

## Statement on principal adverse impacts of investment decisions on sustainability factors

**Financial market participant** Kredietrust Luxembourg S.A. with Legal Entity Identifier: 2222100SROVDPQTLZKT42

### Summary

Kredietrust Luxembourg S.A (hereafter: KTL), with Legal Entity Identifier: 222100SROVDPQTLZKT42 considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of KTL. KTL is an affiliate of Quintet Private Bank (Europe) S.A. (hereafter: Quintet).

This statement on principal adverse impacts on sustainability factors covers the reference period from 01 January 2023 to 31 December 2023. Hereafter this statement on principal adverse impacts on sustainability factors will be referred to as ‘this Statement’.

In the table in the section Description of the principal adverse impacts on sustainability factors, the adverse impacts are provided for each adverse sustainability indicator that the Sustainable Finance Disclosure Regulation (SFDR) prescribes to report on, in accordance with the criteria and formulas provided in the Regulatory Technical Standards (RTS) of the regulation. This includes areas of adverse impact related to greenhouse gas emissions, biodiversity, water, waste, and social and employee matters for investments in companies, and greenhouse gas emissions and social violations in relation to investments in sovereigns and supranationals. Across all areas the investments have adverse impacts and a comparison with the adverse impacts in 2022 reference period is included in the table below.

Please note that KTL also serves as the Management Company for mutual funds for which KTL does not do the day-to-day asset management, and for which KTL’s investment policies do not apply. The adverse impacts of the investments made by these funds are included in the adverse impact figures provided in this Statement. However, all qualitative information provided in this Statement (such as related to the policies, engagement, voting, data sources, processes, etc.) is only applicable to those investments made by KTL in its role of investment manager.

In this Statement we provide additional information on how principal adverse impacts are considered at KTL, which is structured in the following way:

- Description of the principal adverse impacts on sustainability factors
- Description of policies to identify and prioritise principal adverse impacts on sustainability factors
- Engagement policies
- References to international standards
- Historical comparison

### **Description of the principal adverse impacts on sustainability factors**

The table below contains quantitative information for a prescribed set of adverse sustainability indicators as required by the Delegated Regulation 2022/1288 of the Sustainable Finance Disclosure Regulation (hereafter: SFDR). The indicators are calculated based on the investments that KTL held on 31 March, 30 June, 30 September and 31 December 2023 where KTL served as the Management Company for.

Please note that KTL also serves as the Management Company for mutual funds for which KTL does not do the day-to-day asset management, and for which KTL's investment policies do not apply. The adverse impacts of the investments made by these funds are included in the adverse impact figures provided in this Statement. However, all qualitative information provided in this Statement (such as related to the policies, engagement, voting, data sources, processes, etc.) is only applicable to those investments of KTL's in-house funds.

KTL has exercised best efforts to obtain the data needed to calculate the impacts of the adverse sustainability indicators in this Statement. The two main data inputs are: 1) Information on the size of the investment in individual investment instruments (such as stocks and bonds) for 31 March, 30 June, 30 September and 31 December 2023, and 2) Adverse sustainability indicator data in relation to the issuers of these investment instruments. Please refer to the section "Description of policies to identify and prioritise principal adverse impacts on sustainability factors" for more information about the sources used.

KTL makes investments through single lines (for example by buying investment instruments such as stocks and bonds), as well through collective investment vehicles (such as mutual funds and Exchange Traded Funds (ETFs)) that are managed by external fund managers.

The calculations in the table below are based on those investments that fall within the categories specified by the SFDR, which are investments in companies, sovereigns and supranationals, and (direct) real estate. This includes both the investments made through single lines, as well as through collective investment vehicles. The assets in these categories together amount to approximately 80% of the assets managed by KTL. The remaining approximately 20% relate to investment instruments for which no data was available (for example when we were not able to obtain the underlying holdings of third party funds), and other investment categories such as cash, derivatives, and commodities.

