# Sustainability-related disclosures Transparency in advertising environmental or social features



1 2

# DJE – Concept LEI: 529900HKMGHLMU337O91

# Summary

## 1. No sustainable investment target

In order to achieve the environmental and social characteristics promoted by the master UCITS and thus also by the feeder UCITS, the following sustainability indicators are taken into account This financial product as well as the master UCITS promote environmental or social features but does not seek sustainable investments. However, it may be that some of the investments constitute sustainable investments within the meaning of Art. 2 No. 17 of the Disclosure Regulation, although these are not targeted.

The fund manager follows a best-in-class approach taking into account exclusions of companies that violate certain principles in order to reduce potential negative environmental and social impacts.

Are the principal adverse impacts ("PAI's") of investment decisions on sustainability factors considered for this sub-fund	tment 🛛 Yes	
respectively master UCITS?	□ No	
2. Environmental or social characteristics of the financial product		
⊠ Exclusion criteria	☑ ESG-integration	
Sustainable investments	[others]	

#### 3. Investment strategy

The sub-fund permanently invests at least 85% of its net sub-fund assets in units of the master UCITS.

The master UCITS is subject to supervision by the German supervisory authority, the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin). The Master UCITS is managed on a cross-border basis by DJE Investment S.A. The depositary of the master UCITS is DZ PRIVATBANK S.A. Frankfurt am Main branch. Only units in the master UCITS denominated in the unit class XP (EUR) (WKN: A3ENGF / ISIN: DE000A3ENGF3) are acquiredDetailed information on the sub-fund's investment policy can be found in the prospectus of the sub-fund.

### 4. Breakdown of investments

The applied exclusion criteria are used for all direct investments in the master UCITS.

### 5. Monitoring of environmental or social characteristics

Compliance with the exclusions listed under "Investment Strategy" and "Description of Environmental or Social Characteristics" is checked in the pre-trade process by means of negative lists, which are stored in the order management system and updated at least quarterly. In the post-trade process MSCI ESG Research LLC updates the data on a weekly basis. The sustainability indicators integrated in the investment process are listed below:

☑ Exclusion criteria	☑ ESG-integration
□ Sustainable investment	□ [andere]
6. Methods for environmental or social characteristics	

# The following methods are used for the master UCITS to check the described best-in-class approach and the listed exclusions. For the exclusions, negative lists are created using data from MSCI ESG Research LLC:

☑ Exclusion criteria	Defined exclusion criteria are checked using external data fields for all investments in the portfolio (negative list) of the master UCITS.
⊠ ESG-integration	The fund manager follows a best-in-class approach taking into account exclusions of companies that violate certain principles for reducing potential negative environmental and social impacts.



# 2 2

Sustainable investment

The sub-fund as well as the master UCITS does not aim for a minimum quota in sustainable investments within the meaning of Art. 2 No. 17 of the Disclosure Regulation.

## 7. Data sources and processing

As part of the best-in-class approach, potential companies are rated using an in-house rating methodology based on external ESG data (MSCI ESG Research LLC.) as well as proprietary research results. In case of doubt, the fund manager may subject the available data to a review by a committee.

### 8. Limitations regarding methods and data

The methods and data are limited insofar as data are not available or cannot be supplied for all securities. In addition, data for an individual issuer may not be available to a sufficient extent. Furthermore these data may be based on estimates.

Securities without data are classified as "other investments", which may not exceed 50% of the assets of the master UCITS. This also includes bank deposits and derivatives.

## 9. Investment verification (due diligence)

The master UCITS is subject to the investment process of the Fund Manager:

1/ Stock selection: The stock selection process includes analyst assessment, company interview, sustainability/ESG criteria, valuation, momentum and safety & liquidity categories. In each category a score is assigned in the range of -10 to +10, with -10 being the worst ranking and +10 being the best. All six categories are equally weighted in the standard process.

2/ Exclusions: The exclusion criteria applied reduces the potential investment universe.

## **10. Participation Policy**

The participation policy of DJE Investment S.A. is available to investors free of charge on the website www.dje.lu under the header "Legal Notice".

### 11. Determined reference value

A reference value has not been determined for the sub-fund to determine whether this financial product is aligned with the advertised environmental and/or social characteristics.

Detailed information can be found in the overall document "Sustainability-related disclosures Transparency in the application of environmental or social features", which is published at https://www.dje.de/transparenz-bei-dje-concept.