



RITRANSPARENCY REPORT 2019

Volksbank Vorarlberg e. Gen.





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 2019 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
Ø	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



Organisa	ational Overview						cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG	·	✓	-							
00 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	✓	Public							✓
OO 10	Active ownership practices for listed assets	✓	Public							✓
00 11	ESG incorporation practices for all assets	✓	Public							✓
00 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown of listed equity investments by passive and active strategies	✓	Public							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	✓	Private							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	✓	Public							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	8	n/a							✓
OO FI 03	Fixed income breakdown by market and credit quality	✓	Public							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	✓	Private							✓
OO PE 01	Breakdown of private equity investments by strategy	8	n/a							✓
OO PE 02	Typical level of ownership in private equity investments	8	n/a							✓
00 PR 01	Breakdown of property investments	8	n/a							✓
OO PR 02	Breakdown of property assets by management	8	n/a							✓
OO PR 03	Largest property types	8	n/a							✓
OO INF 01	Breakdown of infrastructure investments	8	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	8	n/a							✓
OO INF 03	Largest infrastructure sectors	8	n/a							✓
OO HF 01	Breakdown of hedge funds investments by strategies	8	n/a							✓
OO End	Module confirmation page	✓	-							

CCStrategy and Governance						rin	cip	le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	-	n/a							✓
SG 08	RI in performance management, reward and/or personal development	-	n/a							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	-	n/a				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		✓	Public							✓
SG 14	Long term investment risks and opportunity	✓	Public	~						
SG 14 CC		✓	Public							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Public	✓						
SG 16	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 17	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 18	Innovative features of approach to RI	✓	Private							✓
SG 19	Communication	✓	Public		✓				✓	
SG End	Module confirmation page	-	n/a							

Indirect -	Indirect – Manager Selection, Appointment and Monitoring						Principle						
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6				
SAM 01	ESG incorporation strategies	✓	Public	✓									
SAM 02	Selection processes (LE and FI)	✓	Public	✓									
SAM 03	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	8	n/a		~								
SAM 04	Appointment processes (listed equity/fixed income)	8	n/a	✓									
SAM 05	Monitoring processes (listed equity/fixed income)	✓	Public	✓									
SAM 06	Monitoring on active ownership (listed equity/fixed income)	8	n/a	✓									
SAM 07	Percentage of (proxy) votes	8	n/a		✓								
SAM 08	Percentage of externally managed assets managed by PRI signatories	✓	Private	✓									
SAM 09	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	✓					✓				
SAM End	Module confirmation page	✓	-										

Direct - I	Direct - Listed Equity Incorporation							le		General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Percentage of each incorporation strategy	✓	Public	✓						
LEI 02	Type of ESG information used in investment decision	✓	Private	✓						
LEI 03	Information from engagement and/or voting used in investment decision-making	-	n/a	✓						
LEI 04	Types of screening applied	✓	Public	✓						
LEI 05	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 06	Processes to ensure fund criteria are not breached	✓	Private	✓						
LEI 07	Types of sustainability thematic funds/mandates	✓	Public	✓						
LEI 08	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 09	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 10	Aspects of analysis ESG information is integrated into	✓	Private	✓						
LEI 11	ESG issues in index construction	✓	Private	✓						
LEI 12	How ESG incorporation has influenced portfolio composition	-	n/a	✓						
LEI 13	Examples of ESG issues that affected your investment view / performance	-	n/a	✓						
LEI End	Module confirmation page	✓	-							

Direct - I	Direct - Listed Equity Active Ownership							Principle					
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6				
LEA 01	Description of approach to engagement	✓	Public		✓								
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓							
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓								
LEA 04	Objectives for engagement activities	✓	Public		✓								
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓								
LEA 06	Role in engagement process	✓	Public		✓		✓						
LEA 07	Share insights from engagements with internal/external managers	-	n/a	✓	✓								
LEA 08	Tracking number of engagements	✓	Public		✓								
LEA 09	Number of companies engaged with, intensity of engagement and effort	8	n/a		✓								
LEA 10	Engagement methods	-	n/a		✓								
LEA 11	Examples of ESG engagements	-	n/a		✓								
LEA 12	Typical approach to (proxy) voting decisions	8	n/a		✓								
LEA 13	Percentage of voting recommendations reviewed	8	n/a		✓								
LEA 14	Securities lending programme	8	n/a		✓								
LEA 15	Informing companies of the rationale of abstaining/voting against management	8	n/a		✓								
LEA 16	Informing companies of the rationale of abstaining/voting against management	8	n/a		✓								
LEA 17	Percentage of (proxy) votes cast	8	n/a		✓								
LEA 18	Proportion of ballot items that were for/against/abstentions	8	n/a		✓								
LEA 19	Proportion of ballot items that were for/against/abstentions	8	n/a		✓								
LEA 20	Shareholder resolutions	8	n/a		✓								
LEA 21	Examples of (proxy) voting activities	8	n/a		✓								
LEA End	Module confirmation page	✓	-										

