

Všeobecná úverová banka, a.s.; skrátený názov: VÚB, a.s.,
so sídlom Mlynské nivy 1, 829 90 Bratislava 25,
zapísaná v Obchodnom registri Mestského súdu Bratislava III,
Oddiel: Sa, vložka č. 341/B, IČO: 31320155 BIC: SUBASKBX
www.vub.sk (ďalej len "VÚB, a.s." alebo "banka")

Scope of business: pursuant to the Act on Banks
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I. Karvaša 1, 813 25 Bratislava
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POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISKS AND STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF ADVISORY ON SUSTAINABILITY FACTORS

Notice:

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Produced by:

Compliance Office VÚB, a.s.s.
compliance@vub.sk

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TABLE OF CONTENT

INTRODUCTION	3
REGULATORY FRAMEWORK	3
THE ROLE OF SUSTAINABILITY FOR THE ISP GROUP	3
THE INTEGRATION OF SUSTAINABILITY RISKS INTO THE ADVISORY SERVICE MODEL	4
ANNEX	7
1. GLOSSARY	7
2. LIST OF SUSTAINABLE DEVELOPMENT GOALS (SDGS)	7
3. LIST AND DESCRIPTION OF PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS (PAI)	8

INTRODUCTION

The purpose of this document, prepared in accordance with articles 3 and 4 of Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (hereinafter also „SFDR regulation“) is to:

- Publish politics with respect to the integration of ESG – environmental, social and governance sustainability risks implemented by VÚB, a.s., LEI: 549300JB1P61FUTPEZ75 (hereinafter also „Bank“), as part of international group Intesa Sanpaolo (hereinafter also „ISP“).
- Provide information on how the Bank considers Principle Adverse Impacts¹ on Sustainability factors in the field of investment advisory and insurance distribution advice.

This document applies to the company's activities and processes for selecting issuers and defining the catalogue of financial products and providing the advisory service.

REGULATORY FRAMEWORK

The regulation on the provision of investment services has been the subject of significant interventions by the European Union legislator related to the so-called “sustainable finance,” which falls within the scope of EU initiatives aimed at directing markets and capital flows toward inclusive and sustainable growth².

The main innovation concern the following areas of the “investor protection” regulations under Directive (EU) 2014/65 (the so-called “MiFID II”):

- the introduction of new and specific sustainability disclosure towards the client, pursuant to the aforementioned SFDR Regulation (as amended by Regulation (EU) 2020/852, the “Taxonomy Regulation”);,
- the integration of clients’ “sustainability preferences” into the suitability assessment of investment operations, through targeted amendments to the Delegated Regulation (EU) 2017/565,
- the consideration of sustainability-related objectives in product governance processes, through specific amendments to the provision under Delegated Directive (EU) 2017/593 applicable to manufacturers and distributors

In particular, the SFDR Regulation was introduced as a “cross-cutting” framework integrated into various sectoral regulation, including MiFID II, with the aim of achieving a harmonized and standardized representation of sustainability information in the financial sector. This is intended to facilitate comparability and support investors in carrying out informed decisions regarding:

- the integration of sustainability risks;
 - the consideration of adverse impact on sustainability;
 - the promotion of environmental or social characteristics and sustainable investments;
- by placing specific transparency obligation on financial market participants and financial advisers.

THE ROLE OF SUSTAINABILITY FOR THE ISP GROUP

The ISP Group, which the bank is part of, is committed to strengthening its leadership in Corporate Social Responsibility, aiming to become a reference model in terms of environmental and social sustainability.

Through the establishment of a dedicated central structure³, the ISP pursues the objective of promptly monitoring projects, initiatives, and quantitative performance indicators in the field of sustainability and to fully inform the market and all stakeholders of the results achieved during the year, also testifying to the constant proactive focus of the IPS Group on sustainability issues.

