

DWS Investment S.A.

# DWS Russia

Annual Report 2024

Investment Fund Organized under Luxembourg Law



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**DWS Russia**

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**for the period from January 1, 2024, through December 31, 2024**

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# General information

**The fund described in this report is subject to the laws of Luxembourg.**

## Performance

The investment return, or performance, of a mutual fund investment is measured by the change in value of the fund's units. The net asset values per unit (= redemption prices), with the addition of intervening distributions, are used as the basis for calculating the value. Past performance is not a guide to future results.


The corresponding benchmark – if available – is also presented in the report. All financial data in this publication is **as of December 31, 2024** (unless otherwise stated).

## Sales prospectuses

Fund units are purchased on the basis of the current sales prospectus and management regulations as well as the key investor information document, in combination with the latest audited annual report and any semiannual report that is more recent than the latest annual report.

## Issue and redemption prices

The current issue and redemption prices and all other information for unitholders may be requested at any time at the registered office of the Management Company and from the paying agents. In addition, the issue and redemption prices are published in every country of distribution through appropriate media (such as the Internet, electronic information systems, newspapers, etc.).

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# **Annual report and annual financial statements**

# Annual report

## DWS Russia

### Investment objective and performance in the reporting period

The fund DWS Russia sought to achieve an appreciation relative to the benchmark (MSCI Russia 10/40 (RI)).\* To achieve this, it invested predominantly in equities of issuers having their registered offices in Russia or of issuers having their registered offices outside of Russia but whose principal business activity is in Russia.

The capital market environment in the 2024 fiscal year was challenging, especially due to geopolitical crises like the Russia-Ukraine war that has been ongoing since February 24, 2022, the escalating conflict in the Middle East and the intensifying power struggle between the United States and China. However, inflationary pressure did ease over the course of the fiscal year. Against this backdrop, the majority of central banks ended the previous rate hiking cycle.

Against the backdrop of the escalating conflict between Russia and Ukraine, certain trading conditions did not function as they normally would have. This had an impact on the valuation of the financial instruments concerned and, in turn, on the calculation of the net asset value of the fund. In view of the extremely volatile and constantly changing market situation at the time and reduced trading and settlement capability, net asset value calculation with regard to DWS Russia, as well as unit issuance and redemption, were suspended until further notice as of March 1, 2022.\*

Individual ADRs (American Depositary Receipts) and GDRs (Global Depositary Receipts) were sold during the reporting period. In addition, the equity investment in Nebius (previously: Yandex) was reduced. The Dutch company, formerly called Yandex NV, had spun off from the Russian technology company Yandex in summer 2024 and renamed itself Nebius Group, which led to the lifting of sanctions against this company. The equivalent values resulting from the sales were invested as cash and time deposit positions for the purpose of preserving capital value and safeguarding investors' interests.

### Other information – Not covered by the audit opinion on the annual report

#### Information on environmental and/or social characteristics

This financial product qualified as a product in accordance with Article 6 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR").

The following is the disclosure in accordance with Article 7 of Regulation (EU) 2020/852 of June 18, 2020, on the establishment of a framework to facilitate sustainable investment: The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The following disclosures are made for the financial product in accordance with Article 7(1) of Regulation (EU) 2019/2088 on

sustainability-related disclosures in the financial services sector: The portfolio management did not consider principal adverse impacts on sustainability factors for this financial product, because (as stated above) no ESG and/or sustainable investment policies were pursued with the product.

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\* Further details are available at the end of the "Annual financial statements" section.

# Annual financial statements

## DWS Russia

The format used for complete dates in security names in the investment portfolio is "day month year".

### Statement of net assets as of December 31, 2024

	Amount in EUR	% of net assets
<b>I. Assets</b>		
<b>1. Equities (sectors):</b>		
Communication Services	1 708 788.22	10.02
Information Technology	785 221.66	4.61
Basic Materials	496 494.32	2.91
Financials	193.63	0.00
Industrials	33.87	0.00
Energy	1.63	0.00
Utilities	0.10	0.00
Consumer Staples	0.09	0.00
Consumer Discretionaries	0.05	0.00
Other	0.12	0.00
<b>Total equities:</b>	<b>2 990 733.39</b>	<b>17.54</b>
<b>2. Cash at bank</b>	<b>14 027 499.39</b>	<b>82.28</b>
<b>3. Other assets</b>	<b>32 232.28</b>	<b>0.19</b>
<b>II. Liabilities</b>		
<b>1. Other liabilities</b>	<b>-2 006.33</b>	<b>-0.01</b>
<b>III. Net assets</b>	<b>17 048 458.73</b>	<b>100.00</b>

Negligible rounding errors may have arisen due to the rounding of calculated percentages.