Direct -	Direct - Fixed Income						Principle			
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Incorporation strategies applied	✓	Public	✓						
FI 02	ESG issues and issuer research	✓	Private	✓						
FI 03	Processes to ensure analysis is robust	✓	Public	✓						
FI 04	Types of screening applied	✓	Public	✓						
FI 05	Examples of ESG factors in screening process	-	n/a	✓						
FI 06	Screening - ensuring criteria are met	✓	Public	✓						
FI 07	Thematic investing - overview	✓	Private	✓						
FI 08	Thematic investing - themed bond processes	✓	Public	✓						
FI 09	Thematic investing - assessing impact	✓	Public	✓						
FI 10	Integration overview	✓	Public	✓						
FI 11	Integration - ESG information in investment processes	✓	Public	✓						
FI 12	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 13	ESG incorporation in passive funds	-	n/a	✓						
FI 14	Engagement overview and coverage	✓	Private		✓					
FI 15	Engagement method	✓	Private	✓	✓					
FI 16	Engagement policy disclosure	✓	Private	✓	✓					
FI 17	Financial/ESG performance	✓	Private							✓
FI 18	Examples - ESG incorporation or engagement	-	n/a	~	✓					
FI End	Module confirmation page	✓	-							

Confider	Confidence building measures						Principle						
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6				
CM1 01	Assurance, verification, or review	✓	Public							✓			
CM1 02	Assurance of last year's PRI data	✓	Public							✓			
CM1 03	Other confidence building measures	✓	Public							✓			
CM1 04	Assurance of this year's PRI data	✓	Public							✓			
CM1 05	External assurance	✓	Public							✓			
CM1 06	Assurance or internal audit	8	n/a							✓			
CM1 07	Internal verification	✓	Public							✓			
CM1 01 End	Module confirmation page	✓	-										

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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.



Bas	ic info	rmation				
O 01	Mar	ndatory	Pu	blic	Gateway/Peering	Gener
000	01.1	Select the services and funds yo	ou offer			
Select the	e servic	es and funds you offer		% of asset	under management (AUM)	in ranges
Fund mana	agemen	t		○ 0%○ <10%● 10-50%○ >50%		
Fund of fu	nds, ma	nager of managers, sub-advised p	products	○ 0%○ <10%○ 10-50%● >50%		
Other				0%<10%10-50%>50%		
Total 100%	%					
	edge fur	Further options (may be selected ands edge funds	d in addi	tion to the abo	ove)	
O 02	Mar	ndatory	Pu	blic	Peering	Gener
00 (02.1	Select the location of your organ	nisation's	headquarter	S.	
Aust	tria					
000	02.2	Indicate the number of countries	s in whicl	n you have of	fices (including your headqu	arters).
● 1○ 2-○ 6-						



○ >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE
240

OO 03 Mandatory Public Descriptive

OO 03.1

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

O Yes

No

OO 04 Mandatory Public Gateway/Peering General

00 04.1

Indicate the year end date for your reporting year.

31/12/2018

00 04.2

Indicate your total AUM at the end of your reporting year.

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM			200	000	000
Currency	EUR				
Assets in USD			228	178	626

 $\hfill\square$ Not applicable as we are in the fund-raising process

00 04.4

Indicate the total assets at the end of your reporting year subject to an execution and/or advisory approach.

	trillions	billions	millions	thousands	hundreds
Total AUM			350	000	000
Total / total			000	000	000
Currency	EUR				
Assets in USD			399	312	596

 \square Not applicable as we do not have any assets under execution and/or advisory approach

OO 06 Mandatory Public Descriptive General



General

 \bigcirc as percentage breakdown

as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	10-50%
Fixed income	10-50%	10-50%
Private equity	0	0
Property	0	<10%
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	<10%
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2	Publish asset	class mix as	s per attached	image	[Optional]	l

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional]

○ Yes

No



OO 06.5

Indicate whether your organisation uses fiduciary managers.

