# Kredietrust

# Sustainability Risks in Investments Policy

**General Information**

| Process Owner (Entity): Kredietrust Luxembourg SA ("KTL") |
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| Responsible | Business Title |
|---|---|
| Cyril Thiébaut | Conducting Officer in charge of Portfolio Management |
| **Contact Name/Backup** | **Business Title** |
| Jefferson Marcon Avelino | Head of Compliance |
| **Other(s) Contributor(s)** | **Business Title** |
| (name) | |

**Reviewing Entity**

| Responsible | Entity | Date |
|---|---|---|
| Cyril Thiébaut | KTL | 27.12.2022 |
| Jefferson Marcon Avelino | KTL | 28.12.2022 |

**Approval Authorities**

| Responsible | Entity | Date |
|---|---|---|
| Board of Directors | KTL | 05.01.2023 |
| Authorised Management | KTL | 04.01.2023 |

**Versioning**

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# I. KEY DEFINITIONS

- **Engagement** – The act of undertaking constructive dialogue with investee companies/issuers with a view to improve environmental, social, and governance (ESG) practises.
- **ESG factors** – environmental, social or governance aspects. Examples of such aspect are pollution, carbon emissions, health & safety, labour conditions, board diversity, and anti-corruption.
- **Exclusion** – the act of barring an entity's securities from being purchased for a portfolio due to business activities that are deemed unethical, harmful to society, or in breach of laws or regulations.
- **Funds** – collective investment vehicle that is widely held which holds a diversified portfolio of securities
- **SFDR** – Regulation 2019/2088 of European Parliament and the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector. SFDR is a European regulation introduced to improve transparency in the market for sustainable investment products, to prevent greenwashing and to increase transparency around sustainability claims made by financial market participants.
- **Sustainability risk** - is an environmental, social or governance (ESG) event or condition that, if it occurs, could cause a material negative impact on the value of the investment.
- **SI team**- shall mean in sustainable investment team which is part of the Investment & Client Solutions ('ICS').
- **FRR team-** shall mean Financial Risk and Reporting team which is part of the Risk Function at Quintet
- **GFS team-** shall mean Group Fund Solution team
- **BRM team-** shall mean Business Risk Management
- **Voting** – shareholders (typically) receive voting rights to be cast at annual or extraordinary general meetings on a range of strategic and environmental, social, and governance (ESG) matters
- **Quintet** – Quintet Private Bank Europe (S.A.) including its branches and subsidiaries.

# II.PURPOSE

This document summarises our processes relating to the integration of sustainability risks in the investment decision-making and investment advisory processes for Rivertree Bond, Rivertree Equity, Rivertree FD and Essential Portfolio Selection, to ensure that sustainability risks are adequately identified, measured, and managed in the investment process. As per article 3(1) of the SFDR Kredietrust Luxembourg S.A. (hereinafter "Kredietrust") must publish and maintain on their website policies on the integration of sustainability risks in their investment

The owner of this document is the conducting officer of Kredietrust in charge of portfolio management. This policy has been approved by Kredietrust's management committee and board of directors.

Effective: 31/12/2022

# III.POLICY PROVISIONS

## 3.1. INVESTMENT RELEVANCE

Kredietrust views sustainability factors as sources of both risk and return and believes such factors are financially material to the investment process across a broad range of assets and geographies.

## 3.2. IDENTIFICATION OF SUSTAINABILITY RISKS

There are different types of sustainability risks that may impact the investment case. Not all risks may be relevant to all investments therefore the investment team identifies the material sustainability risks relevant to for the particular strategy, industry or sector etc. Examples of sustainability risks include, but are not limited to:

### *3.2.1. CLIMATE AND ENVIRONMENTAL RISKS TO THE INVESTMENT*

Climate risks represent all possible risks to an investment induced by climate change and its consequences. They are divided into two broad categories: physical and transition risks.

Physical risks are typically the negative impacts of (i) either an increasing accumulation and intensity of acute extreme weather events, for example heat waves and storms, or (ii) longer-term chronic changes in mean values and ranges of various climate variables, for example temperature, precipitation, and sea levels. A failure to adequately manage physical climate risks may lead to, amongst other consequences, the destruction or damage of facilities, the disruption or failure of supply chains and logistics, and potential changes in demand for products and services.

Transition risks materialise as the additional costs, loss of market share, or loss of competitiveness, induced by the transition to a greener economy. They can occur because of environmental or social factors such as emerging technologies or policies (e.g., pushing towards less polluting practises), or shifts in consumer preferences. A failure to adequately manage transition risks may lead to, amongst other consequences, the impairment of defunct or outdated assets or reserves, the loss of customers, and the need for significant capital expenditure.

Other (non-climate) environmental risks cover all negative impacts linked to a degradation of the environment, the pollution of land or marine ecosystems, losses of biodiversity, the scarcity of natural resources, etc. Despite being not directly linked to climate change, these various factors bear essentially the same types of risk for individuals, corporate firms, and society in general, as those identified above.

### *3.2.2. REPUTATIONAL RISK TO THE INVESTMENT*

Reputational risks may arise due to a variety of reasons such as inadequate controls, excessive risk-taking, and lack of due diligence. In the event an investee entity violates a sustainability norm or fails to adequately manage its sustainability risks, the entity may suffer reputational damage. Consequences of reputational damage include, but are not limited to, a loss of customers, the loss or degradation of supplier relationships, or a withdrawal of funding from financial partners.

### *3.2.3. NON-COMPLIANCE RISK TO THE INVESTMENT*

Non-compliance risks may arise due to voluntary or involuntary violation of the law. In the event an investee entity violates a sustainability norm or fails to adequately manage its sustainability risks the entity may suffer regulatory consequences. Regulatory consequences include, but are not limited to, monetary fines, the removal of licenses to operate, increased supervision, or reporting burdens.

