



15 September 2023

# Publication pursuant to SFDR - Summary

## DWS Vermögensbildungsfonds I

This financial product promotes environmental and social characteristics and qualifies as product in accordance with Article 8(1) of Regulation (EU) 2019/2088.

### No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

The fund commits to partially invest in sustainable investments. To ensure those sustainable investments do not cause significant harm to any environmental or social sustainable investment objective following processes are implemented:

#### DNSH Assessment

The Do No Significant Harm (DNSH) assessment is an integral part of the DWS Sustainability Investment Assessment and assesses whether an issuer that contributes to a UN SDG significantly harms one or more of these goals. Where significant harm is identified, the issuer does not pass the DNSH assessment and the investment can therefore not be deemed sustainable.

#### Integration of adverse impacts on sustainability factors

As part of the Sustainability Investment Assessment, a DNSH assessment shall systematically integrate the mandatory indicators for the principal adverse impacts on sustainability factors from Table 1 (by relevance) and relevant indicators from Tables 2 and 3 in Annex I of the Commission Delegated Regulation (EU) 2022/1288 supplementing the Disclosure Regulation. Taking these adverse impacts into account, the Company has set quantitative thresholds and/or defined qualitative values to determine whether an issuer significantly harms the environmental or social objectives. These values are defined based on various external and internal factors, such as data availability, policy objectives or market trends, and may be adjusted over time.

#### Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

As part of the Sustainability Investment Assessment, the Company also assesses on the basis of the Norm Assessment the extent to which an enterprise meets international standards. This entails tests of compliance with international standards such as 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 Organisation. Companies with the lowest Norm Assessment (i.e., a letter score of "F") do not qualify as sustainable and are excluded as an investment.

### Environmental or social characteristics of the financial product

Through this fund, the Company promotes environmental and social characteristics in the areas of climate action, social norms and governance, as well as in relation to a country's political freedoms and civil liberties, taking into account the following exclusion criteria:

- (1) Climate and transition risks;
- (2) Norm issues with respect to compliance with international norms for governance, human rights, labor rights, customer safety, environmental safety and business ethics;
- (3) Countries rated as "not free" by Freedom House;
- (4) Controversial sectors for companies that exceed a predefined revenue limit;
- (5) Controversial weapons.

Through this fund, the Company also promotes a minimum proportion of sustainable investments that make a positive contribution to one or more United Nations Sustainable Development Goals (UN SDGs).

For this fund the Company has not designated a reference benchmark for the attainment of the promoted environmental and/or social characteristics.

### Investment strategy

This fund follows an equity strategy.

The fund's assets are primarily invested in assets that fulfill the defined standards for the promoted environmental or social characteristics, as set out in the following sections. The strategy of the fund in relation to the promoted environmental or social characteristics is an integral part of the proprietary ESG assessment methodology and is continuously monitored through the investment guidelines of the fund.

Please refer to the special section of the Sales Prospectus and the Special Terms and Conditions of Investment for further details of the investment strategy.



### Proportion of investments

This fund invests at least 51% of its net assets in investments that are aligned with the promoted environmental and social characteristics. At least 15% of the sub-fund's assets qualify as sustainable investments in the sense of article 2(17) SFDR. Up to 49% of the investments are not aligned with these environmental or social characteristics. A more detailed description of the specific asset allocation of this fund can be found in the Special Section of the Sales Prospectus.

Derivatives are not used to attain the environmental or social characteristics promoted by the fund.

## Monitoring of environmental or social characteristics

The ESG investment limits resulting from the ESG assessment methodology and investment limits for eligible assets which are described in the prospectus are coded and embedded into the Investment Management System where they are monitored pre- and post-trade on a daily basis to ensure the compliance with the investment guidelines. The pre-trade monitoring ensures that investment limits are complied with before trading. In case a breach is detected in post-trade monitoring it will be investigated for its cause and scope, addressed and corrected.

## Methodologies

A proprietary ESG methodology is used to measure the attainment of the promoted environmental and social characteristics as well as the proportion of sustainable investments. The following sustainability indicators are used:

- **The Climate and Transition Risk Assessment** serves as an indicator for the extent to which an issuer is exposed to climate and transition risks.
- **The Norm Assessment** serves as an indicator for the extent to which norm issues constituting breaches of international standards arise at a company.
- **Freedom House status** serves as an indicator of a country's political freedoms and civil liberties.
- **The Exclusion Assessment for controversial sectors** serves as an indicator for determining the extent of a company's exposure to controversial sectors.
- **The Exclusion Assessment for controversial weapons** serves as an indicator for determining the extent of a company's exposure to controversial weapons.
- **The methodology for determining sustainable investments as defined in article 2 (17) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR)** is used as an indicator for measuring the proportion of sustainable investments (**Sustainability Investment Assessment**).

## Data sources and processing

For the purpose of assessing the assets concerning sustainability DWS utilizes commercial vendor data from ESG Book, ISS ESG, Morningstar Sustainalytics, MSCI ESG and S&P TruCost. This information is supplemented with NGO data, e.g. from Urgewald. Quality and process controls apply on both sides, by the vendor and by DWS. DWS applies an internal software solution, the DWS ESG Engine, to standardize and aggregate the inbound ESG data into DWS ESG assessments, which are then used in the investment process. As DWS's ESG assessments are based on external vendor data, it does not estimate ESG data on its own.

## Limitations to methodologies and data

Limitations to sustainability data originate mainly from the fact that they may carry a high amount of subjectivity (e.g. with qualitative ESG ratings or estimation processes for numerical data). DWS aims to mitigate that challenge by utilising multiple vendors.

## Due Dilligence

The due diligence carried out on the underlying assets of a financial product is governed by relevant internal policies, key operating documents and handbooks. The due diligence is founded on the availability of ESG data which the management company sources from external ESG data vendors. In addition to the external quality assurance by the vendors, the management company has processes and governance bodies in place that control the quality of the ESG signals.

## Engagement policies

An engagement activity can be initiated with the individual issuers regarding matters such as strategy, financial and non-financial performance, risk, capital structure, social and environmental impact as well as corporate governance including topics like disclosure, culture and remuneration. The engagement activity can be exercised by, for example, proxy voting, company meetings or engagement letters.

## Designated reference benchmark

An index has not been defined as a benchmark.