# DWS Russia

## Investment portfolio – December 31, 2024

Security name	Count/ currency (– / '000)	Quantity/ principal amount	Purchases/ additions in the reporting period	Sales/ disposals	Market price	Total market value in EUR	% of net assets in 1000
<b>Securities traded on an exchange</b>						<b>2 990 726.56</b>	<b>17.54</b>
<b>Equities</b>							
Aeroflot-Russian Airlines (RU0009062285) .....	Count	1 000			RUB 0.0001	0.00	0.00
Aksionernaya Kompaniya 'ALROSA' (RU0007252813) ...	Count	2 000 000			RUB 0.0001	1.83	0.00
Gazprom Neft (RU0009062467) .....	Count	350 000			RUB 0.0001	0.32	0.00
LUKOIL (RU0009024277) .....	Count	150 000			RUB 0.0001	0.14	0.00
Magnit (RU000A0JKQU8) .....	Count	102 000			RUB 0.0001	0.09	0.00
Novatek (RU000A0DKVS5) .....	Count	675 000			RUB 0.0001	0.62	0.00
Novolipetskiy Metallurgicheskiy Kombinat (RU0009046452) .....	Count	750 000			RUB 0.0001	0.68	0.00
Ozon Holdings GDR (US69269L1044) .....	Count	50 000			RUB 0.0001	0.05	0.00
Rosneft Oil (RU000A0J2Q06) .....	Count	600 000			RUB 0.0001	0.55	0.00
Sankt-Peterburgskaya Birzha (RU000A0JQ9P9) .....	Count	165 000			RUB 0.0001	0.16	0.00
Sberbank of Russia (RU0009029540) .....	Count	1 200 000			RUB 0.0001	1.10	0.00
Segezha group (RU000A102XG9) .....	Count	1 301 800			RUB 0.0001	1.19	0.00
United Company Rusal (RU000A1025V3) .....	Count	4 000 000			RUB 0.0001	3.65	0.00
VTB Bank (RU000A0JP5V6) .....	Count	650 000		3 249 350 000	RUB 0.0001	0.59	0.00
Cian ADR (US83418T1088) .....	Count	45 000			USD 0.0001	4.31	0.00
Gdev (VGG6529J2092) .....	Count	7 500	7 500		USD 19.5500	140 526.16	0.82
Inter RAO UES (RU000A0JPNM1) .....	Count	1 000			USD 0.0001	0.10	0.00
Magnitogorsk Iron & Steel Works GDR Reg S (US5591892048) .....	Count	125 000			USD 0.0001	11.98	0.00
Moscow Exchange MICEX-RTS (RU000A0JR4A1) .....	Count	2 000 000			USD 0.0001	191.68	0.00
Nebius Group (NL0009805522) .....	Count	30 000			USD 27.3100	785 221.39	4.61
Neftekamskiy Avtozavod (RU0009115604) .....	Count	353 350			USD 0.0001	33.87	0.00
Sberbank of Russia Pref. (RU0009029557) .....	Count	1 000			USD 0.0001	0.10	0.00
Severstal PAO GDR Reg S (Oct. 2006) (US8181503025) ..	Count	150 000			USD 0.0001	14.38	0.00
Solidcore Resources (JEO0B6T5S470) .....	Count	175 000			USD 2.9600	496 453.90	2.91
Veon ADR (US91822M5022) .....	Count	42 000			USD 38.9600	1 568 257.62	9.20
VK Co. (US5603172082) .....	Count	1 000			USD 0.0001	0.10	0.00
<b>Unlisted securities</b>						<b>6.83</b>	<b>0.00</b>
<b>Equities</b>							
PhosAgro (US71922G4073) .....	Count	1 280			USD 0.0001	0.12	0.00
Polyus Sp. GDR (US73181M1172) .....	Count	70 000			USD 0.0001	6.71	0.00
<b>Total securities portfolio</b>						<b>2 990 733.39</b>	<b>17.54</b>
<b>Cash at bank</b>						<b>14 027 499.39</b>	<b>82.28</b>
<b>Demand deposits at Depositary</b>							
EUR deposits .....	EUR	4 866 466.48			% 100	4 866 466.48	28.54
Deposits in other EU/EEA currencies .....	EUR	0.20			% 100	0.20	0.00
Deposits in non-EU/EEA currencies							
Swiss franc .....	CHF	0.31			% 100	0.33	0.00
British pound .....	GBP	661.98			% 100	797.95	0.00
Hong Kong dollar .....	HKD	1.40			% 100	0.17	0.00
Russian rouble .....	RUB	71 500.00			% 100	652.57	0.00
U.S. dollar .....	USD	6 757 107.53			% 100	6 476 047.09	37.99
<b>Time deposits</b>							
USD deposits (DZ BANK AG Deutsche Zentral -Genossenschaftsbank, Frankfurt/Main) .....	USD	2 800 000.00			% 100	2 683 534.60	15.74
<b>Other assets</b>						<b>32 232.28</b>	<b>0.19</b>
Interest receivable .....	EUR	32 232.28			% 100	32 232.28	0.19
<b>Total assets<sup>1</sup></b>						<b>17 050 465.06</b>	<b>100.01</b>
<b>Other liabilities</b>						<b>-2 006.33</b>	<b>-0.01</b>
Liabilities from cost items .....	EUR	-2 006.33			% 100	-2 006.33	-0.01
<b>Net assets</b>						<b>17 048 458.73</b>	<b>100.00</b>