The ISP Group has also put in place specific processes and responsibilities to understand and manage risks to ensure long-term soundness and business continuity, extending benefits to its stakeholders. The ISP's approach to sustainability can be declined in the following pillars:

- support for the ESG transition to accelerate progress toward a low-emission economy, through specific financing ceilings for natural persons and businesses, and an increasingly broad range of products with sustainability dimensions;
- commitment to environment and climate with the aim of zeroing its net emissions (“Carbon neutrality”) by 2030 and, in line with the adherence to the Net Zero Banking Alliance (NZBA), the Net Zero Asset Managers Initiative

1 Principal Adverse Impacts –PAI, represent adverse significant or likely significant impacts on sustainability factors that are caused by or directly related to investment decisions and investment advice.

2 Following the adoption in 2015 of the so-called „2030 Agenda“ by the United Nations for sustainable development and the related „Paris Agreement“ on climate in 2016, the EU defined its strategy for achieving the objectives set forth therein. This strategy is detailed in the so-called „Action Plan: Financing Sustainable Growth“ of March 2018, which was subsequently renewed through the so-called „European Green Deal,“ announced in December 2019.

3 This also includes the establishment – in 2024- of the Chief Sustainability Officer Governance Area which is focused on ESG matters and is dedicated to steering the ISP Group's sustainable development strategies, with a strong commitment to social initiatives and the fight against inequalities, ongoing support for culture, and significant contribution to sustainability through innovation projects and investments in startups.

(NZAMI), the Net Zero Asset Owner Alliance (NZAOA) and the Forum for Insurance Transition to Net Zero (FIT), achieve net zero emissions by 2050 for loan and investment portfolios, asset management and insurance activities;

- promotion of innovation, through a constant focus on optimizing an advanced multichannel platform aimed at offering all customer segments an innovative, secure, and effective offering, along with the complete digitalization of the Group's priority processes;
- support for financial inclusion through social credit, for example by providing credit to the third sector, offering direct support to individuals who cannot access credit through traditional financial channels, financing urban regeneration, and supporting vulnerable individuals;
- attention to social needs and commitment to culture, with the aim of providing support to address social needs through, for example, programs to assist people in difficulty (expanding food and shelter programs for those in need), promoting educational inclusion and youth employability, and providing assistance to the elderly;
- focus on and valuing people, through the development and implementation of important training programs and the creation of a work environment where diversity represents a real and decisive added value.

THE INTEGRATION OF SUSTAINABILITY RISKS INTO THE ADVISORY SERVICE MODEL

The Bank as part of ISP has adopted in line with commitment to sustainable economic development and in accordance with principles outlined in the Code of Ethics and aware of the importance of allocating resources according to social and environmental sustainability criteria for long-term value creation, an internal regulatory framework in relation to the governance of environmental, social and governance risks.

Within the framework of internal document Rules for the Governance of environmental, social and governance (ESG) risks outline with reference to these risks:

- The general principles underlying the steering and management process,
- The tasks and responsibilities of the corporate functions and control bodies and other involved functions of the Bank in the governance process,
- The ESG risks monitoring model,
- The governance of macro-processes.

With reference to the investment policies and services rendered to clients, internal rules commit the Bank to:

- integrating ESG factors into investment analysis and decision-making, criteria for the selection of issuers and asset management companies, including in relation to specific benchmarks,
- progressively expanding the monitoring of financial assets in terms of ESG, as well as the extension of its proposal of sustainable financial products,
- promoting themed and impact investments, through which the Bank can play an active role in helping to mitigate environmental or social problems such as the challenges of climate change, resource depletion, economic and social inequalities,
- provision of clear and understandable information to clients about financial products with sustainable characteristics or products with sustainable investment objectives,
- offering clients an advisory service with a high level of protection and, as part of the client profiling process, collect information on any sustainability preferences regarding investments.

The assessment of sustainability risk in the selection of Product Companies and in the Product Oversight Governance processes

In relation to the decision-making process for the selection of issuers and asset management companies the Bank provides for the analysis of counterparties with respect to sustainability risk, the consideration of PAIs and adherence to relevant regulations. In this regard, the Bank analysed the degree of compliance and implementation of sustainability issues by the companies whose products may be included in its offer catalogue investigating the safeguards adopted by the asset management companies and insurance companies in relation to the following issues:

