Deutsche Bank AG

Commercial bank and capital markets | Germany

External Review - Future Environmental Performance Claim
25 September 2026

Claim and Assessment Summary

Claim reviewed	"Ambition to facilitate 300 transactions in the years 2026 and 2027, supporting biodiversity as well as ecosystem conservation and restoration in alignment with the UN Sustainable Development Goals."
Assessment type	Initial Plan Assessment
Review period / evidence cut-off	The assessment was based on information made available to ISS-Corporate up to 25.09.2026.
Overall conclusion	ISS-Corporate concludes that the implementation plan supporting the reviewed future environmental performance claim satisfies the applicable criteria of the ISS-Corporate Verification of Future Environmental Performance Claims Methodology. Based on the evidence assessed, the claim is considered credible, realistic, measurable, verifiable and time-bound.

Assessment Overview

ISS-Corporate was engaged by Deutsche Bank AG to independently assess the implementation plan supporting the Trader's future environmental performance claim. Responsibility for the claim, its supporting implementation plan, and all related public disclosures remains entirely with the Trader.

Verification Parameters

Scope of verification	Implementation plan supporting the Trader's future environmental performance claim.
Relevant standards	External Review Services - Verification of Future Environmental Performance Claims Methodology
Documents and evidence reviewed	» Deutsche Bank Environmental Claim (date 18.09.2026) » Deutsche Bank Implementation Plan (date 18.09.2026)
Validity	This conclusion applies only to the specific claim, implementation plan, and information and evidence reviewed up to the evidence cut-off date. Material changes affecting the basis of the assessment may require reassessment.

Scope of work

Deutsche Bank AG (the "Trader", or "Deutsche Bank") commissioned ISS-Corporate to conduct an independent Initial Plan Assessment of the implementation plan supporting the following future environmental performance claim: "Ambition to facilitate 300 transactions in the years 2026 and 2027, supporting biodiversity as well as ecosystem conservation and restoration in alignment with the UN Sustainable Development Goals.". The assessment evaluates whether sufficient evidence has been provided to support the claim and whether the associated targets and implementation measures are specific, measurable, credible, realistic and time-bound under ISS-Corporate's Verification of Future Environmental Performance Claims Methodology. The assessment considered whether the claim and associated targets are clear, objective, measurable, time-bound, publicly available, and verifiable, as well as the integrity of the baseline and scope, the level of detail and realism of the implementation plan, and the adequacy of resource planning and allocation. The assessment also considered the quality of the information provided, the robustness of supporting evidence, and any relevant limitations identified during the review. The conclusion is limited to an assessment against the applicable methodology criteria and does not constitute a legal compliance opinion, certification, endorsement of the claim, or guarantee that the stated objective will be achieved.

Claim Information and Applicability

Claim information	Information provided by the Trader
Claim wording, including key definitions	"Ambition to facilitate 300 transactions in the years 2026 and 2027, supporting biodiversity as well as ecosystem conservation and restoration in alignment with the UN Sustainable Development Goals." Nature-related transactions are identified only among Sustainable Finance transactions (definitions of eligible activities as per Deutsche Bank's Sustainable Finance Framework) & Transition Finance transactions (definitions of eligible activities as per Deutsche Bank's Transition Finance Framework) and mapped to SDG 6[1] (Clean Water and Sanitation), SDG 14 (Life Below Water) and SDG 15 (Life on Land). There is no double counting if a transaction is contributing to multiple relevant SDGs. The transactions are facilitated by Investment Bank and Corporate Bank; the counting event is the execution of a transaction.
Claim scope level: product, brand, subsidiary or entity level	Entity level
Communication channels	Website, 2025 Annual Report, Repository of future environmental claims (dated 18.09.2026), 2026 Transition Plan.
Geographic markets and relevant national measures	Globally

[1] For transactions associated with SDG 6, as it encompasses both social and environmental objectives, only the nature-related components are considered. Specifically, those that can demonstrate a contribution to SDG 6-targets 6.3, 6.4, 6.5, 6.6, and 6.a.

Claim information	Information provided by the Trader
Intended audience, including consumers	Any stakeholder, including consumers
Legal entity responsible for the claim	Deutsche Bank AG
Material exclusion	Private Bank

Assessment

ISS-Corporate's independent assessment evaluates whether the Trader's initial implementation plan provides a credible basis for the future environmental performance claim.

Based on the scope of review, the methodology applied, and the information and evidence made available to ISS-Corporate up to the evidence cut-off date, ISS-Corporate concludes that the implementation plan supporting the specific future environmental performance claim reviewed satisfies the applicable criteria of the Verification of Future Environmental Performance Claims Methodology.

Based on the evidence assessed, the claim is considered credible, realistic, measurable, verifiable and time-bound.

This conclusion is subject to the observations and limitations identified and described in this statement.

Dimension	Opinion
Claims and targets	The claim and associated targets are clear and specific, objective and measurable, time-bound, publicly available, and verifiable.
Baseline and scope integrity	The baseline and scope are adequately defined, supported by appropriate evidence, and based on a transparent and consistently applied methodology.
Credibility of implementation plan	The implementation plan is sufficiently detailed, internally coherent, realistic in light of identified constraints and assumptions, and capable of supporting delivery of the stated target.
Resource planning and allocation	Resource commitments, governance arrangements, and monitoring processes are appropriately defined and proportionate to the implementation plan. Dedicated resources for this claim are primarily reflected in staff capacity within Deutsche Bank's existing organisational structure. ISS-Corporate recognises that, for this type of claim, resource sufficiency may be demonstrated through established governance structures and available employee capacity, rather than through a separate dedicated financial budget. ISS-Corporate's conclusion is based on the evidence provided by Deutsche Bank regarding current FTE availability within the relevant steering and implementation teams, together with Deutsche Bank's disclosure that the allocated resources are considered sufficient to achieve the target.

