Kredietrust
Sustainable Investment Framework
Overview

1. Introduction

This document describes Kredietrust's Sustainable Investment Framework (SIF), which is a proprietary framework to assess which investment instruments can be considered sustainable investments in line with the definition of sustainable investments of Article 2(17) of the Sustainable Finance Disclosure Regulation ("SFDR") in order to meet the requirements laid out in the European Regulation (EU) 2019/2088.

Kredietrust has developed this framework as there is no uniform external data set available in the market that fully captures this specific definition. Furthermore, while the SFDR requirements already apply to the disclosures that Kredietrust needs to make for its financial products, not all requirements are fully clear and financial market participants, like Kredietrust, are awaiting further clarifications and guidance from the European Commission (EC) and the European Supervisory Authorities (ESA). In light of this, Kredietrust will further develop the framework in the course of 2023 following such clarifications and guidance or any emerging market practices.

1.1 Kredietrust's interpretation of the sustainable investment definition

Kredietrust's interpretation is that SFDR's definition of a sustainable investment applies to investments instruments related to corporates and sovereign bonds. As the SFDR's sustainable investment definition is multi-dimensional, in order to systematically assess investments based on this definition, Kredietrust has divided the definition into three key pillars:

1. Contribution to an environmental and social objective
2. Do no significant harm
3. Good governance

Kredietrust's interpretation is that an investment instrument needs to meet the requirements of each pillar to be considered a sustainable investment. An exception to this are sovereign bonds, as the European Commission has clarified that the good governance requirement only applies to investments in companies[1].

1.2 Application

The framework is applied to investments in equities and bonds (including sovereign bonds, though Kredietrust for the time being will only consider sovereign bonds that are Green Bonds as potentially eligible to be sustainable investments).

[1] Q&A provided by the European Commission with answers to questions of the ESAs, d.d. 25 May 2022, p.8.

For each asset class we may deploy a tailored approach, depending on the nature of the asset class and our interpretation of the regulation.

For investments in third-party mutual funds, Exchange Traded Funds (ETFs), and Alternative Investment Funds[2] ("Alternatives"), Kredietrust relies on the sustainable investment disclosures of these financial products. Kredietrust's current interpretation is that this is the method expected by the European Commission and the European Supervisory Authorities. Kredietrust's approach may be amended in case regulatory guidance prescribes a different method.

2. Approach to single lines (equities and bonds)

2.1 General approach

An equity or corporate bond needs to meet the three pillars listed in section 1.1 in order to qualify as a sustainable investment. The general approach to each of the three pillars is described in the table below.

SFDR Sustainable Investment pillar	**Kredietrust Approach**
1. Contribution to an environmental or social objective	As there is limited quantitative market data available on this topic, Kredietrust has opted for using different ''lenses'' to evidence such contribution by leveraging on different data sets, each capturing potential contributions in different ways. The following data sets have been selected for that purpose: 1. **EU Taxonomy alignment[3]**; 2. **Sustainable activities;** 3. **Strong performance on carbon emissions and risks; and** 4. **Companies active in healthcare and education.** Companies are considered meeting the requirements of the first pillar if they have significant revenue alignment with the EU Taxonomy alignment (>=25%), or significant revenue involvement in sustainable activities (>= 25%), or low carbon intensity combined with low carbon risks and good performance on ESG factors, or derive a majority of their revenues from healthcare or education.
2. Do no significant harm (DNSH)	In line with the requirements described in the SFDR Delegated Regulation, our framework relies on two key elements to assess whether companies don't do significant harm: 1. Compliance with the UN Global Compact principles, including compliance with the OECD guidelines for SMEs and UN Guiding Principles for Business & Human Rights. 2. Taking into account the Principal Adverse Impacts (PAIs) listed in Annex I of the SFDR Delegated Regulation that are considered

[2]Alternative investment funds as defined in the Directive 2011/61/EU

[3] Environmentally sustainable activities which meet the criteria set forth in Article 3 of Regulation 2020/852 on the establishment of a framework to facilitate sustainable investments (EU Taxonomy Regulation).

	relevant to assess potential significant harm The regulation does not prescribe a specific way to do this. Kredietrust's current interpretation is that a prudent approach is to set quantitative thresholds for relevant PAIs, which need to be met to demonstrate no significant harm. Where sufficient robust data is available Kredietrust has set PAI-specific thresholds. For some PAIs where currently data is limited and/or considered insufficiently reliable - which does not allow to set meaningful thresholds for the indicators themselves - Kredietrust considers an appropriate proxy, which also has a PAI-specific threshold. In cases where an appropriate proxy is not available, Kredietrust doesn't set a threshold for the PAI at this point and will continue to review the availability of (reliable) data or proxies, as well as regulatory guidance on how to address such cases.
3. Good governance	Kredietrust uses external research related to governance controversies to identify companies that do not meet good governance practices. The good governance requirement is considered to be met when companies are not involved in severe controversies related to governance matters such as sound management structures, employee relations, remuneration of staff and tax compliance. In addition, Kredietrust expects the companies to comply with the UN Global Compact principles, which include commitments to anti-corruption and labour relations to satisfy the good governance pillar.

Kredietrust has interpreted the regulation to be a based on a pass-fail method. As such, only when a company successfully meets the requirements in all three pillars, the investments instruments related to that company are considered sustainable investments. Such a holding is then considered a 100% sustainable investment. The percentage of sustainable investments in Kredietrust financial product is subsequently calculated by adding up the weights of all investments that are considered sustainable investments.

2.2 Green bonds

Kredietrust uses a separate approach for Green Bonds, as these are debt instruments where the funds raised are used exclusively to fund green projects. Green bonds are by nature focused on individual projects and cannot be used for general corporate purposes of the issuer. Applying the framework to the issuer of these bonds is therefore not an accurate assessment of whether or not the investment instrument is a sustainable investment based on SFDR.

To determine whether there is contribution to an environmental objective (pillar I), we consider any green bonds (both corporate and sovereign) that are part of the Bloomberg MSCI Global Green Bond Index to meet the requirements of pillar I.

Furthermore, it is our interpretation that good governance requirement applies at company level rather than project level, so we believe it would not be needed to assess good governance for green bond instruments. However, at this point the regulation is not clear about this. Therefore, as long as there is no regulatory guidance or established market practices on this, Kredietrust will apply a precautionary approach in this regard.

This approach entails that in order to consider Green Bond holdings as sustainable investments, these holdings also need to satisfy the good governance requirement either through the index construction by the index provider or through additional checks by Kredietrust (in line with the checks done for non-green bonds, as described in the table). This does not apply to sovereign green bonds as the good governance requirement only applies to investments in companies. In addition, as part of the precautionary approach, the do no significant harm (DNSH) requirement is also applied to green bonds – again, either through the index construction by the index provider or through additional checks conducted by Kredietrust.

3. Upholding the framework

For externally-managed investments, we classify funds according to the ESG policies and strategies applied by external managers. This is assessed as part of our due diligence process. Where external managers do not meet Kredietrust rigorous quality standards for a given approach, these funds are either not recommended to clients, or are classified according to our Sustainable Investment Framework, which may differ considerably from the self-reported approach a manager claims to apply.