



January 2017

## Environmental and Social Policy Framework

### 1. Introduction

At Deutsche Bank, our aspiration is to live by the highest standards of integrity. We are committed to act as a responsible partner to all our stakeholders and to address impacts that our business operations may have on the environment and society.

Our understanding of responsibility is further informed by formal commitments we make to internationally recognized standards and principles such as the ten Principles of the United Nations (UN) Global Compact, the UN Environment Programme Finance Initiative and the Principles for Responsible Investment<sup>1</sup>. We also support industry initiatives such as the Soft Commodities Compact of the Banking Environment Initiative (BEI) and the Green Bond Principles.

Our objectives are to promote sustainable business, to ensure our risk management processes are aligned with industry good practices and to increase transparency. To this end, we:

- have been rated in the top ten percent of financial service providers in the Dow Jones Sustainability Index (DJSI) since 2000;
- co-created Green Bond Principles with our peers in 2014;
- were the first global commercial bank to be accredited to the Green Climate Fund<sup>2</sup> in 2015;
- have maintained carbon neutrality in our business operations since 2012; and
- established a formal environmental and social (ES) review process in 2011, materially revising it in 2015.

As a global bank that offers a wide range of products and services in corporate investment and retail banking, as well as in asset and wealth management, we have clients across all sectors including those that may be linked to significant ES impacts. We therefore need to understand the ES risks associated with an industry, a client or a transaction, just as we do with traditional banking risks.

Doing this effectively is essential to avoid any negative impacts on the environment or society, and to uphold our commitments to international standards. Failing to do this may also lead to reputational and financial risks for Deutsche Bank, and restrict our ability to benefit from potential business opportunities. Systematic evaluation of ES risks is therefore an integral part of our risk management process.

This document summarizes Deutsche Bank's position on ES matters. Such position is reflected in policies, guidelines and processes which help ensure that consistent standards are applied when identifying, assessing and managing ES risks in relation to our own operations and business relationships with our clients across corporate finance, including project finance, trade finance, and investment banking.

Deutsche Asset Management, the asset management division of Deutsche Bank group, also acknowledges the importance of environmental and social aspects. However, in order to preserve and fulfil its independent fiduciary obligations, Deutsche Asset Management may follow own (and prevailing) policies in relation to environmental and social matters.

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<sup>1</sup> The UN Principles for Responsible Investment (UN PRI) are signed by parts of our asset management organisation

<sup>2</sup> The Green Climate Fund (GCF) was founded within the UN Framework Convention on Climate Change (UNFCCC) as a mechanism to make finance available from developed to developing countries for climate change adaptation and mitigation



Our policies are subject to regular review. Changes as a result of such review are based upon a number of factors. To the extent such changes affect the statements herein, Deutsche Bank will update the information in this document in a timely manner.

## 2. Environmental and social risk management

Our approach to manage ES risks is aligned with Deutsche Bank's Code of Business Conduct and Ethics (The Code), itself based on our Values and Beliefs. Applicable to all employees, as well as interactions with internal and external stakeholders, it emphasises that sustainability is at the heart of our corporate responsibility (CR) principles; that we will consider the ES impacts of our actions; and that we will apply high ES standards to our business to support a sustainable future. In order to comply with the Code, employees must ask themselves whether or not a proposed transaction or initiative presents any risks to the environment or society.

Our ES risk management approach builds on our ES Policy Framework, part of the Bank's global Reputational Risk Framework (RepRisk Framework). Initially introduced in 2011, the ES Policy Framework was substantially revised in 2015 and includes general and sector-specific provisions. Applicable globally for corporate finance including project finance, trade finance, and investment banking, it defines procedures and responsibilities for risk identification, assessment, and decision-making. It also covers deal-independent screening and the identification of companies with a controversial profile from an ES perspective.

