

Triodos SICAV I –

Triodos Pioneer Impact Fund

Legal entity identifier: 549300K3BHI3TTMCAP19

Sustainable investment objective

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

Does this financial product have a sustainable investment objective?

☒ ☒ ☒ Yes

☐ ☐ ☐ No

☒ It will make a minimum of **sustainable investments with an environmental objective: 50%**

☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☒ It will make a minimum of **sustainable investments with a social objective: 20%**

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective

☐ It promotes E/S characteristics, but **will not make any sustainable investments**



What is the sustainable investment objective of this financial product?

- The sustainable investment objectives of the fund are to:
- make money work for environmental and social change
 - contribute to the transition to an economy within planetary boundaries
 - contribute to the transition to an economy where all humans can enjoy a prosperous life

In order to realise these three objectives, the fund invests in listed equities that actively contribute to at least one Triodos transition:

THEME	DESCRIPTION	OBJECTIVE CATEGORY
Resources	Transition from a wasteful "extract, use and dispose" linear economy to a circular economy in which resources are truly valued, used prudently and recycled.	Environmental
Energy	Transition from fossil fuel-based energy production to renewable energy generation and energy efficiency.	Environmental
Society	Transition from a society that incentivises competition and divisiveness to one that is rooted in solidarity and collaboration.	Social
Wellbeing	Transition from a narrow focus on material satisfaction to an economy that deeply values and nurtures broader individual wellbeing.	Social
Food	Transition from a predominantly extractive food system to regenerative agriculture, fair supply chains and healthy diets.	Environmental and social

Through investments that contribute to the resource and energy transition, the fund contributes to climate change mitigation as set out in article 9 of the EU Taxonomy. For further details on these transitions and the management company's impact investing vision, go to triodos-im.com/impact-investing/vision.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

In order to measure the attainment of its sustainable investment objectives, the fund measures its exposure to the Triodos transitions as a percentage of portfolio holdings that contribute to at least one transition and as a percentage of assets under management allocated to each transition.

Each Triodos transition is linked to one or more UN Sustainable Development Goals (SDGs):

- Resource transition: SDG 3, 6, 8, 11, 12, 13, 14 and 15
- Energy transition: SDG 7, 8, 9, 11, 12 and 13
- Societal transition: SDG 1, 3, 5, 6, 8, 10 and 16
- Wellbeing transition: SDG 1, 3, 4, 6, 8 and 10
- Food transition: SDG 2, 12, 14 and 15

Therefore the fund also reports its absolute and relative contribution to environmental (SDGs 2, 3, 6, 7, 8, 9, 11, 12, 13, 14 and 15) or social (SDGs 1, 2, 3, 4, 5, 6, 8, 10, 11, 12 and 16) SDGs based on external data performing a comprehensive assessment of company products and services that affect SDGs.

Finally, the fund reports its carbon footprint relative to its benchmark.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

To select only those investments that do not cause significant harm to any environmental or social sustainable investment objective, every (new) investment is assessed on its alignment with the [Triodos Bank Minimum Standards](#) (Minimum Standards). If an issuer is found to cause significant harm to any of those standards, it is excluded from investment. All applicable principal adverse impact indicators (PAIs) on sustainability factors are taken into account in the investment process. The Minimum Standards are aligned with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the Paris-Aligned Benchmark (PAB) exclusions (which also cover the Climate Transition Benchmark (CTB) exclusions). They also set out the minimum standards for employee relations, remuneration, taxes and other corporate governance topics that investees must meet in order to be eligible for investment.

How have the indicators for adverse impacts on sustainability factors been taken into account?

What Triodos considers significant environmental and social harm is outlined in the Minimum Standards. For every (new) investment, alignment with the Minimum Standards is assessed. If an issuer is found to cause significant harm in relation to any of those standards, it is excluded from investment.

The PAIs are taken into account in the second phase of the investment process (negative impact, consisting of three steps), both as part of the initial screening and the continuous monitoring of investments:

1. Negative screening: Every (potential) investee is screened for involvement in controversial business activities. If an investee exceeds the threshold below, “high concern” is concluded, and the investee is excluded from investment.