The available data for most adverse sustainability indicators in the table below ranges between approximately 0% and 100% as there are instances where for specific indicators there was no data available for investment instruments. In these cases the adverse impacts depicted in the table are likely to understate the actual adverse impacts. For some adverse sustainability indicators the available data was much lower, such as for emissions to water (approx. 1% data available) and gender pay gap (approx. 3% data available), as these are indicators that are currently not common for companies to report. Where the available data is very limited for a specific indicator, we have highlighted this in the table below (in the Explanation column) as this significantly affects the robustness of the indicator value. KTL will continue to engage with investee companies, external fund managers, and data providers to improve the availability, reliability, and timeliness of the data, which we expect will improve the disclosures in this Statement for future reporting periods.

In the last column of the table below, the actions taken and actions planned have been described. This is in addition to KTL’s engagement efforts with third party fund managers. The description in the column does not include any actions taken by third party fund managers themselves in relation to each individual adverse sustainability indicator, as KTL works with a multitude of third party fund managers who all have different approaches to taking adverse impacts into account.

**Indicators applicable to investments in investee companies**

Adverse sustainability indicator	Metric	Impact [2023]	Impact [2022]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	109,503	176,883	A decrease in all scopes emissions was observed. The total emissions of funds managed by KTL decreased by 26% compared to last year.	These adverse impacts are part of the topics that were considered in engagements with companies where KTL invested in single lines. This continues in 2024.
		Scope 2 GHG emissions	31,571	44,013		
		Scope 3 GHG emissions	874,597	1,159,774		
		Total GHG emissions	1,015,671	1,380,669		

						A 20% GHG intensity reduction target has been set for 2030 for KTL's core flagship funds.
	2. Carbon footprint	Carbon footprint	279	300	The carbon footprint (per EUR 1 million invested in by KTL), decreased by 6.75% compared to last year.	These adverse impacts will be monitored and reviewed.
	3. GHG intensity of investee companies	GHG intensity of investee companies	552	574	The GHG intensity (per EUR 1 million of revenue generated by the companies invested in by KTL) decreased by 3.91% compared to last year.	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	3.76%	4.63%	The adverse impact was further controlled by KTL's single line process and remained stable.	KTL addressed this adverse impact via exclusions of investments in thermal coal for single lines. Within KTL's core flagship

						<p>funds, this is further addressed by limiting investments in companies active in the fossil fuel sector in single lines. This continues in 2024.</p> <p>Within KTL’s core flagship funds, the active fund selection process has been enhanced in 2024 to require the same.</p> <p>This adverse impact will be monitored and reviewed.</p>
	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 energy sources	<p>27.66% (consumption)</p> <p>5.25% (production)</p>	<p>27.84% (consumption)</p> <p>3.99% (production)</p>	The increase in share of non-renewable energy production may be due to changes in our strategic asset allocation which may shift the portfolio to have increased exposure in	No specific actions taken. Will be monitored and reviewed in 2024.

					<p>certain utility companies. Share of non-renewable energy consumption remained stable. However, please note that because of the formula prescribed by the SFDR Regulatory Technical Standards to calculate this indicator, the resulting figure when there is limited data availability (which is the case for this indicator with data for only 54% of the investments in corporates for consumption and 26% for production),</p>	
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					may understate this adverse impact and is not representative for the assets that are in scope of this Statement.	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	<p>Agriculture, Forestry &amp; Fishing: 0.00</p> <p>Construction: 0.00</p> <p>Electricity, Gas, Steam &amp; Air Conditioning Supply: 0.04</p> <p>Manufacturing: 0.09</p> <p>Mining &amp; Quarrying: 0.05</p>	<p>Agriculture, Forestry &amp; Fishing: 0.02</p> <p>Construction: 0.00</p> <p>Electricity, Gas, Steam &amp; Air Conditioning Supply: 0.06</p> <p>Manufacturing: 1.67</p> <p>Mining &amp; Quarrying: 0.08</p>	A decrease in these adverse impacts was observed. This may be due to changes in strategic asset allocation that may have shifted investments in these sectors and changes in the energy consumption intensity of the companies KTL invested in.	No specific actions taken. Will be monitored and reviewed in 2024.

