **Goal 13** – Take urgent action to combat climate change and its impacts.

The Fund has closed an investment in a company involved in green construction materials production. The construction materials provided by the company are made from recycled industrial waste and can bring significant positive environmental impact. The resources and energy savings and the carbon emission reduction due to the delivery of the green materials are consistently monitored. The Fund has also been proactively seeking other investment opportunities to help to reduce greenhouse gas emissions.

The fund has closed an investment in the de-SOx and de-NOx industry for GHG emission intensive sectors, e.g. steel & iron manufacturing and cement.

Country-Specific Environment Fund carefully evaluates the environmental impact of the portfolio companies for the whole investment lifecycle and engage third party professional consultant for the preparation of ESG reports on a quarterly basis accordingly.

Sustainable Agriculture Strategy

The Sustainable Agriculture Strategy is a public-private blended fund with the objective to uplift the agricultural potential through sustainable investments across the agricultural value chain. The Strategy is an internally managed fund for which DWS acts as investment advisor and the International Labour Organization together with the UN Environment Programme as compliance advisor. By providing financing where it is most needed, the Strategy aims to contribute to inclusive growth and environmental sustainability increasing productivity, primary agricultural production, local processing, trade, employment, local value addition, knowledge transfer, and resilience, for the benefit of farmers, entrepreneurs and workers, men and women alike.

The Strategy was founded within the framework of the Millennium Development Goals and its objectives remain highly relevant under the global development agenda as expressed in the Sustainable Development Goals (SDGs), which underscore the importance of sustainably investing public and private resources as a means to end poverty, achieve food security and promote decent work.

By supporting the business growth of agricultural enterprises, connecting farmers to inputs and markets, contributing to local value creation and ultimately reducing poverty, the Strategy's mission is directly linked towards achieving SDG 1 on no poverty, SDG 2 on zero hunger and SDG 8 on Decent Work and economic growth. By targeting agricultural companies in least developed countries, the Strategy responds to SDG 10 on reduced inequalities. Finally, the Strategy's sustainable investing approach addresses topics covered by other SDGs, including sustainable management of water, sustainable production patterns and sustainable use of terrestrial ecosystems.

Investments chosen by the Strategy will directly and indirectly support households in the agricultural sector, through improved access to inputs, finance, technology, markets and skills development, as well as innovation and transformation in production practices, to contribute to the reduction of poverty and vulnerability, increased food security, incomes and resilience, and decent employment. The theory of change presented in the table below describes the Strategy's approach for contributing to sustainable development and the SDGs.

Inputs	Private and public investments into Sustainable Agriculture Strategy	Private and public grants into Sustainable Agriculture Strategy TA Facility		
Activities	Debt, and in special circumstances equity, provided to Direct and Indirect Investee Companies along the agricultural value chain as well as Financial Institutions	(Matched) grant funding from Sustainable Agriculture Strategy TA Facility for core business development and inclusive business development services		
Outputs	<p>Pls use Sustainable Agriculture Strategy Facility for:</p> <ul style="list-style-type: none"> _ Acquisition/building of processing, warehousing and storage facilities _ Direct purchase and marketing of key crops from farmers, including smallholders _ Supply of inputs, capital, training and essential services to farmers (inputs, farm equipment, farming technologies, sustainable practices) 	<p>Pls use Sustainable Agriculture Strategy Technical Assistance for:</p> <ul style="list-style-type: none"> _ Core business development support _ Inclusive business development support 		
Outcomes and Impact Dimensions	<p>All Sustainable Agriculture Strategy activities are contributing to a selection of the following seven impact dimensions:</p> <table border="0"> <tr> <td style="vertical-align: top;"> <p>1. Primary agricultural production (SDG 2)</p> <ul style="list-style-type: none"> _ Productivity (yield) _ Production _ Good Agricultural Practices _ Certification <p>2. Local Processing (SDG 8)</p> <ul style="list-style-type: none"> _ Processing _ Productivity _ Significance of Value Addition _ Certification <p>3. Outreach to producers (SDG 1, 2)</p> <ul style="list-style-type: none"> _ Outreach to smallholders _ Impacted individuals / female individual impacted _ Products / services provided _ Certification </td> <td style="vertical-align: top;"> <p>4. Employment (SDG 8)</p> <ul style="list-style-type: none"> _ FTE and growth _ Gender _ Terms of employment _ Working conditions <p>5. Trade (SDG 8, 17)</p> <ul style="list-style-type: none"> _ Imports and exports _ Certification <p>6. Environment (SDG 12, 13, 14, 15)</p> <ul style="list-style-type: none"> _ Energy, water, solid waste _ GHG and air emissions <p>7. Social and Environmental Management System</p> <ul style="list-style-type: none"> _ Systematic S&E management _ S&E regulations _ Stakeholder engagement _ Supply chain </td> </tr> </table>		<p>1. Primary agricultural production (SDG 2)</p> <ul style="list-style-type: none"> _ Productivity (yield) _ Production _ Good Agricultural Practices _ Certification <p>2. Local Processing (SDG 8)</p> <ul style="list-style-type: none"> _ Processing _ Productivity _ Significance of Value Addition _ Certification <p>3. Outreach to producers (SDG 1, 2)</p> <ul style="list-style-type: none"> _ Outreach to smallholders _ Impacted individuals / female individual impacted _ Products / services provided _ Certification 	<p>4. Employment (SDG 8)</p> <ul style="list-style-type: none"> _ FTE and growth _ Gender _ Terms of employment _ Working conditions <p>5. Trade (SDG 8, 17)</p> <ul style="list-style-type: none"> _ Imports and exports _ Certification <p>6. Environment (SDG 12, 13, 14, 15)</p> <ul style="list-style-type: none"> _ Energy, water, solid waste _ GHG and air emissions <p>7. Social and Environmental Management System</p> <ul style="list-style-type: none"> _ Systematic S&E management _ S&E regulations _ Stakeholder engagement _ Supply chain
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The Strategy’s portfolio approach is to achieve a balanced impact across the dimensions listed. Due to the diversity of the beneficiaries, the contribution dimension differs from one investment to another. For the purpose of reporting under the Impact Principles, the Strategy priority focus will be on reporting annually gender-disaggregated employee numbers of investee companies.