Triodos controversial activity	SFDR PAI	Threshold
Controversial weapons	14 (Exposure to controversial weapons)	Any involvement
Fossil fuels	4 (Exposure to companies active in the fossil fuel sector)	GICS Energy Sector classification (i.e. companies active in the fossil fuel sector)
Hazardous substances	E9 (Investments in companies producing chemicals)	Pesticides – production, distribution (>5% revenue) Persistent Organic Pollutants – production, use (>0% revenue)

2. Controversies: Every (potential) investee is assessed on violations of UN Global Compact and OECD Guidelines for Multinational Enterprises on a case-by-case basis considering violations in the last three years. Per case, the verification of information, severity and company response are considered to conclude if a case is low, medium or high concern. In case a company is involved in severe and/or frequent violations without taking credible remediation measures, “high concern” is concluded, and the investee is excluded from investment.

Triodos assessment	SFDR PAI	Threshold
Controversies	10 (Violations of UN Global Compact principles and OECD Guidelines)	Significant violations of UN Global Compact or OECD Guidelines within the last 3 years
	11 (Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines)	
	S7 (Incidents of discrimination)	
	S14 (Number of severe human rights issues and incidents)	
	S16 (Cases of insufficient action with breaches of anti-corruption)	
	S17 (Convictions and fines for anti-corruption)	

3. ESG assessment: By combining our proprietary materiality map, highlighting material ESG issues per industry, with an understanding of the company’s actual business activities, the risk that an investee inflicts negative impacts on these ESG issues is assessed. Based on the risk classification (low, medium or high risk), the company must meet additional requirements such as having sustainability programs, reporting, certifications, policies or practices in place. In case a company does not meet these requirements but is in transition, it is flagged for engagement. The PAI indicators are considered on an absolute basis, over time and compared to five peers (where relevant). Taking all of the above into consideration, a company’s practices are assessed as low, medium or high concern. If “high concern” is concluded, the investee is excluded from investment.

Triodos ESG issue		SFDR PAI	Threshold
Environmental	Climate change	1 (GHG emissions) 2 (Carbon footprint) 3 (GHG intensity) 5 (Share of non-renewable energy consumption and production) 6 (Energy consumption intensity) E4 (Companies without carbon reduction initiatives) E5 (Energy consumption per non-renewable energy source)	High risk for climate change without GHG emissions reporting and Paris-aligned reduction targets; Significant controversies
	Water	E6 (Water usage and recycling) E7 (Investments in companies without water management policies) E8 (Exposure to areas of high water stress)	High risk for water scarcity without activities to reduce freshwater use; Significant controversies
	Waste	E13 (Non-recycled waste ratio)	Significant controversies
	Pollution	8 (Emissions to water) 9 (Hazardous and radioactive waste ratio) E2 (Emissions of air pollutants)	Significant controversies
	Ecosystems	7 (Activities negatively affecting biodiversity) E11 (Companies without sustainable land/agriculture practice) E12 (Companies without sustainable oceans/seas practice) E15 (Deforestation)	High risk for biodiversity, deforestation, cotton, soy, palm oil or fishery without relevant policies, programs and measures promoting sustainable activities; Significant controversies
Social	Human rights and community	S9 (Lack of human rights policy) S10 (Lack of human rights due diligence)	High risk for human rights or conflict minerals without relevant policy and practices; Significant controversies
	Labour practices	S1 (Companies without workplace accident prevention policies) S2 (Rate of accidents) S3 (Numbers of days lost to injuries, accidents, fatalities or illness) S4 (Lack of supplier code of conduct) 12 (Unadjusted gender pay gap) S5 (Lack of grievance/complaints mechanism for employee matters) S12 (Operations and suppliers at significant risk of child labour) S13 (Operations and suppliers at significant risk of forced labour)	High risk for labour rights without relevant policies, targets and monitoring; Significant controversies
	Supply chain management	S12 (Operations and suppliers at significant risk of child labour) S13 (Operations and suppliers at significant risk of forced labour)	High risk for labour rights in the supply chain without relevant policies, targets and monitoring; Significant controversies
Governance	Corporate governance	13 (Board gender diversity) S8 (Excessive CEO pay ratio)	CEO pay ratio exceeding 100:1 and size-adjusted absolute CEO pay exceeding €2.5 mln in the last 5 years; Significant controversies
	Business ethics	S15 (Lack of anti-corruption and anti-bribery policies) S6 (Insufficient whistleblower protection)	Significant controversies

The PAI assessment is based on data provided by external parties (third-party ESG data provider, public information and/or investee company).

