



RITRANSPARENCY REPORT 2016

VERKA VK Kirchliche Vorsorge VVaG





About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the PRI website, ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six <u>Principles for Responsible Investment</u>. It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
6	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ъ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.



Principles Index

Organisational Overview							Principle				
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6		
OO 01	Signatory category and services	✓	Public							✓	
OO 02	Headquarters and operational countries	✓	Public							✓	
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓	
OO 04	Reporting year and AUM	✓	Public							✓	
OO 05	Breakdown of AUM by asset class	~	Asset mix disclosed in OO 06							✓	
OO 06	How would you like to disclose your asset class mix	✓	Public							✓	
OO 07	Fixed income AUM breakdown	✓	Private							✓	
OO 08	Segregated mandates or pooled funds	✓	Private							✓	
OO 09	Breakdown of AUM by market	✓	Private							✓	
OO 10	Additional information about organisation	✓	Private							✓	
00 11	RI activities for listed equities	✓	Public							✓	
00 12	RI activities in other asset classes	✓	Public							✓	
OO 13	Modules and sections required to complete	✓	Public							✓	

Strategy	and Governance	nce Principle (General		
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	1	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	RI goals and objectives	✓	Public							✓
SG 05	Main goals/objectives this year	✓	Private							✓
SG 06	RI roles and responsibilities	✓	Public							✓
SG 07	RI in performance management, reward and/or personal development	1	Private							✓
SG 08	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09	Promoting RI independently	✓	Public				✓			
SG 10	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 11	ESG issues in strategic asset allocation	✓	Private	✓						
SG 12	Long term investment risks and opportunity	✓	Private	~						
SG 13	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 14	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 15	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 16	RI/ESG in execution and/or advisory services	8	n/a	✓	✓					
SG 17	Innovative features of approach to RI	✓	Private							✓
SG 18	Internal and external review and assurance of responses	✓	Private							✓

Indirect – Manager Selection, Appointment and Monitoring							cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	Role of investment consultants/fiduciary managers	✓	Public				✓			
SAM 02	RI factors in selection, appointment and monitoring across asset classes	✓	Public							✓
SAM 03	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Private							✓
SAM 04	ESG incorporation strategies	✓	Public	✓	✓					
SAM 05	Selection processes (LE and FI)	✓	Public	✓					✓	
SAM 06	Appointment considerations (LE and FI)	✓	Private				✓			
SAM 07	Monitoring processes (LE and FI)	✓	Public	✓						
SAM 08	Percentage of (proxy) votes cast	8	n/a		✓					
SAM 09	Selection processes (PE, PR and INF)	✓	Public	✓					✓	
SAM 10	Appointment considerations (PE, PR and INF)	✓	Private				✓			
SAM 11	Monitoring processes (PE, PR and INF)	✓	Public	✓					✓	
SAM 12	Percentage of externally managed assets managed by PRI signatories	✓	Private	✓					✓	
SAM 13	Examples of ESG issues in selection, appointment and monitoring processes	✓	Private		✓					
SAM 14	Disclosure of RI considerations	✓	Public						✓	

Direct -	Fixed Income			Principle						General	
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6		
FI 01	Breakdown by passive,active strategies	✓	Private							✓	
FI 02	Option to report on <10% assets	8	n/a							✓	
FI 03	Breakdown by market and credit quality	✓	Private							✓	
FI 04	Incorporation strategies applied	✓	Public	✓							
FI 05	ESG issues and issuer research	✓	Private	✓							
FI 06	Processes to ensure analysis is robust	✓	Public	✓							
FI 07	Types of screening applied	✓	Public	✓							
FI 08	Negative screening - overview and rationale	✓	Public	~							
FI 09	Examples of ESG factors in screening process	✓	Private	✓							
FI 10	Screening - ensuring criteria are met	✓	Public	✓							
FI 11	Thematic investing - overview	✓	Private	✓							
FI 12	Thematic investing - themed bond processes	✓	Public	✓							
FI 13	Thematic investing - assessing impact	✓	Public	✓							
FI 14	Integration overview	✓	Public	✓							
FI 15	Integration - ESG information in investment processes	✓	Public	✓							
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓							
FI 17	ESG incorporation in passive funds	8	n/a	✓							
FI 18	Engagement overview and coverage	✓	Private		✓						
FI 19	Engagement method	✓	Private	✓	✓						
FI 20	Engagement policy disclosure	✓	Private	✓	✓						
FI 21	Financial/ESG performance	✓	Private							✓	
FI 22	Examples - ESG incorporation or engagement	✓	Private	✓	✓						
FI 23	Communications	✓	Public		✓				✓		

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Reported Information

Public version

Organisational Overview

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.



Basic Information 00 01 **Mandatory** Gateway/Peering General Select the category which best represents your primary activity. 00 01.1 Non-corporate pension or superannuation or retirement or provident fund or plan O Corporate pension or superannuation or retirement or provident fund or plan O Insurance company Foundation O Endowment O Development finance institution O Reserve - sovereign or government controlled fund O Family office \bigcirc Other, specify 00 01.2 Additional information. [Optional]

VERKA VK is a pension fund but is also subject to regulatory obligations for insurance companies in Germany.