## DWS Russia

Net asset value per unit and number of units outstanding	Count/ currency	Net asset value per unit in the respective currency
<b>Net asset value per unit</b>		
Class LC .....	EUR	41.98
Class IC .....	EUR	22.65
Class TFC .....	EUR	20.84
<b>Number of units outstanding</b>		
Class LC .....	Count	404 839.710
Class IC .....	Count	100.000
Class TFC .....	Count	2 370.628

Negligible rounding errors may have arisen due to the rounding of calculated percentages.

A list of the transactions completed during the reporting period that no longer appear in the investment portfolio is available free of charge from the Management Company upon request.

### The following risk management disclosures (other information) are unaudited and are not covered by the audit opinion on the annual report.

#### Composition of the reference portfolio (according to CSSF circular 11/512)

Ex-Derivative Benchmark for Portfolio

#### Market risk exposure (value-at-risk) (according to CSSF circular 11/512)

Lowest market risk exposure .....	%	100.000
Highest market risk exposure .....	%	100.000
Average market risk exposure .....	%	100.000

The values-at-risk were calculated for the period from January 1, 2024, through December 31, 2024, using the VaR method of historical simulation with a 99% confidence level, a 10-day holding period and an effective historical observation period of one year. The risk in a reference portfolio that does not contain derivatives is used as the measurement benchmark. Market risk is the risk to the fund's assets arising from an unfavorable change in market prices. The Company determines the potential market risk by means of the relative value-at-risk approach as defined in CSSF circular 11/512.

In the reporting period, the average leverage effect from the use of derivatives was 0.0, whereby the total of the nominal amounts of the derivatives in relation to the fund's assets was used for the calculation (sum-of-notional approach).

The gross exposure generated via derivatives pursuant to point 40 a) of the "Guidelines on ETFs and other UCITS issues" of the European Securities and Markets Authority (ESMA) totaled EUR 0.00 as of the reporting date.

#### Exchange rates (indirect quotes)

As of December 30, 2024

Swiss franc .....	CHF	0.941050	=	EUR	1
British pound .....	GBP	0.829600	=	EUR	1
Hong Kong dollar .....	HKD	8.098200	=	EUR	1
Russian rouble .....	RUB	109.567450	=	EUR	1
U.S. dollar .....	USD	1.043400	=	EUR	1

#### Notes on valuation

The Management Company determines the net asset values per unit and performs the valuation of the assets of the fund. The basic provision of price data and price validation are performed in accordance with the method introduced by the Management Company on the basis of the legal and regulatory requirements or the principles for valuation methods defined in the fund prospectus.

