

Brussels, 6.4.2022 C(2022) 1931 final

ANNEX 1

#### **ANNEX**

to the

Commission Delegated Regulation (EU) .../...

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports

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### **ANNEX I**

#### Template principal adverse sustainability impacts statement

For the purposes of this Annex, the following definitions shall apply:

- (1) 'scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in points (1)(e)(i) to (iii) of Annex III to Regulation (EU) 2016/1011 of the European Parliament and of the Council<sup>1</sup>;
- (2) 'greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in Article 3, point (1), of Regulation (EU) 2018/842 of the European Parliament and of the Council<sup>2</sup>;
- (3) 'weighted average' means a ratio of the weight of the investment by the financial market participant in an investee company in relation to the enterprise value of the investee company;
- (4) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (5) 'companies active in the fossil fuel sector' means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council<sup>3</sup>;
- (6) 'renewable energy sources' means renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;
- (7) 'non-renewable energy sources' means energy sources other than those referred to in point (6);
- (8) 'energy consumption intensity' means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company;

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Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26).

Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

- (9) 'high impact climate sectors' means the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council<sup>4</sup>;
- (10) 'protected area' means designated areas in the European Environment Agency's Common Database on Designated Areas (CDDA);
- 'area of high biodiversity value outside protected areas' means land with high biodiversity value as referred to in Article 7b(3) of Directive 98/70/EC of the European Parliament and of the Council<sup>5</sup>;
- (12) 'emissions to water' means direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council<sup>6</sup> and direct emissions of nitrates, phosphates and pesticides;
- 'areas of high water stress' means regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%) in the World Resources Institute's (WRI) Water Risk Atlas tool "Aqueduct";
- (14) 'hazardous waste and radioactive waste' means hazardous waste and radioactive waste;
- (15) 'hazardous waste' means hazardous waste as defined in Article 3(2) of Directive 2008/98/EC of the European Parliament and of the Council<sup>7</sup>;
- (16) 'radioactive waste' means radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom<sup>8</sup>;
- (17) 'non-recycled waste' means any waste not recycled within the meaning of 'recycling' in Article 3(17) of Directive 2008/98/EC;
- (18) 'activities negatively affecting biodiversity-sensitive areas' means activities that are characterised by all of the following:
- (a) those activities lead to the deterioration of natural habitats and the habitats of species and disturb the species for which a protected area has been designated;

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Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains Text with EEA relevance (OJ L 393, 30.12.2006, p. 1–39).

Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1).

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48).

- (b) for those activities, none of the conclusions, mitigation measures or impact assessments adopted pursuant to any of the following Directives or national provisions or international standards that are equivalent to those Directives have been implemented:
  - (i) Directive 2009/147/EC of the European Parliament and of the Council<sup>9</sup>;
  - (ii) Council Directive 92/43/EEC<sup>10</sup>;
  - (iii) an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council<sup>11</sup>:
  - (iv) for activities located in third countries, conclusions, mitigation measures or impact assessments adopted in accordance with national provisions or international standards that are equivalent to the Directives and impact assessments listed in points (i), (ii) and (iii);
- 'biodiversity-sensitive areas' means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139<sup>12</sup>;
- 'threatened species' means endangered species, including flora and fauna, listed in the European Red List or the IUCN Red List, as referred to in Section 7 of Annex II to Delegated Regulation (EU) 2021/2139;
- (21) 'deforestation' means the temporary or permanent human-induced conversion of forested land to non-forested land;
- (22) 'UN Global Compact principles' means the ten Principles of the United Nations Global Compact;
- 'unadjusted gender pay gap' means the difference between average gross hourly earnings of male paid employees as a percentage of average gross hourly earnings of male paid employees;
- (24) 'board' means the administrative, management or supervisory body of a company;
- 'human rights policy' means a policy commitment approved at board level on human rights that the economic activities of the investee company shall be in line with the UN Guiding Principles on Business and Human Rights;

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Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7).

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7).

Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 026, 28.1.2012, p. 1).

<sup>12</sup> Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (OJ L 442, 9.12.2021, p. 1).

- (26) 'whistleblower' means 'reporting person' as defined in Article 5(7) of Directive (EU) 2019/1937 of the European Parliament and of the Council<sup>13</sup>;
- 'inorganic pollutants' means emissions within or lower than the emission levels associated with the best available techniques (BAT-AEL) as defined in Article 3, point (13) of Directive 2010/75/EU of the European Parliament and of the Council<sup>14</sup>, for the Large Volume Inorganic Chemicals- Solids and Others industry;
- (28) 'air pollutants' means direct emissions of sulphur dioxides (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), non-methane volatile organic compounds (NMVOC), and fine particulate matter (PM<sub>2,5</sub>) as defined in Article 3, points (5) to (8), of Directive (EU) 2016/2284 of the European Parliament and of the Council<sup>15</sup>, ammonia (NH<sub>3</sub>) as referred to in that Directive and heavy metals (HM) as referred to in Annex I to that Directive;
- (29) 'ozone depletion substances' mean substances listed in the Montreal Protocol on Substances that Deplete the Ozone Layer.