In line with the requirements of Deutsche Bank's RepRisk Framework, our business units are initially responsible for identifying ES risks. To support business units, the ES Policy Framework acts as a starting point when assessing client relationships or transactions. Its general provisions define sensitive sectors, specify the requirements for ES due diligence, and include criteria for mandatory referral to Group Sustainability. For all sectors requiring mandatory involvement of Group Sustainability, detailed sectoral guidelines are available. These offer further guidance on the scope of ES due diligence and outline good industry practice benchmarks and principles.

Under the ES Policy Framework, the following sectors and activities are defined as having high potential for significant ES impacts: agriculture and forestry, chemicals, infrastructure projects in certain countries, metals and mining, oil and gas (including hydraulic fracturing and exploration in the Arctic), utilities, and other activities either with a high carbon intensity and/or potential for human rights infringements. This scope is regularly reviewed and updated if required.



Embedding environmental and social (ES) provisions



Under the RepRisk Framework, Group Sustainability is responsible for assisting business units in assessing ES issues and associated risks. In 2015, the referral criteria for mandatory involvement of Group Sustainability were strengthened and the set of sector guidelines expanded to eight.

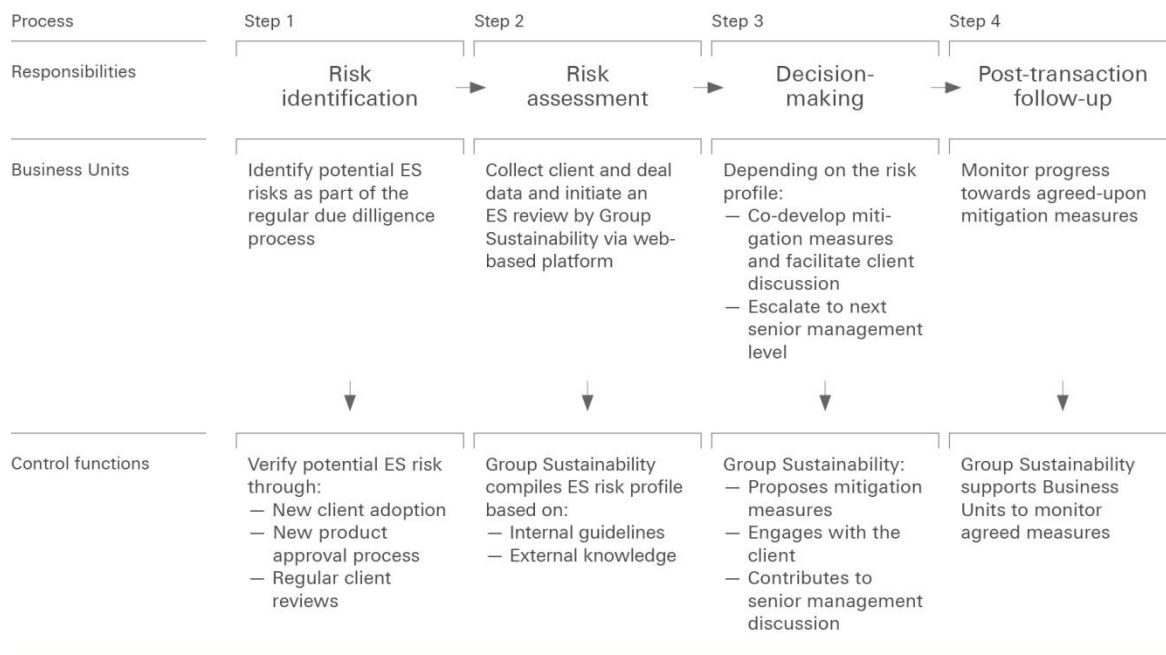
The ES risk review process includes discussion of critical issues with clients and remediation actions. Third-party subject-matter experts may be involved in this process. The final ES risk profile will include evaluation of the materiality of the identified ES risks and associated reputational risks. If the risks are deemed to pose a material reputational risk, or meet one of the mandatory referral criteria, the transaction will be referred to one of the four Regional Reputational Risk Committees.