If no trading prices are available, prices are determined with the aid of valuation models (derived market values) which are agreed between State Street Bank International GmbH, Luxembourg Branch as external price service provider and the Management Company and which are based as far as possible on market parameters. This procedure is subject to an ongoing monitoring process. The plausibility of price information from third parties is checked through other pricing sources, model calculations or other suitable procedure.

Owing to the situation caused by the Russia-Ukraine conflict, alternative valuation methods are being used to measure certain Russian assets for the time being.

Russian equities and depositary receipts such as ADRs/GDRs were written down in full to a memo value of EUR 0.0001 per currency and per unit as of March 3, 2022, because these were either prohibited from exchange trading or western investors were excluded from Russian markets. This valuation method will be reviewed at the regular meetings of DWS's Pricing Committee.

The fund expected cash inflows of RUB 778 927 282.00 and USD 430 094.52 from outstanding dividend payments by Russian companies as of the end of the fiscal year, December 31, 2024, which are accounted for off the books. However, due to the current political situation, it is not possible to forecast whether the dividend payments by the Russian companies will be resumed at a later date.

#### Footnotes

<sup>1</sup> Does not include positions with a negative balance, if such exist.

## DWS Russia

### Statement of income and expenses (incl. income adjustment)

for the period from January 1, 2024, through December 31, 2024

#### I. Income

1. Dividends (before withholding tax) . . . . .	EUR	33 637.20
2. Interest from investments of liquid assets (before withholding tax) . . . . .	EUR	362 705.15
3. Deduction for foreign withholding tax <sup>1</sup> . . . . .	EUR	94.02
4. Other income . . . . .	EUR	61.29
<b>Total income . . . . .</b>	<b>EUR</b>	<b>396 497.66</b>

#### II. Expenses

1. Other expenses . . . . .	EUR	-5 737.17
thereof:		
Taxe d'abonnement . . . . .	EUR	-5 737.17
<b>Total expenses . . . . .</b>	<b>EUR</b>	<b>-5 737.17</b>

<b>III. Net investment income . . . . .</b>	<b>EUR</b>	<b>390 760.49</b>
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#### IV. Sale transactions

1. Realized gains . . . . .	EUR	568 783.99
2. Realized losses . . . . .	EUR	-24 690 283.51

<b>Capital gains/losses . . . . .</b>	<b>EUR</b>	<b>-24 121 499.52</b>
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<b>V. Realized net gain/loss for the fiscal year . . . . .</b>	<b>EUR</b>	<b>-23 730 739.03</b>
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1. Net change in unrealized appreciation . . . . .	EUR	515 289.84
2. Net change in unrealized depreciation . . . . .	EUR	32 037 195.39

<b>VI. Unrealized net gain/loss for the fiscal year . . . . .</b>	<b>EUR</b>	<b>32 552 485.23</b>
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<b>VII. Net gain/loss for the fiscal year . . . . .</b>	<b>EUR</b>	<b>8 821 746.20</b>
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Note: The net change in unrealized appreciation (depreciation) is calculated by subtracting the total of all unrealized appreciation (depreciation) at the end of the fiscal year from the total of all unrealized appreciation (depreciation) at the beginning of the fiscal year. Total unrealized appreciation (depreciation) includes positive (negative) differences resulting from the comparison of the values recognized for the individual assets as of the reporting date with their respective acquisition costs.

Unrealized appreciation/depreciation is shown without income adjustment.

### Total expense ratio / Transaction costs

#### BVI total expense ratio (TER)

The total expense ratio(s) for the unit class(es) was/were:

Class LC 0.05% p.a., Class IC 0.01% p.a., Class TFC 0.05% p.a.

The TER expresses total expenses and fees (excluding transaction costs) including any commitment fees as a percentage of the fund's average net assets in relation to the respective unit class for a given fiscal year.

#### Transaction costs

The transaction costs paid in the reporting period amounted to EUR 1 223.40.

The transaction costs include all costs that were reported or settled separately for the account of the fund in the reporting period and are directly connected to the purchase or sale of assets. Any financial transaction taxes which may have been paid are included in the calculation.

<sup>1</sup> Includes corrections for the previous year.