For the purposes of this Annex, the following formulas shall apply:

(1) 'GHG emissions' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{\textit{current value of investment}_{i}}{\textit{investee company's enterprise value}_{i}} \times \textit{investee company's Scope}(x) \; \textit{GHG emissions}_{i} \right)$$

(2) 'carbon footprint' shall be calculated in accordance with the following formula:

$$\frac{\sum_{n}^{i} \left(\frac{current\ value\ of\ investment_{i}}{investee\ company's\ enterprise\ value_{i}} \times investee\ company's\ Scope\ 1, 2\ and\ 3\ GHG\ emissions_{i}\right)}{current\ value\ of\ all\ investments\ (\not\in M)}$$

(3) 'GHG intensity of investee companies' shall be calculated in accordance with the following formula:

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Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L305, 26.11.2019, p. 17).

Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (Text with EEA relevance), *OJ L 344*, *17.12.2016*, *p. 1–31* 

$$\sum_{n}^{i} \left( \frac{\text{current value of investment}_{i}}{\text{current value of all investments } (\in M)} \times \frac{\text{investee company's Scope 1, 2 and 3 GHG emissions}_{i}}{\text{investee company's } \in M \text{ revenue}_{i}} \right)$$

(4) 'GHG intensity of sovereigns' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{current \ value \ of \ all \ investments} ( \in \! M ) \times \frac{The \ country's \ Scope \ 1, 2 \ and \ 3 \ GHG \ emissions_{i}}{Gross \ Domestic \ Product_{i}( \in \! M )} \right)$$

(5) 'inefficient real estate assets' shall be calculated in accordance with the following formula:

((Value of real estate assets built before 31/12/2020 with EPC of C or below) + (Value of real estate assets built after 31/12/2020 with PED below NZEB in Directive 2010/31/EU))

Value of real estate assets required to abide by EPC and NZEB rules

For the purposes of the formulas, the following definitions shall apply:

- (1) 'current value of investment' means the value in EUR of the investment by the financial market participant in the investee company;
- (2) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (3) 'current value of all investments' means the value in EUR of all investments by the financial market participant;
- (4) 'nearly zero-energy building (NZEB)', 'primary energy demand (PED)' and 'energy performance certificate (EPC)' shall have the meanings given to them in paragraphs 2, 5 and 12 of Article 2 of Directive 2010/31/EU of the European Parliament and of the Council<sup>16</sup>.

#### Table 1

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

#### Financial market participant Landseer Asset Management (UK) LLP

Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) (OJ L 153, 18.6.2010, p. 13)

Summary	y
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Landseer Asset Management (UK) LLP (LAM) 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 LAM

This statement on principal adverse impacts on sustainability factors covers the reference period from 30 June 2023 to 30 June 2024 [year n].

[Summary referred to in Article 5 provided in the languages referred to in paragraph 1 thereof]

## Description of the principal adverse impacts on sustainability factors

[Information referred to in Article 7 in the format set out below]

### Indicators applicable to investments in investee companies

Adverse sustainability indicator	Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference
					period

	CLIMA	TE AND OTHER ENVIRO	NMENT-RELATEI	DINDICATORS	
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	56,103,610 tCO2e	119,187,782 tCO2e	
		Scope 2 GHG emissions	13,029,856 tCO2e	18,361,161 tCO2e	
		Scope 3 GHG emissions	2,374,499,612 tCO2e	3,563,176,931 tCO2e	
		Total GHG emissions	751,654.45	134,565.03	We restrict or exclude investee companies with a high GHG emission intensity (such as fossil fuels and energy). The portfolio may make investments in such companies but limited to a

2. Carlson				maximum of 15% of Net Asset Value.
2. Carbon footprint	Carbon footprint	2,044.21	738.42	As above in Q1.
3. GHG intensity of investee companies	GHG intensity of investee companies	1,673.97	753.14	As above in Q 1.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	9.97%	3.76%	The maximum amount permissable to invest in such companies is 15% as set out in our internal ESG policy. We are currently comfortably below this level, but continue to monitor this metric regularly.

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	76.89%	22.05% Explanation for n-1 share of investments aware of need to increase renewables as insufficent data	Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources.	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues. The portfolio consistantly beats the average ESG score
				Note that where a company has not disclosed a breakdown for renewable/non-renewable energy we have assumed all energy usage is from non-renewable sources.	for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.

