

## Statement from DWS:

The fulfillment of the requirements of our social standards and rules for the respect of human rights emerge from our joint statement with the DB Group.

*DWS is fully committed to its responsibilities in relation to human rights. The overall responsibility for sustainability lies with DWS's Chief Executive Officer but is also shared across the entire DWS Executive Board. In the DWS investment approach, the incorporation of human right is governed by relevant internal policies and frameworks. The United Nations Guiding Principles on Business and Human Rights clearly expect companies to operate to a higher international standard in situations where national laws are not sufficient to respect human rights.*

*When controversies are assessed in the ESG Engine as part of our investment process, international norms are applied, whereby the guiding principles are codified in the United Nations Global Compact (UNGC). Other important norms include the International Labour Organisation (ILO) or OECD Guidelines for Multinational Enterprises. The assessment of norm compliance (the Norm Rating, as explained in the section 'ESG Engine Developments') is part of the ESG integration policy for Active.*

*During 2021, the Committee for Responsible Investments (CRI) analysed issuers with poor Norm ratings. These issuers with poor Norm ratings included cases of very severe human rights violations.*

*In certain cases, the CRI continued to waive certain investment restrictions conditional upon close monitoring of norm violations and engaging with the aim of improving disclosure. We will continue to place a high emphasis on issuers' norm compliance through company engagement and due diligence in our general research processes.*

**>> Please see 2021 Annual Report, DWS Group ([www.go.dws.com/Annual\\_Report\\_2021](http://www.go.dws.com/Annual_Report_2021)), p. 39**

*Following the political events in Belarus and Myanmar, DWS has been engaging with selected issuers operating in both countries. The alleged continuation of Myanmar military junta's severe human rights violations ranging from abuses against ethnic minorities, restrictions on freedom of expression and peaceful assembly and limitations on the flow of information and other violations is of great concern to DWS. The significant deterioration of human rights in Belarus is also very concerning where publicly available information from non-governmental organisations indicate allegations of torture, discrimination against various groups in society, restrictions on freedom of expression and peaceful assembly and limitations on the flow of information. We will continue to monitor the situation very closely and engage in critical but constructive dialogue with issuers operating in Belarus. We also report on other engagements on social issues as part of our annual Active Ownership report.*

**>> Please see 2021 Annual Report, DWS Group ([www.go.dws.com/Annual\\_Report\\_2021](http://www.go.dws.com/Annual_Report_2021)), p. 40-41**

For actively managed DWS funds subject to EU regulation, DWS offers two different types of Article 8 products under SFDR that apply one of the following ESG filters: "DWS Basic Exclusions" or "DWS ESG Investment Standard". The "DWS Basic Exclusions" filter represents our basic approach to include certain exclusions (related to issuers with excessive climate risk, norm violators or issuers with a stake in controversial sectors) in the investment policy of the respective fund. The "DWS ESG Investment Standard" filter applies

extended exclusions compared to the "DWS Basic Exclusions" filter and adds an "ESG Quality Assessment" approach, which includes investments in issuers selected for their high ESG quality in a competitive comparison (so-called "best-in-class approach").

Please understand that we cannot comment publicly on dialogs with individual companies. In general, the exchange with invested companies is an integral part of the DWS investment process on the active investment platform. We evaluate companies individually. In our fiduciary function, constructive dialog with companies is important to us in order to urge and implement improvements in sustainability factors. If we are not invested, we cannot exert influence. Most companies are open to critical-constructive exchange. As part of this approach, engagement can be initiated in critical situations involving ESG factors or reputational risks of individual companies and, if necessary, escalated further, up to and including divestment of the relevant companies. In addition to regular engagement with boards of invested companies, we conducted 581 engagements with 471 companies on environmental, social or governance issues in 2021, an increase of almost 28 percent year-on-year.

In cases where we cannot identify any progress, we use our voting rights accordingly or also publicly comment critically on the lack of change at the respective Annual General Meeting. This involves combining the voting rights of all active and passive DWS funds. In individual cases, we came to the conclusion that little potential was discernible for improving important sustainability factors in the corporate dialog. If the sustainability risks of these investments outweighed the benefits, a divestment of the holdings in relevant mutual funds was implemented. Further information and results can also be found in our publicly available [Active Ownership Report](#).