### Statement of changes in net assets for the fund

#### I. Value of the fund's net assets

<b>at the beginning of the fiscal year . . . . .</b>	<b>EUR</b>	<b>8 226 712.53</b>
1. Net gain/loss for the fiscal year . . . . .	EUR	8 821 746.20
thereof:		
Net change in unrealized appreciation . . . . .	EUR	515 289.84
Net change in unrealized depreciation . . . . .	EUR	32 037 195.39

#### II. Value of the fund's net assets

<b>at the end of the fiscal year . . . . .</b>	<b>EUR</b>	<b>17 048 458.73</b>
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### Summary of gains/losses

<b>Realized gains (incl. income adjustment) . . . . .</b>	<b>EUR</b>	<b>568 783.99</b>
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from:

(Forward) currency transactions . . . . .	EUR	568 783.99
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<b>Realized losses (incl. income adjustment) . . . . .</b>	<b>EUR</b>	<b>-24 690 283.51</b>
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from:

Securities transactions . . . . .	EUR	-24 580 187.75
(Forward) currency transactions . . . . .	EUR	-110 095.76

<b>Net change in unrealized appreciation/depreciation . . . . .</b>	<b>EUR</b>	<b>32 552 485.23</b>
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from:

Securities transactions . . . . .	EUR	32 552 485.22
(Forward) currency transactions . . . . .	EUR	0.01

### Details on the distribution policy\*

#### Class LC

The income for the fiscal year is reinvested.

#### Class IC

The income for the fiscal year is reinvested.

#### Class TFC

The income for the fiscal year is reinvested.

\* Additional information is provided in the sales prospectus.

### Changes in net assets and in the net asset per unit over the last three years

Net assets at the end of the fiscal year

2024 . . . . .	EUR	17 048 458.73
2023 . . . . .	EUR	8 226 712.53
2022 . . . . .	EUR	7 495 143.48

Net asset value per unit at the end of the fiscal year

2024	Class LC . . . . .	EUR	41.98
	Class IC . . . . .	EUR	22.65
	Class TFC . . . . .	EUR	20.84
2023	Class LC . . . . .	EUR	20.26
	Class IC . . . . .	EUR	10.92
	Class TFC . . . . .	EUR	10.06
2022	Class LC . . . . .	EUR	18.46
	Class IC . . . . .	EUR	9.95
	Class TFC . . . . .	EUR	9.16

### Transactions processed for the account of the fund's assets via closely related companies (based on major holdings of the Deutsche Bank Group)

The share of transactions conducted in the reporting period for the account of the fund's assets via brokers that are closely related companies and persons (share of 5% and above) amounted to 0.00% of all transactions. The total volume was EUR 0.00.

## Russia/Ukraine crisis

Against the backdrop of the conflict between Russia and Ukraine, trading conditions in the local markets have still not returned to normal. Due to the extremely volatile and constantly changing market situation and the sanctions that have already been imposed against Russia, as well as planned extensive sanctions, an adequate valuation backed up by active market trading of various securities of issuers having their registered office or principal business activity in Russia can no longer be ensured at any given time. This means, among other things, that the net asset value ("NAV") of the units of the fund DWS Russia can no longer be calculated with the necessary accuracy and adequacy. As a result, the issue of units (in accordance with article 9 of the fund's management regulations) as well as the calculation of the net asset value per unit and the redemption of fund units in accordance with articles 7 and 10 of the fund's management regulations have been suspended until further notice.

This decision was taken in particular to protect all investors and ensure their equal treatment, as there was insufficient market liquidity and valuation certainty in the period from when the above decisions were taken through to the time of preparing this report.

All issue requests that were received after the order acceptance deadline on February 25, 2022, were rejected in order to protect investors from disadvantages due to the current market situation. All redemption requests that were received by the order acceptance deadline on February 28, 2022, were executed and all redemption requests that were received after the order acceptance deadline on February 28, 2022, were rejected.

The suspension will be reviewed at regular intervals. The Management Company will publish all information regarding the decision to end the suspension on the website [www.dws.com](http://www.dws.com).

Following the suspension of the issue of units, the calculation of the NAV per unit and the redemption of units of the fund DWS Russia, the Management Company DWS Investment S.A. decided to reduce the all-in fee for the fund as follows:

Name	ISIN	All-in fee (old)	All-in fee (new)
DWS Russia IC	LU1628016351	0.5%	0.0%
DWS Russia LC	LU0146864797	2.0%	0.0%
DWS Russia TFC	LU1673816341	1.0%	0.0%

This decision applies retroactively as of March 1, 2022, until further notice.