OO 02	Mand	latory	Peering	General
00 02	2.1	Select the location of your organisation's headqu	uarters.	
Germany	у			
00 02	2.2	Indicate the number of countries in which you ha	ave offices (including your headquarters	s).
• 1				
○ 2-5				
○ 6-1	0			
○ >10)			
00 02	2.3	Indicate the approximate number of staff in your	organisation in full-time equivalents (F	TE).
		FTE		
60				
OO 03	Mand	latory	Descriptive	General

00 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

O Yes

No

OO 03.3

Additional information, [Optional]

We have two companies within our organisation for which we provide the organization and management including investment services. We also provide investment advisory for ecclesiastical utilities.

OO 04 Mandatory Gateway/Peering General

00 04.1

Indicate the year end date for your reporting year.

31/12/2015

00 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on, and advisory/execution only assets.

	trillions	billions	millions	thousands	hundreds
Total AUM		1	481	685	877
Currency	EUR				
Assets in USD		1	615	342	568

OO 04.5

Additional information. [Optional]

The figures are preliminary.

OO 06 Mandatory Descriptive General

00 06.1

To contextualise your responses to the public, indicate how you would like to disclose your asset class mix.

Publish our asset class mix as percentage breakdown

	Internally managed (%)	Externally managed (%)
Listed equity	0	5
Fixed income	50	30
Private equity	0	1



Property	0	5
Infrastructure	0	2
Commodities	0	0
Hedge funds	0	1
Forestry	0	2
Farmland	0	0
Inclusive finance	0	0
Cash	4	0
Other (1), specify	0	0
Other (2), specify	0	0

O Publish our asset class mix as broad ranges

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 06.3 Additional information. [Optional]

The figures are provisional.

	Gatev	way a	sset class implementation indicators		
001	1	Mar	ndatory	Gateway	General
	00 11	.1	Select your direct or indirect ESG incorporation equities in the reporting year.	activities your organisation implemented	d, for listed
	✓ V	Ve ado	dress ESG incorporation in our external manager s	election, appointment and/or monitoring	processes
			not incorporate ESG in our directly managed listed tion in our external manager selection, appointmen		



00 11.2	Select your direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.
☑ We enç	gage with companies on ESG issues via our staff, collaborations or service providers
	uire our external managers to engage with companies on ESG issues on our behalf
□ We do	not engage directly and do not require external managers to engage with companies on ESG factors.
00 11.3	Select your direct or indirect voting activities your organisation implemented for listed equity in the reporting year
☐ We cas	st our (proxy) votes directly or via dedicated voting providers
☑ We req	uire our external managers to vote on our behalf
□ We do	not cast our (proxy) votes directly and do not require external managers to vote on our behalf
00 11.5	Additional Information [Optional]

activities are carried out by external fund managers in cooperation with specialized agencies and the ESG Coordination Point at the Evangelical Church in Germany which is itself supported by specialised companies.

OO 12 Mandatory General

OO 12.1 Select investm

Select internally managed asset classes where you implemented responsible investment into your investment decisions and/or your active ownership practices (during the reporting year)

- ☑ Fixed income SSA
- ☑ Fixed income corporate (financial)
- ☑ Fixed income securitised
- ☑ Cash
- □ None of the above

00 12.2

Select externally managed assets classes where you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year)

- ☑ Fixed income SSA
- ☑ Fixed income corporate (financial)
- $\ensuremath{\square}$ Fixed income corporate (non-financial)
- ☑ Fixed income securitised
- ☑ Private equity
- ☑ Property
- ✓ Infrastructure
- $\ensuremath{\square}$ Hedge funds
- ☐ None of the above



00 12.3

00

Additional information. [Optional]

Last year, the process of internal credit risk assessment concerning direct investments in fixed income has been extended to an explicit ESG assessment. Since last year, all fixed-income funds pursue Best-in-class approaches. Moreover, in all external funds ESG concepts are applied, there are certain requirements to managers and debtors including reporting. This also applies to the new investments of VERKA in Private Equity, Property, Infrastructure, Hedge funds and the Timber fund. The investments must always comply with the sustainability requirements of VERKA and are ideally certified.

13	Man	ndatory	Gateway	General
You wi report		to make a selection in OO 13.1onlyif you have	any voluntary modules that you can	choose to
00 1	3.1	You are only required to report on asset classes may report voluntarily on any applicable module		
		Core modules		
√	Organis	sational Overview		
	_	y and Governance		
		RI implementation directly or via service provide	ders	
		Direct - Listed Equity active ownership		
	□ Enga	agements		
		Direct - Fixed Income		
	☑ Fixed	d income - SSA		
	☑ Fixed	d income - Corporate (financial)		
	☑ Fixed	d income - Securitised		
		RI implementation via external managers		
		Indirect - Selection, Appointment and Monito	pring of External Managers	
	☑ Liste	d Equities		
	☑ Fixed	d income - SSA		
	☑ Fixed	d income - Corporate (financial)		
	☑ Fixed	d income - Corporate (non-financial)		
	☑ Fixed	d income - Securitised		
	☑ Priva	ate Equity		
	☑ Prop	erty		
	✓ Infras	structure		



Closing module

☑ Closing module

00 13.2

Additional information. [Optional]

As noted above, we carry out comprehensive internal ESG assessments by regarding direct investments in Fixed income SSA. In addition to specified exclusion criteria, an implicit best-in-class approach is implemented. To this end, all available ESG-related information and data are analyzed including sustainability reports. A similar procedure is related to external funds for listed Equities. Here the manager works with MSCI as external service provider and uses their SRI indices. Indirect investments in Fixed income - Corporate (financial) and Fixed income - Securitised run through a cut-off filter and a similar best-in-class approach, taking into account ESG scores and ratings. Indirect investments in Private Equity and Infrastructure must comply with the sustainability requirements. Not suitable properties are excluded. Real Estate / property in external funds should be built CO2-neutral as possible, energy-efficient and environmentally conscious. Ideally, green building standard will be sought.