Sustainable Energy Strategy

The Sustainable Energy Strategy is an innovative public-private partnership dedicated to mitigating climate change through energy efficiency measures and the use of renewable energy in the member states of the European Union. The Strategy aims to support the climate goals of the European Union (EU 2030 Framework for Climate and Energy and the climate-neutral objectives of the European Green

Deal) to promote a sustainable energy market and foster climate protection. The Strategy’s objectives are

- _ Contributing to the mitigation of climate change
- _ Contributing to resilient, energy-efficient and green infrastructure in the cities and regions while financing energy efficiency, small scale renewable energy and clean urban transport with all projects to achieve a minimum of 30% primary energy or CO2 savings

The Strategy has registered its partnership with the UN on the Sustainable Development Goals (SDGs) partnership platform. Partnerships for sustainable development are voluntary multi-stakeholder initiatives, whose efforts are contributing to the implementation of inter-governmentally agreed development goals and commitments. The Strategy has been contributing effectively to three of the 17 SDGs:

SUSTAINABLE ENERGY



i. **Goal 7** – Ensure access to affordable, reliable, sustainable and modern energy for all.
 The UN SDGs target to increase substantially the share of renewable energy in the global energy mix and double the global rate of improvement in energy efficiency by 2030. The Strategy finances a range of energy efficiency projects (e.g. building retrofit, street lighting) and renewable energy electricity generation projects (e.g. small-scale wind) which have a minimum of 30% primary energy or CO2 savings. The indicators are already included within the Strategy’s regular monitoring and evaluation scheme and are published periodically.

ii. **Goal 11** – Make cities and human settlements inclusive, safe, resilient and sustainable.
 All projects within the Strategy’s portfolio contribute to the communities in a sustainable way, as all invested projects have a public link. The Strategy’s investing activities enable public entities and/or public sector to have access to renewable energy, energy efficiency and clean urban transport investments, which directly benefit the local communities, cities and dwellers.

iii. **Goal 13** – Take urgent action to combat climate change and its impacts.
 The Strategy supports a number of countries within the European Union to establish and operationalise their policies/strategies/plans, which increases their ability to adapt to the adverse impact of climate change, and foster climate resilience and low greenhouse gas emissions development in a sustainable manner. The carbon emission savings data are consistently observed and monitored, as part of the Strategy’s reporting activity.

As part of the Strategy’s due diligence and for the duration of each individual investment, The Strategy evaluates and monitors periodically the carbon emissions and primary energy savings’ performance in alignment with the International Performance Monitoring and Verification Protocol (IPMVP), which requires every project to establish a baseline energy consumption and then conduct a post-project implementation assessment.

Principle 2

Manage strategic impact on a portfolio basis.

The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

We are working on incorporating certain impact KPIs into the personal performance goals and objectives in annual performance review process for the relevant key investment team members of the Sustainable Investments funds and strategies. Such incorporation would be done in line with the overall criteria and requirements of DWS' HR policies governing the performance and remuneration process.

Country-Specific Clean Energy Fund

The Fund seeks to achieve impact on each invested project and on the portfolio basis utilizing a systematic investment process with standardized underwriting criteria. The performance of each project aligns climate impact with the financial returns.

The Fund integrates impact considerations throughout the different phases during the investment process, specifically:

- _ **Fatal Flaw Screening:** when a project enters into the pipeline, the Manager will conduct initial business due diligence on a high-level basis, focusing on the region's natural resources and regulatory compliance issues, and identifying any ESG red flags such as land, water preservation and noise.
- _ **Due Diligence:** the Fund engages internationally-recognized professional advisors to conduct in-depth due diligence on financial, legal and technical aspects to examine and evaluate the profile and performance of the targets. ESG risks for project specifics will be identified and included in transaction structuring and valuation. Mitigation measures will be incorporated into the transaction documents as a condition precedent or subsequent to ensure such risks are appropriately attended to.
- _ **Quarterly Report and Annual Audit:** the Fund collects performance KPIs for each portfolio project and translates them into measurable indicators to be included in the quarterly report. The quarterly report is disclosed to the Fund investors. Annual audit on each investee is carried out to ensure their compliance with the reporting standards and management criteria as set out in the transaction agreements.

– **Ad-hoc Reports:** in instances where the investee performance and impact are affected in a specific or systemic manner, the Manager will evaluate and document the situation for such affected projects and communicate with the investors on the implications.

Country-Specific Environment Fund

The Fund carefully examines and monitors the environmental impact of its investments in every step of its investment process:

– **Pipeline Selection:** The Fund focuses on investments in enterprises involved in sectors like renewable energy, clean technology, water and waste which have positive environmental impact.

