

Kennisgeving over duurzaamheid (productniveau)

Deze versie van onze kennisgevingen over duurzaamheid (de '**Kennisgevingen**', '**Kennisgevingen van website**') is van toepassing vanaf 26 Februari 2026.

De kennisgeving is van toepassing op alle ESG-portefeuilles die worden aangeboden door Revolut Securities Europe UAB:

- Duurzaam defensief
- Duurzaam en stabiel
- Bewuste balans
- Gedurfd en duurzaam
- Krachtige groei

Ga voor meer informatie kennisgevingen voor duurzaamheid op entiteitsniveau naar [deze pagina](#). Voor meer informatie over de concepten op het gebied van milieu, sociale zaken en governance ('ESG'), raadpleegt u de [uitleg van voorkeuren voor duurzaamheid](#) en gerelateerde [veelgestelde vragen](#).

Deze kennisgevingen zijn voorbereid in overeenkomst met Verordening (EU) 2019/2088 van het Europees Parlement en de Raad van 27 november 2019 inzake duurzaamheidsgerelateerde informatie in de financiële dienstverlening ('**EU-verordening inzake informatieverschaffing over duurzame financiering**', '**SFDR**').

Houd er rekening mee dat de hieronder verstrekte informatie openbaar wordt gemaakt in overeenstemming met de toepasselijke wetgeving voor transparantie en informatieve doeleinden, en geen promotiemateriaal vormt. De Kennisgevingen moeten samen met andere [productdocumentatie](#) worden overwogen.

Met ingang van 4 november 2024.

Laatst bijgewerkt op 26 Februari 2026.

In overeenstemming met de vereisten van artikel 25, lid 2, van Gedelegeerde Verordening (EU) 2022/1288 van de Commissie van 6 april 2022 tot aanvulling van Verordening (EU) 2019/2088 van het Europees Parlement en de Raad ('Gedelegeerde

SFDR-verordening'), zie de vertaling van het overzicht hieronder. In geval van een afwijking geldt de oorspronkelijke Engelse versie.

1. Overzicht

Revolut Securities Europe UAB ('**RSEUAB**', '**wij**', '**we**', '**onze**', '**ons**'), vertegenwoordigd in Zwitserland door Revolut (Switzerland) AG, biedt discretionaire portefeuilleheerdiensden via Robo-Advisor.

De [Robo-Advisor-voorwaarden](#) vormen samen met onze [Handelsvoorwaarden](#), de [Precontractuele kennisgeving](#) het betreffende Portefeuillestrategierapport en alle andere documenten of voorwaarden die van toepassing zijn op de beleggingsrekening van de klant ('**u**', '**uw**') een juridische overeenkomst tussen de klant en ons. Na het voltooien van de geschiktheidsevaluaties krijgt de klant de meest geschikte beschikbare beleggingsstrategie gepresenteerd op basis van de informatie die tijdens de evaluatie is verstrekt. Wij bouwen, controleren en beheren de portefeuille namens de klant in overeenstemming met de beleggingsstrategie.

Vanwege de beperkte beschikbare gegevens op het gebied van milieu ('E'), sociale zaken ('S') en governance ('G'), kunnen we echter niet garanderen dat de aanbevolen risicoprofiel-gebonden beleggingsstrategie overeenkomt met de specifieke individuele duurzaamheidsvoorkeuren van de klant. Wanneer de klant aangeeft belang te hebben bij het afstemmen van diens beleggingen op duurzaamheidskenmerken, heeft de klant, afhankelijk van de relevante geschiktheidsevaluatie en, indien relevant en overeengekomen, aanpassing van duurzaamheidsvoorkeuren, de mogelijkheid om te beleggen in portefeuilles met onderliggende activa die ecologische of maatschappelijke kenmerken bevorderen (of een combinatie van deze kenmerken), met bedrijven waarin wordt geïnvesteerd die goede governance-activiteiten volgen (de '**ESG-portefeuilles**', de '**Portefeuilles**').

ESG-portefeuilles zijn beleggingsstrategieën die zijn ontworpen voor beleggers die hun financiële doelstellingen beter willen afstemmen op andere overwegingen, zoals de impact van de bedrijven waarin wordt geïnvesteerd op het milieu, hun maatschappelijke activiteiten of de effectiviteit van hun governancestructuren (de '**ESG-beleggingsstrategie**').