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Reported Information

Public version

Strategy and Governance

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Responsible investment policy

SG 01 Mandatory Core Assessed General

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
☑ Policy setting out your overall approach	Applicable policies cover all AUM
☑ Formalised guidelines on environmental factors	O Applicable policies cover a majority of AUM
	O Applicable policies cover a minority of AUM
☑ Formalised guidelines on corporate governance factors	
✓ Asset class-specific guidelines	
☑ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☑ Engagement policy	
☑ (Proxy) voting policy	
☐ Other, specify (1)	
☐ Other, specify(2)	
	I

SG 01.3 Inc	dicate what	t norms h	iave you used	I to deve	lop yo	ur RI	polic	СУ
-------------	-------------	-----------	---------------	-----------	--------	-------	-------	----

- $\ensuremath{\,\boxtimes\,}$ UN Global Compact Principles
- $\ensuremath{\square}$ UN Guiding Principles on Business and Human Rights
- ☑ Universal Declaration of Human Rights
- ☑ International Bill of Human Rights
- ☑ International Labour Organization Conventions
- $\ensuremath{\square}$ United Nations Convention Against Corruption
- ☐ OECD Guidelines for Multinational Enterprises
- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above



SG 01.4

Provide a brief description of the key elements of your investment policy that covers your responsible investment approach [Optional].

We focus on the ESG Guide of the Evangelical Church in Germany. This was drawn up by a working group of the Church, which also includes VERKA and is constantly evolving. Here you find the above elements into account explicitly or implicitly. The resulting accounting RI principles were further clarified in the context of the internal of VERKA and include the entire investment portfolio. A distinction is made according to asset classes and instruments, issuers and borrowers, industries, sectors, etc., and different forms of RI measures.

 \bigcirc No

SG 01.5

Additional information [Optional].

The will be continuously developed and adapted to changing framework and market conditions.

SG 02 Mandatory Core Assessed PRI 6

SG 02.1

Indicate which of your investment policy documents (if any) are publicly available. Provide URL and an attachment of the document.

☑ Policy setting out your overall approach

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

Attachment [Optional]

Nachhaltigkeitsbericht_VERKA_VK_2014.pdf

Information Nachhaltigkeit Kapitalanlage VERKA VK 290714 Internet.pdf

Auszug KAR 5 Nachhaltigkeit.pdf

☑ Formalised guidelines on environmental factors

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

 $\ensuremath{\square}$ Formalised guidelines on social factors

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

☑ Formalised guidelines on corporate governance factors



URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

 $\ oxdot$ Asset class-specific guidelines

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

☑ Sector specific RI guidelines

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

☑ Screening / exclusions policy

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

☑ Engagement policy

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

☑ (Proxy) voting policy

URL

https://www.ekd.de/download/ekd_texte_113_2013.pdf

 $\hfill\square$ We do not publicly disclose our investment policy documents

SG 03 Mandatory Core Assessed General

SG 03.1

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes



SG 03.2

Describe your policy on managing potential conflicts of interest in the investment process.

Our policy on managing potential conflicts of interest in the investment process is part of our internal general investment policy. Accordingly, it concerns with the safety, profitability, liquidity and sustainability to equal investment principles. The safety, quality and sustainability of each investment go in doubt before speculative profit targets. Under the perspective of sustainability not suitable investments are excluded, even if the target yield is above average. Conflicts of interest are to be avoided in any case. This includes external fund managers, issuers and debtors.

 \bigcirc No

Objectives and strategies SG 04 Mandatory Gateway/Core Assessed General Indicate if and how frequently your organisation sets and reviews objectives for its responsible SG 04.1 investment activities. O Quarterly or more frequently O Biannually ○ Annually O Less frequently than annually Ad-hoc basis O It is not reviewed Additional information. [Optional] SG 04.2

Objectives for responsible investment activities are a result from the investment strategy and planning. These are continually reviewed and adjusted to changing market conditions and framework. Sustainability strategy is part of it. Even if things change from one day to another, they will be checked with regard to a possible impact on the sustainable investment objectives.

Governance and human resources									
SG 06 Mandat			ndatory	Core Assessed	General				
	SG 06.	.1	Indicate the roles present in your organisation a and/or implementation responsibilities for respon	nd for each, indicate whether nsible investment.	they have oversight				



	Roles present in your organisation
	nembers or trustees
☑ Ov	ersight/accountability for responsible investment
☑ Imp	plementation of responsible investment
□ No	oversight/accountability or implementation responsibility for responsible investment
☑ Chief Ex	xecutive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
☑ Ov	ersight/accountability for responsible investment
☑ Imp	plementation of responsible investment
□ No	oversight/accountability or implementation responsibility for responsible investment
☐ Other C	hief-level staff or head of department, specify
✓ Portfolio	managers
☑ Ov	ersight/accountability for responsible investment
☑ Imp	plementation of responsible investment
□ No	oversight/accountability or implementation responsibility for responsible investment
□ Investm	ent analysts
☑ Dedicate	ed responsible investment staff
☑ Ov	ersight/accountability for responsible investment
□ Im _l	plementation of responsible investment
□ No	oversight/accountability or implementation responsibility for responsible investment
	I managers or service providers
☑ Ov	ersight/accountability for responsible investment
☑ Imp	plementation of responsible investment
□ No	oversight/accountability or implementation responsibility for responsible investment
☐ Investor	relations
☐ Other ro	ole, specify
☐ Other ro	ole, specify
SG 06.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.
part of the gene part, beginning	s of the roles of the different persons and organizations mentioned above in respect of RI topics are ral investment policy und there especially the investment process description, where all of them take with the RI-strategy adopted by the board members and ending with ESG service providers which rith external managers of our funds.
SG 06.3	Indicate the number of dedicated responsible investment staff your organisation has.