– **Preliminary Investment Memorandum (PIM):** The PIM is a memorandum prepared by the Deal Team and may be submitted to the Investment Committee (IC) before the signing of a term sheet with the proposed investee company. A PIM will provide a brief summary of the proposed investment including environmental benefits: a brief description of the benefits to the environment brought about by the company's business and how they will be measured.

– **Due Diligence:** During the due diligence phase, the Manager conducts thorough in-depth due diligence on the investment opportunity and evaluates carefully the company's environmental impact. For example, the Fund reviews the technical documents and calculates the resources and energy savings and waste and carbon emission reduction as a result of the daily activities of the pipeline company.

– **Quarterly Report:** The Fund is engaging with a quality third party consultancy to conduct the quarterly ESG reporting for the Fund on both the fund level and portfolio company level. The deliverables provided by the third party consultancy include ESG Rating for portfolio company investments, Quality ESG Analysis Report and ESG KPI Metrix report for portfolio company investments.

Sustainable Agriculture Strategy

The Strategy is committed to prioritising investments that contribute to improving food security, create employment and boost local incomes. True to the concept of impact investing, the Strategy seeks to track, measure and report on the social and environmental performance of its investments

to assess its progress and impact. Impact management is integrated into every step of the investment cycle.

– **Establish Impact:** When it comes to selecting investments, the potential for development impact is a key factor. During the due diligence process, the alignment of an investment with The Strategy's strategic impact orientation is carefully reviewed. Only if an investment meets the requirements for financial return and development impact potential, as well as key environmental and social requirements, it will be pursued.

– **Monitor Impact:** The Strategy collects impact information through a three-level monitoring and evaluation (M&E) framework, which spreads from the analysis of annually self-reported data of investee companies to rapid appraisals conducted by third parties for each investment to long-term in-depth impact evaluations. The results of such impact reviews are reported in the Strategy's annual report as well as using ad-hoc impact briefs.

The Strategy's commitment to incentivizing impact across the dimensions listed above is reflected in the performance fee component of investment advisor remuneration, which is calculated based on both financial and impact performance. The evaluation criteria are reviewed annually by the Board of Directors.

Sustainable Energy Strategy

To determine the impact of the Strategy's investments through measuring, monitoring and verification processes (M&V), the Strategy technical criteria will be assessed, which depend on the project's volume and the technology applied. The appropriate M&V methods will then be adopted.

All projects are evaluated using a pre-and post-project analysis approach to calculate savings. This provides energy consumption, primary energy and carbon savings.

Specifically, the impact achievement at the portfolio basis is managed through:

– **Initial Screening:** Investment Managers screen the eligibility of projects in the pipeline, if they are in line with the Strategy's general criteria - in sectors like renewable energy, energy efficiency and clean urban transport with a public link and positive social and environmental impact. In case of positive screening, detailed due diligence (including on-site) with legal and technical advisors will be carried out.

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- Due Diligence:** The Strategy reviews project technical documents submitted by the project developers to ensure that the information provided is complete and complies with the Strategy's energy and carbon calculation and reporting principles. Among the submitted technical files by the project developer, a technology-specific due diligence questionnaire created by the Strategy is attached, where the investment manager updates yearly emission conversion factors. The investment manager then evaluates the projects' eligibility along with the various criteria including estimating project carbon and/or primary energy savings using validated calculations. Avoided CO₂e amount in tones per million of Euros invested should also fall within the range that appear in the market standards given geography and project scale. Besides, the project developer is also requested to submit Social and Environmental Management System (SEMS) questionnaire, so that we can ensure the compliance of the project's social and environmental aspects to the EU Directives on Environmental Impact Assessment.
 - Investment Preparation:** Investment Committee proposal is drafted, containing investment recommendations and the findings on the due diligence process, projects economics and risk mitigation strategy. Upon approval of the Investment Committee, signing of documentation and disbursement upfront or agreed milestones will follow.
 - Reporting:** Partner Institutions will provide quarterly data on energy consumption, primary energy/CO₂e savings. The Strategy reports project-specific and aggregates portfolio primary energy and carbon savings on quarterly basis. The realised investments are included in the quarterly report. The Social & Environment (S&E) reporting is also conducted in a periodic basis on the project level. The dedicated team from the Strategy manages the Strategy's annual audits, ensures that project lifetime savings and S&E aspects are aligned with estimations and investment criteria. When necessary, it will be proposed an on-site audit plan for assurance of project savings, especially for investments through local financial institutions (FI).

Principle 3

Establish the Manager's contribution to the achievement of impact.

The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels. The narrative should be stated in clear terms and supported, as much as possible, by evidence.

Country-Specific Clean Energy Fund

The Fund is dedicated to making investments into clean energy power assets to promote the use of clean energy, mitigate greenhouse gas emissions and improve environmental quality. The Manager contributes to the achievement of impact for each investment through the holistic ESG-salient investment process and post-investment management, specifically:

- **Due Diligence and Documentation:** financial, legal and technical risks found during the due diligence process are evaluated and rectification measures are incorporated into the transaction documents as condition precedent or subsequent, as well as ongoing operational standards. The Fund seeks to improve the management quality and operational efficiency through such arrangements for better impact performance.
- **Ongoing Monitoring:** the Fund convenes monthly operation review and quarterly board meetings with each investee to discuss any operational issues and provide resources to facilitate problem-solving.
- **Industry Example:** the Fund serves as an example of how multinational corporations seeking to mitigate their carbon emissions could invest in one of the fastest growing clean energy markets globally, and attracts substantial financial resources into clean energy in an emerging economy.