Momenteel biedt RSEUAB de volgende ESG-portefeuilles aan, afhankelijk van de individuele financiële situatie, beleggingservaring en -kennis, beleggingsdoelstellingen en risicotolerantie van de klant, zoals bepaald tijdens de geschiktheidsevaluatie:

- Duurzaam defensief;
- Duurzaam en stabiel;
- Bewuste balans;
- Gedurfd en duurzaam;
- Krachtige groei.

Aangezien dezelfde methodologie voor de selectie van onderliggende activa met ESG-kenmerken van toepassing is op alle momenteel beschikbare ESG-beleggingsstrategieën, zijn er gestandaardiseerde precontractuele en websitegegevens opgesteld in overeenstemming met artikel 10 van de SFDR.

De ESG-beleggingsstrategieën die RSEUAB aanbiedt, bevorderen ecologische, maatschappelijke en goede governancekenmerken; er is echter geen sprake van duurzame beleggingen als doelstelling in de zin van artikel 9 van de SFDR en er wordt ook niet belegd in ecologisch duurzame economische activiteiten.

De ESG-beleggingsstrategieën bevorderen kenmerken op het gebied van milieu, sociale zaken en governance door een substantieel deel van de beleggingen toe te wijzen aan fondsen uit artikel 8 van de SFDR, met onderliggende beleggingen in bedrijven die zouden moeten bijdragen aan het behalen van de milieu- of maatschappelijke kenmerken die door het fonds worden bevorderd, goede governance volgen en op weg zijn naar meer duurzaamheid, in het bijzonder bij het werken aan het behalen van netto-nuldoelstellingen. Het resterende deel van de activa in de Portefeuille geclassificeerd als 'Overige' beleggingen) kan zorgvuldig geselecteerde fondsen van artikel 6 van de SFDR omvatten, die een uitgebreide screening hebben ondergaan om ervoor te zorgen dat deze fondsen voldoen aan een vastgestelde minimumdrempel van een betrouwbare interne ESG-proxy. RSEUAB heeft geen referentiebenchmark aangewezen voor het bereiken van de milieu- of maatschappelijke kenmerken die door het financiële product worden bevorderd.

Voor op aandelen gebaseerde fondsen en op vastrentende waarden gebaseerde fondsen (obligaties) die in aanmerking komen voor de ESG-beleggingsstrategieën, heeft RSEUAB gebruikgemaakt van ESG-statistieken van onafhankelijke leveranciers (Bloomberg, MSCI, enz.) en proxy's met behulp van respectievelijk landenscores voor soevereine instrumenten en onderliggende aandelenscores voor bedrijfsinstrumenten die worden gebruikt om eigen interne ESG-scores samen te stellen. Dit is gecombineerd met onafhankelijke verslagen en beoordelingen van derden om te beoordelen welke fondsen in de definitieve selectie moeten worden opgenomen.

RSEUAB houdt regelmatig toezicht op de samenstelling van de Portefeuilles en vervangt fondsen die niet langer aan de vastgestelde criteria voldoen. Daarnaast zet RSEUAB zich in om de belangrijkste beperkingen van ESG-gegevens aan te pakken (beperkte beschikbaarheid, inconsistente kwaliteit, gebrek aan standaardisatie in verschillende regio's, discrepanties in methodologieën van providers en hiaten in de dekking voor sommige activaklassen) door belangrijke ontwikkelingen op de voet te volgen en waar nodig nieuwe gegevens in de methodologie op te nemen. Met betrekking tot betrokkenheidsbeleid wordt betrokkenheid niet gepromoot als onderdeel van de milieu- en/of maatschappelijke kenmerken van dit product.

Informatie over het beleggingsbeleid van elk financieel instrument binnen de ESG-portefeuille, gespecificeerd door de productproducent, is te vinden in de documentatie van het desbetreffende financiële instrument.

2. No sustainable investment objectives

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

3. Environmental or social characteristics of the financial product

The Article 8 funds within the ESG portfolios promote a variety of environmental and social/governance characteristics, particularly, climate change mitigation, improvement of energy efficiency, support of the transition to low-carbon economy, and good governance.

Not all funds within the Portfolio follow a sustainable or impact investment strategy. Article 6 funds do not have ESG characteristics and/or promote them, and do not hold sustainability as an objective. However, carefully selected Article 6 funds may be included in the remaining portion of the Portfolio, provided they successfully undergo proprietary screening and selection criteria, using a combination of independent provider ratings, including individual E, S, and G pillar and CO2 emissions scores. Please see the Methodology section for more details.