KPMG issued an unqualified audit opinion for the full annual report. The translation of the report of the réviseur d'entreprises agréé (the independent auditor's opinion) is as follows:

KPMG Audit S.à r.l.  
39, Avenue John F. Kennedy  
1855 Luxembourg, Luxembourg

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**To the unitholders of  
DWS Russia  
2, Boulevard Konrad Adenauer  
1115 Luxembourg, Luxembourg**

## **REPORT OF THE RÉVISEUR D'ENTREPRISES AGRÉÉ**

### **Report on the audit of the financial statements**

#### **Audit opinion**

We have audited the annual financial statements of DWS Russia ("the Fund"), which comprise the statement of net assets, including the statement of investments in the securities portfolio and other net assets as of December 31, 2024, the statement of income and expenses and the statement of changes in net assets for the Fund for the fiscal year then ended, as well as notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying annual financial statements give a true and fair view of the financial position of DWS Russia as of December 31, 2024, and of the results of its operations and changes in its net assets for the fiscal year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of financial statements.

#### **Basis for the audit opinion**

We conducted our audit in accordance with the Law of July 23, 2016, on the audit profession ("Law of July 23, 2016") and with International Standards on Auditing ("ISAs") as adopted for Luxembourg by the Commission de Surveillance du Secteur Financier ("CSSF"). Our responsibilities under the Law of July 23, 2016, and the ISAs as adopted in Luxembourg by the CSSF are further described in the "Responsibilities of the réviseur d'entreprises agréé for the audit of the financial statements" section. We are also independent of the Fund in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants, including International Independence Standards, ("IESBA Code") as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### **Other information**

The Management Board of the Management Company is responsible for the other information. The other information comprises the information included in the annual report, but does not include the financial statements and our report of the réviseur d'entreprises agréé thereon.

Our audit opinion on the financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

### **Responsibility of the Management Board of the Management Company for the financial statements**

The Management Board of the Management Company is responsible for the preparation and fair presentation of the financial statements in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of financial statements, and for such internal control as the Management Board of the Management Company determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Management Board of the Management Company is responsible for assessing the Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Management Board of the Management Company either intends to liquidate the Fund or to cease operations, or has no realistic alternative but to do so.

### **Responsibilities of the réviseur d'entreprises agréé for the audit of the financial statements**

The objective of our audit is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a report of the réviseur d'entreprises agréé that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Law of July 23, 2016, and with ISAs as adopted for Luxembourg by the CSSF will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with the Law of July 23, 2016, and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional skepticism throughout the audit.

We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Management Board of the Management Company.
- Conclude on the appropriateness of the use by the Management Board of the Management Company of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in the report of the réviseur d'entreprises agréé to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of the report of the réviseur d'entreprises agréé. However, future events or conditions may cause the Fund to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Luxembourg, April 29, 2025

KPMG Audit S.à r.l.  
Cabinet de révision agréé

Pia Schanz

Other information – Not covered by the audit opinion on the annual report

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# Supplementary information

# Remuneration disclosure

DWS Investment S.A. (the “Company”) is a subsidiary in DWS Group GmbH & Co. KGaA (“DWS KGaA”), and is subject to the regulatory requirements of the Fifth Directive on Undertakings for Collective Investment in Transferable Securities (“UCITS V Directive”) and the Alternative Investment Fund Management Directive (“AIFM Directive”) as well as the European Securities and Markets Authority’s Guidelines on Sound Remuneration Policies (“ESMA Guidelines”) with regard to the design of its remuneration system.

## Remuneration Policy & Governance

The Company is governed by the Group-wide Compensation Policy that DWS KGaA has adopted for itself and all of its subsidiaries (“DWS Group” or only “Group”). In line with the Group structure, committees have been set up to ensure the appropriateness of the compensation system and compliance with regulatory requirements on compensation and are responsible for reviewing it.

As such the DWS Compensation Committee was tasked by the DWS KGaA Executive Board with developing and designing sustainable compensation principles, making recommendations on overall compensation and ensuring appropriate governance and oversight with regard to compensation and benefits for the Group.

Furthermore, the Remuneration Committee was established to support the Supervisory Board of DWS KGaA in monitoring the appropriate structure of the remuneration systems for all Group employees. This is done by testing the consistency of the remuneration strategy with the business and risk strategy and taking into account the effects of the remuneration system on the group-wide risk, capital and liquidity management.