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Prior to being selected for investment and for the entire duration of the investment, (potential) investees are screened for compliance with the Minimum Standards. The Minimum Standards are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Alignment with the Minimum Standards is assessed in the second phase of the investment process through the check on controversies and the ESG assessment, based on data from external sources and additional in-house desk research (see above the answer to question 'How have the indicators for adverse impacts on sustainability factors been taken into account?'). In case of significant violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (i.e. having severe impact, recurrence of incidents, lack of risk management and inadequate remediation measures), the investee is excluded from investment.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The **investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.



Does this financial product consider principal adverse impacts on sustainability factors?

☒ Yes ☐ No

Yes, the fund considers all PAIs on sustainability factors referred to in the tables above.

How these adverse impacts are considered, is outlined in the Minimum Standards Policy, Due Diligence Policy and Sovereign Framework, where applicable. Every potential investment is assessed using the relevant policies and if an issuer is found to cause significant harm, it is excluded from investment. PAIs are continuously monitored to ensure the fund remains compliant with our policies. On a yearly basis, the PAIs of the fund are collected and analysed to plan actions for the next reference period. The fund aims to outperform its benchmark on PAI 3 (greenhouse gas intensity of investee companies) and PAI 7 (activities negatively affecting biodiversity).

Information on the PAIs will be available in the annual report of the fund.



What investment strategy does this financial product follow?

The management company has defined four stages in the investment process in order to attain the sustainable objectives of the fund. Every potential investment that has passed the first three stages is included in the Triodos investment universe. This universe is the basis from which investments must be made; the fund is not allowed to invest outside the Triodos investment universe. The bottom-up approach used to build the Triodos investment universe leads to a reduction of 60 to 90% of the benchmark universe, on average.

- **Contribution to transitions (positive screening):** Every (potential) investment is assessed in-depth on its thematic fit with the Triodos transitions, and needs to actively contribute to at least one Triodos transition in order to be eligible for the Triodos investment universe. Impact indicators based on sources of revenue data are used to track companies' contribution towards the impact objectives formulated per transition. The analysis is further substantiated by examining companies' product offering and relevant impact indicators as well as other qualitative evidence of sustainable practices as stated by companies' policies and active programmes.
- **Minimise adverse impact (negative screening):** In order to eliminate any significant negative impact, every (potential) investment goes through an exclusionary screening consisting of three steps: negative screening, check on controversies and ESG assessment (see above the answer to question 'How have the indicators for adverse impacts on sustainability factors been taken into account?'). Every (potential) investment needs to align with the Minimum Standards in order to be eligible for the Triodos investment universe.
- **Integrated impact, risk and return analysis:** From the previous assessment of negative sustainability impact, the management company selects those ESG factors that are expected to have a material financial impact on the investment. The research team considers the outcomes of all three stages and analyses the investment impact, risk and return, which then leads to the investment decision. For equity investments the financial impact is quantified.
- **Engagement with investee companies to drive progress:** The fund (through the intermediary of the management company) takes its responsibility as a shareholder seriously, strongly believing that by exercising its voting rights, it can exert a positive influence on a company's long-term strategy. Therefore, whenever possible, the fund votes (by proxy) and attends shareholder meetings of the companies in which it invests. Additionally, the management company aims to accelerate and direct transitions through thought leadership, stakeholder dialogues, engagement and advocacy. As such, the management company frequently engages on environmental and social topics that are relevant to each company's individual business models, as well as on general corporate governance issues.

Once included in the Triodos investment universe, every eligible investment is continuously monitored to ensure it still meets the investment criteria. To do so, the management company bases itself on the alerts it gets from external parties signaling any new development or controversy, and on its own research, which includes news feeds and analyst sector expertise.

In case the management company finds that an (eligible) investment no longer meets the investment criteria, or is in danger of no longer meeting the criteria, it evaluates whether a dialogue with the issuer could be fruitful. If, due to the nature of the investment criteria violation, dialogue is not expected to lead to change or if there has been a dialogue with the issuer which has not led to the desired change, the eligible investment will be removed from the Triodos investment universe and the investment will be divested from all portfolios within a period of three months after removal from the Triodos investment universe.