### *3.2.4. LITIGATION RISK TO THE INVESTMENT*

Litigation risks may arise due to voluntary or involuntary harm to internal or external stakeholders, caused by action or inaction. In the event an investee entity violates a sustainability norm or fails to adequately manage its sustainability risks, the entity may be subject to ligation. Consequences of litigation include, but are not limited to, monetary settlements, loss of intellectual property and removal of licenses to operate.

## 3.3. MANAGEMENT OF SUSTAINABILITY RISKS

The management of sustainability risks may vary per type of investment and asset class. Quintet manages sustainability risks in the following ways, as appropriate for the relevant risks.

### *3.3.1. ADHERENCE TO INTERNATIONAL STANDARDS*

Kredietrust, through its mother company Quintet adheres to multiple international standards in favour of sustainable practices, such as the Principles for Responsible Investment. In addition, it encourages investee entities to adopt the same level of standards. For instance, Kredietrust requires investees to adhere to the United Nations’ Global Compact Principles, a set of ten general principles relating to human rights, labour, environment, and anti-corruption practices. On behalf of Kredietrust, Quintet SI and BRM teams monitor on a continuous basis the adherence of its investees to these sustainability guidelines. Any non-compliant firm is excluded from Quintet's investment scope.

### *3.3.2. ACTIVE OWNERSHIP*

Active ownership is the use of the rights and position of ownership to influence the activities or behaviour of investee entities. Quintet believes that active ownership is an effective means of managing sustainability risks and effecting change. Quintet operates a policy of active ownership across single line equities, fixed income securities and with third-party fund managers. Kredietrust executes this policy through such actions as proxy voting and collective and individual engagement with a company's management. Please refer to Kredietrust's Group Active Ownership Policy for more detail.

### 3.3.3 EXCLUSION

Exclusion is the conscious divestment or refusal to purchase securities issued by an entity. Kredietrust believes that exclusion is a viable means of managing sustainability risks, particularly when active ownership has previously failed or is not feasible. Kredietrust applies exclusions across single line equities and fixed income securities.

The portfolio management team executes the day-to-day application of the exclusion list and report any breaches to the conducting officer in charge of portfolio management. The risk management team, as second line, reports to the management committee of Kredietrust and to the Board of Directors as part of its overall KRI follow-up.

### *3.3.4 CONTROVERSY MONITORING*

Controversies refer to ESG incidents or events that have a negative impact on the environment, society, external stakeholders, or entity value. On behalf of Kredietrust, Quintet's SI team operates a process of controversy monitoring across single line equities and fixed income securities, using third-party data suppliers. This ongoing process enables to detect potential sustainability risks and to trigger further actions (e.g., active ownership or exclusion) wherever needed. Please refer to the Kredietrsut's Responsible Investment Policy for more detail on controversy monitoring.

### 3.3.5 ESG INTEGRATION

ESG integration is the process of analysing and assessing sustainability risks and incorporating the assessment into opportunity identification, investment assessment, investment decision making, and portfolio construction process. Kredietrust undertakes ESG integration at multiple levels.

A. Individual securities / single lines:

Sustainable Investment team integrates ESG at the individual security level through an internally developed sector-specific materiality matrix and issuer factsheets. This process combines industry best practices, such as frameworks from the Sustainable Accounting Standards Board, third-party data, and in-house expertise. As the materiality of sustainability risks varies over time, Kredietrust update our underlying frameworks as new insights and best practices emerge, for which we leverage our in-house expertise, as well as the expertise of our ESG service providers. ESG integration is complementary to other (market, credit, or duration) risk assessments in the investment making process.

B. Collective investment vehicles:

Kredietrust requires third-party managers of collective investment vehicles to apply sustainability risk management practices, and to actively engage with their investee entities to adequately maintain suitable risk management standards.

To ensure such standards, Fund Selection Team conducts an extensive sustainability due diligence process on each third-party manager and collective investment vehicle in which Kredietrust invests, combined with extensive reporting requirements on third-party managers and continued monitoring.

## 3.4. MONITORING OF SUSTAINABILITY RISKS

Sustainability risk management processes described above rely largely on a continuous monitoring of all investments, single line equities, and fixed income securities.

I. Data

Sustainability risk identification, assessment, and monitoring processes are supported by the use of external expert information sources from third-party providers.

II. Process

Sustainability risk management is integrated into the investment and investment risk framework, where first and second lines of defence have distinct responsibilities.

III. Infrastructure

Third-party sustainability research and expert data is incorporated into information systems and is made available to investment and relevant risk staff.

IV. Adaptation

Sustainability risks can change, so our models and processes are continuously updated. Ongoing education of investment and relevant risk staff is necessary. Kredietrust operates staff training on sustainability topics and Quintet Group's Performance monitoring team monitor and track attendance and completion.

## 3.5. ESCALATION AND REPORTING

In the event that a sustainability risk is not adequately managed within functions and workflows, Kredietrust operates an escalation procedure through control functions. In the event of a breach, this will be escalated by risk management to the management committee and the risk committee of Kredietrust

## 3.6. TRANSPARENCY AND DISCLOSURE

Kredietrust is committed to providing timely and relevant communication and reporting of its sustainability risk efforts both externally and internally in full compliance with the current regulatory requirements.

Kredietrust publishes a summary of its Sustainable Risk Policy on its website. It also publishes related reports and disclosures including, but not limited to Responsible Investment Policy, an annual Active Ownership Report, and sustainability information within the Quintet Group Annual Report.