- ESG Principles/Policies/Codes: adherence to national and global ESG principles and/or codes (UN PRI⁴, Codes of Conduct, adherence to the Net Zero initiative);
- Governance and corporate organization: Implementation of an internal regulatory framework and definition of bodies or internal structures focused on sustainability;
- Adoption of policies, integration of sustainability risks within investment and remuneration processes;
- Sustainable product range under SFDR regulation: complete product documentation that is consistent with the relevant regulations, presence of any processes for updating and adapting products from sustainability perspective, methods for making information about sustainability characteristics of products available (for example, through the completion of the European ESG Template – EET);
- Use of environmental, social and governance terms or those related to sustainability: adoption of an internal regulatory framework aimed at ensuring the compliance of fund documentation and related marketing communications with the *“Guidelines on funds’ names using ESG or sustainability related terms”* issued by ESMA on May 14, 2024;

4 PRI - Principles for Responsible Investment

- Consideration of PAIs defined within the regulatory technical standard under SFDR regulation,

The analysis already carried out on all existing counterparties, is performed during the on-boarding of the asset management companies (product companies) with which a new distribution or brokerage agreement is to be signed and is formalised within the Product Governance processes. The analysis is also subject to periodic updates.

With a view to strengthening controls in terms of sustainability risks, the Bank has planned to direct and expand its offer towards financial products that promote environmental and/or social characteristics (pursuant to Art. 8 SFDR regulation) that pursue sustainable investment objectives (pursuant to Art. 9 SFDR regulation) and that considers PAIs.

To this end, as part of the Product Oversight Governance processes for the expansion of the product catalogue under Investment Advisory model, the Bank examines the pre-contractual and contractual documentation prepared by the asset management companies (product companies) and any supporting commercial documentation, also with regard to the factors relevant to sustainability and compliance with the relevant regulatory provisions, with the aim of evaluating the consistency of the communicated information with the actual sustainability features of the products.

In connection with the foregoing, as part of the procedures adopted for the provision of advisory services⁵ the Bank shall ensure to:

- collect information (sustainability preferences) from clients during profiling, in order to gain insight into their possible interest in investment solutions that value environmental, social and good governance factors;
- define internal rules for the selection of products that can be considered consistent with the sustainability preferences expressed by clients.

The consideration of sustainability factors during the profiling process

During profiling, the Bank investigates whether the Client is interested in integrating financial products that take into account sustainability factors, i.e. environmental (E), social (S) and good governance (G) aspects into their portfolio, should the answer be positive, it detects:

- the sustainability factors (E-S-G) that the investment product shall pursue;
- the minimum percentage (%) of the portfolio that the Client intends to allocate to those investments (25%, 50%, 75%);
- the potential willingness of the Client to further define, in line with the selected sustainability factors, their interest regarding products of that type by indicating:
 - The minimum proportion, within specific ranges, that these products shall allocate respectively to sustainable investments (pursuant to the SFDR Regulation) and eco-sustainable investment (pursuant to the Taxonomy Regulation) in order to be considered consistent with the Client's sustainability preferences,
 - The PAIs categories – environmental and/or social – that these products shall consider in order to mitigate negative effects of investments on sustainability factors.

The consideration of sustainability factors in classification of financial products

The Bank has adopted a classification model for the financial products included in its range of offerings under advisory model that reference to applied across both primary and secondary market operations, differentiated based on the type of financial instrument:

- shares and bonds
- the Issuer shall comply with the following “exclusion criteria”: (i) it does not produce unconventional weapons or nuclear weapons; (ii) it derives revenues from controversial sectors (such as coal mining and electricity generation from coal, tobacco products, or oil sands) below threshold defined at the Group level; (iii) it does not have a high exposure to environmental, social, and governance risks that would result in an ESG rating of CCC⁶. If even one of these checks is not met, the instrument cannot be placed in the primary market and is classified as non-sustainable for secondary market operations;
- the financial instrument is considered “sustainable” under the SFDR Regulation if, while adhering to the “exclusion criteria,” the relevant Issuer complies with the 17 Sustainable Development Goals (SDGs) in environmental and social terms, defined by ONU in 2015. The methodology provides that the individual Issuer (and, consequently, the securities issued by them) is qualified as sustainable if at the same time at least one SDG is aligned with these goals and no SDG is misaligned, while neutral situations are acceptable⁷. It is, however, possible that

⁵ The Bank provides to client investment service Investment Advisory. In the context of financial intermediation of insurance based investment products, the Bank is authorised to carry out only financial intermediation (professional assistance, information and recommendations that are suitable for the client), i.e. it does not carry financial advisory in relation to distribution on insurance based investment product. For more information see the document Responsible Investment published on www.vub.sk.