- O Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

00 0	9	Mandatory	Public	Peering	General
	OO 09.1	Indicate the breakdown of your org	anisation's AUM by	market.	
•		Developed Markets			
	80				
		Emerging Markets			
	20				
		Frontier Markets			
	0				
		Other Markets			
	0				
		Total 100%			
	100%				
	Asset	lass implementation gateway indic	eators		
00 1		Mandatory	Public	Gateway	General
	00 10.1	Select the active ownership activitie	es your organisation	n implemented in the reporting ye	ar.
		Listed equity – engagement			
		engage with companies on ESG factors require our external managers to engage		·	
	□We	do not engage directly and do not require	e external manager	s to engage with companies on E	SG factors.
		Listed equity – voting			



☑ We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

☐ We cast our (proxy) votes directly or via dedicated voting providers

 \square We require our external managers to vote on our behalf.

00 10.3

Indicate why you do not cast your votes

- O Indicate why you do not cast your votes
- We do not cast our votes but provide substantive research and voting recommendations to our clients.

Describe the process and the actions taken.

If a customer is aksing us for information regarding voting recommendations, we get in contact with our voting partners from Union Investment in Germany. They operate as a voting provider for sustainability issues. To cast or votes directly to Union Investments is at the moment not possible, as costs are too high. Therefore we prefer a "bilateral" solution, providing voting recommendations on customer request.

	Fixed income SSA – engagement							
☑ We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.								
☐ We requ	☐ We require our external managers to engage with SSA bond issuers on ESG factors on our behalf.							
	\Box We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.							
	Fixed income Corporate (finan	cial) – engagement	:					
	age with companies on ESG facto	ors via our staff, coll	aborations or service providers.					
□ We requ	ire our external managers to enga	age with companies	s on ESG factors on our behalf.					
	oot engage directly and do not req ease explain why you do not.	uire external mana	gers to engage with companies o	on ESG				
	Fixed income Corporate (non-f	financial) – engage	ment					
	age with companies on ESG facto	ors via our staff, coll	aborations or service providers.					
☐ We requ	ire our external managers to enga	age with companies	s on ESG factors on our behalf.					
	ot engage directly and do not req ease explain why you do not.	uire external mana	gers to engage with companies of	on ESG				
	Fixed income Corporate (secu	ritised) – engageme	ent					
☑ We enga	☑ We engage with companies on ESG factors via our staff, collaborations or service providers.							
\square We require our external managers to engage with companies on ESG factors on our behalf.								
\Box We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.								
Mandat	tory	Public	Gateway	General				

Select the internally managed asset classes in which you addressed ESG incorporation into your

investment decisions and/or your active ownership practices (during the reporting year).



00 11.1

00 11

Listed equity

- We address ESG incorporation.
- \bigcirc We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- \bigcirc We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- $\ensuremath{\, \bullet \,}$ We address ESG incorporation.
- \bigcirc We do not do ESG incorporation.

Fixed income - securitised

- We address ESG incorporation.
- \bigcirc We do not do ESG incorporation.

00 11.2

Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.



Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
Listed equity	Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	✓ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	☐ We invest only in pooled funds and external manager appointment is not applicable			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - SSA				
	Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	$\hfill\square$ We invest only in pooled funds and external manager appointment is not applicable			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - corporate (financial)	Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	☐ We invest only in pooled funds and external manager appointment is not applicable			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - corporate (non-financial)	Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes			
	☑ We incorporate ESG into our external manager selection process			
	☐ We incorporate ESG into our external manager appointment process			
	$\hfill\square$ We invest only in pooled funds and external manager appointment is not applicable			
	☑ We incorporate ESG into our external manager monitoring process			
	☐ We do not do ESG incorporation			
Fixed income - securitised	Fixed income - securitised - ESG incorporation addressed in your			



	external manager selection, appointment and/or monitoring processes				
	☑ We incorporate ESG into our external manager selection process				
	☐ We incorporate ESG into our external manager appointment process				
	☐ We invest only in pooled funds and external manager appointment is not applicable				
	☑ We incorporate ESG into our external manager monitoring process				
	☐ We do not do ESG incorporation				
Property					
	Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes				
	☑ We incorporate ESG into our external manager selection process				
	☐ We incorporate ESG into our external manager appointment process				
	☐ We invest only in pooled funds and external manager appointment is not applicable				
	☑ We incorporate ESG into our external manager monitoring process				
	☐ We do not do ESG incorporation				
Hedge funds					
	Hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes				
	☑ We incorporate ESG into our external manager selection process				
	☐ We incorporate ESG into our external manager appointment process				
	☐ We invest only in pooled funds and external manager appointment is not applicable				
	☑ We incorporate ESG into our external manager monitoring process				
	☐ We do not do ESG incorporation				

00 11.4

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

ESG is a substantial part of our management selection process. Every investment vehicle will be analysed through partner access (MSCI ESG Research, yourSRI.com, Climetrics, ...) on their ESG-score, United Global Compact Compliance and Business Involvement Exposure. Additionally, fund manager have to respond to questions regarding their use of ESG-criteria during their selection and portfolio construction process.