PRII Principles for Responsible Investment

4

Number

SG 06.4

Additional information. [Optional]

Two employees work in the front, the other two in the back office of the investment department

	Promoting responsible investment									
SG 0	8	Man	ndatory	Core Assessed	PRI 4,5					
New selection options have been added to this indicator. Please review your prefilled responses ca										
	SG 08.	.1	Select the collaborative organisation and/or initial which it participated during the reporting year, as		nember or in					
			at apply for Responsible Investment							
	Your organisation's role in the initiative during the reporting period (see definitions)									
		☑ Ba	asic							
	☐ Moderate									
		□ Ac	dvanced							

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

2015 VERKA took part in an engagement-action for Vedanta in community with other asset owners and asset managers from among the PRI signatories.

□ AFIC – La Commission ESG
☐ Asian Corporate Governance Association
☐ Australian Council of Superannuation Investors
□ BVCA – Responsible Investment Advisory Board
□ CDP Climate Change
□ CDP Forests
□ CDP Water
☐ CFA Institute Centre for Financial Market Integrity
□ Code for Responsible Investment in SA (CRISA)
☐ Council of Institutional Investors (CII)
☐ ESG Research Australia
□ Eumedion
□ EVCA – Responsible Investment Roundtable
☐ Extractive Industries Transparency Initiative (EITI)
☐ Global Investors Governance Network (GIGN)
☐ Global Impact Investing Network (GIIN)
☐ Global Real Estate Sustainability Benchmark (GRESB)
☐ Institutional Investors Group on Climate Change (IIGCC)
☐ Interfaith Center on Corporate Responsibility (ICCR)
☐ International Corporate Governance Network (ICGN)
☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
☐ International Integrated Reporting Council (IIRC)
☐ Investor Network on Climate Risk (INCR)/CERES
□ Local Authority Pension Fund Forum
☐ Principles for Financial Action for the 21st Century
\square Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
☐ Shareholder Association for Research and Education (Share)
☐ United Nations Environmental Program Finance Initiative (UNEP FI)
☐ United Nations Global Compact
☑ Other collaborative organisation/initiative, specify



Arbeitsgemeinschaft für betriebliche Altersversorgungg e.V. (aba)

	Your organisation's role in the initiative during the reporting year (see definitions)
☐ Basic	
✓ Mode	rate
☐ Advar	nced
Other collaboration ✓ Other collaboration Other collaboration	rative organisation/initiative, specify
Gesamtverba	nd der Deutschen Versicherungswirtschaft e.V. (GDV)
	Your organisation's role in the initiative during the reporting year (see definitions)
☐ Basic	
	rate
☐ Advar	nced
Other collabo	rative organisation/initiative, specify
	nschaft der Versicherungsvereine auf Gegenseitigkeit e.V. (ARGE)
	Your organisation's role in the initiative during the reporting year (see definitions)
☐ Basic	
	rate
☐ Advar	nced
Other collaboration ✓ Other collaboration Other collaboration	rative organisation/initiative, specify
Arbeitskreis k	Circhliche Investments (AKI)
	Your organisation's role in the initiative during the reporting year (see definitions)
☐ Basic	
☐ Mode	rate
	nced
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
	ot a leading role in RI topics and further developing of the guidelines for sustainable investments
of the Evange	elical Church in Germany
SG 08.2 A	dditional information. [Optional]
VERKA also atte	ends meetings and lectures of different sustainability organizations and holds itself guest lectures
on RI topics	



PRI 4

Core Assessed

Mandatory

SG 09

SG 09.1

Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

□ Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
□ Provided financial support for academic or industry research on responsible investment
□ Encouraged better transparency and disclosure of responsible investment practices across the investment industry
□ Spoke publicly at events and conferences to promote responsible investment
□ Wrote and published in-house research papers on responsible investment
□ Encouraged the adoption of the PRI
□ Wrote articles on responsible investment in the media.
□ Other, specify

 \bigcirc No

SG 09.3 Additional information. [Optional]

VERKA has e.g. contributed to the costs of a scientific study on the effectiveness of sustainability rating agencies and posted articles for the trade press as "Responsible Investor", "dpn" and "Portfolio Institutionell"

Implementation not in other modules

SG 14 Mandatory Descriptive General

SG 14.1

Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Cash	Possibilities of expansion of the investment portfolio within the ESG requirements and criteria of VERKA and of new RI topics investments are checked. Speaking to asset managers, other asset owners and specialized ESG providers new RI Topics Investments are elicited as currently a possible investment in energy storage.

SG 15 Mandatory Descriptive General

SG 15.1

Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.



Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Hedge funds	VERKA is invested in a FoHF. Before investing we checked if the investment satisfies the specific requirements of the guidelines of the Evangelical Church in Germany to sustainable hedge fund investments.
Forestry	See above the details about the sustainable forest fund investment of VERKA



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Reported Information

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Indirect – Manager Selection, Appointment and Monitoring

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	Overview									
SAM	01	Mar	ndatory	Core Assessed	PRI 4					
	SAM 0	1.1	Indicate whether your organisation uses investm	nent consultants and/or fiduciary manag	jers.					
	□ Y	es, we	e use investment consultants							
	□Y	es, we	e use fiduciary managers							
	☑ No									
SAM	02	Mar	ndatory	Gateway	General					

SAM 02.1

Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring

Select all that apply

Asset classes	(a) Selection	(b) Appointment	(c) Monitoring
Listed equity	V	V	\checkmark
Fixed income - SSA	\checkmark	V	V
Fixed income - Corporate (financial)	V	\checkmark	V
Fixed income - Corporate (non-financial)	V	7	V
Fixed income - Securitised	V	V	V
Private equity	V	\checkmark	V
Property	V		\checkmark
Infrastructure	V	V	V



SAM 02.2

Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

VERKA makes beauty contests for the selection of investment managers for all asset classes. In addition to economic factors sustainability aspects are assessed here. VERKA presupposes regularly that investment managers also signed the UN PRI or are based on the principles. This is also considered in the appointment of investment managers. Sustainability issues are enshrined in the Treaty and are part of the prescribed investment guidelines such as sustainable benchmark indices. All investment managers are continuously monitored by VERKA in compliance with these sustainability requirements.

	Liste	d equity	(LE) and Fi	хе	d inco	me (FI)			
	Overv	/iew							
041	104								DDI 4 0
SAN	VI 04	Manda	atory				Gateway		PRI 1,2
	☐ Appeal approved for this indicator								
	SAN	/I 04.1				ollowing ESG incorporati ent on your behalf:	on strategies you require your	external	
			managor(o)						
			Active inve	estr	ment st	rategies			
	Active investment strategies				SSA	Corporate (financial)	Corporate (non-financial)	Securi	tised
		_			\checkmark	\checkmark	\checkmark	\checkmark	
	Screening	9							
					V	N	N	V	

 $\sqrt{}$

Passive investment strategies

 $\sqrt{}$

 $\sqrt{}$



 $\sqrt{}$

Thematic

Integration

None of the above

Passive investment strategies	LE		
Screening	\overline{V}		
Thematic	V		
Integration	V		
None of the above			

	Select	ion			
SAM 05		Manda	atory	Core Assessed	PRI 1-6
		Indicate whether your organisation and/or you following in the manager selection process for		of the	
			General		

	LE	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Review the manager's responsible investment policies		V		Ø	V
Discuss managers' governance and management of responsible investment activities	V	V	☑	Ø	V
Meet staff with responsible investment responsibilities to assess their skills and competence	V	V		☑	V
Discuss minimum responsible investment expectations that managers must meet	V	V	V	V	✓
Discuss the role managers have played in collaborative initiatives			V	v	
Ask whether the organisation is a signatory to the PRI and/or other relevant organisations	V	V			V
Review the manager's responsible investment reporting to clients and/or the public, (excluding PRI)	V	V	☑		V
Review the manager's PRI Transparency or Assessment reports	V	V	V	v	V
Discuss the type of ESG reporting you expect	V	\checkmark	V	\checkmark	V
Assign specific weighting to ESG factors in your manager evaluation	V	V	V	v	V
Other general aspects in your selection process, specify					
None of the above					

ESG incorporation



	LE	SSA	Corporate (financial)	Corporate (non- financial)	Securitised
Evaluate the quality and coverage of ESG research used by managers	V	$\overline{\vee}$	V	V	\checkmark
Assess how the manager incentivises brokers to provide ESG research					
Assess managers' ESG incorporation strategies and ability to identify and manage ESG issues	V	V	V	V	V
Discuss with managers how ESG issues have impacted specific investment decisions and, where relevant, stock or portfolio performance	V	V	V	V	V
Evaluate index providers' ESG incorporation when designing the index	V				
Other ESG incorporation issues in your selection process, specify					
None of the above					

Engagements



	LE	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Discuss with the manager the historic interactions they have had with the investee entities		\checkmark			V
Discuss the comprehensiveness of managers' engagement processes		V	V	V	V
Discuss the role managers have played in influencing investee entities' ESG practices and performance		V	☑		V
Discuss the escalation strategies the manager deploys in case of insufficient ESG performance		V	V	Ø	V
Discuss how information gained through engagement is incorporated into investment decision-making		V	Ø		V
Other engagement issues in your selection process,specify					
None of the above					

(Proxy) voting

	LE
Discuss the managers' voting processes	
Discuss how information gained through research for (proxy) voting is used in investment-decision making	
Discuss whether the manager is able to deploy the asset owner's proprietary voting policy or aligning its voting policy with the asset owner's investment beliefs and strategy	
Other (proxy) voting issues in your selection process, specify	
None of the above	V



SAM 05.2

Please describe the level of experience board members/trustees/chief-level staff have with incorporating ESG factors into investment decision-making processes.

Board members and and chief-level staff of the investment department have a great experience with RI-topics. VERKA

SAM 05.3

Provide additional information relevant to your organisation's selection approach for listed equity and/or fixed income. [Optional]

VERKA promoted the wide sustainable development of investments since 2009. All persons involved have accompanied this process and continuously raise the level. Board member and chief-level staff have many years of investment experience.