If issues are not resolved at the level of a Regional Reputational Risk Committee, the governance structure requires escalation to the Group Reputational Risk Committee (GRRC). Ultimately, the Management Board is accountable for the management of reputational risk, delegating authority to the Group Risk Committee for subsequent delegation to the GRRC. The GRRC receives a quarterly update from Group Sustainability on sensitive ES topics and trends.

Since 2015, the entire ES risk review process has been supported by a dedicated IT application. Training plays an important role in supporting business units to understand the ES Policy Framework and is a key priority going forward.



ES Policy Framework – process and responsibilities



### 3. Environmental and social review

In our transactions with clients, we expect, as a minimum, that they meet applicable ES laws and regulations, and that they hold relevant licenses and permits. At Deutsche Bank, we also expect our clients to consider international best practice approaches.

Deutsche Bank will not engage in any activities or relationships where there is clear evidence of severe human rights violations and/or damage to the environment. To this end, we will not knowingly finance:

- activities and/or clients that use child or forced labour as defined by the core conventions of the International Labour Organization<sup>3</sup>;
- activities within or in close proximity to a World Heritage Site unless there is a prior consensus with both Government and UNESCO that such operations will not adversely affect the Outstanding Universal Value of the Site;
- projects or activities located in or involving the clearing of primary tropical moist forests, illegal logging or uncontrolled and/or illegal use of fire; or
- activities of mining companies which use Mountain Top Removal (MTR) as their extraction method and materially contribute to the total annual MTR coal production in the United States.

<sup>3</sup>C138 Minimum Age Convention; C182 Worst Form of Child Labour Convention; C29 Forced Labour Convention



While conducting ES risk reviews, we assess our clients' ES risk management systems including governance and capacity to address ES risks. We look for policies and commitments, as well as a responsible approach to stakeholder engagement and disclosure. We also assess their track record. In this review, we rely on publicly available information such as corporate disclosure, media, and external data providers. We may also engage with clients directly and, depending on the risk profile, more intense ES due diligence may be required in accordance with our general and sector-specific ES provisions.

Across sectors with high potential for significant ES impacts<sup>4</sup>, we aim to identify the issues that require attention. Some of these issues will be cross-sectoral, while others will be sector-specific (see below). We regularly review our approach and understanding of issues through continuous dialogue with our peers, the industry, NGOs, and other relevant stakeholders. Accordingly, our ES Policy Framework is reviewed annually – or as events occur – to reflect changes in the environment in which we operate.

### 3.1 Cross-sectoral issues

#### Human rights

Our long-standing commitment to human rights is reflected in our Human Rights Statement, publicly available since 2015. To address this complex topic, we are guided by a wide range of international standards and principles including the UN Guiding Principles on Business and Human Rights. We integrate human rights considerations into the due diligence process as part of our ES Policy Framework.

We focus on the client's measures to avoid any involvement in child and/or forced labour, and the policies and procedures to protect the health and safety of employees and sub-contractors. Further, Deutsche Bank understands that our clients' activities may impact the communities they operate in, and we expect clients to have processes in place to minimise any negative impact. In particular, during the due diligence we focus on policies and procedures that:

- protect the health and safety of affected communities;
- ensure respect for land rights and cultural heritage; and
- address engagement with communities, including responding to community concerns (for example through grievance mechanisms).

In cases involving resettlement, we expect our clients to act in accordance with national laws and regulations and, where applicable, in alignment with the objectives and requirements of IFC Performance Standard (PS) 5 on Land Acquisition and Involuntary Resettlement.

We recognise the vulnerability of indigenous peoples and the connection to ancestral lands, as defined by the UN Declaration on the Rights of Indigenous Peoples. In cases where we can identify potential impacts on indigenous peoples, we expect our clients to act in alignment with the objectives and requirements of the IFC PS 7 on Indigenous People. For circumstances outlined in the IFC PS 7, we expect clients to obtain the Free Prior and Informed Consent of affected communities.

We also recognise that in certain circumstances our clients' activities may be exposed to security risks due to the socio-economic environment. Where necessary, we review our clients' approach to the use of security forces for site protection and whether the established processes have been informed by international standards such as the Voluntary Principles on Security and Human Rights.

