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# Publication pursuant to SFDR - Summary

## DWS Invest Conservative Sustainable Bonds

This financial product has sustainable investment as its objective and qualifies as product in accordance with article 9 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector

### No significant harm to the sustainable investment objective

#### DNSH Assessment

The sustainable investments in which the sub-fund invests are assessed to ensure they do not cause significant harm to any environmental or social investment objective. This is achieved by taking into account the indicators for principal adverse impacts on sustainability factors (dependent on relevance) as described below. If a significant harm is identified, the investment cannot be considered sustainable.

#### Integration of adverse impacts on sustainability factors

The Sustainability Investment Assessment systematically integrates 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 SFDR. Taking into account these principal adverse impacts, DWS has established quantitative thresholds and/or qualitative values to assess a significant harm on any of the environmental or social sustainable investment objectives. These values are set based upon various external and internal factors, such as data availability or market developments and may be adapted going forward. These values may be set at issuer or use of proceeds bond level.

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

The alignment of sustainable investments with, amongst others, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is evaluated through the Norm Controversy Assessment (as further described below). Companies with the worst Norm Controversy Assessment of "F" are excluded as an investment.

### Sustainable investment objective of the financial product

The sustainable investment objective of this sub-fund is to finance environmentally and/or socially beneficial projects or activities. The sub-fund invests at least 80% of its net assets in debt instruments where the use of proceeds is limited to projects with environmental, climate benefits and/or other sustainability or ESG themed projects (i.e., Green Bonds, Social Bonds, Sustainability Bonds) which typically contribute (i) to at least one of the Sustainable Development Goals of the United Nations (UN SDGs), such as no poverty, good health and well being, clean water and sanitation, affordable and clean energy, decent work and economic growth, industry, innovation, and infrastructure, reduced inequalities, sustainable cities and communities, climate action, and/or life on land and/or (ii) to at least one other environmental objective such as climate change adaption

and/or climate change mitigation (as defined under the EU Taxonomy).

Use of proceeds bonds are devoted to (re)finance projects or activities with positive environmental and/or social impacts. The decisive difference to conventional bonds is that the issuers of use of proceeds bonds invest the issue proceeds in environmentally and/or socially beneficial projects or activities, and hereby, directly contribute to the sustainable objective of the sub-fund.

The sub-fund has not designated a reference benchmark for the purpose of attaining its sustainable investment objective.

### Investment strategy

This sub-fund pursues a strategy based on bonds as main investment strategy. The sub-fund's assets are predominantly invested in interest-bearing debt securities from issuers domiciled in OECD member countries that finance special ESG related/themed projects (use of proceeds bonds, that represent a group of sustainable bonds). All of the sub-fund's assets shall be invested in interest-bearing debt securities that have an investment grade status at the time of the acquisition. The average duration of the sub-fund's assets is limited to a maximum of 5 years. All investments must be denominated in a currency from OECD members. The sub-fund manager aims to hedge any currency risk versus the Euro in the portfolio.

Further details regarding the main investment strategy are specified in the Special Section of the Sales Prospectus.

At least 80% of the sub-fund's net assets are allocated to investments that meet the sustainable investment objective as described in the following sections. The alignment of the portfolio with the binding elements of the investment strategy used to attain the sustainable investment objective as well as the PAB-Exclusions is continuously controlled via the sub-fund's investment guidelines monitoring.



### Proportion of investments

This sub-fund invests at least 80% of its net assets in investments that qualify as sustainable investments in the sense of article 2(17) SFDR. Up to 20% of the investments do not qualify as sustainable investments. Derivatives are currently not used to attain the environmental or social characteristics promoted by the sub-fund.

### Monitoring of sustainable investment objective

For the purpose of the investment guideline monitoring, a coding process is established in which the investment policy as described in the prospectus and the investment limits contained therein are coded in accordance into the investment management system. This applies in particular to the respective ESG investment limits. The investment limits are monitored daily pre- and post-trade in the investment management system to ensure compliance with the investment

guidelines. In pre-trade monitoring, it is ensured that the investment limits are complied with before trading. However, if a breach has been detected, the breach will be investigated for its cause and scope, addressed and corrected in accordance with legal/regulatory requirements and guidelines.

## Methodologies

The attainment of the sustainable investment objective is assessed via the application of an in-house assessment methodology and ESG specific exclusion thresholds as further described in the section “What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?” (pre-contractual disclosure according to Annex II of the Commission Delegated Regulation (EU)2022/1288 supplementing the Sustainable Finance Disclosure Regulation). The methodology applies different assessment approaches that are used as sustainability indicators, which are:

- Use of Proceeds Bond Assessment used as an indicator for qualifying a bond as use of proceeds bond that follows the Climate Bonds Standards, similar industry standards for green bonds, social bonds or sustainability bonds (such as ICMA Principles) or the EU Green Bond Standard or is subject to an independent review.
- Norm Controversy Assessment used as an indicator for a company’s exposure to norm-related issues towards international standards.
- Exposure to controversial sectors used as an indicator for a company’s involvement in controversial sectors.
- Freedom House Status used as an indicator for the political and civil liberties of a country.
- Exposure to investments subject to the EU Paris-aligned Benchmark exclusion criteria as set forth in article 12(1) of Commission Delegated Regulation 2020/1818 (PAB-Exclusions) as described below.
- Sustainability Investment Assessment) used as an indicator to measure the proportion of sustainable investments pursuant to article 2(17) of the regulation on sustainability-related disclosures in the financial services sector (SFDR).

## Data sources and processing

DWS sources sustainability information from different data vendors. Each of the commercial data vendors established upstream controls to ensure quality of their processes and of the data that is being provided. In addition, DWS has set up different quality control processes for inbound ESG data and ESG assessments derived by the DWS ESG Engine. The ESG assessments are quality controlled and/or validated by responsible teams and/or councils. Based on current understanding of the regulatory guidelines on estimates, DWS classifies all data that is not publicly reported by investee companies under (regulatory) reporting requirements as estimated data (including data received from data vendors if they do not disclose their coverage of estimated data). Therefore, up to 100% of the data used may be reported as estimated data.

## Limitations to methodologies and data

DWS ESG assessments are based on external vendor data and/or DWS internal assessments and research. In both cases, potential expert-based subjectivity weighs in. The prevalence of potential subjectivity constitutes a limitation if not properly mitigated. DWS mitigates this potential challenge by selecting the methodology deemed most reasonable for the relevant DWS ESG assessment under consideration, e.g. by seeking for cross vendor consensus in order to avoid bias or by applying a worst off assessment approach in order to gather different facets deemed relevant by different ESG providers regarding the same topic. ESG assessments based on DWS internal research follow at least a four-eye principle approach and are regularly reviewed by the relevant DWS ESG council. Further data limitations, including limited data coverage for certain asset classes and investments, outdated data and structural data update issues, may apply.

## 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 based on the availability of ESG data which the sub-fund management sources from external ESG data vendors. In addition to the external quality assurance by the vendors, the sub-fund management 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 company meetings.

## Attainment of the sustainable investment objective

This sub-fund has not designated a reference benchmark to meet the sustainable investment objective.