TRANSPARENCY WITH REGARD TO THE ADVERTISING OF ECOLOGICAL OR SOCIAL FEATURES

1. INTRODUCTION

As financial market participants within the meaning of Article 2 No. 1 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial sector (hereinafter "Disclosure Regulation"), DJE Investment S.A. and DJE Kapital AG are obliged under Art. 10 of the Disclosure Regulation to provide transparency regarding

– the advertising of environmental or social features

in view of financial products within the meaning of Art. 8 of the Disclosure Regulation. The corresponding information to be published in accordance with Art. 10 of the Disclosure Regulation for the sub-fund

DJE – Agrar & Ernährung			
Unit class PA (EUR)	ISIN LU0350835707	WKN	A0NGGC
Unit class I (EUR)	ISIN LU0350836184	WKN	A0NGGD
Unit class XP (EUR)	ISIN LU0350836341	WKN	A0NGGE

can be obtained from this document.

2. Description of ecological or social features

The fund manager of the sub-fund **DJE – Agrar & Ernährung** (hereinafter "sub-fund") managed by DJE Investment S.A., DJE Kapital AG, is a signatory to the United Nations Principles for Responsible Investments, abbreviated to "UN PRI", and is thus obliged to integrate factors such as environmental, social and good corporate governance, so-called ESG factors, into its investment analysis, decision-making processes and the practice of actively executing shareholder rights. Consequently, sustainability risks are also taken into account in the sub-fund's investments.

Further information can be obtained in the sections "ESG integration" and "Consideration of sustainability risks" of the sales prospectus applicable to the sub-fund.

In managing the sub-fund, the Company takes into account, among other things, environmental and/or social characteristics and invests in companies that apply good corporate governance practices. The fund manager follows a best-in-class approach, taking into account the exclusions set out in the sub-fund's investment policy.

The environmental and social features of this product are met as follows:

Companies are excluded that are active in the following controversial business fields and generate sales through involvement in the following business fields:

- controversial/outlawed weapons (e.g. landmines, cluster bombs, weapons of mass destruction)
- armaments[1]
- power plant coal[2]
- tobacco[3]

Furthermore, companies with controversial business practices are excluded. These include companies that clearly violate one or more of the ten principles of the United Nations Global Compact (available on the internet at https://www.unglobalcompact.org/what-is-gc/mission/principles). These consist of requirements regarding human and labour rights as well as environmental protection and corruption and therefore do not correspond to good corporate governance.

In addition, sovereign issuers are excluded if they have an inadequate score according to the Freedom House Index (https://freedomhouse.org/) and/or according to the World Bank Governance Indicators (https://info.worldbank.org/governance/wgi/).

The above exclusions only apply to direct investments.

3. Information on the methods used to assess, measure and monitor the environmental or social attributes, including information on the data sources, the criteria used to assess the underlying assets, and the relevant sustainability indicators used to measure the environmental or social attributes or the overall sustainability impact of the financial product;

In order to check whether a company is suitable for investment, it is subjected to a filtering process that excludes those companies to which one of the above exclusion criteria applies. As a corresponding basis for decision-making, the fund manager uses ESG data from MSCI ESG Research LLC in addition to company data in this respect. If there is any doubt, the fund manager may submit the available data to a review by a committee. During the review, the committee may come to the conclusion that the data does not adequately reflect the actual situation and correct it in such a way that a more adequate reflection of reality is created.

Due to the increased sustainability risk associated with this as defined in Article 2 (22) of the Disclosure Regulation, those companies are also excluded that fundamentally and clearly violate the UN Global Compact without any prospect of positive change. The exclusion reduces the company-specific investment risk, as risks triggered by violations of human and labor rights or by environmental pollution are avoided. A sustainability risk within the meaning of Article 2 No. 22 of the Disclosure Regulation is defined as an ***environmental, social or governance event or condition***, the occurrence of which could have an ***actual or potential material adverse effect on the value of the investment.***

Remaining companies are rated using an in-house rating methodology based on external ESG data (MSCI ESG Research LLC.) as well as own research results. The rating methodology is based on sub-areas comprising different indicators. One of these is the final assessment, which the analyst arrives at based on fundamental analysis and personal contact with the company. Like all other sub-areas, he quantifies this with a rating of –10 to 10. Together with the quality of the interview resulting from the personal contact with the company, the analyst's assessment is included

1) Exclusion if sales > 5 % of total sales.

2) Exclusion if sales > 30 % of total sales from production and/or distribution.

3) Exclusion if sales > 5 % of total sales from production and/or distribution.

in the final individual stock rating. If, in the case of existing target investments, the target investment receives a negative rating and the above-mentioned committee agrees with the database assessment, these target investments are generally sold. During the review, the committee takes into account other criteria, such as development prospects with regard to ESG factors voting rights or general economic development prospects.

In the assessment tool, companies that counter the sustainability risks to which they are exposed with adequate or even exemplary risk management perform better. The tool also takes into account the CO_2 intensity of the companies in order to counteract the risk of a possible environmental or climate-related loss of value (so-called stranded assets).

By excluding companies that clearly, demonstrably and without any prospect of positive change violate one or more of the ten principles of the “United Nations Global Compact” (available on the Internet at https://www.unglobalcompact.org/what-is-gc/mission/principles), the company-specific investment risk is reduced, as risks triggered by violations of human and labor rights (social) and with regard to environmental protection (environmental) and corruption (corporate governance) are avoided.

Accordingly, exclusion lists applicable to the sub-fund are drawn up by the fund manager.

4. Information pursuant to Article 8 of the Disclosure Regulation

The information to be published in accordance with Art. 8 of the Disclosure Regulation is part of the sales prospectus published for the sub-fund and is listed in the sub-fund-specific appendix.

5. Information pursuant to Article 11 of the Disclosure Regulation

The information to be published in accordance with Art. 11 of the Disclosure Regulation is part of the annual report published for the sub-fund.

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