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<sup>4</sup>Agriculture and forestry, chemicals, infrastructure projects in certain countries, metals and mining, oil and gas (including hydraulic fracturing and exploration in the Arctic), utilities and other activities either with a high carbon intensity and/or potential for human rights infringements.



### Sensitive and protected locations

Deutsche Bank recognises that corporate client activities may have material impacts on areas of international or national biodiversity value and high-sensitivity ecosystems and habitats. We expect clients to identify, assess and mitigate these risks by applying widely accepted international guidance and best practices. This means implementing the mitigation hierarchy with regard to areas of high biodiversity and/or high-sensitivity ecosystems/habitats. The mitigation hierarchy requires primary impacts to be avoided through site selection, design or scheduling of activities.

Where avoidance is not possible, impacts should be minimised by reducing their duration, intensity and extent of the impacts; on-site restoration should be implemented for impacts that cannot be completely avoided and/or minimised; and, as a last resort, significant residual impacts can be offset through implementation of measurable conservation outcomes.

Depending on the location of activities that require financing, Deutsche Bank will use the following review approach:

- We will not finance projects and activities located in World Heritage Sites unless there is a prior consensus with both Government and UNESCO that such operations will not adversely affect the Outstanding Universal Value of the Site.
- For transactions where we are able to identify impacts on areas of international or national biodiversity value and high-sensitivity ecosystems/habitats an enhanced ES review is required. It will consider the implementation of the mitigation hierarchy with further focus on:
  - alternative site selection;
  - compliance with national laws and regulations; and
  - biodiversity action plans where applicable.

Areas of high biodiversity and/or high-sensitivity ecosystems/habitats include Biosphere Reserves<sup>5</sup> Wetlands of International Importance<sup>6</sup>, legally protected areas according to IUCN categories I-VI<sup>7</sup> and other nationally protected or sensitive areas. We further recognise the need to protect and preserve areas of cultural heritage. For transactions where we are able to identify potential impacts on such areas, an enhanced ES review will be conducted.

## 3.2 Sector-specific issues based on our sectoral guidelines

### Energy

Deutsche Bank recognises the risks of climate change and is committed to support the transition to a low-carbon, climate-resilient economy. We were the first global commercial bank to receive Global Climate Fund accreditation in 2015. By signing the [Paris Pledge for Action](#) in December 2015, we welcomed the [universal climate agreement](#) made at the 2015 Climate Summit in Paris. This further emphasized our commitment to protect the climate and to contribute to the overall targets set by the Paris Agreement to limit global warming to 2 degrees Celsius above pre-industrial levels. Our corporate financial activities that support renewable energy are growing, while in asset management, building sustainable investment capacities remains one of our priorities.

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<sup>5</sup> Biosphere Reserves are designated under the UNESCO Man and the Biosphere Programme

<sup>6</sup> Wetlands of International Importance are protected under the Convention on Wetlands 1971 (Ramsar Convention)

<sup>7</sup> Based on their management objectives, there are six categories of protected areas in the IUCN classification system: Ia Strict Nature Reserve, Ib Wilderness Area, II National Park, III Natural Monument or Feature, IV Habitat/Species Management Area, V Protected Landscape/Seascape, VI Protected Area with Sustainable Use of Natural Resources.



### *Coal*

In some regions of the world, coal remains the main source of power due to persisting energy poverty problems and lack of available and affordable alternatives. However, coal-fired power plants produce far greater amounts of CO<sub>2</sub> emissions per unit of electricity generated than oil and natural gas.

As such, in order to align ourselves with the requirements of the Paris Agreement, we have revised our approach to coal financing. We have amended our formal position and internal guidelines, effective from December 2016, to state that we will provide no financing to new coal-fired power plant construction or for the expansion of an existing coal fired power plants irrespective of their location.