The internal annual review at DWS Group level concluded the design of the remuneration system to be appropriate and no significant irregularities were recognized.

## Compensation structure

Employee compensation consists of fixed and variable compensation.

Fixed compensation remunerates employees for their skills, experience and competencies, commensurate with the requirements, size and scope of their role.

Variable compensation takes into account performance at group, divisional and individual level. Variable compensation generally consists of two elements – the “Franchise Component” and the “Individual Component”.

The Franchise Component is determined based upon the performance of three Key Performance Indicators (KPIs) at DWS Group level. For the performance year 2024 these were: Adjusted Cost Income Ratio (“CIR”), long-term Net Flows and ESG metrics.

The individual component of variable compensation takes into account a number of financial and non-financial factors, relativities within the peer group, and retention considerations. Variable compensation can be reduced accordingly or cancelled completely in the event of negative performance contributions or misconduct. In principle, it is only granted and paid out if the granting is affordable for the Group. Guaranteed variable compensation is not normally granted to employees. On an exceptional basis, guaranteed variable compensation can be granted to new hires but only during their first year of employment.

The compensation strategy is designed to achieve an appropriate balance between fixed and variable compensation. This helps to align employee compensation with the interests of customers, investors and shareholders, as well as to industry standards. At the same time, it ensures that fixed compensation represents a sufficiently high proportion of total compensation to allow the Group full flexibility in granting variable compensation.

## Determination of variable compensation and appropriate risk-adjustment

The total amount of variable compensation is subject to appropriate risk-adjustment measures which include ex-ante and ex-post risk adjustments. The robust methodology is designed to ensure that the determination of variable compensation reflects Group’s risk-adjusted performance as well as the capital and liquidity position.

A number of considerations are used in assessing the performance of the business units. Performance is assessed in the context of financial and non-financial targets based on balanced scorecards. The allocation of variable compensation to the infrastructure areas and in particular to the control functions depends on the overall results of the Group, but not on the results of the business areas they oversee.

Principles for determining variable compensation apply at individual employee level which detail the factors and metrics that must be taken into account when making IVC decisions. These include, for instance, investment performance, client retention, culture considerations, and objective setting and performance assessment based on the “Total Performance” approach. Furthermore, any control function inputs and disciplinary sanctions and their impact on the VC have to be considered as well.

## Sustainable Compensation

Sustainability and sustainability risks are an essential part that determine the variable compensation. Therefore, the remuneration policy is fully in line and consistent with sustainability risks. Hence, DWS Group incentivises behaviour that benefits both interest of clients and the long-term performance of the firm. Relevant sustainability factors are reviewed on a regular basis and incorporated in the design of the compensation system.



## Compensation for 2024

The DWS Compensation Committee has monitored the affordability of VC for 2024 and determined that the Group's capital and liquidity levels remain above regulatory minimum requirements, and internal risk appetite threshold.

As part of the overall 2024 variable compensation granted in March 2025, the Franchise Component is awarded to eligible employees in line with the assessment of the defined KPIs. The Executive Board recognizing the considerable contribution of employees and determined a target achievement rate of 90,0% for 2024.

## Identification of Material Risk Takers

In accordance with the regulatory requirements, the Company has identified Material Risk Takers. The identification process was carried out in accordance with the Group's policies and is based on an assessment of the impact of the following categories of staff on the risk profile of the Company or on a fund it manages: (a) Board Members/Senior Management, (b) Portfolio/Investment managers, (c) Control Functions, (d) Staff heading Administration, Marketing and Human Resources, (e) other individuals (Risk Takers) in a significant position of influence, (f) other employees in the same remuneration bracket as other Risk Takers, whose roles have an impact on the risk profile of the Company or the Group. At least 40% of the VC for Material Risk Takers is deferred. Additionally, at least 50% of both, the upfront and the deferred proportion, are granted in the Group share-based instruments or fund-linked instruments for Key Investment Professionals. All deferred components are subject to a number of performance conditions and forfeiture provisions which ensure an appropriate ex-post risk adjustment. In case the VC is lower than EUR 50,000, the Material Risk Takers receive their entire variable compensation in cash without any deferral.