⁶ The verification is carried out through the analysis of specific data (so-called Datapoints) provided by the information provider MSCI

⁷ The SDGs are considered: (i) aligned with the standards defined by the UN if they have a score greater than or equal to +2; (ii) misaligned with the standards defined by the UN if they have a score less than or equal to -2; (iii) neutral if their scores fall between -2 and +2 (excluding the extremes). These scores are assigned to issuers by the information provider MSCI.

an issue of an issuer rated as “non-sustainable” can be considered sustainable if it has specific sustainability characteristics, e.g. due to punctual constraints on the use of the related funding (so-called “Sustainable/Green Bonds” or “ESG Bonds”); for the purposes of classifying this type of security it is verified – provided that the “exclusion criteria” are met – that the individual issue is structured in accordance with one of the internationally recognized frameworks (such as, for example, the Green/Social Principles defined by the ICMA – International Capital Market Association);

- Mutual funds (UCITs), insurance based investment products (IBIPs), products based on portfolio management – based on the classification provided by the product companies according to the requirements of the SFDR regulation. Taking into account the information acquired from the Product Companies, the consistency of products with sustainability preferences expressed by the clients within the profiling process assessed according to the following logic:
- products classified by Product Companies under Art. 8 SFDR regulation are considered consistent with the Client’s sustainability preferences if they meet at least one of the following conditions:
 - Minimum percentage (%) investment under the SFDR⁸ consistent with the percentage selected by the client, if expressed, or in the case where the client does not express a preference, those that present a percentage of sustainable investment equal to 10%;
 - Minimum percentage (%) of eco-sustainable investment in accordance with the Taxonomy Regulation⁹ consistent with the percentage selected by the client, if expressed, or, in the case where client does not express a preference, those that present a percentage of eco-sustainable investment equal to at least 5%;
 - Consideration of at least one of the PAIs¹⁰ at the environmental and/or social levels, consistent with the selection made by the client, if expressed;
 - Products classified by Product Companies under Art. 9 of the SFDR regulation are consistent with: (i) the sustainability preferences under the SFDR Regulation. Regardless of the percentage threshold that may have been selected by the client; (ii) the eco-sustainable investment percentage of at least 5%; (iii) preferences related to PAIs when they align with the selection possibly made by the client;
 - Products classified by Product Companies as not Art. 8 and 9 SFDR are always considered as not consistent with Client’s sustainability preferences;
- certificates - highlight the characteristics of both the issuer and the underlying. At the issuer level, it is verified whether it also respects the “exclusion criteria” and it qualifies as sustainable according to the methodology represented for shares and bonds. As far as underlyings are concerned, the methodology applied, in addition to the verification of the “exclusion criteria” already mentioned, differs depending on the type of underlying utilized time after time, the same criteria being applied as described above depending on whether the underlying consists of mutual funds or of shares, bonds and related indices. On the other hand, interest rate, exchange rate or commodity indices are not considered suitable to supplement the sustainability requirement.

The suitability assessment with reference to sustainability factors

The investment advisory service model envisages a check aimed at verifying the consistency between the preferences indicated by Clients during profiling and the financial products included in its range of offerings or traded on the secondary market, assessing as consistent the investment transaction equivalent to or equal to the minimum percentage chosen by the Client during profiling or, when lower, an increase over the initial percentage. If the operation is non-coherent, the reasons for it are explained to the Client, so they can assess whether to adapt their sustainability preferences in relation to the specific operation and proceed to its conclusion.

The Bank ensures the continuous updating of the rules and criteria described, also in consideration of regulatory developments on sustainability and the market context.

8 Calculated by considering, for each underlying issuer, the investments made by the savings product in the 17 Sustainable Development Goals (SDGs) according to the methodology defined for shares and bond securities.