Projects designed to employ Carbon Capture and Storage (CCS) technology will be assessed on a case by case basis. CCS is a technology that can capture up to 90% of the CO<sub>2</sub> emissions produced from the use of fossil fuels in electricity generation and industrial processes, preventing the CO<sub>2</sub> from entering the atmosphere.

### *Hydropower*

Hydropower is the world's largest source of renewable energy, accounting for one sixth<sup>8</sup> of global electricity generation. It is a mature technology, playing a key role as demand for clean, reliable and affordable energy rises. However, the development of new plants poses complex ES challenges and risks, which will depend on the type, place and scale of the project.

Any transaction involving financing of a new hydropower plant or expansion of an existing one requires an enhanced ES review and, potentially, discussion within a regional Reputational Risk Committee. We will look at a number of sector-specific factors including the client's management systems and track record. Application of the Hydropower Sustainability Assessment Protocol by clients will be highly valued. We also review how a utility company and/or project developer has:

- taken into account the host country's energy situation, including its national energy strategy;
- addressed analysis of site alternatives;
- assessed river ecosystems and evaluated impacts on threatened and endangered species;
- analysed the impact on sites of cultural, historic, religious value or agricultural land; and
- addressed resettlement of people where applicable.

### *Nuclear*

Nuclear power is the second-largest source of low-carbon electricity generation worldwide, after hydropower<sup>9</sup>. Deutsche Bank views nuclear power as an important low-carbon source of energy in the transition to a more sustainable energy mix. At the same time, we recognise serious risks such as nuclear accidents or improper nuclear waste disposal. Therefore, our financing for civil nuclear power is subject to strict specific country and project criteria.

Any transaction involving financing of a new nuclear power plant or expansion of an existing one requires enhanced ES review and, potentially, discussion within a regional Reputational Risk Committee.

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<sup>8</sup> International Energy Agency; key world energy statistics 2013

<sup>9</sup> International Energy Agency: Energy and Climate Change 2015



We will look at a number of sector-specific factors including the client's management systems and track record, focusing specifically on:

- the status of ratification of the relevant conventions and treaties by the project country, for example the Convention on Nuclear Safety or Nuclear Non-Proliferation Treaty;
- the robustness of national regulatory frameworks;
- cooperation of the project country with the International Atomic Energy Association and application of internationally recognised safety and security standards; and
- assessments addressing seismic and/or flood risks.

## **Mining**

Although the mining industry is an important source of metals and minerals for the global economy, mining operations present a range of environmental and social impacts requiring management and mitigation

Therefore any transaction involving financing of mining (the extraction of minerals and metals) requires enhanced ES review.

We look at a number of sector-specific factors including the client's management systems and track record. This includes assessing how the client's Environmental and Social (ES) management system addresses:

- contamination of water and soil;
- waste management;
- impacts on local ecosystems;
- workplace and community health and safety; and
- community consultation, especially where operations are close to tribal areas or places of worship.

Our review will also consider whether the ES management system is certified according to internationally recognised standards such as ISO 14001 and OHSAS 18001. Further, we will positively value the application of best practices such as the Sustainable Development Principles of the International Council of Mining and Metals, the IFC's Environmental, Health and Safety Guidelines for Mining, and the Voluntary Principles on Security and Human Rights.

### *Mountain Top Removal*

Mountain Top Removal (MTR) is defined as a surface mining method that involves the removal of mountain tops to expose coal seams and the disposal of the associated mining overburden into adjacent valleys. We recognize that MTR, whilst being an established and regulated mining method, continues to be subject to political, judicial and regulatory scrutiny.

In 2015 we updated our policy position in relation to MTR. Accordingly, Deutsche Bank will not provide financing and advisory services including M&A to mining companies which use MTR as an extraction method and which make a material contribution to the total annual MTR coal production in the United States.





### *Coal mining*

In recent years, mining of coal has become subject to public scrutiny due to high contribution of burning of coal to climate change. To support our commitment to protect the climate and to contribute to the overall targets set by the Paris Agreement, we have revised our approach to coal mining financing, detailed as follows:

- We will provide no new financing for greenfield thermal coal mining;
- We have set a three-year target for a gradual reduction of our existing exposure to the thermal coal mining sector.