Country-Specific Environment Fund

The ultimate aim of the Fund is to seek to provide the Partners with attractive risk-adjusted investment returns through a combination of capital appreciation and cash income yield by making investments primarily in non-publicly listed enterprises involved in the renewable energy, clean technology, water, and waste sectors. The Investment Manager carefully evaluates every investment opportunity to make sure it is in line with the Fund's investment criteria.

During the internal due diligence process, the deal team carefully examines and evaluates the investment risks and ESG impact of the pipeline company and all the findings are duly recorded in the PIM. During the external due diligence process, the Fund engages professional third parties to help

identify potential risks of the investment opportunity and all the findings and documented. In the final transaction documents, all the potential risks identified will be addressed and the Fund always requires our target company to comply with the highest standard of operational standards and cooperate to collect data for quarterly impact reporting.

The Fund has engaged a quality third party consultancy to conduct the quarterly ESG reporting for the Fund on both the fund level and portfolio company level. Each quarter, the quantified environmental impact in terms of resources savings, energy savings, pollution controlled amount, carbon emission reduction, and waste reduction as a result of the daily businesses of the portfolio companies will be calculated and reported to our investors.

The Fund cooperates with the consultancy to develop applicable methodologies for each portfolio company to determine their environmental impact. For example, the Fund has closed an investment in a company specializing in environmentally friendly construction materials production. To calculate the CO₂e reduction every quarter, we first collect the quantity of construction materials delivered this quarter and calculate the cement consumption saved due to the adoption of our green construction materials based on construction industry's standards. The cement savings can translate to CO₂e reduction according to the "cement industry CO₂ calculation methodology". The Fund also closed an investment in a company that involves in wastewater treatment equipment and solar power generation system provisioning. Every quarter the number and treatment capacity of the wastewater treatment equipment delivered by the Company are monitored. The number and the power generation capacity of solar power generation systems delivered by the company are also monitored. Based on these data and the average utilization hours, we can estimate the wastewater treated and the green power generated by the systems delivered by the invested Company and calculate the corresponding environmental impact. As the Fund's investment activities are involved in many different kinds of industries and the Fund will keep working with the consultancy to develop applicable calculation methodologies for different industries and improve the accuracy.

Sustainable Agriculture Strategy

Sustainable and responsible investments are at the heart of the Strategy's operations. The Strategy channels private and public capital into agriculture seeking to generate additionality of its financing, i.e. financing that increases access to finance for the agricultural sector where otherwise it would not have been available (financial additionality) and leverages development impact that otherwise would not have occurred (development additionality according to OECD definition). Financial flows channelled by the Strategy support private sector development, thereby improving local capacity and skills development at the local and national levels, increasing tax revenues and foreign currency inflows. By improving their S&E practices, Partner Institutions will be better positioned to generate positive impact and manage risks, which will further allow them to access other sources of capital and maximize their positive impact. Since its inception, the Strategy has invested more than US\$332 million in over 18 countries (as of 31 March 2021).

- **The Strategy's contribution to achieving impact:** The Strategy's contribution to each investment is outlined in each respective investment proposal defining the opportunity, presenting the financial and impact case and seeking approval from its Investment Committee. The proposals are required to include a contribution narrative that highlights why the Strategy's investment will help improve food security and or increase incomes as well as reach its social and environmental objectives.
- **The Strategy reports on its impact achievements,** especially the generation of additional employment opportunities on a gender disaggregated basis in its annual report. Such report is available on the Strategy's dedicated website which serves as a platform of transparent communication around the impact of the Strategy investments to our clients and other stakeholders. On such website, annual reports as well as quarterly reports, together with ad-hoc Strategy activity-related news are maintained and published.

Sustainable Energy Strategy

The ultimate aim of the Strategy is to foster energy efficiency and intelligent use of energy as a resource in local communities, to enable projects which are not only environmentally friendly but also financially sound. The Strategy can invest in a range of energy efficiency, clean urban transport and small-scale renewable energy technologies, providing the carbon or primary energy savings investment criteria are met. Each project must achieve at least 20 % primary energy and / or carbon savings compared to baseline. The Strategy may only invest when savings and other investment criteria are fulfilled. It contributes to reduce public spending and remove pressure from local municipalities' budgets with various project finance structures.

The Manager has developed a proprietary carbon and energy monitoring and verification tool, which on a regular basis, automatically and consistently calculates anticipated and realized energy, primary energy and carbon savings of all investment projects in the Strategy's portfolio, which could be accessed via public website. The Strategy has this dedicated website to serve as a platform of transparent communication around the impact of the Strategy's investments to our clients and other stakeholders, where the annual reports and quarterly reports, together with ad-hoc Strategy's activity-related news are maintained and published up to date.

The Investment Manager conducts the Strategy's business on behalf of the Strategy, identifies proposes potential new investments in line with the Strategy's eligibility criteria as per investment guidelines that are serving to reach the objectives of the Strategy as described above.

Principle 4

Assess the expected impact of each investment, based on a systematic approach.

For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice.