			Real estate: 0.01	Real estate: 0.04		
			Transportation & Storage: 0.02	Transportation & Storage: 0.02		
			Water supply, Sewerage, Waste management & Remediation: 0.00	Water supply, Sewerage, Waste management & Remediation: 0.00		
			Wholesale & Retail Trade & Repair of Motor Vehicles & Motorcycles: 0.00	Wholesale & Retail Trade & Repair of Motor Vehicles & Motorcycles: 0.04		
Biodiversity	7. Activities negatively affecting	Share of investments in investee companies with sites/operations	3.27%	3.96%	This adverse impact was part of the topics that	This adverse impact is part of the topics that were considered



	biodiversity-sensitive areas	located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas			were considered in engagements with companies where KTL invested in single lines. A decrease in this adverse impact was observed.	in engagements with companies where KTL invested in single lines. This continues in 2024, and this adverse impact will be monitored and reviewed.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	0.04	A decrease in this adverse impact was observed. Because of the formula prescribed by the SFDR Regulatory Technical Standards to calculate this indicator, the resulting figure when there is limited data availability (which is the case for this indicator with data for less than 1% of the	No specific actions taken. Will be monitored and reviewed in 2024.

					investments in corporates), may understate this adverse impact and is not representative for the assets that are in scope of this Statement.	
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	1.53	9.38	A decrease in This adverse impact was observed.	No specific actions taken. Will be monitored and reviewed in 2024.
<b>INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS</b>						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD)	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.30%	0.72%	This adverse impact was further controlled via exclusions and engagements for single lines and remained minimal.	KTL addressed this adverse impact via exclusions and engagement for single lines. This continues in 2024. Within KTL's core flagship funds, the active fund selection

	Guidelines for Multinational Enterprises					process has been enhanced in 2024 to require the funds to limit investments in companies that are in violation of the UN Global Compact.  This adverse impacts will be monitored and reviewed.
	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	34.51%	36.26%	This adverse impact remained stable.	No specific actions taken. Will be monitored and reviewed in 2024.

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	0.43%	0.30%	An increase in this adverse impact was observed. However, please note that because of the formula prescribed by the SFDR Regulatory Technical Standards to calculate this indicator, the resulting figure when there is limited data availability (which is the case for this indicator with data for only 3.12% of the investments in corporates), may understate this adverse impact and is not representative of the assets that	No specific actions taken. Will be monitored and reviewed in 2024.
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					are in scope of this Statement	
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	20.32%	21.28%	This adverse impact remained stable.	This adverse impact is part of the topics that were considered in engagements and voting with companies where KTL invested in single lines. This continues in 2024, and this adverse impact will be monitored and reviewed.
	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	0.06%	0.00%	This adverse impact was further controlled via exclusions for single lines and third party fund selection and remained minimal.	KTL addressed this adverse impact via exclusions for single lines and third party fund selection. This continues in 2024.  Within KTL's core flagship funds, the active fund selection process has been enhanced in 2024 to require the funds to

						<p>limit investments in companies that are in violation of the UN Global Compact.</p> <p>This adverse impacts will be monitored and reviewed.</p>
<b>Indicators applicable to investments in sovereigns and supranationals</b>						
<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact [2023]</b>	<b>Impact [2022]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
Environmental	15. GHG intensity	GHG intensity of investee countries	0.02	0.03	This adverse impact remained minimal.	No specific actions taken. Will be monitored and reviewed in 2024.
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	<p>Absolute: 2 countries</p> <p>Relative: 2.53%</p>	<p>Absolute: 2 countries</p> <p>Relative: 2.02%</p>	This adverse impact was further controlled via exclusions for single lines of countries with UN and EU	KTL addressed this adverse impact via exclusions for single lines of countries with UN and EU arms embargoes targeted at the central government.