Information on the investment policy of each financial instrument within the ESG portfolio may be found in the disclosure documentation of the respective financial instrument.

4. Investment strategy

ESG portfolios are designed for socially and/or environmentally conscious investors who seek diversification and financial returns, while also considering non-financial (i.e., ESG) factors alongside traditional financial performance. Therefore, in the ESG portfolio design, ESG criteria was taken into account to shortlist and, then, select the final set of underlying funds.

The ESG portfolio invests in financial products (primarily, exchange-traded funds ("**ETFs**", "**funds**"), which match predetermined criteria for ESG screening. For ESG Investment Strategies, RSEUAB has created Portfolios that consist of either selected funds that are classified as Article 8 funds (environmental and socially promoting as per the SFDR) or Article 6 funds (no explicit sustainability focus as per the SFDR) that bear a sufficiently high ESG score, as determined by independent ESG score providers. In case of bond ETFs, various other parameters such as the ESG rating of the issuer of the sovereign are taken into consideration. RSEUAB has ensured that Portfolio-level coverage of Article 8 ETFs is between 44% to 74%. Please see the Methodology section for more information on the selection of funds for the Portfolios.

At the moment, no Article 9 funds (funds with sustainable investment as an objective, as per the SFDR) are included in the asset allocation of the ESG portfolios. Put simply, the investments underlying the Portfolios do not have direct significant environmental or social objectives but consider E/S factors. Additionally, under the SFDR, Article 8 funds must ensure that their underlying investments follow good governance practices. The remaining Article 6 funds in the ESG portfolios are also screened and assigned an ESG score, which includes good governance as one of the key parameters. By extension, through the ETF selection process, ESG portfolios also focus on companies with effective and accountable company management practices.

Despite not having committed to an explicit sustainability objective, these investments consider ESG initiatives (e.g., promote positive structural changes within the society and the economy). In accordance with our ESG Investment Strategy, the coverage of Article 8 funds (promoting environmental and/or social characteristics) per Portfolio is as follows: 44% for the Sustainably Defensive Portfolio, 44% for the Sustainable and Steady Portfolio, 59% for the Conscious Equilibrium Portfolio, 60% for the Bold and Sustainable Portfolio, and 74% for the Impactful Growth Portfolio.

Principal adverse impact metrics are not taken into account in the investment decision-making process at this moment in time.

Please refer to the "Strategy" section of the relevant Portfolio Strategy Report for Portfolio-specific details.

5. Proportion of investments

The Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852 (the "**Pre-contractual Disclosure**") for ESG Investment Strategies is available as an annex to the RSEUAB Risk Description document [here](#).

The ESG portfolio invests in financial products (primarily, ETFs with underlying investments in equities and bonds (fixed income)), which match predetermined criteria for ESG screening.

At least 44% of the ESG portfolios are aligned with E/S characteristics through commitment to invest at least this proportion of assets into Article 8 ETFs. The remaining portion of the ESG portfolio assets are into 'Other' investments. These consist of Article 6 ETFs which, although they do not specifically promote sustainability characteristics, are nonetheless screened against sustainability criteria. Please see the graph in section "What is the asset allocation planned for this financial product?" of the Pre-contractual Disclosure for additional information.

6. Monitoring of environmental or social characteristics

As a portfolio manager, RSEUAB pays close attention to ensuring that compliance with the sustainability criteria at the level of individual financial instruments is maintained. Therefore, as noted below, RSEUAB regularly monitors the underlying holdings of the largest portfolio constituents to ensure their ongoing alignment with disclosed ESG characteristics. Where the funds' alignment with ESG characteristics shifts and it no longer meets the initial criteria laid out in the methodology, inclusion of the said fund is re-evaluated and substituted.

In addition, ongoing oversight, ESG Portfolio composition may at any point be subject to risk and compliance control spot checks and independent audit.

7. Methodologies

For ESG Investment Strategies, in addition to the usual selection criteria (e.g. low costs, high liquidity and broad diversification), the three aspects of sustainability (environmental, social and corporate governance) are taken into account when selecting financial instruments. RSEUAB primarily selects financial instruments the composition of which takes into account certain ESG standards, i.e. where the investment policy already aims to avoid or reduce sustainability risks using suitable and recognised methods of selection and Portfolio construction.

Generally speaking, the ESG Investment Strategies are built using a strategic asset allocation ("**SAA**") approach, with a strong emphasis on sustainability factors. The aim is to achieve maximum diversification across regions and asset classes, primarily through the use of financial instruments that track broad market benchmark indices.