Country-Specific Clean Energy Fund

The Manager assesses the likelihood of achieving the intended impact holistically throughout the investment process. During the initial business diligence and the in-depth due diligence process, the Manager assesses the resources and economics of the assets and engages professional technical advisors to conduct energy yield analysis and quantify the uncertainty level taking all the project specifics into consideration. The Manager also considers the qualitative factors which will potentially impact the ongoing operations of the assets and come up with rectification/mitigation measures accordingly with the professional advisors. All findings are included in the transaction documents and monitored on a regular basis, which helps to enhance the performance of the portfolio.

Country-Specific Environment Fund

The Fund invests in projects in renewable energy, clean technology, water, and waste sectors with an intended impact on energy efficiency, resources efficiency, share of renewable energies, and waste proper disposal ratio, for the cities and regions in the emerging market.

The Investment Manager reviews the business of each project in detail in order to evaluate and monitor each individual project's impact assessment from the due diligence to the end of investment. The Fund has engaged a quality third party consultancy to help evaluate the environmental impact of every set of equipment provided or each service delivered by the portfolio companies, and the Investment Manager assesses the expected environmental impact of each investment based on the business plan of each portfolio company and does a sensitivity analysis to evaluate the impact varying from ex-ante expectations under different scenarios with different business plan completion ratios. At present, the Fund mainly adopts local standards, such as the "cement industry CO2 calculation methodology" to prepare the quarterly impact report and determine the environmental impact. In the future, the Fund will work with the consultancy to introduce the international standards in environmental impact assessment processes.

Sustainable Agriculture Strategy

The Strategy assesses the expected impact of all individual investments in its portfolio via its three-level monitoring and evaluation (M&E) framework, which spreads, as noted before, from the analysis of self-reported data (during due diligence and annually as agreed in the facility agreement) of investee companies to rapid appraisals conducted by third parties to long-term in-depth impact evaluations with (quasi-) experimental designs.

The objective of the self-reported data and rapid appraisals is to collect and analyse a selected and limited set of comparable data from each investment of the Strategy, as a basis for assessing the overall impact of the Strategy. In-depth impact evaluations provide the Strategy with empirical evidence to assess the effectiveness of funding a particular approach, e. g. outgrower schemes. This provides the Strategy with valuable insights and allows the Strategy to learn and inform future investments.

The process follows clear investment procedures and is done as described in the M&E framework. During due diligence, the investment advisor together with the Strategy compliance advisor reviews the Strategy impact dimensions together with the investee and establishes which impact can be achieved and who will to what extend benefit from the investees operations and activities. The results are summarized in an impact grid which forms an integral part of each investment proposal of the Strategy. Depending on the agricultural value chain position of an investee the impact proposition differs. Both, investment advisor together with the Strategy compliance advisor comment on the likely risk factors which could result in the impact varying from ex-ante expectations. Key impact indicators are collected annually. This data is reviewed and validated by the investment team and used to generate monitoring reports and investors' updates

To support the investee in achieving pre-determined impact, the Strategy has a dedicated Technical Assistance Facility, which seeks to build the capacity required to enable PIs to contribute to the Strategy's development objectives.

Sustainable Energy Strategy

The Strategy invests in projects in clean and efficient energy area, with an intended impact on achieving resilient, energy efficient and green infrastructure, for the cities and regions in the EU Member States as intended impact beneficiaries. With the guiding questions in mind (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact?, the Investment Manager has formed a dedicated Climate Environment Impact Management

(CEIM) team that reviews the technical details of each project in order to evaluate and monitor each individual project's impact assessment from the due diligence to until the end of investment. In the eligibility assessment phase, one important impact indicator is the avoided Greenhouse Gas Emissions amount in tones per million of Euros invested. It should also fall into the range within the market standards. As a matter of extent of intended impact, the Strategy's projects aim to achieve at least 20 % primary energy savings on an annual basis (higher for the building sector) and/or a 20 % reduction of CO2 equivalents for transport and renewable energy projects. Due to the wide variety of technologies included in the Strategy's portfolio, the Investment Manager has developed a standardised approach for calculating the project energy, primary energy and carbon savings for the Strategy's most common project technologies.

All project savings are calculated following international protocols, including the **International Performance Measurement and Verification Protocol (IPMVP)** for energy accounting and ISO 14064 for carbon accounting. All methodologies used by the Strategy were validated by a global engineering company and agreed with the technical teams of the founding investors. Currently, all projects with concrete data are reporting in alignment with these guidelines, and all new projects are aligned with these frameworks. Factor sources include the **Chartered Institution of Building Services Engineers (CIBSE)** for technology benchmark data and the Intergovernmental Panel on Climate Change for the conversion of energy data into greenhouse gas emissions. Electricity emission factors are sourced from the **International Energy Agency (IEA)** and are updated annually in line with **ISO 14064-2**. For some projects within the portfolio, factors cannot be updated due to project specifics, so they continue to report on factors issued within the loan documentation. The Strategy's proprietary tool facilitates the Strategy's carbon and energy monitoring and verification on a regular basis. This proprietary tool offers impact insight through customized real-time dashboards and reports. This allows the frequent communication of investment performance against impact targets.

Apart from the targeted Strategy-specific primary energy/ carbon savings goals stated in its investment guidelines, all investment in its portfolio also has to comply with its Social Environmental Management System (SEMS) from the due diligence process until loan maturity. Partner institution is required to fill the SEMS questionnaire in the due diligence process as part of eligibility check and later on during periodic monitoring and reporting. SEMS questionnaire covers various environmental and social issues, biodiversity and climate change, social as well as other E&S issues and reputational risk.

Principle 5

Assess, address, monitor, and manage potential negative impacts of each investment.