	Monito	oring			
SAM 07		Manda	atory	Core Assessed	PRI 1
			Indicate whether your organisation and/or you monitoring of your external manager typically		dialogue and
			General		

	l				
	LE	SSA	Corporate (financial)	Corporate (non- financial)	Securitised
Include responsible investment as a standard agenda item at performance review meetings	V	V			
Highlight examples of good responsible investment practice by other managers	V	V	\square	V	\checkmark
Discuss if the manager has acted in accordance with your overall investment beliefs on responsible investment and ESG issues	V	V	V	V	V
Discuss if the manager has acted in accordance with your organisation's overall strategy on responsible investment and ESG issues	V	V	Ø	V	
Discuss if the manager has acted in accordance with your organisation's overall policy on responsible investment and ESG issues	V	V	V	V	V
Review the manager's responsible investment reporting (excluding PRI)	V	V	V	V	V
Review the manager's PRI Transparency or Assessment reports	V	V	\square	\square	
Review ESG characteristics of the portfolio	V	V		\checkmark	V
Review the impact of ESG issues on financial performance	V	V	V	V	\checkmark
Encourage your managers to consider joining responsible investment initiatives/organisations or participate in collaborative projects with other investors	V	V	V		V
Include responsible investment criteria as a formal component of overall manager performance evaluation	V	V	V	Ø	V
Other general aspects of your monitoring, specify					
None of the above					

ESG incorporation



	LE	SSA	Corporate (financial)	Corporate (non- financial)	Securitised
	\checkmark	V	\checkmark	$\overline{\checkmark}$	V
Request information on ESG incorporation in specific investment decisions					
Other ways you monitor ESG incorporation, specify					
None of the above					

Engagements

	LE	SSA	Corporate (financial)	Corporate (non-financial)	Securitised
Review the ESG information relevant to the engagements		\checkmark	V	V	\checkmark
Discuss the number of engagements and their comprehensiveness		\checkmark	V	V	▽
Discuss the type of role played (i.e. leading or supporting)		\checkmark	V	V	\checkmark
Discuss the outcomes and quantifiable impact of the engagements		V		V	
Review the progress of ongoing engagements and/or outcomes of completed engagements		V	V	V	√
Other ways you monitor engagement activities, specify					
None of the above					

(Proxy) voting



	LE
Review the number or percentage of votes cast	
Request an explanation of reasons for votes cast	
Discuss whether companies were informed of the reasons for votes against management recommendations or abstentions/withheld votes	
Review the number of resolutions on ESG issues filed or co-filed	
Discuss the changes in company practice (outcomes) that have been achieved from voting activities	
Other ways you monitor (proxy) voting activities, specify	
None of the above	V

SAM 07.2

Provide additional information relevant to your organisation's dialogue and monitoring of external managers.

These things are discussed at the regular review meetings and Investment Committee meetings with investment managers.

Private equity (PE), property (PR) and infrastructure (INF)

SAM 09 Mandatory Core Assessed PRI 1-6 SAM 09.1 In your manager selection process for the following assets, indicate whether your organisation and/or your investment consultant typically take any of the following actions. General



	1	1	1
	PE	PR	INF
Used the PRI's LP DDQ during discussions with managers as part of your selection process		n/a	n/a
Review the manager's/general partner's responsible investment policy	V	V	V
Discuss the manager's governance and management of responsible investment	V	V	V
Meet staff with responsible investment responsibilities to assess their skills and competence	V	V	V
Discuss minimum responsible investment expectations that managers must meet	V	V	V
Discuss the role managers have played in collaborative initiatives	V		V
Ask whether the organisation is a signatory to the PRI and/or other relevant organisations	V	V	V
Assess the external manager's reporting and how it will help you to monitor that it is acting consistent with the agreed-upon ESG-related policies and practices during the life of the fund	V	V	V
Review the manager's responsible investment disclosure, excluding PRI reporting	V	V	\checkmark
Review the manager's PRI Transparency or Assessment reports	V	V	V
Assign specific weighting to ESG factors in your manager evaluation, specify in 09.2	V	V	V
Other general aspects in your selection process, specify			
None of the above			

Investment selection (pre-investment) of underlying holding

	PE	PR	INF
Assess the manager's policies, processes and systems for identifying ESG-related value drivers and managing material ESG-related risks pre-investment	V	V	V
Other pre-investment aspects reviewed in your selection process, specify			
None of the above			

Investment monitoring (post-investment) of underlying holding



	PE	PR	INF
Understand if and how the manager influences and supports its portfolio companies'/assets' management of ESG-related risks and pursuit of ESG-related opportunities	V	V	V
Discuss examples of how managers have previously identified and addressed ESG issues in their portfolios on an ongoing basis	V	V	\checkmark
Assess the manager's/general partner's approach to managing and disclosing material incidents at the manager / General Partner and underlying holdings	V	V	V
Other post-investment aspects reviewed in your selection process, specify			
None of the above			

SAM 09.2

Provide additional information on how weighting of ESG factors in your manager evaluation are applied.

ESG factors have the same weight in the evaluation as economic factors like track records and a higher weight than soft facts that have nothing to do with ESG.