The weights of the optimal asset allocation are determined based on performance and risk of the shortlisted ETFs. The final selection of ETFs from the shortlist is based on their potential performance, which is based on fundamentals, risks, intrinsic valuations, and estimated returns. The selected funds are overlaid with market views (optional), and fed into allocation optimizers which are then aligned with the clients' target objectives.

Portfolio allocation can be constructed based on selected target objectives (e.g., if the client prefers to target market estimated returns, market risks, likelihood of loss, or tail risks - Conditional Var, or CvaR). The output is the long-term stable allocation, or SAA. Short term market swings can figure in the allocation adjustments (Tactical Asset Allocation, "**TAA**") against the SAA allocations. Finally, rebalancing and monitoring of the performances is used to stabilize market exposures and minimize unintended consequences.

Regarding the financial instruments and their specific ESG characteristics, as well as the methods used to assess, measure, and monitor these characteristics and impacts, RSEUAB relies on data provided by the respective product manufacturers. This includes information on data sources, criteria for valuing underlying assets, and the sustainability indicators used to measure the environmental or social attributes or overall sustainability impacts.

In our ESG fund selection methodology, we place stringent emphasis on verifying the accuracy of labeling to prevent exposure to greenwashing. This process ensures the integrity of the funds we shortlist. Additionally, we track and regularly monitor the major Portfolio constituents' underlying holdings to ensure that the investment funds

selected remain consistent with the ESG characteristics they have disclosed to be aligned with.

All ESG portfolios should have a minimum between 44-74% (depending on the Portfolio) of Article 8 funds (meaning, a substantial fraction of the Portfolio invests in funds that promote sustainable - environmental or social - characteristics, as defined in the SFDR). All considered funds are compared and selected using the combination of their SFDR classification, the ESG score (sustainability rating) given by the external provider, Environmental, Social and Governance Pillar scores, and the CO2 emissions score.

Furthermore, in our classification, we use the following indicators:

Equities-based financial instruments (equity funds): there is a wide variety of independent ESG metrics providers in the equity market. Our metrics used for ESG scoring of these instruments are drawn from a combined score based on:

- Bloomberg ESG;
- MSCI ESG;
- Sustainalytics ESG.

Fixed Income-based instruments (bond funds): fixed income instrument issuers mainly comprise sovereigns and corporates. ESG scores are not readily available for these instruments; therefore, we have constructed our own proxies using country scores for sovereign instruments and underlying equity scores for corporate instruments.

RSEUAB has also employed a list of independent third-party reports and assessments to come up with the final selection of funds:

- World Bank ESG Ratings;
- Notre Dame Global Adaptation Initiative Country Index ("ND-GAIN");
- GHG Sovereign Emissions;
- Net Zero Alignment - Germanwatch's Climate Change Performance Index ("CCPI") and the Climate Action Tracker.

Ratings on governments (for sovereign issuers) are derived from ESG scores from the World Bank. We compose the 3 different pillars of Environmental, Social and Governance from a weighted normalized Min-Max computation of selected indicators within each pillar. The country scores are used to represent the rating of the sovereign issuer. We employ a subset of 32 (E), 22 (S), and 18 (G) indicators. The chosen indicators used are listed below:

Environment Indicators (3 selected out of 32):

1. CO2 emissions (metric tons per capita);
2. Methane emissions (metric tons of CO2 equivalent per capita);
3. Nitrous oxide emissions (metric tons of CO2 equivalent per capita).

Social Indicators (11 selected out of 22):

1. School enrollment, primary (% gross);
2. People using safely managed drinking water services (% of population);
3. People using safely managed sanitation services (% of population);
4. Access to electricity (% of population);
5. Access to clean fuels and technologies for cooking (% of population);
6. Government expenditure on education, total (% of government expenditure);
7. Life expectancy at birth, total (years);
8. Literacy rate, adult total (% of people ages 15 and above);
9. Income share held by lowest 20%;
10. Labor force participation rate, total (% of total population ages 15-64);
11. Fertility rate, total (births per woman).

Governance Indicators (4 selected out of 18):

1. Government Effectiveness: Estimate;
2. Political Stability and Absence of Violence/Terrorism: Estimate;
3. Regulatory Quality: Estimate;
4. Strength of legal rights index (0 = weak to 12 = strong).
- 5.