For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG) risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice. As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.

Country-Specific Clean Energy Fund

Upon deal origination, the Manager rules out projects that fail to meet the relevant requirements per the Fund's internal ESG framework on aspects such as environmental and social regulatory compliance. During the due diligence process, the Manager engages professional third-party advisors to examine the financial, technical and legal aspects of the projects, especially those that would translate into ESG risks. Potential risks and mitigation measures are presented to the Investment Committee and rectification work is carried out to address such issues. Managerial and operational criteria of leading industry practice are incorporated into the transaction documents (e.g. Asset Management Agreement) with ongoing monitoring by the Manager to ensure up-to-standard operations and risk mitigation.

Country-Specific Environment Fund

The Fund aims to conduct its operations in line with the expectations regarding social and environmental responsibility. The manager seeks to add value to Investments during the life of each Investment by applying a range of asset management strategies including environmental planning and impact management strategies. The Fund has established strict operation procedures to manage potential ESG risks. A very detailed screening check table in accordance with the IFC Environmental & Social Performance Standards is prepared for each investment and is included in the investment memo to examine the potential ESG risks. The Fund carefully monitors the operation of the portfolio companies and ensures that they operate in compliance with the environmental standards and regulations. The Fund also has engaged a third-party consultancy to conduct the quarterly ESG reporting for the Fund and the quarterly reports include risk analyses and records the waste generation and air pollutant emissions in detail. As part of the future action plan, the Fund will work with the consultancy to introduce the international standards in environmental impact assessment processes.

Sustainable Agriculture Strategy

The Strategy takes a holistic approach³ to impact management, combining managing and mitigating any potential negative impact with enhancing the positive impact.

³ Please refer to "Figure 1: Sustainable Agriculture Strategy and Sustainable Energy Strategy's holistic SEMS approach" in the same section below

The Strategy manages E&S risks and impact through its Social and Environmental Management System (SEMS) which is the tool to implement the Strategy’s S&E Policy that clearly outlines those activities excluded from the Strategy’s financing and S&E standards that the Strategy aligns to (i.e. IFC Performance Standards). The Strategy’s SEMS sets out (i) S&E responsibilities across the Strategy’s governance, (ii) S&E capacity development for the Strategy’s entities, (iii) S&E procedures and (iv) S&E monitoring and reporting requirements. While the investment advisor is responsible for investment selection according to the Strategy’s investment policies, the Strategy’s compliance advisor provides an opinion to the investment advisor and the investment committee whether a proposed investment is aligned with the Strategy’s S&E Policy. If potential breaches or issues of concern are identified during the due diligence, the compliance advisor also provides recommendations to the investment committee as to any reasonable conditions precedent that would allow the potential investment to be in compliance with the same. After due diligence, the future investees develop an action plan to address the S&E gaps found during due diligence. Throughout the investment process, the compliance advisor accompanies and monitors the implementation of the S&E action plan and S&E reporting requirements of the Strategy’s investee companies.

Understanding that establishing adequate social and environmental management systems requires resources and skills not always present in potential investee companies, the Strategy also makes use of a Technical Assistance Facility, which seeks to build the capacity required to enable investee

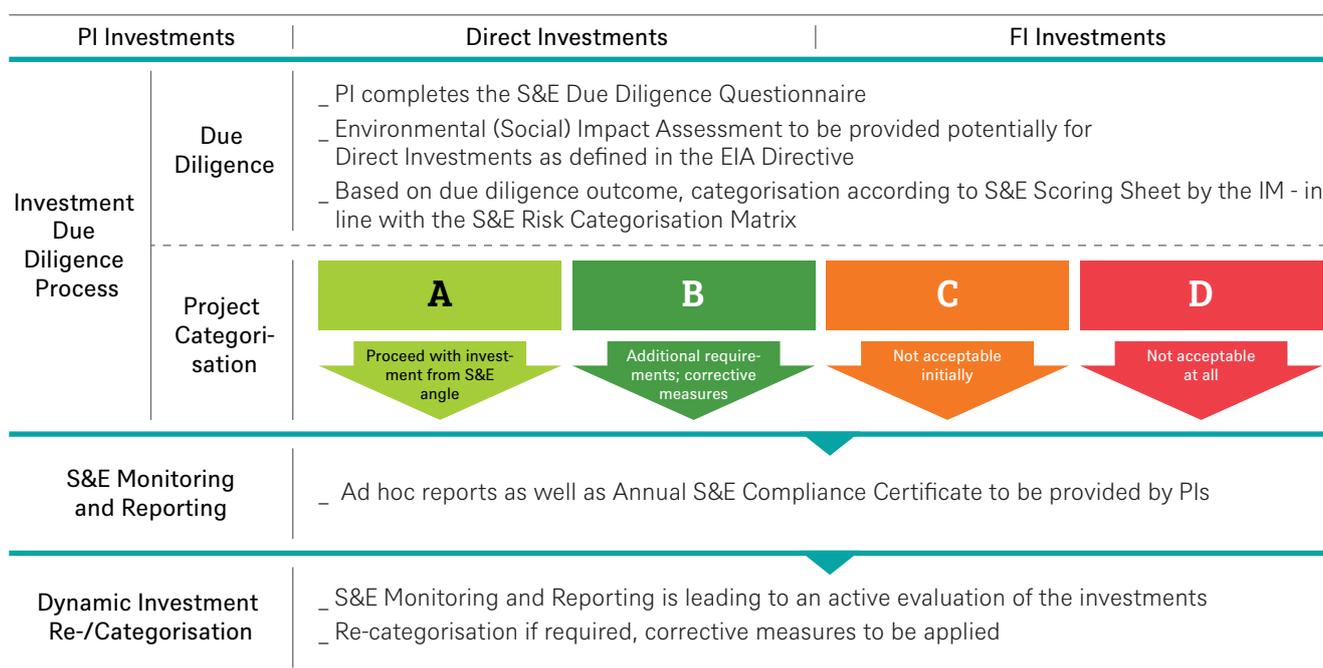
companies to contribute to the Strategy’s development objectives.