		treaties and conventions, United Nations principles and, where applicable, national law			arms embargoes targeted at the central government and remained stable.	This continues in 2024. Within KTL's core flagship funds, the active fund selection process has been enhanced in 2024 to require the funds to limit investments in countries that are subject to UN and EU arms embargoes. This adverse impacts will be monitored and reviewed.
<b>Indicators applicable to investments in real estate assets</b>						
<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact [2023]</b>	<b>Impact [2022]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
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	Not applicable	Not applicable	Not applicable	Not applicable

		manufacture of fossil fuels				
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	Not applicable	Not applicable	Not applicable	Not applicable
<b>Other indicators for principal adverse impacts on sustainability factors</b>						
Information on additional climate and other environment-related indicators, as set out in Table 2 of Annex I of the SFDR Delegated Regulation (2022/1288):						
<b>Adverse sustainability impact</b>	<b>Adverse impact on sustainability factors (qualitative or quantitative)</b>		<b>Metric</b>			
<b>Indicators applicable to investments in investee companies</b>						
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>						
Emissions	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			
Information on additional climate and other environment-related indicators, as set out in Table 3 of Annex I of the SFDR Delegated Regulation (2022/1288):						



Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
<b>Indicators applicable to investments in investee companies</b>		
<b>INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS</b>		
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy

**Description of policies to identify and prioritise principal adverse impacts on sustainability factors**

This section describes the policies to identify and prioritise principal adverse impacts on sustainability factors and how those policies are kept up to date and applied to KTL’s investments.

The KTL Responsible Investment policy considers a range of adverse impacts on sustainability factors in investment management process, through different methods. The key methods that are used are exclusion, the incorporation of ESG factors and limits in portfolio construction, engagement,. The first two methods are specifically used by KTL to consider various adverse impacts already in the investment due diligence process for single lines (equities, bonds). For investments in funds managed by external fund managers this is conducted via KTL’s fund due diligence process. The exact way adverse impacts are taken into account differs between external fund managers. KTL does not prioritise certain adverse impacts over others, however, some adverse impacts are steered on more explicitly than others. While all indicators in the table in this Statement are directly or indirectly influenced through the different methods and criteria that KTL applies, the indicators that are most explicitly embedded in the KTL Responsible Investment Policy are PAI indicator 4 (companies active in the fossil fuel sector) through the exclusion criteria for single lines related to thermal coal, PAI 10, (violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises) through the combined engagement and exclusion approach for single lines related to companies that are considered to be in violation thereof, and PAI 14 (involvement in controversial weapons) through the exclusion criteria for single lines related to company involvement in controversial weapons. Please refer to the [KTL Responsible Investment policy](#) for more information.

*When was the policy approved?*

The date of approval of the most recent version of the Responsible Investment policy is 22 December 2022. The policy is reviewed at least annually by KTL's management.

*How is the responsibility for the implementation of the policies within organisational strategies and procedures allocated?*

KTL's Portfolio Management department is the formal owner of the policy and needs to approve any changes to it, whereafter the KTL's Board of Directors also needs to formally approve the policy. The responsibility for implementing KTL's Responsible Investment policy (including principal adverse sustainability impacts) into organisational procedures and investment decisions lies with the Portfolio Management department.

The scope of the Responsible Investment policy (including the way adverse sustainability impacts are considered) applies to all assets managed by KTL. However, specific investment products or propositions can deviate from this approach – in these cases their respective approach is described in the legal documentation of that specific investment product.

*What are the methodologies to select the adverse sustainability indicators listed in the table?*

KTL believes it is important that companies demonstrate their commitment to reducing environmental and social adverse impacts and has selected two additional adverse sustainability indicators (next to the prescribed mandatory indicators), which are the environmental indicator "Investments in companies without carbon emission reduction initiatives" and the social indicator "Lack of a human rights policy". The lack of carbon emission reduction initiatives and lack of a human rights policy is a strong signal that further attention may be required, especially given the high probability of adverse impacts (particularly in certain sectors of the economy) in these areas, the severity of the potential impact in case companies do not take appropriate actions, and the potentially irremediable character of these impacts. These two indicators were selected after reviewing all the additional indicators listed in Table 2 and Table 3 of Annex I of the SFDR Delegated Regulation 2022/1288. Most indicators were not considered suitable, relevant or feasible to include. The review was conducted in the following way: a first assessment was done based on whether or not the indicators directly or indirectly relate to a topic that KTL addresses via its Responsible Investment policy. Subsequently, KTL analysed whether at this moment in time sufficient reliable information is available for the remaining indicators and whether the indicators are expected to measure adverse impacts that given KTL's investment approach would likely cause severe, irremediable impacts. Based on this review the two beforementioned indicators were selected, which are directly and indirectly addressed KTL's investment decision-making through exclusions, portfolio construction, and active ownership activities.