### **Agriculture and forestry**

Agribusiness and forestry are important for the production of soft commodities such as palm oil, cacao, cotton, rubber, soy, coffee, beef and timber. Industrial developments in these areas are positive for economic growth in certain countries but may have adverse impacts such as deforestation, loss of biodiversity and conflicts with local communities. To address these concerns and to promote sustainable production, Deutsche Bank introduced a set of guiding principles for clients active in these areas. As a member of the Banking Environment Initiative and signatory to the Soft Commodities Compact<sup>10</sup>, we are committed to help achieve zero net deforestation by 2020 in the palm oil, timber, soy and beef sectors.

Any transaction involving financing for companies active in the upstream production and primary processing of the outlined soft commodities (for example growers or operator of mills) outside the EU and US requires enhanced ES review. Here, we will look at a number of sector-specific factors including the client's management systems and track record. An important element of our review is the status of certifications, for example:

- for **palm oil**, we require as a minimum, certification in accordance with the Roundtable on Sustainable Palm Oil (RSPO) or time-bound commitment to RSPO certification;
- for **timber**, we prefer clients to be certified according to Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC);
- for **soy** we prefer clients to be either certified according to the Roundtable on Responsible Soy Association or to demonstrate commitment to the Basel Criteria for Responsible Soy Production; and
- for other commodities such as **beef** or **cotton** we expect clients to be guided by industry best practices and initiatives such as the Global Roundtable for Sustainable Beef or Better Cotton Initiative.

We might accept an equivalent certification standard subject to a prior assessment. For these purposes, we observe development of different forestry certification standards and initiatives in the areas outlined above. Further, we expect clients to demonstrate:

- a “Zero-net Deforestation” commitment or policy (ideally publicly disclosed) which shows the approach to using fire to clear forests;
- policies on new developments including commitment to no new plantations on peatlands and commitment to conduct a High Conservation Value (HCV) assessment before any new plantation development. This involves identifying and conserving land with a high ecological, cultural or social value;
- water management and protection provision (for example recycling of wastewater, responsible use of pesticides and herbicides); and

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<sup>10</sup> The Soft Commodities Compact is a joint initiative of the Banking Environment Initiative (BEI) and the Consumer Goods Forum (CGF), launched in April 2014



- measures to protect biodiversity or endangered species and prevent soil erosion, land degradation and natural stock depletion.

We will not engage in business relationships where there is clear and known evidence on clearing of primary tropical moist forests, illegal logging or uncontrolled and/or illegal use of fire.

### **Hydraulic fracturing**

Hydraulic fracturing is a technique used in the 'unconventional' shale oil and gas production. Shale gas is the least carbon-intensive fossil fuel. However, its benefit may be outweighed by methane leakage along with other potential ES impacts.

For this reason, any transaction involving the material financing of hydraulic fracturing activities (exploration and/or extraction) requires enhanced ES review. The review is based on a number of sector-specific factors including management systems, the client's track record and how the client addresses well integrity, the use and transparency around toxic chemicals, and water handling (including water protection, use of fresh water and wastewater recycling). Air emissions and community impacts are other critical components in the due diligence process.

### **Fisheries**

According to the UN Food and Agriculture Organization (FAO), nearly 3 billion people were provided with almost 20 percent of their intake of animal protein by fish in 2012. Fisheries and aquaculture support the livelihoods of 10-12 percent of the world's population<sup>11</sup>. But today's fishery industry faces a number of challenges such as illegal, unregulated and unreported fishing, and over-exploration of important fish stocks. Therefore, responsible fishery practices are essential to "ensuring the effective conservation, management and development of living aquatic resources, with due respect for the ecosystem and biodiversity"<sup>12</sup>.