Furthermore, it is easier to use proxies for companies than for governments, provided those companies are listed on major stock exchanges. Using the equivalent equity

proxy for corporate issuers which have equity listings allows us to be more consistent with the equity scores. The metrics used for ESG scoring of corporate bonds (with equity listings) are drawn from the similar list of providers, including:

- Bloomberg ESG;
- MSCI ESG;
- Sustainalytics ESG.
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8. Data sources and processing

To measure the attainment of the environmental or social characteristics promoted by this financial product, RSEUAB employs data from a variety of leading external data providers, specializing in sustainability analyses, such as Bloomberg, MSCI and Sustainalytics. This is supplemented through the use of reputable independent third-party reports, including the World Bank ESG Ratings, the Notre Dame Global Adaptation Initiative Country Index ("ND-GAIN"), GHG Sovereign Emissions, Net Zero Alignment - Germanwatch's Climate Change Performance Index ("CCPI"), and the Climate Action Tracker. Funds are then carefully handpicked based on computed scores - where sufficient ESG metrics are unavailable, the fund is not considered for the shortlisted selection. For example, for assessing which fixed-income instruments should be included in the fund selection, we use the World Bank ESG dataset (a customizable calibration describing the three main pillars of E, S, and G) to formulate ESG scores for sovereign issuers and their respective agencies.

Please note that the data sourced from external providers is not differentiated based on estimated and reported data, making it challenging to precisely calculate the proportion of data that is estimated. Therefore, the proportion of estimated data used at a given point in time is not currently tracked for ESG portfolios.

Please see the Methodology section for details on how this data is used by the analysts to produce a final list of funds to be included in the asset allocation, and the Due Diligence section for information on quality controls employed.

9. Limitations to methodologies and data

In today's digital landscape, gathering high-quality ESG data remains a challenge. Key limitations to the methodology employed may include the following:

- limited data availability and/or granularity, largely because reporting is often not mandatory for smaller and/or private companies;
- inconsistent data quality and inadequate auditing of company disclosures;
- absence of a unified standard framework across jurisdictions, including differing terminology and definitions (e.g. between the EU and the U.S.);
- inconsistencies and lack of comparability in available data from different providers due to varied proprietary methodologies;
- ESG data and ratings remain unavailable for certain asset classes.

Nonetheless, RSEUAB's focus on available data ensures that investments align with the ESG portfolios' overarching environmental or social objectives, even if some specific data points may be limited. The methodology prioritizes reliable data sources and considers qualitative factors, to obtain a more comprehensive view of sustainability practices. Furthermore, funds, for which there are no sufficient ESG metrics available, are not considered for the shortlisted selection.

To address these limitations, we also intend to continue closely monitoring key developments in ESG data metrics, refining our approach as needed to integrate new information and enhance our methodology.

10. Due diligence

As a portfolio manager, RSEUAB conducts due diligence on the underlying assets by ensuring that investment restrictions for the financial product are adhered to, particularly those related to defined final selection criteria, including SFDR classification, ESG rating threshold and labels, and defined minimum E, S, and G pillar scores, derived from a subset of selected E, S, and G indicators from the World Bank ESG database.

Note that all underlying assets selected must have some measure of environmental, social, and governance characteristics, as described, before they are even shortlisted for consideration. This means that only assets that fulfill these baseline ESG selection standards will proceed to the next stages of evaluation or consideration for inclusion in the Portfolios.

The composition of the Portfolio is regularly monitored by an external provider as well as through an internal register to ensure that the funds selected remain consistent with the ESG characteristics they have disclosed to be aligned with.

11. Engagement policies

At this stage, engagement is not a part of the environmental and/or social investment strategy or characteristics of this product.

12. Designated reference benchmark

At this moment, no specific reference benchmark has been designated to attain environmental and/or social characteristics.

Change log

Version number	Date of publication	Description of changes made
Version 1	4.11.2024	First version
Version 2	26.02.2026	Annual review: correction of SFDR Art. 8 portfolio-level coverage

Information in these product-level Disclosures should not be understood as investment advice or personal recommendation. These Disclosures do not provide any indication of current or future performance of the Portfolio nor do they represent its potential risk and return profile. Revolut Securities Europe UAB does not guarantee that your investment objectives will be achieved or that the Portfolio will generate returns or that negative returns can or will be avoided in the Portfolio. Past performance or future projections of individual instruments or Portfolios is not a guarantee or reliable indicator of future results. Investing involves risk, therefore, your Portfolio may lose value and you may not get back the amount invested.