*What is the associated margin of error of the methodologies to select the adverse sustainability indicators?*

KTL is not able to identify a specific associated margin of error in assessing or calculating the indicators listed in the table. If in the future KTL will be able to identify a specific margin of error, such information will be included in future updates to this Statement.

*What data and sources does KTL use for the calculations of the adverse impacts?*

There is limited data availability for the data points needed to calculate the adverse sustainability indicators in the table in this Statement. This has various causes, among others the fact that for many of these indicators not many companies are voluntarily reporting (or only a subset of these indicators), and reporting by external fund managers on these indicators is limited thus far. Furthermore, as KTL invests a significant portion of clients' assets through external fund managers, KTL needs information on the holdings of these funds, as well as the size of these holdings, at the prescribed four measurement dates at the end of each quarter (31 March, 30 June, 30 September and 31 December 2023).

For this reason, KTL has done the following as part of our commitment to exercise best efforts to obtain relevant, robust, and timely data:

1. We obtain information on the holdings of the funds we have invested in on behalf of our clients via Refinitiv, a global provider of financial markets data and infrastructure. Where Refinitiv did not have the holdings data available, or not in line with the prescribed four measurement dates in 2023, KTL has made best efforts to obtain these holdings, for example, by engaging directly with the largest external fund managers. While this has helped improving the data set, there are still data gaps.
2. We have obtained an adverse impacts data set on a global universe of companies and countries from our external data provider Sustainalytics, which is a global ESG and corporate governance research, ratings and analytics firm. Sustainalytics collects reported data from companies, does additional analyses on policies, targets, or activities (where the specific indicators require so), and makes use of proxies or estimations to fill data gaps where it believes to be appropriate. While this does not fill all data gaps, using their data set helps improving the available data compared to only using data reported by investee companies.

Next to having more adverse impact data available by working with Sustainalytics, using their data set also allows KTL to do the calculations on our investments (both single lines and external funds) based on one data set instead of relying on the disclosures of external fund managers, who may use different sources and methodologies, which would have made the impacts shown in the table in this Statement less consistent.

### **Engagement policies**

Active ownership (which includes engagement with companies) is a fundamental part of our investment process, and a key method to reduce adverse sustainability impacts. Active ownership involves monitoring the investments we make, identifying environmental, social and governance

(ESG) issues, strategic problems or opportunities for improvement, engaging with management teams or investment managers, and other efforts to encourage positive change for the long-term benefit of our clients and the world. Since we also invest client assets with other fund managers, we hold them to the same high standards regarding active ownership, and we engage with those managers to encourage that they are active owners on behalf of our clients. In the case of external assets managers of passive funds, this can be in the form of these external fund managers engaging with the index providers on environmental, social or governance factors related to the index construction methodology.

Since KTL represents a diverse group of clients with diverse holdings across the investment universe, we invest in a wide range of companies. As many of these companies are large, our direct investments may be small relative to the size of these firms. To be effective in engaging with these companies, we believe that collective engagement is likely to achieve better results than efforts we might undertake on our own. We have therefore hired specialised external service providers to conduct engagement on our behalf.

#### *What are KTL's engagement priorities?*

The primary focus of KTL's engagement is to address companies' key risks, challenges and opportunities, covering environmental, social, governance, strategy, risk and communication matters. This includes mitigating and reducing adverse impacts of our investments on sustainability factors. Our ultimate objective is to create value for investors, the company, and people and the planet. KTL's parent company, Quintet, works with its engagement partner Equity Ownership Services (EOS) at Federated Hermes to give special attention to companies that violate the principles of the UN Global Compact, or that have experienced significant ESG controversies. The engagement priorities are currently focused on the most material drivers of long-term value, with four priority themes: climate change, human and labour rights, human capital management and board effectiveness. In addition, further engagements are also pursued in fast-growing areas of biodiversity, tax and digital rights. Climate change is an ongoing priority. KTL's parent company, Quintet, is a member of Climate Action 100+, a collaborative investor engagement initiative that seeks to ensure that the world's largest corporate greenhouse gas (GHG) emitters take action to reduce GHG emissions. Engagement priorities are reviewed annually, and we provide our insights and priorities as part of the priority-setting process with EOS.

