

Sustainability-related Disclosures (product-level)

This version of our Sustainability-related Disclosures (the “**Disclosures**”, “**Website Disclosures**”) will apply from 4 November, 2024.

The Disclosure applies to all ESG portfolios offered by Revolut Securities Europe UAB:

- Sustainably Defensive
- Sustainable and Steady
- Conscious Equilibrium
- Bold and Sustainable
- Impactful Growth

For entity-level Sustainability-related Disclosures, please consult [this page](#). To learn more about the environmental, social, and governance (“**ESG**”) related concepts, please see the [Explanation of Sustainability Preferences](#) and related [FAQs](#).

These Disclosures are prepared 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 is disclosed in accordance with applicable law for transparency and informational purposes, and does not constitute promotional material. The Disclosures should be considered together with other [product documentation](#).

Effective from 4 November 2024.

Last updated on 4 November 2024.

1. Summary

Revolut Securities Europe UAB (“**RSEUAB**”, “**us**”, “**we**”, “**our**”) provides discretionary portfolio management services via Robo-Advisor.

The [Robo-Advisor Terms](#) together with our [Trading Terms](#), the [Pre-contractual Disclosure](#), the respective Portfolio Strategy Report, and any other document or terms

and conditions which apply to the client's ("**you**", "**yours**") Investment account, form a legal agreement between the client and us. After completing the suitability assessment, the client is presented with the most suitable available investment strategy based on the information provided during the assessment. We build, oversee, and manage the portfolio on the client's behalf in accordance with the investment strategy.

However, due to limited environmental ("E"), social ("S"), and governance ("G") data available, we cannot guarantee that the recommended risk profile-aligned investment strategy matches the client's specified individual sustainability preferences. Where the client indicates interest in aligning their investments with sustainability features, the client - subject to the relevant suitability assessment and, if relevant and agreed, adaptation of sustainability preferences - has the opportunity to invest in portfolios with underlying assets that promote environmental or social characteristics (or a combination of those characteristics), with investee companies that follow good governance practices (the "**ESG portfolios**, the "**Portfolios**").

ESG portfolios are investment strategies designed for investors who wish to better align their financial objectives with other considerations, such as the investee companies' impact on the environment, their social practices, or the effectiveness of their governance structures (the "**ESG Investment Strategy (-ies)**").

Currently, RSEUAB offers the following ESG portfolios, depending on the individual financial situation, investment experience and knowledge, investment objectives, and risk tolerance of the client, as determined during the suitability assessment:

- Sustainably Defensive;
- Sustainable and Steady;
- Conscious Equilibrium;
- Bold and Sustainable;
- Impactful Growth.

As the same methodology for the selection of underlying assets with ESG characteristics applies to all currently available ESG Investment Strategies, standardized Pre-contractual and Website Disclosures have been prepared in accordance with Article 10 of the SFDR.

The ESG Investment Strategies offered by RSEUAB promote environmental, social and good governance characteristics; however, they do not have sustainable

investment as an objective within the meaning of Article 9 of the SFDR, and they also do not make investments into environmentally sustainable economic activities.

The ESG Investment Strategies promote environmental, social and good governance characteristics by allocating a significant portion of investments (at least 75%, classified as promoting E/S characteristics) to SFDR Article 8 funds, with underlying investments in companies that should help attain the environmental or social characteristics promoted by the fund, follow good governance, and are on the path toward greater sustainability, particularly in working toward achieving net-zero goals. The remaining portion of assets in the Portfolio (up to 25%, classified as 'Other' investments) may include carefully selected SFDR Article 6 funds, which have undergone a comprehensive screening to ensure that these Funds meet a defined minimum threshold of a robust internal ESG proxy. RSEUAB has not designated a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product.

For equity-based funds and fixed income-based (bonds) funds considered for the ESG Investment Strategies, RSEUAB has utilised ESG metrics from independent providers (Bloomberg, MSCI, etc.) and proxies using country scores for sovereign instruments and underlying equity scores for corporate instruments used to compile own internal ESG scores, respectively. This has been combined with independent third-party reports and assessments to assess which funds should be included in the final selection.

RSEUAB maintains regular oversight over Portfolio composition, substituting any funds that no longer meet the defined criteria. Similarly, RSEUAB is committed to addressing the key limitations of ESG data (limited availability, inconsistent quality, lack of standardization across regions, discrepancies in provider methodologies, and gaps coverage for some asset classes) by closely monitoring key developments and integrating new data into the methodology, as needed. With regards to engagement policies, engagement is not promoted as part of the environmental and/or social characteristics of this product.

Information on the investment policy of each financial instrument within the ESG portfolio, specified by the product manufacturer, may be found in the documentation of the respective financial 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 (up to 25%) 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 at

least 75% of each ESG portfolio consists of Article 8 ETFs. 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 the binding elements of our ESG Investment Strategy, the minimum proportion of Article 8 funds (promoting environmental and/or social characteristics) is 75%.

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.

75% 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 25% 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 performance 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 at least 75% of Article 8 funds (meaning, a minimum 75% 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).

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.

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 1.0.0	4.11.2024	First version

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.