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

In order to attain its sustainable investment objectives, the fund has the following binding elements:

1. It only makes sustainable investments (excluding ancillary assets) that contribute to at least one of the Triodos transitions (positive screening). In this respect, every (potential) investment is assessed in-depth on its thematic fit with the Triodos transitions, for which impact objectives have been defined as described below. Impact indicators based on sources of revenue data are used to track companies' contribution towards the impact objectives formulated per transition and the following pass/fail thresholds are applied. For shares, a minimum of 33% of the company revenue must contribute to one or

more impact objectives. The analysis is further substantiated by examining companies' product offering and relevant impact indicators as well as other qualitative evidence of sustainable practices as stated by companies' policies and active programmes.

Impact objectives of Triodos transitions	
Resource transition	- Minimise the mining of raw materials and conservation of scarce raw material inputs, including ecosystem preservation - Extend the life of materials and goods by integrating circular value chains into the design and manufacturing of products, encouraging the transition from end-of-pipe solutions to the circulation of materials at their highest value - Support waste prevention where end-of-life materials flow back into the production of new products for as long as possible
Energy transition	- Increase renewable energy generation where resource use and waste are minimised - Make energy supply more efficient to meet demand and decrease the CO2 footprint - Improve the reliability of the renewable energy system by investing in solutions that make the system more stable and robust - Improve the awareness and involvement of the general public in order to make a systemic shift in the mindset of how energy is owned and used to make things move, heat up and cool down – reaching all corners of society and the economy to ensure a just energy transition
Food transition	- Empower a transition to resilient farming practices that have a positive impact on biodiversity, pollution, and resource use - Encourage a transition to diverse, local, and seasonal diets that are largely plant-based with modest amounts of animal protein - Encourage true pricing in food value chains by increasing transparency to expose all externalities in the food system and provide equitable and resilient prosperity for workers - Support initiatives that educate consumers and reconnect them with food producers
Societal transition	- Ensure basic needs, such as access to water, food, healthcare and education, are met to guarantee human dignity; solidarity contributes to a strong sense of community and vice versa - Support equitable design to ensure equal opportunities to access spaces, services and markets, paying special attention to children as well as vulnerable and marginalised groups - Empower people to find themselves reflected in their communities and network, creating a strong sense of involvement with and connection to those around
Wellbeing transition	- Ensure human and individual rights are respected to empower people in shaping their own life - Endorse a positive, holistic view on health whereby body and mind are connected and healthy lifestyles are enabled and valued, which underlies both society and the formal healthcare system - Promote arts and culture as well as spiritual centres to help people experience a sense of meaning in and awareness of the world

2. Every investment is assessed on its alignment with the Minimum Standards. If an issuer is found to cause significant harm to any of those standards, it is excluded from investment.
3. Issuers that are in breach of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights, are excluded from investment.

What is the policy to assess good governance practices of the investee companies?

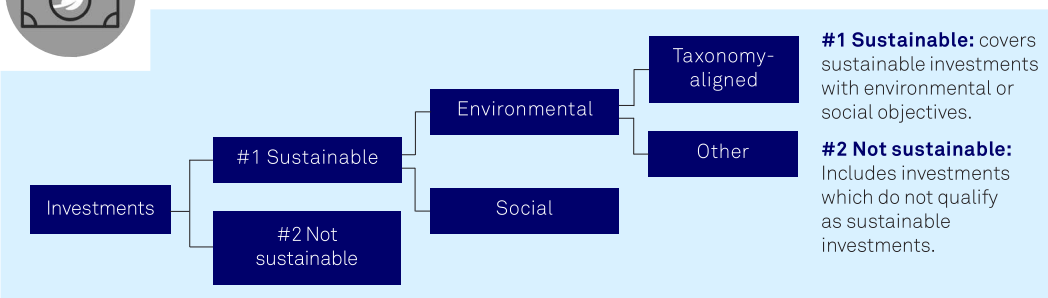
The Minimum Standards is used to assess good governance practices of investee companies. This policy describes our minimum standards for employee relations, remuneration, taxes and other corporate governance topics. Additionally, the Triodos Position on Tax describes the five principles to ascertain good governance in relation to tax. The Minimum Standards and the Position on Tax are applied through internal policies and procedures. For listed equities, the Triodos Proxy Voting Guidelines are used to vote on governance practices put forward at shareholder meetings. Existing investments undergo periodic review and monitoring, which includes the review and monitoring of good governance practices.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Asset allocation describes the share of investments in specific assets.