	Monitor	ring			
SAM 11		Manda	atory	Core Assessed	PRI 1-6
SAM 11.1		1.1	Indicate whether your organisation, and/or you monitoring of your external manager, typically	ur investment consultant, in the do any of the following:	dialogue and
			General		



	PE	PR	INF
Include responsible investment as a standard agenda item at performance review meetings	V	V	V
Highlight examples of good responsible investment practice by other managers	V	V	V
Review manager's responsible investment reporting excluding PRI	V	V	V
Review the manager's PRI Transparency or Assessment reports	V	V	V
Encourage your managers to consider joining responsible investment initiatives or organisations or participate in collaborative projects with other investors	V	V	V
Include responsible investment criteria as a formal component of overall manager performance evaluation	V		V
Request information on whether your manager's approach to ESG issues has impacted financial performance			
Request information on whether your manager's approach to ESG issues has impacted ESG performance			V
Other general aspects of your monitoring, specify			
None of the above			

Investment selection (pre-investment) of underlying holding

	PE	PR	INF
Discuss how the analysis of ESG issues affected investment decisions during the reporting period	V	V	V
Other ways ESG issues are incorporated in the pre-investment process, specify			
None of the above			

Investment monitoring (post-investment) of underlying holding



	PE	PR	INF
Request reports on the ESG characteristics of the manager's underlying holdings and discuss related developments that may impact holdings in the fund			
Request examples of ESG issues identified within the portfolio and action taken in response	V	\checkmark	V
Request details of how ESG factors were considered when preparing to exit from investments			$\overline{\checkmark}$
Other ways ESG issues are monitored in the post-investment process, specify			
None of the above			

Comi	Communication						
SAM 14	Mandatory	Core Assessed					

SAM 14.1

Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.

Yes, we disclose information publicly

provide URL

https://www.verka-vk.de/die-verka-vk/kapitalanlagen/nachhaltiges-investieren/

SAM 14.2

Indicate if the level of information you disclose to the public is the same as that disclosed to clients and/or beneficiaries.

Yes

SAM 14.3

Indicate what type of information your organisation proactively discloses to the public and clients and/or beneficiaries about your indirect investments.

- $\ensuremath{\square}$ How responsible investment considerations are included in manager selection, appointment and monitoring processes
- ☑ Details of the responsible investment activities carried out by managers on your behalf
- $\ensuremath{\square}$ E, S and/or G impacts and outcomes that have resulted from your managers' investments and active ownership
- ☐ Other, specify
- \bigcirc No
- O Yes, we disclose information to clients/beneficiaries only
- O We do not proactively disclose information to the public and/or clients/beneficiaries



PRI 6

VERKA VK Kirchliche Vorsorge VVaG

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.



ESG incorporation in actively managed fixed income

Implementation processes

FI 04 Mandatory Gateway PRI 1

FI 04.1

Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA		
		Screening alone
	95	
		Thematic alone
	0	
		Integration alone
		megration alone
	0	
		Screening + integration strategies
	0	
		Thematic + integration strategies
	0	
		Screening + thematic strategies
	0	
		All three strategies combined
	5	
	5	
		No incorporation strategies applied
	0	
	100%	
Corporate		
(financial)		Screening alone
	90	
		Thematic alone
	0	
		Integration alone
	0	
		Screening + integration strategies
		Solvening + integration strategies
	0	

	Thematic + integration strategies
0	
	Screening + thematic strategies
0	
	All three strategies combined
10	
	No incorporation strategies applied
0	
100%	



Securitised		
		Screening alone
	100	
		Thematic alone
	0	
		Integration alone
	0	
		Screening + integration strategies
	0	
		Thematic + integration strategies
	0	
		Screening + thematic strategies
	0	
		All three strategies combined
	0	
		No incorporation strategies applied
	0	
	100%	

Describe your primary reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Examples for combined strategies are investments in green bonds from the public issuer 'lle de France" and investments in different microfinance bonds directly from micro finance institutions or through SPVs.

FI 06 Mandatory Additional Assessed PRI 1



FI 06.1	Indicate how you ensure that	at your E	ESG research process is ro	bust:					
✓ Issuers ar correct inaccorrect	e given the opportunity by you curacies	ı or you	r research provider to revie	w ESG research on t	hem and				
✓ Issuer info	ormation and/or ESG ratings a	re upda	ated regularly to ensure ES	G research is accurat	e				
☐ Internal a	udits of ESG research are und	lertaker	n in a systematic way						
☐ ESG anal	☐ ESG analysis is benchmarked for quality against other providers								
☐ Other, spe	ecify								
☐ None of the	ne above								
FI 06.2	Describe how your ESG info	ormation	n or analysis is shared amo	ng your investment to	eam.				
☑ ESG infor	mation is held within a central	ised da	tabase and is accessible to	all investment staff					
☑ ESG infor documents	☑ ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents								
☐ Investmer committee m	nt staff are required to discuss neetings	ESG ir	formation on issuers as a s	standard item during i	nvestment				
	capture how ESG information	and res	earch was incorporated into	o investment decision	S				
☐ Other, spe	ecify								
□ None of the property of	ne above								
(A) Implemer	ntation: Screening								
Manda	atory		Gateway		PRI 1				
FI 07.1	Indicate the type of screenir	ng you c	conduct.						
Select all tha	at apply								
		SSA	Corporate (financial)	Securitised					

	SSA	Corporate (financial)	Securitised
Negative/exclusionary screening	V	\checkmark	V
110gativo, oxoladionally colociling			
Positive/best-in-class screening	V	V	
Norms-based screening	V		

FI 07.2 Describe the type of screening you apply to your internally managed active fixed income

VERKA uses negative lists and exclusive criteria and preferably selects the under ESG aspects most appropriate investments for the purposes of a best-in-class approach, taking account also different norms such as corruption indices for government bonds.

