Sustainability-related Disclosures

In accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**EU Sustainable Finance Disclosure Regulation**”, “**SFDR**”)
Please note that the information provided below must be disclosed in accordance with applicable law and does not constitute promotional material.

Effective from 29 January 2024.
Last updated on 17 May 2024.

Background

The EU Sustainable Finance Disclosure Regulation, including its supplementary regulatory technical standards aim to improve transparency in the market for sustainable investment products by mandating certain disclosures on sustainability from financial market participants, including investment firms providing the service of portfolio management. Revolut Securities Europe UAB (“RSEUAB”) is a Lithuania-based investment firm, authorised and regulated by the Bank of Lithuania. Among other investment services, RSEUAB uses an automated digital solution Robo-advisor to provide portfolio management services to its EEA clients. These disclosures outline RSEUAB’s approach to ensuring compliance with applicable SFDR requirements.

Integration of sustainability risks in the remuneration policy (Article 5 of SFDR)

"Sustainability risk" refers to an environmental, social, or governance event or condition whose occurrence would lead to an actual or potential negative impact on the value of an investment.

At RSEUAB, we are committed to responsible risk management, including incorporating sustainability risk considerations into our remuneration policy to promote sound decision-making and risk management.

Our remuneration framework aims to recognise and reward positive behaviors and responsible risk management. Our group values, policies, and regular mandatory training encourage the consideration of environmental and social impact in everyday business decisions.

The consideration of ESG impact is a part of the performance-based determination of variable remuneration at RSEUAB. Compliance with group ESG Policy principles and completion of mandatory ESG e-learning is required. Failure to meet training obligations may lead to disciplinary action and potential bonus ineligibility. Proactive management of sustainability risks and innovative ESG-related contributions may positively impact employee performance review and bonus eligibility.

Please note that this section may be updated periodically. It serves informational purposes and does not replace the complete summary of our Remuneration Policy.

In case of any inconsistency between this section, the Remuneration Policy, or any agreements between RSEUAB and its clients, the latter documents shall prevail. This disclosure does not constitute legal advice, and RSEUAB accepts no liability for actions taken or refrained from in reliance on this information.

No consideration of adverse impacts of investment decisions on sustainability factors (Article 4 of SFDR)

"Sustainability factors" are defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. "Principal Adverse Impacts" ("PAI") entail any adverse effects that an investment may have on these sustainability factors. Therefore, PAI indicators consist of metrics designed to illustrate the sustainability risks associated with specific investments.

As of the present date, Revolut Securities Europe UAB does not consider principal adverse impacts of its investment decisions on sustainability factors.

Complexity associated with the availability and collection of PAI data contribute to the exclusion of PAI consideration on sustainability factors. PAIs often demand a substantial amount of data for their calculation, and the available data may vary in reliability, depending on its source.

At this time, we cannot offer portfolios tailored to clients with sustainability preferences. This decision is subject to ongoing review and will be formally reassessed on an annual basis.

Transparency of integration of sustainability risks (Article 3 of SFDR)

"Sustainability risk" refers to an environmental, social or governance event or condition that, if it occurs, would cause a negative material impact on the value of an investment. **As of the present date, Revolut Securities Europe UAB has not integrated sustainability risks into its investment decision-making process.**

We consider the integration of sustainability risk in our investment decision making process as an essential next step in the further development of our portfolio management services. The present challenge lies in the varying quality and inconsistency of environmental, social, and governance ("ESG") data, driven by evolving corporate reporting standards and the diverse methodologies employed by different ESG data providers. As a small investment firm, RSEUAB relies on leveraging the support of external ESG research and rating providers; however, we consider the integration of vendor data with proprietary analysis systems as essential in gaining the deeper insight of ESG metrics required to successfully integrate sustainability risks into its investment decision-making process.

Currently, RSEUAB has not yet developed an in-house sustainability risk assessment framework to provide ESG-integrated investment decisions that meet our clients' sustainability objectives. Therefore, at this time, we cannot offer portfolios tailored to clients with sustainability preferences. However, we are currently working on incorporating sustainability considerations into our due diligence and model portfolio construction processes to offer portfolios with ESG focus, suitable to our clients' with sustainability preferences in the near future.