What is the asset allocation and the minimum share of sustainable investments?



The fund invests at least 90% of its net asset value in sustainable investments, which will be split between sustainable investments with an environmental objective (minimum 50%) and sustainable investments with a social objective (minimum 20%), with the remaining 20% floating between the two as either environmentally or socially sustainable as to allow for flexibility for proper portfolio management as fitting in the strategy of the fund. The remaining (maximum 10%) will be cash or cash equivalents held as ancillary liquidity. Due to the neutral nature of these investments, they will not qualify as sustainable investments.

Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

More information on the purpose and proportion of the remaining (non-sustainable) investments is disclosed below in the answer to question ‘What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?’.

How does the use of derivatives attain the sustainable investment objective?

Not applicable.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Taxonomy-data is purchased from a third-party data provider that has a review process in place to verify and validate the data. The coverage of this third-party reviewed data includes equity and corporate bonds. Taxonomy-data related to bonds that are not covered by this data provider are obtained directly from investee companies. A distinction is made between Taxonomy-aligned data reported by investee companies and equivalent information collected or estimated by the data provider based on publicly available information. The Taxonomy-aligned economic activities are measured by turnover as this data is readily available and provides a good insight into the scope of sustainable activities of the investee companies. Also, turnover data is more stable than capital or operational expenditure figures which are highly variable from one year to another, resulting in an undesirable volatility in Taxonomy-alignment.

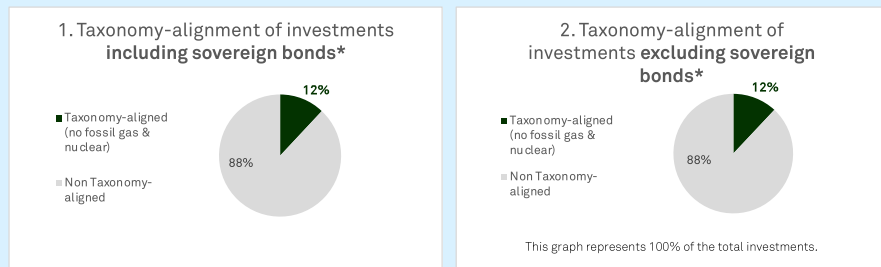
The fund does not have any sovereign exposures.

The Taxonomy minimum alignment percentages shown in the graphs below are not subject to an assurance by an auditor or a review by a third party.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

- ☐ Yes
- ☐ In fossil gas ☐ In nuclear energy
- ☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.

What is the minimum share of investments in transitional and enabling activities?

The minimum share of investments in transitional activities is 0%, while the minimum share of investments in enabling activities is 0%.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund commits to a minimum 50% of sustainable investments with an environmental objective aligned with SFDR. The Triodos transitions, which are used for the positive selection of the investments, encompass more environmentally sustainable economic activities than currently covered by the EU Taxonomy. Presently, the EU Taxonomy focuses on certain sectors only, whereas the Triodos transitions are sector-agnostic. The percentage of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is likely to decrease over time more economic activities are added to the Taxonomy.



What is the minimum share of sustainable investments with a social objective?

At least 20% of the investments of the fund will be sustainable investments that contribute to a social objective.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.



What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

Although the fund does not plan to have other investments than sustainable investments, it can hold cash and cash equivalents as ancillary liquidity.

Cash and cash equivalents do not affect the delivery of the sustainable investment objectives of the fund on a continuous basis. Firstly, they are used - in limited proportion - to support the proper liquidity management of the fund. Secondly, the management company assesses on a regular basis whether counterparties for cash and cash equivalents comply with the four pillars of the UN Global Compact, using data from a third-party provider. These four pillars consist of 1) human rights, 2) labour rights 3) environment and 4) anti-corruption. Also, the management company assesses its counterparties’ policies and sustainability performance.



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No reference benchmark has been designated for the purpose of attaining the sustainable investment objectives.



Where can I find more product specific information online?

More product-specific information can be found in the section ‘Sustainability-related disclosures’ on the website triodos-im.com/funds/triodos-pioneer-impact-fund