## Aggregate Compensation Information for the Company for 2024<sup>1</sup>

Number of employees on an annual average		106
Total Compensation <sup>2</sup>	EUR	16,564,921
Fixed Pay	EUR	13,170,723
Variable Compensation	EUR	3,394,198
Thereof: Carried Interest	EUR	0
Total Compensation for Senior Management <sup>3</sup>	EUR	1,689,020
Total Compensation for other Material Risk Takers <sup>4</sup>	EUR	0
Total Compensation for Control Function employees	EUR	2,422,471

<sup>1</sup> In cases where portfolio or risk management activities have been delegated by the Company, the compensation data for delegates are not included in the table.

<sup>2</sup> Considering various elements of remuneration as defined in the ESMA Guidelines which may include monetary payments or benefits (such as cash, shares, options, pension contributions) or none (directly) monetary benefits (such as fringe benefits or special allowances for car, mobile phone, etc.).

<sup>3</sup> Senior Management refers to the members of the Management Board of the Company, only. Members of the Management Board meet the definition of managers. Apart from the members of Senior Management, no further managers have been identified.

<sup>4</sup> Identified risk takers with control functions are shown in the line "Control Function employees".

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## Aggregate Compensation Information for the Company for 2024<sup>1</sup>

Number of employees on an annual average		424
Total Compensation	EUR	87,621,310
Fixed Pay	EUR	50,090,899
Variable Compensation	EUR	37,530,411
Thereof: Carried Interest	EUR	0
Total Compensation for Senior Management <sup>2</sup>	EUR	5,648,841
Total Compensation for other Material Risk Takers	EUR	7,856,650
Total Compensation for Control Function employees	EUR	2,168,139

<sup>1</sup> In cases where portfolio or risk management activities have been delegated by the Company, the compensation data for delegates are not included in the table.

<sup>2</sup> Senior Management refers to the members of the Management Board of the Company, only. Members of the Management Board meet the definition of managers. Apart from the members of Senior Management, no further managers have been identified.

## **DWS Russia**

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### **Information pursuant to Regulation (EU) 2015/2365 on transparency of securities financing transactions (SFTs) and of reuse and amending Regulation (EU) No. 648/2012 – Statement in accordance with Section A**

There were no securities financing transactions according to the above Regulation in the reporting period.

## **Management Company, Central Administration Agent, Transfer Agent, Registrar and Main Distributor**

DWS Investment S.A.  
2, Boulevard Konrad Adenauer  
1115 Luxembourg, Luxembourg  
Equity capital as of December 31, 2024:  
EUR 387.1 million before profit appropriation

## **Supervisory Board**

Manfred Bauer  
Chairman  
DWS Investment GmbH,  
Frankfurt/Main

Björn Jesch  
(from March 15, 2024, until November 11, 2024)  
DWS CH AG,  
Zurich

Dr. Matthias Liermann  
DWS Investment GmbH,  
Frankfurt/Main

Holger Naumann  
DWS Group GmbH & Co. KGaA,  
Frankfurt/Main

Corinna Orbach (since March 15, 2024)  
DWS Group GmbH & Co. KGaA,  
Frankfurt/Main

Frank Rückbrodt (until January 31, 2025)  
Deutsche Bank Luxembourg S.A.,  
Luxembourg

## **Management Board**

Nathalie Bausch  
Chairwoman  
DWS Investment S.A.,  
Luxembourg

Leif Bjurström  
DWS Investment S.A.,  
Luxembourg

Dr. Stefan Junglen  
DWS Investment S.A.,  
Luxembourg

Michael Mohr  
DWS Investment S.A.,  
Luxembourg

## **Auditor**

KPMG Audit S.à r.l.  
39, Avenue John F. Kennedy  
1855 Luxembourg, Luxembourg

## **Depository**

State Street Bank International GmbH  
Luxembourg Branch  
49, Avenue John F. Kennedy  
1855 Luxembourg, Luxembourg

## **Fund Manager**

DWS Investment GmbH  
Mainzer Landstraße 11-17  
60329 Frankfurt/Main, Germany

## **Sales, Information and Paying Agent\***

LUXEMBOURG  
Deutsche Bank Luxembourg S.A.  
2, Boulevard Konrad Adenauer  
1115 Luxembourg, Luxembourg

\* For additional Sales and Paying Agents,  
please refer to the sales prospectus

As of: March 5, 2025

**DWS Investment S.A.**

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