6. Energy				Furthermore, where companies have disclosed a % renewable energy figure but have not disclosed total energy usage, we have written 'Not Disclosed' and it is not reflected in the figure	
consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.09	10.27	Energy consumption in GWh per million EUR of revenue of investee companies.	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues. The portfolio consistantly beats the average

						ESG score for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.
Biodiversity	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	5.31%	1.98%	% of the portfolio which are known to have holdings involved in incidents of non-compliance with ecological regulations in the last financial year.  Note that if a company for	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues. The portfolio consistantly beats the

					which this environmental issue is material, but do not disclose on it, we assume the company IS negatively affecting biodiversity-sensitive areas.	average ESG score for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	57,400.47	147,671.84	Water generated by investee companies per million EUR invested, expressed as a weighted average. We use m3 of water extracted as a proxy for tonnes emitted into water. It reasonably captures the	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues. The portfolio consistantly beats the average

						"protection of water as an environmental resource".	ESG score for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.
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	45.09	20,201.53  We use tonnes of total waste, as a more comparable proxy for tonnes of hazadous (only) waste	Tonnes of waste generated by investee companies per million EUR invested, expressed as a weighted average. We use tonnes of total waste disposed (total waste minus waste recycled), as a proxy for	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues. The portfolio consistantly beats the average ESG score

				tonnes of hazardous (only) waste.	for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.
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	ANTI-CORRUP	Performance in the Cambridge Impact Framework used as a proxy.	We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues.  The portfolio consistantly

	processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multipational	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	0.0%	35.66%	Performance in the Cambridge Impact Framework used as a proxy.	beats the average ESG score for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.  We commit to a strengthened dialogue with companies wherever possible to improve their ESG issues.  The portfolio consistantly
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12. Unadjusted		NY/A			average ESG score for our referenced benchmark in E, S and G factors, and we will continue to disclose these scores on a regular (monthly) basis to investors.
gender pay gap	Average unadjusted gender pay gap of investee companies	N/A	N/A	Insufficient data supplied to provide quantified answer	
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	41.04%	39.09%		We continually monitor this metric and the portfolio consistantly beats the average score of our referenced benchmark.

14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%		We will continue to restrict or exlude companies whose board of directors is not at least 30% female.  The sector will remain on our exclusion list
Indica	tors applicable to investments i	n sovereigns and s	upranationals		
Adverse sustainability indicator	Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next

						reference period
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 invest	nents in real estat	e assets		
Adverse	sustainability indicator	Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the				Posso

		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		

### Other indicators for principal adverse impacts on sustainability factors

[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (a) in the format in Table 2]

[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (b), in the format in Table 3]

[Information on any other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factor referred to in Article 6(1), point (c), in the format in Table 2 or Table 3]

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

LAM use a third-party data provider that visualises all potential risks, enabling us to then drill into the underlying company-specific PAI information

### **Engagement policies**

Where practical and having regard to the asset class or investment type, LAM will proactively engage in dialogue with companies to better understand, manage and address ESG issues, to support business growth, good governance, standards of conduct, and to invest accordingly.

#### References to international standards

[Information referred to in Article 9]

### **Historical comparison**

LAM were able to source more accurate data than in previous year. LAM has made significant improvements in certain PAI's and will endeavour to improve the metrics in other PAI's where there has been no improvements or actual increases in negative scores. LAM is an investment manager which invests in equities, both directly and using derivatives. We regard ESG factors as important input into our investment process

while cognisant that portfolios also have to meet clients' investment objectives. As a result, we view our approach as being "ESG aware" rather than driven by ESG considerations alone.

 $\label{eq:Table 2} \mbox{Additional climate and other environment-related indicators}$ 

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	
	Indicators applicable to investments in investee companies		
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS			
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

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	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  Indicators applicable to investments in real estate assets	Share of bonds not issued under Union legislation on environmentally sustainable bonds
Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets  Scope 2 GHG emissions generated by real estate assets  Scope 3 GHG emissions generated by real estate assets

		Total GHG emissions generated by 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

Table 3

# Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
,	Indicators applicable to investments in investee companies	
Social and employee matters	Investments in companies without workplace accident prevention policies	Share of investments investee compani without a workpla accident preventi policy
	2. Rate of accidents	Rate of accidents investee compan expressed as a weight average
	3. Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lot to injuries, accident fatalities or illness investee companies expressed as a weight 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
		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
	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 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

	17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	identified insufficiencies in actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery  Numbers of convictions and amount of fines for violations of anti-	
		corruption and anti- bribery laws by investee companies	
	Indicators applicable to investments in sovereigns and supranationals		
Social	18. Average income inequality score	The distribution of income and economic inequality among the participants in a particular economy including a quantitative indicator explained in the explanation column	
	19. Average freedom of expression score	Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator	

		explained in the explanation column
Human rights	20. Average human rights performance	Measure of the average human right performance of investee countries using a quantitative indicator explained in the explanation column
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column
	22. Non-cooperative tax jurisdictions	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes
	23. Average political stability score	Measure of the likelihood that the current regime will be overthrown by the use of force using a quantitative indicator explained in the explanation column
	24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and

	the deficience	ies in	civil
	and criminal justice using		
	a quantitativ	e indi	cator
	explained	in	the
	explanation co	olumn	