9 Calculated based on the criteria defined by the Regulation to qualify the investments made by the managed savings product as exo-sustainable, requiring that, to be considered as such, it must contribute to achieving at least one environmental goal among six identified (climate change mitigation; climate change adaptation; sustainable use and protection of water; transition to a circular economy; pollution prevention and reduction; biodiversity protection) without causing harm to the others and in compliance with social principles.

10 These products are considered to be consistent with the sustainability preferences expressed by Clients in terms of:

- Environmental (E): if they consider at least one mandatory environmental PAI within their investment policy;

- Social (S): if they consider at least one compulsory social PAI in their investment policy.

To be rated E and/or S, financial products must also comply with good governance practices and, consequently, such products are also considered consistent with the sustainability preferences expressed by clients in terms of “G - good governance”.

ANNEX

1. GLOSSARY

Sustainability factors: environmental, social and employee-related issues, respect for human rights, and matters related to the fight against active and passive corruption (SFDR Regulation).

Sustainable investment: an investment in an economic activity contributing to an environmental objective, measured, for example, by key resource efficiency indicators relating to energy use, use of renewable energies, use of raw materials and water resources and land use, waste generation,

greenhouse gas emissions, as well as impact on biodiversity and the circular economy or an investment in an economic activity contributing to a social objective, in particular an investment contributing to the fight against inequality, or promoting social cohesion, social inclusion and industrial relations, or an investment in human capital or economically or socially disadvantaged communities provided that such investment does not significantly harm any of these objectives and that the enterprises benefiting from such investment comply with good governance practices, particularly with regard to sound management structures, staff relations, staff remuneration and compliance with tax obligations (SFDR Regulation)

Eco-sustainable investment: investment in one or more economic activities that are considered environmentally sustainable because (i) they contribute substantially to achieving one or more of the

following environmental objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, prevention and reduction of pollution, and protection and restoration of biodiversity and ecosystems, (ii) they do not significantly harm any of the above environmental objectives (Taxonomy Regulation).

Principal Adverse Impacts (PAI): represent the so-called “negative externalities” of economic activities, i.e. the effects of investment decisions and investment advice that lead to negative impacts on sustainability factors. PAIs are listed in the Regulatory Technical Standards (RTS) to the SFDR and are differentiated by the environmental and social components and divided into mandatory and optional.

Sustainability risk: an environmental, social, or governance event or condition that, if it occurs, could cause significant actual or potential negative impact on the value of the investment (SFDR Regulation).

2. LIST OF SUSTAINABLE DEVELOPMENT GOALS (SDGS)

1. No poverty; 2. Zero Hunger; 3. Good Health and Well-being; 4. Quality education; 5. Gender equality; 6. Clean water and sanitation; 7. Affordable and Clean energy; 8. Decent work and economic growth; 9. Industry, innovation and infrastructure; 10. Reduced inequalities; 11. Sustainable cities and communities; 12. Responsible consumption and production; 13. Climate action; 14. Life below water; 15. Life on land; 16. Peace, justice and strong institutions; 17. Partnership for the goals.

3. LIST AND DESCRIPTION OF PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS (PAI)

MANDATORY PAI INDICATORS		
Indicators applicable to investments in Investee Companies		
Climate and Other Environment-Related Indicators		
Type	PAI Indicator	Metric
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions
		Scope 2 GHG emissions
		Scope 3 GHG emissions
		Total GHG emissions
	2. carbon footprint	Carbon footprint
	3. GHG intensity of the investee companies	GHG gas intensity of the investee companies
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector
Greenhouse gas emissions	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total sources
	6. Energy consumption intensity per high climate impact sector.	Energy consumption expressed in GWh per million EUR of revenue of the investee companies, per high climate impact sector
	7. Activities negatively affecting biodiversity sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
Water	8. Emissions to water	Tonnes of emissions to water generated by investees companies per million EUR invested, expressed as a weighted average
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average
Indicators for social and employee, respect for human rights, Anti-Corruption and Anti-Bribery matters		
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises

Social and employee matters	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons
Indicators applicable to investments in Sovereigns and Supranationals		
Environmental	15. GHG intensity	GHG intensity of investee countries
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law
Indicators applicable to investments in Real Estate assets		
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets

OPTIONAL PAI INDICATORS

Additional Climate and Other Environment-Related Indicators

Indicators applicable to Investments in Investee Companies

Type	PAI Indicator	Metric
Emissions	1. Emissions of inorganic pollutants	Tonnes of inorganic pollutants equivalent per million EUR invested, expressed as a weighted average
	2. Emissions of air pollutants	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average
	3. Emissions of ozone-depleting substances	Tonnes of ozone-depleting substances equivalent per million EUR invested, expressed as a weighted average
	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement
Energy performance	5. Breakdown of energy consumption by type of non-renewable sources of energy	Share of energy from non-renewable sources used by investee companies broken down by each non-renewable energy source
Water, waste and material emissions	6. Water usage and recycling	1. Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies 2. Weighted average percentage of water recycled and reused by investee companies
	7. Investments in companies without water management policies	Share of investments in investee companies without water management policies

Water, waste and material emissions	8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high water stress without a water management policy
	9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006
	10. Land degradation, desertification, soil sealing	Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing
	11. Investments in companies without sustainable land/agriculture practices	Share of investments in investee companies without sustainable land/agriculture practices or policies
	12. Investments in companies without sustainable oceans/seas practices	Share of investments in investee companies without sustainable oceans/seas practices or policies
	13. Non-recycled waste ratio	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average
	14. Natural species and protected areas	1. Share of investments in investee companies whose operations affect threatened species 2. Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas
15. Deforestation	Share of investments in companies without a policy to address deforestation	
Green securities	16. Share of securities not issued under Union legislation on environmentally sustainable bonds	Share of securities in investments not issued under Union legislation on environmentally sustainable bonds
Indicators applicable to investments in Sovereigns and Supranationals		
Green securities	17. Share of bonds not issued under Union legislation on environmentally sustainable bonds	Share of bonds not issued under Union legislation on environmentally sustainable bonds
Indicators applicable to investments in Real Estate assets		
Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by the Real Estate assets Scope 2 GHG emissions generated by the Real Estate assets Scope 3 GHG emissions generated by the Real Estate assets Total GHG emissions generated by the Real Estate assets
Energy consumption	19. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter
Waste	20. Waste production in operations	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract

Resource consumption	21. Raw materials consumption for new construction and major renovations	Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used in new construction and major renovations
Biodiversity	22. Land artificialisation	Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of the plots of all assets
Indicators on social and employee, respect for human rights, Anti-Corruption and Anti-Bribery matters		
Indicators applicable to Investments in Investee Companies		
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy
	2. Rate of accidents	Rate of accidents in investee companies expressed as a weighted average
	3. Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average
	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)
	5. Lack of grievance/complaints handling mechanism related to employee matters	Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters
	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers
	7. Incidents of discrimination	1. Number of incidents of discrimination reported in investee companies expressed as a weighted average 2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average
	8. Excessive CEO pay ratio	Average ratio within investee companies of the annual total compensation for the highest compensated individual to the median annual total compensation for all employees (excluding the highest-compensated individual)
Human rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy
	10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts
	11. Lack of processes and measures for preventing trafficking in human beings	Share of investments in investee companies without policies against trafficking in human beings
	12. Operations and suppliers at significant risk of incidents of child labour	Share of investments in investee companies exposed to operations and suppliers at significant risk of incidents of child labour in terms of geographic areas or type of operation

Human rights	13. Operations and suppliers at significant risk of incidents of forced or compulsory labour	Share of the investments in investee companies exposed to operations and suppliers at significant risk of incidents of forced or compulsory labour in terms of geographic areas and/or the type of operation
	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis
Anti-Corruption and Anti-Bribery	15. Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption
	16. Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery
	17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws by investee companies
Indicators applicable to Investments in Sovereign and Supranationals		
Social	18. Average income inequality score	The distribution of income and economic inequality among the participants in a particular economy
	19. Average freedom of expression score	Measuring the extent to which political and civil society organizations in society can operate freely
Human rights	20. Average human rights performance	Measure of the average human rights performance of investee countries
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption
	22. Non-cooperative tax jurisdictions	Investments in jurisdictions on the EU list of non-cooperative jurisdictions with for tax purposes
	23. Average political stability score	Measure of the likelihood that the current regime will be overthrown by the use of force
	24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and deficiencies in civil and criminal justice