Sustainable Energy Strategy

The Strategy aims to conduct its operations in line with the highest expectations regarding social and environmental responsibility. The Strategy’s Social and Environmental Management System (SEMS) defines the respective roles and responsibilities of the Strategy and its Partner Institutions in promoting social and environmental sustainability.

The Strategy’s SEMS has specific performance requirements and procedures which are applied. Compliance with these requirements and procedures is assessed during the due diligence process and monitored later on throughout the lifetime of the project. The environmental and social (E&S) screening in the early due diligence and the regular review of external information sources during the investment check areas such as general environmental and social issues, environment, biodiversity and climate change, social as well as other E&S issues and reputational risk. Other monitoring measures include on-site visits of investment project and city project(s), S&E validation is done by independent technical advisors, consultations are held with the public authorities. Compliance with the SEMS criteria is included in all contracts that are signed between the Strategy and the investment project. All financing documents include the clauses on social and environmental standards. Potential deviations could cause obligatory repayments.

SUSTAINABLE ENERGY STRATEGY AND SUSTAINABLE AGRICULTURE STRATEGY’S HOLISTIC SEMS APPROACH



Notes: EIA (Environmental Impact Assessment), PI (Partner Institution), IM (Investment Manager)

Principle 6

Monitor the progress of each investment in achieving impact against expectations and respond appropriately.

The Manager shall use the results framework (referenced in Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes.

Country-Specific Clean Energy Fund

The Manager collects performance data of each project in the portfolio on a monthly basis through operational review with the responsible person such as the operation & management staff. The operational data are organized in a pre-defined format provided by the Manager and backed by supporting paper documents.

Country-Specific Environment Fund

The Fund has engaged a quality third party consultancy to conduct the quarterly ESG reporting for the Fund on both the fund level and portfolio company level. Quantified environmental impact such as energy savings and CO₂e emission reduction of each project are tracked quarterly and monitored in line with international protocols.

Detailed and professional energy analysis, pollution reduction analysis, and waste disposed amount analysis are provided in the third-party validated reports. The data are based on the products, equipment and services provided by the portfolio companies. Under Principle 3, there have been mentioned CO₂e reduction amount calculation for one investment in green construction material area and the amount waste water treated and green power generated for another investment. The Fund has closed another investment in a company specializing in flue gas treatment lately. With the investment, the harmful substances contained in pre-treatment flue gas and emitted flue gas will be consistently monitored and recorded, and the emission reduction amount will be calculated based on the harmful substances eliminated. As the Fund's investment activities involve in many different kinds of industries and the Fund will keep working with the consultancy to develop applicable calculation methodologies for different industries and improve the accuracy.

The Investment Manager ensures that all projects comply with the terms and conditions agreed upon prior to the investment. This includes regular (quarterly and annual) review of carbon, environment and impact performance.

The Manager also monitors the asset managers of the investees and ensure the managerial and operational responsibility documented in the transaction documents are strictly followed. In case any breach is identified, the Manager will seek appropriate recourse to ensure the quality running of the projects.

Sustainable Agriculture Strategy

Prior to any investment, regular reporting requirements are agreed with all investees and are built into the facility agreement. Such reporting requirements specify, which data is to be reported, how often such data is to be reported and the responsibilities. Failure to provide this information can trigger a breach of agreement and can prevent future business between the Strategy and the investee. Regular reporting requirements include as outlined above:

- _ Annual self-reporting on agreed impact indicators
- _ Annual monitoring of S&E achievements
- _ Regular monitoring of improvements according to timelines and milestones agreed in S&E action plans

In addition, the investee is requested to collaborate with the Strategy to undertake rapid appraisals through third-party researchers at least at the end of the Strategy financing (all investee companies) and, if so desired by all parties, depth impact evaluations.

The Strategy's team, especially the Strategy's investment and compliance advisors discuss with each investee on a quarterly basis developments of the preceding quarter including financial as well as S&E- and impact-relevant progress made. Discussions and the review of quarterly received documentation may reveal that agreed on S&E and impact targets may be delayed. Reasons can be manifold and include macro-economic events that are outside of the investees influence as well as events that are within the scope of being addressed by the investee. Depending on the reason, the Strategy team together with the investee determines a way forward including for instance revisiting additional technical assistance needs or refining targets or the timing to reach the same.

Progress towards impact for each investee of the Strategy is published on the Strategy's website by way of the Strategy's quarterly and annual report. Furthermore, the results of the rapid appraisals and impact evaluations are published on the Strategy's website in a dedicated impact section. In a situation where the investee does not show willingness to collaborate and follow up on agreed upon S&E milestones, the Strategy by way of its facility documentation ensures that the Strategy can terminate the engagement with the investee.