#### *How does that apply to external fund managers?*

KTL allocates a significant portion of our clients' assets to external fund managers. Active ownership to create sustainable investor value is important for all investments, and we incorporate this into the selection and monitoring of external managers where possible and feasible. As part of our formal fund due diligence and monitoring process, we engage with these managers to communicate our beliefs and to understand theirs, and for insight into their active ownership policy and practices.

#### *How do the engagement policies and priorities adapt over time?*

Given the dynamic nature of the annual review and priority-setting process at EOS, and the fact that KTL works with dozens of external fund managers who all have their own specific approaches to address adverse impacts and to prioritise these, KTL does not have a predetermined set of adverse sustainability indicators that are structurally and systematically considered in the engagement activities. KTL will monitor the development of the principal adverse impacts reported in this Statement over time and where considered appropriate, KTL will review if it's feasible to adapt either the engagement policy or the engagement priorities where for specific principal adverse impacts there is no or only limited reduction of the adverse impacts from reporting period to reporting period.

#### *Voting priorities*

For equities investments in single lines KTL works with the specialized proxy voting service provider Glass Lewis, where we have adopted an ESG Voting Policy. The primary focus of KTL's voting decisions is good governance of the organisation, including the management of material environmental and social risks. Governance structures that drive performance, create shareholder value and maintain a proper tone at the top are key to mitigating risk and building long-term shareholder value. Boards that work to protect and enhance the best interests of shareholders are independent, diverse, have a record of positive performance, and have members with a breadth and depth of relevant knowledge and experience. With our votes we seek to support widely-accepted enhanced environmental, social and governance practices. The ESG voting policy, which draws upon the expertise of Glass Lewis, emphasizes governance, environmental, and social matters. The ESG policy will support most governance related shareholder proposals all environmental and social shareholder proposals aimed at enhancing a company's policies and performance or increasing a company's disclosures with respect to such issues

#### **References to international standards**

The KTL Responsible Investment approach in general, as well as specifically in relation to the mitigation of adverse impacts, KTL considers various international standards and codes. The most important ones are the United Nations' Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the United Nations' Guiding Principles on Business and Human Rights. These are embedded in our due diligence and investment decision-making. This is underpinned by data, research, tools and services that we receive from our external service providers related to ESG risks and opportunities, exclusions, and engagement. Furthermore, where possible and feasible we expect our external managers to apply these standards, or similar standards as considered relevant, in their investment decision-making, exclusions, engagement and voting activities.

The adverse sustainability indicators in the table in this Statement that measure alignment with the above are primarily the following ones:

10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The methodology and data used to measure the adherence to the above items is described in the “Sources” section on the previous page. KTL’s methodology and data do not enable forecasting the future principal adverse impacts of investee companies. Furthermore, KTL does not use a forward-looking climate scenario in its due diligence. When more robust data sets and tools become available to do forward-looking climate scenario analyses, KTL will review if and how forward-looking climate scenarios may be of added value and feasible to implement in the investment due diligence on adverse impacts and the monitoring thereof.

### **Historical comparison**

An explanation of the changes for each indicator between 2022 and 2023 is included in the Explanation column of the table above.

### Legal disclaimer

Public disclosures under SFDR are solely the responsibility of KTL and its affiliates. Where references are made to data providers, the information is intended exclusively to provide insights into the datasets that KTL relies on to meet their disclosure obligations and do not speak to any specific characteristics of a particular fund or product of KTL and its affiliates. The data providers referenced in this disclosure are not responsible for any disclosure made by KTL and they shall have no liability hereunder for any use of the information provided to KTL. KTL acknowledges that it is its responsibility to decide upon the usage of the information provided by the data providers and to provide the relevant information, according to its specific use case, to meet its disclosure obligations.

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