Basis for Conclusion

The overall conclusion is based on the findings across the four external review dimensions and reflects whether sufficient evidence has been provided to substantiate the claim in accordance with the applicable methodology criteria. In reaching its conclusion, ISS-Corporate considers the significance of any unmet criteria, evidence gaps, limitations, or unresolved findings. A positive conclusion requires that all applicable mandatory criteria are satisfied and that no unresolved matter materially undermines the credibility of the implementation plan as a basis for the claim.

Where one or more mandatory criteria are only partially satisfied within a dimension, that dimension is concluded as partially satisfied and the limitation is documented. The overall conclusion may remain partially satisfied where only one dimension is partially satisfied and no dimension is concluded as not satisfied. Where two or more mandatory criteria are not satisfied within a dimension, that dimension is concluded as not satisfied. If any dimension is concluded as not satisfied, the overall conclusion is also not satisfied. ISS-Corporate may be unable to reach a positive conclusion where evidence is insufficient, a material finding remains unresolved, or the Trader prevents completion of the assessment.

Observations, Limitations and Reliance

The assessment was based on information made available to ISS-Corporate up to the evidence cut-off date, together with publicly available information considered relevant to corroborating the Trader's submissions. Unless expressly stated in the engagement scope, the review did not include an operational or financial audit, engineering verification, legal advice, continuous monitoring, independent collection of primary environmental data or independent confirmation of raw-data accuracy. ISS-Corporate has not verified future outcomes and does not guarantee that the Trader will achieve the stated environmental objective. The conclusion applies only to the claim, implementation plan, scope, evidence and circumstances reviewed as of the evidence cut-off date. Material subsequent changes may require reassessment.

Annex 1: Regulatory Basis, Assessment Approach and Sources

ISS-Corporate's methodology for the Verification of Future Environmental Performance Claims incorporates the requirements established under applicable European Union legislation, national implementing measures, and relevant regulatory guidance governing environmental claims, consumer protection, and the substantiation of sustainability-related communications.

The methodology is designed to provide a structured framework for assessing whether future environmental performance claims are supported by a credible implementation plan and whether progress toward such claims remains verifiable over time. The methodology reflects the legal requirements applicable to claims concerning future environmental performance while applying transparent and consistent assessment criteria.

The methodology should be interpreted in conjunction with applicable laws, regulatory guidance, and evolving market practice. Where regulatory requirements change or additional guidance becomes available, ISS-Corporate may update this methodology accordingly.

Annex 2: Quality management processes

Scope

ISS-Corporate was engaged to assess whether the implementation plan supporting the Trader's future environmental performance claim provides a credible basis for the claim under the Verification of Future Environmental Performance Claims Methodology. The assessment considered commitments and targets, baseline and scope integrity, credibility and realism of the implementation plan, resource planning and allocation, information quality, supporting evidence and relevant limitations identified during the review.

Trader's responsibility

The Trader is responsible for the environmental claim, the implementation plan, the accuracy and completeness of information provided to ISS-Corporate, and any public disclosure relating to the claim. ISS-Corporate is responsible for applying its methodology and issuing an independent verification statement based on the information reviewed. This statement does not constitute legal advice, certification of environmental performance, assurance under financial reporting assurance standards, or a guarantee that the stated environmental objective will be achieved.

- Environmental claim and exact consumer-facing wording, including qualifications and accompanying disclosures
- Implementation plan and relevant supporting documentation, data, calculations and approval records

ISS-Corporate's verification process

Since 2014, ISS STOXX, of which ISS-Corporate forms part, has built a reputation as a thought leader in the green and social bond market and was among the verifiers approved by the Climate Bonds Initiative (CBI).

The engagement with Deutsche Bank took place from August to September 2026.

ISS-Corporate's business practices

ISS-Corporate has conducted this verification in strict compliance with the ISS STOXX Code of Ethics, which lays out detailed requirements in integrity, transparency, professional competence and due care, professional behaviour and objectivity for the ISS business and team members. It is designed to ensure that the verification is conducted independently and without any conflicts of interest with other parts of the ISS STOXX.

Glossary

Assessment type: The assessment type can be either “Initial plan assessment” or “Periodic monitoring verification”. It refers to ISS-Corporate independent assessment of whether an implementation plan credibly supports a future environmental claim based on the evidence available at the time of review.

Review period / evidence cut-off: This refers to the final date of evidence received and reviewed by ISS-Corporate.

Relevant standards: This defines the standard used by ISS-Corporate to conduct the assessment. The assessment is based on a proprietary methodology developed with specific reference to EU Directive on Empowering Consumers for the Green Transition (Directive (EU) 2024/825, ECGT Directive), and its national implementations as relevant, and the European Commission Questions & Answers dated June 2026.

Documents and evidence reviewed: This refers to the documents provided by the Trader and reviewed by ISS-Corporate to compile the External Review.

Communication channels: This refers to the main communication channels (websites, reports, etc...) through which the Trader intends to communicate the environmental claim and its implementation plan to the public. The assessment reflects the channels identified at the time of ISS-Corporate’s review and does not preclude the Trader from using other channels.

Material exclusion: Any exclusion to the scope of the environmental claim, as presented by the Trader.

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