Sustainable Energy Strategy

As stated in the investment guidelines of the Strategy, one key eligibility criteria for the Strategy's funding is that projects should demonstrate on an annual basis at least 30% primary energy savings and /or at least 30% CO₂e savings compared to baseline. To ensure the impact assessment, energy consumption, CO₂e emissions and primary energy savings of each project are tracked quarterly and monitored in line with international protocols as outlined under Principle 4. As an integral part of the general eligibility criteria of the Strategy, the investment also has to comply with its Social Environmental Management System (SEMS).

To determine the impact of the Strategy's investments through measuring, monitoring and verification processes (M&V), the Strategy's technical criteria need to be assessed based on the project's technology and loan size; for example, small standard (e. g. street lighting) project savings can be calculated using validated calculations from the Investment Manager's carbon environment impact management (CEIM) proprietary tool. For projects with higher investment volumes and / or more complex technologies, detailed energy audits are required in the form of third-party validated reports. The data are based on estimations for projects under construction and with less than one year of operations and actual data for projects which have been in operation for over one year. At the same time, social and environmental responsibility (e.g. labour standards) of the project itself as well as the partner institution is also to be examined and observed on a regular basis by means of periodic SEMS questionnaire. We also require the project company to specify other positive S&E impacts that the invested project brings about to the local community, for example, possible improvement of citizens' security in the case of street lighting upgrade to the modern types.

The Investment Manager will ensure that all projects comply with the terms and conditions agreed prior to the investment. This includes regular (quarterly and annual) review of carbon, environment and impact performance. Primary energy and carbon savings in absolute and percentage terms are included within quarterly and annual reports of the Strategy, both in terms of internal Board Cockpit reports and reports issued on the Strategy's website. Potential work-out scenarios, restructurings, terminations and any other potential follow-up issues will be performed by the Investment Manager, if material deviation occurs.

Principle 7

Conduct exits considering the effect on sustained impact.

When conducting an exit, the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.

Country-Specific Clean Energy Fund

The Fund sets up high standards of operation & management for the portfolio during the holding period and shall seek exit on the investments to experienced and dedicated long-term owners of the industry without material impact on the quality operation of the assets. The assets will continue to operate after the Fund exits for the rest of the lifecycle.

Country-Specific Environment Fund

The Fund's funding is to support the portfolio companies' expansion in a specific period. After the Fund exits its investment, the companies will continue to operate and expand with the support of internal accumulated capital or other external funding, the sustainability of the impact is not affected.

Sustainable Agriculture Strategy

The Strategy is equally designed as an evergreen instrument, with using primarily senior and subordinated loans with a set maturity date. The timing, structure, and process of exiting these investments are set at the beginning of the financing relationship with the investee. The financing terms for each investee are reached in consideration of the repayment capacity, risk level and liquidity needs.

Sustainable Energy Strategy

The Strategy is designed as an evergreen instrument, so it is envisaged that the debt instruments are held to maturity. In case the Strategy decides to sell its project participation (e.g. in the CHP plants) before end of life, the plants will continue to operate, the sustainability of the impact is not affected.

Principle 8

Review, document, and improve decisions and processes based on the achievement of impact and lessons learned.

The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.

Country-Specific Clean Energy Fund

The Fund closely monitors the operational performance of the portfolio through monthly operational review and quarterly board meetings and collects the relevant operational data. During the review, there are Q&A sessions with on-site operation & management staff, engineers and equipment manufacturers to examine issues found during the course of operations. Performance results, findings and analysis are properly documented and the lessons learned will be applicable across the board.

Country-Specific Environment Fund

Along the lifetime of its investment, the Fund monitors, reviews and documents the impact contribution of the portfolio companies in a quarterly basis. Monthly operational review meetings and quarterly board meetings are held for each portfolio company. The Fund collects the quantitative indicators such as energy consumptions, wastewater treatment volumes, solid waste treatment volumes, air emissions, and water use of each investment project. A detailed ESG report is prepared based on the data collected each quarter. This allows us to identify the reasons behind the variance between the actual impact data and target number for each quarter. If there is a material difference between the actual value and target value, special meeting will be held with the management team to discuss the improvement measures that should be taken.

Sustainable Agriculture Strategy

The Strategy collects and monitors impact data according to its evaluation and monitoring framework described above. The Strategy's investment committee and board of directors are presented with progress on the same in every quarterly meeting. The Strategy's investment committee and board of directors discuss these progress reports and integrate the same in their decision making. Shareholders are regularly updated on impact achievements via shareholder communication and meetings. For the lifetime of its investment, the Strategy monitors, reviews and documents the impact contribution of its investees.

Sustainable Energy Strategy

The Strategy collects quarterly and annually of the energy consumptions and projects savings details from each investment project. Energy consumption and carbon and primary energy savings analysis will be carried out on both inter-project and cross-project level. This continuous assessment of impact allows us to investigate a number of factors that could bring about the year-on-year variances, such as weather advances in static data. This also means Investment managers would question investee companies and look into the discrepancy in the expected and actual impact data. Respective actions will be taken in accordance with the financing agreements when necessary. Along the lifetime of its investment, the Strategy monitors, reviews and documents the impact contribution from its funded projects and publishes the reports on its website.

Principle 9

Publicly disclose alignment with the Principles and provide regular independent verification of the alignment.

The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.

We affirm our commitment to publicly disclose alignment with the Impact Principles and provide regular independent verification of the alignment. DWS SI is currently undergoing this verification process, which will be completed by end of 2021.