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Raiffeisen

Summary changes for the Website disclosure of R-Gestion Sustainable

This financial product has the objective to make sustainable investments (Art. 9_SFDR)

Summary

As part of our ongoing commitment to transparency and continuous improvement in ESG investing, Raiffeisen, also referred to as "the Bank", has updated the pre-contractual documents and website disclosures for R-Gestion Sustainable. This revised document reflects enhancements in our approaches and provides greater detail, precision, and clarity regarding our investment strategies and processes. These changes were possible thanks to a better understanding of the different regulations linked to sustainable finance, and of ESG investing, but also a better access to ESG data.

The first change is about further specifying the sustainable investment objective, and therefore the Sustainable Development Goals (SDGs) targeted, by R-Gestion Sustainable. The financial product has a commitment to environmental objectives linked to the Affordable and Clean Energy (SDG 7) and Climate Action (SDG 13), as well as social objectives linked to No Poverty (SDG 1), Zero Hunger (SDG 2), Good Health and Well-being (SDG 3), Clean Water and Sanitation (SDG 6), and Sustainable Cities and Communities (SDG 11).

Another key improvement concerns the new asset allocation for this financial product, which now targets a minimum of 80% of net assets with a sustainable investment objective, compared to 60% before, for which at least 40% will be aligned with the environmentally sustainable objectives and at least 10% will be aligned with the socially sustainable investment objectives. Then, at least 2.5% of net assets should be aligned with the EU Taxonomy.

Raiffeisen was also able to refine its methodologies. The disclosure now further details both the quantitative data received from fund providers as well as the qualitative assessments conducted. Raiffeisen further stipulates how the Bank strives to maintain data quality and consistency, despite identified limitations which shall be mitigated in the future. More explicit details about the role of third-party ESG data providers and their methodologies to further enhance transparency have been included.

The exclusion and screening policies have been strengthened. The exclusion list now includes:

- jurisdictions identified by the Financial Action Task Force (FATF) as high-risk,
- thermal coal and coal power generation (10% revenue limit), and
- nuclear power, under soft exclusions, (10% revenue limit).

The updated policy provides a clearer distinction between hard exclusions, which are absolute, and soft exclusions, which allow limited exposure under specific conditions. Furthermore, the disclosure outlines the use of MSCI ESG data and other sources to ensure compliance with exclusion policies.

While the fundamental approaches to engagement and voting have not changed, the new disclosure provides more detailed information about these practices, outlining specific questions and procedures to maintain transparency and accountability with fund managers.

Finally, the due diligence framework has been made more comprehensive, with structured processes for annual reviews and engagement, supporting the improvement of the Bank's ESG practices.

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