

DJE – Dividende &amp; Substanz

LEI : 52990096TZHQSL9DD593

**a. Summary**

<b>1. No sustainable investment target</b>	
<p>This financial product advertises environmental or social features but does not seek sustainable investments. The sub-fund aims to achieve a minimum quota of 15% of the sub-fund's assets in sustainable investments within the meaning of Art. 2 No. 17 of the Disclosure Regulation.</p> <p>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.</p>	
Are the principal adverse impacts ("PAI's") of investment decisions on sustainability factors considered for this sub-fund?	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>2. Environmental or social characteristics of the financial product</b>	
<input checked="" type="checkbox"/> Exclusion criteria	<input checked="" type="checkbox"/> ESG-integration
<input checked="" type="checkbox"/> Sustainable investments	<input type="checkbox"/> [others]
<b>3. Investment strategy</b>	
<p>The composition of the portfolio is, except as provided below, active and independent of any benchmark, sector, country, maturity, market capitalisation and rating requirements taking into account ESG factors and adverse sustainability impacts on sustainability factors.</p> <p>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 and minimum ratios set out in the sub-fund's investment policy.</p> <p>In order to achieve the investment objectives the sub-fund's assets are mainly invested in equities listed on a stock exchange or traded on another regulated market which operates regularly, is recognized and open to the public.</p> <p>In addition the sub-fund may also invest in fixed and floating-rate securities listed on a stock exchange or traded on another regulated market that operates regularly, is recognized and is open to the public.</p> <p>The fund manager follows the value approach in the selection of stocks. This means stocks that are undervalued from a fundamental point of view and have a corresponding price potential, or an above-average dividend yield in their market segment.</p> <p>Detailed information on the sub-fund's investment policy can be found in the prospectus of the sub-fund.</p>	
<b>4. Breakdown of investments</b>	
<p>The sub-fund aims to achieve a minimum quota of 15% of the sub-fund's assets in sustainable investments within the meaning of Art. 2 No. 17 of the Disclosure Regulation.</p> <p>At least 65% of the sub-fund's assets must be invested in securities for which an MSCI ESG Research LLC ESG rating of at least BB is available.</p> <p>Other investments (including bank deposits, derivatives, etc.) are limited to 35%.</p>	
<b>5. Monitoring of environmental or social characteristics</b>	
<p>Compliance with the exclusions as well as minimum quotas 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:</p>	
<input checked="" type="checkbox"/> Exclusion criteria	<input checked="" type="checkbox"/> ESG-integration
<input checked="" type="checkbox"/> Sustainable investment	<input type="checkbox"/> [andere]

<b>6. Methods for environmental or social characteristics</b>	
The following methods are used for the sub-fund 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:	
<input checked="" type="checkbox"/> Exclusion criteria	Defined exclusion criteria are checked using external data fields for all investments in the portfolio (negative list).
<input checked="" type="checkbox"/> 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.
<input checked="" type="checkbox"/> Sustainable investment	The positive contribution of a sustainable investment is measured against one or more defined Sustainable Development Goals ("SDGs") of the United Nations. For this purpose data from MSCI ESG Research LLC is used (within the meaning of Article 2 (17) SFDR). Only companies that are categorized as "Pass" in terms of compliance with the UN Global Compact are eligible for possible classification as a sustainable investment
<b>7. Data sources and processing</b>	
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.	
<b>8. Limitations regarding methods and data</b>	
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 35% of the sub-fund's assets. This also includes bank deposits and derivatives.	
<b>9. Investment verification (due diligence)</b>	
The sub-fund is subject to the investment process of the Fund Manager: <b>1/ Stock selection:</b> 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. <b>2/ Exclusions:</b> The exclusion criteria applied reduces the potential investment universe.	
<b>10. Participation Policy</b>	
The participation policy of DJE Investment S.A. is available to investors free of charge on the website <a href="http://www.dje.lu">www.dje.lu</a> under the header "Legal Notice".	
<b>11. Determined reference value</b>	
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-dividende-und-substanz>.