FI 08 Mandatory Descriptive PRI 1



SSA

SSA

SSA

For legal reasons
For non-legal reasons

Corporate (financial)

Corporate (fin)

For legal reasons
For non-legal reasons

Securitised

For legal reasons
For non-legal reasons

If the issuer is explicitly excluded or violates the exclusion criteria, VERKA will not choose him for an investment. This is examined in detail as part of the internal credit risk assessment prior to investing.

Describe your approach to ESG-based negative screening of certain issuers from your

FI 10 Mandatory Core Assessed PRI 1

FI 10.1 Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.



FI 08.2

investable universe.

_		
Type of screening	Checks	
	Negative/exclusionary	☑ Checks are performed to ensure that issuers meet screening criteria
	screening	☑ Data used for the screening criteria is updated at least every 2 years
		☑ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
		☑ Audits of fund holdings are undertaken regularly by internal audit or compliance functions
		☐ Other, specify
		☐ None of the above
	Positive/best-in-class	☑ Checks are performed to ensure that issuers meet screening criteria
	screening	☑ Data used for the screening criteria is updated at least every 2 years
		☑ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
		☑ Audits of fund holdings are undertaken regularly by internal audit or compliance functions
		☐ Other, specify
		☐ None of the above
	Norms-based screening	☑ Checks are performed to ensure that issuers meet screening criteria
		☑ Data used for the screening criteria is updated at least every 2 years
		☑ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
		☑ Audits of fund holdings are undertaken regularly by internal audit or compliance functions
		☐ Other, specify
		☐ None of the above

(B) Implementation: Thematic

FI 12 Mandatory Core Assessed PRI 1



FI 12.1	Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles:	
	☑ We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects	
$\ensuremath{\square}$ We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated		
	$\ensuremath{\square}$ We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated	
$\ensuremath{\square}$ We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects		
□ Other, sp	☐ Other, specify	
☐ None of the	□ None of the above	
	,	
FI 12.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.	
We speak with the issuers and if nothing changes, we sell the affected bonds.		

FI 13 Mandatory Additional Assessed PRI 1

FI 13.1 Indicate how you assess the environmental or social impact of your thematic investments

We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments

☑ We ensure independent audits are conducted on the environmental or social impact of our investments
 ☐ We have a proprietary system to measure environmental and social impact
 ☐ We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
 ☐ Other, specify

(C) Implementation: Integration

☐ None of the above

FI 14 Mandatory Descriptive PRI 1

FI 14.1 Describe your approach to integrating ESG into traditional financial analysis.

Our internal financial and credit risk assessment includes an independent evaluation of ESG factors. These will be evaluated qualitatively and quantitatively to the available information and data.

Describe how your ESG integration approach is adapted to each of the different types of fixed income you invest in.



FI 14.2

SSA

Before investing we analyse the ESG information about the Coutry, region etc.

Corporate (financial)

Before investing we analyse the ESG information about the financial institution.

FI 15 Mandatory Core Assessed PRI 1

FI 15.1 Indicate how ESG information is typically used as part of your investment process.

Select all that apply

SSA Corporate (financial) $\sqrt{}$ ESG analysis is integrated into fundamental analysis $\sqrt{}$ $\sqrt{}$ ESG analysis is integrated into security weighting decisions $\sqrt{}$ $\sqrt{}$ ESG analysis is integrated into portfolio construction decisions $\sqrt{}$ $\sqrt{}$ ESG analysis is a standard part of internal credit ratings or assessment ESG analysis for issuers is a standard agenda item at investment committee meetings $\sqrt{}$ $\sqrt{}$ ESG analysis is regularly featured in internal research notes or similar $\sqrt{}$ $\sqrt{}$ ESG analysis is a standard feature of ongoing portfolio monitoring $\sqrt{}$ $\sqrt{}$ ESG analysis features in all internal issuer summaries or similar documents Other, specify

FI 16	Mandatory	Additional Assessed	PRI 1

FI 16.1 Indicate the extent to which ESG issues are reviewed in your integration process.



Environment	Social	Governance	
SSA	Environmental Systematically Occasionally Not at all	Social Systematically Coccasionally Not at all	Governance Systematically Occasionally Not at all
Corporate (financial)	Environmental Systematically Occasionally Not at all	Social Systematically Occasionally Not at all	Governance Systematically Occasionally Not at all

FI 16.2 Please provide more detail on how you review E, S and G factors in your integration process.

We use the present information about the issuers and involve them in a standardized ranking through a Bloomberg tool. These rankings can be updated anytime. The ESG criteria are also standardized.

the same as SSA

Communication

FI 23 Mandatory Core Assessed PRI 2,6

FI 23.1

Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.

We disclose it publicly

Provide URL

https://www.verka-vk.de/die-verka-vk/kapitalanlagen/nachhaltiges-investieren/

FI 23.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

Yes



FI 23.3

Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.

- \bigcirc Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

FI 23.4 Indicate how frequently you typically report this information.

- O Quarterly or more frequently
- O Biannually
- Annually
- O Less frequently than annually
- O Ad-hoc/when requested
- \bigcirc No
- O We disclose it to clients and/or beneficiaries only
- \bigcirc We do not proactively disclose it to the public and/or clients/beneficiaries