Any transaction involving financing of companies active in catching and primary processing of fish outside the EU and USA requires enhanced ES review. This is based on a number of factors specific to the industry including a client's management systems, track record and ability to demonstrate:

- policies and procedures to regularly monitor the status of targeted fish stocks;
- processes to ensure no breaches of internationally agreed catch-limits for the targeted fish stocks, including measures to reduce by-catch; and
- a commitment to align management systems with recommendations of the FAO's Code of Conduct for Responsible Fisheries and/or plans to attain the Marine Stewardship Council certification or any other equivalent certification.

We will not engage in business relationships where there is clear and known evidence on clients having:

- reoccurring material breaches of imposed catch-limits; and /or
- not being in compliance with national health and safety requirements at a minimum. Please also see our position on child and forced labour on page 3.

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<sup>11</sup> FAO: The state of World Fisheries and Aquaculture; factsheet, June 2014

<sup>12</sup> FAO: Code of Conduct for responsible fisheries



#### 4. Own Operations

Our contribution to a low carbon economy starts with our own operations. Deutsche Bank is certified to ISO 14001, the international environmental management standard. The sustainability performance of the business and infrastructure units integrated in the management system is reviewed by internal audits and annually by an external audit.

To reduce emissions from the energy we use in our offices, we invest in energy efficiency measures and purchase electricity from renewable sources. In 2015, more than 230,000 tonnes of CO<sub>2</sub>e of emissions were avoided by purchasing renewable electricity. Furthermore, we have been reducing our emissions from business travel. For example, in 2015 emissions from air travel were 3% lower than the previous year, while the average CO<sub>2</sub> emissions from company cars reduced by 5%.

Between 2008 and 2012, we reduced our direct carbon footprint by 20 percentage points a year. Unavoidable emissions were offset by purchasing and retiring certificates (VERs) from high-quality emission reduction projects. To this end, our operations have been carbon neutral since 2012.

In compliance with recent German regulation on energy audits for corporate facilities, Deutsche Bank decided to apply the ISO 50001 standard (energy management) to its home market starting 2016. This means establishing a certified quality management process for our energy consumption, including setting reduction goals and measures that will capture wider energy sources such as business travel. Furthermore, we apply a broad range of in-house measures with the aim to reduce the negative ecological impact of our business operations such as reduction of water consumption, increasing deployment of recycled copy paper, less produced and disposed waste.

#### 5. Stakeholder Engagement

Regular and meaningful stakeholder dialogue with shareholders, clients, employees and society at large is fundamental to how we conduct our business responsibly. It allows us to:

- understand stakeholder concerns;
- prepare for potential future impacts on our business model caused by global trends or regulation;
- minimise risks and detect business opportunities early on;
- make informed decisions, for the bank and when dealing with clients;
- define or improve standards and voluntary commitments across our sector;
- explain our position on sensitive topics; and
- promote mutual learning by recognising the complexity of global issues.

The results of our dialogue feed into our sustainability management as well as our ES risk management and annual reporting. They also help us respond constructively to critics, articulating our position on key issues and explaining the functionalities and limitations of financial products and services. We are aware that the interests of shareholders, clients, employees and the general public are sometimes in conflict, and that we have to negotiate between these interests. We remain open to meet critical stakeholders and consider their input with care and attention.

In addition to regular Investor Relations activities and the Annual General Meeting, our communications with stakeholders follow a threefold strategy: running our own events and activities on sustainability themes; taking part in forums, events and working groups; and exchanging with critical stakeholders on ad hoc issues.



## 6. Reporting

Deutsche Bank's CR Report is published annually as part of our annual corporate reporting. It is compiled in accordance with the core option of the Global Reporting Initiative's (GRI) Sustainability Reporting Guidelines.

As well as reporting our CR performance annually, we strive for transparency throughout the year by providing information to sustainability rating organisations. Our CR website and regional publications provide additional information as well as regular updates. Increasingly, we are using social media to improve transparency and to communicate with our stakeholders on certain topics.

For the fiscal year 2015 CR Report, we received an independent limited assurance on selected sustainability disclosures including sections on carbon neutrality, managing ES risks, and our ES Policy Framework.