00 12	Mai	ndatory	Public	Gateway	General	
00	Below are all applicable modules or report (asset classes representing 1 Those which are voluntary to report		0% or more of you	ır AUM) are already ticked and re		
		Core modules				
v	☑ Organisational Overview					
v	☑ Strategy and Governance					



RI implementation directly or via service providers Direct - Listed Equity incorporation ☑ Listed Equity incorporation Direct - Listed Equity active ownership ☑ Fixed income - Corporate (financial) ☑ Fixed income - Corporate (non-financial) ☐ Fixed income - Securitised RI implementation via external managers Indirect - Selection, Appointment and Monitoring of External Managers ☑ Listed Equities ☐ Fixed income - SSA ☐ Fixed income - Corporate (financial) ☐ Fixed income - Corporate (non-financial) ☐ Fixed income - Securitised ☐ Property Closing module ☑ Closing module Additional information. [Optional] 00 12.2

We don't want to report voluntarily on property manager selection.

Peering questions OO LE 01 Mandatory Public Gateway General OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.



Percentage of internally managed listed equities

Strategies	Percentage of internally managed listed equities
Passive	O >50%
	● 10-50%
	○ <10%
	○ 0%
Active - quantitative (quant)	O >50%
	O 10-50%
	● <10%
	○ 0%
Active - fundamental and active - other	O >50%
	● 10-50%
	○ <10%
	○ 0%
Total 100%	

OO FI 01	Mandatory	Public	Gateway	General

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.

OO FI 01.1

Provide a breakdown of your internally managed fixed income securities by active and passive strategies



Туре	Passive	Active - quantitative	Active - fundamental & others	Total internally managed fixed income security
Corporate (financial)	○ >50% ● 10- 50% ○ <10% ○ 0%	>50%10-50%<10%● 0%	○ >50% ● 10-50% ○ <10% ○ 0%	100%
Corporate (non-financial)	>50%● 10-50%<10%○ 0%	○ >50% ○ 10-50% ○ <10% ● 0%	○ >50% ● 10-50% ○ <10% ○ 0%	100%
Securitised	>50%● 10-50%○ <10%○ 0%	>50%10-50%<10%● 0%	○ >50% ● 10-50% ○ <10% ○ 0%	100%

OO FI 03	Mandatory	Public	Descriptive	General

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". Your response to this indicator will be published in the Public Transparency Report. This change is to enable improved analysis and peering.

OO FI 03.2

Indicate the approximate (+/-5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.



Туре	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	○ >50% ● 10-50%	○ >50% ◎ 10-50%	100%
	<10% <10%	○ <10% ○ 0%	
Corporate (non-financial)	>50%● 10-50%<10%○ 0%	○ >50% ● 10-50% ○ <10% ○ 0%	100%
Securitised	>50%10-50%<10%0%	○ >50% ● 10-50% ○ <10% ○ 0%	100%

If you are invested in private debt and reporting on ratings is not relevant for you, please indicate below

 $[\]square$ OO FI 03.2 is not applicable as our internally managed fixed income assets are invested only in private debt.

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Reported Information

Public version

Strategy and Governance

PRI disclaimer

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Investment policy

SG 01 Mandatory Public Core Assessed General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

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
☐ Formalised guidelines on social factors	O Applicable policies cover a minority of AUM
☐ Formalised guidelines on corporate governance factors	
☐ Fiduciary (or equivalent) duties	
☑ Asset class-specific RI guidelines	
☐ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☐ Engagement policy	
☐ (Proxy) voting policy	
☐ Other, specify (1)	
☐ Other, specify(2)	



SG 01.3	Indicate if the investment policy covers any of the following				
✓ Your orga	☑ Your organisation's definition of ESG and/or responsible investment and it's relation to investments				
	estment objectives that take ESG factors/real economy influence into account				
☑ Time hori	zon of your investment				
☐ Governan	nce structure of organisational ESG responsibilities				
☑ ESG inco	prporation approaches				
☐ Active ow	☐ Active ownership approaches				
☑ Reporting	☑ Reporting				
☑ Climate c	☑ Climate change				
☐ Understar	nding and incorporating client / beneficiary sustainability preferences				
☐ Other RI considerations, specify (1)					
☐ Other RI considerations, specify (2)					

SG 01.4

Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

Our investment philosphy is based on three pillars:

- 1. Exclution criteria
- 2. Integration of ESG-Factors
- 3. Impact investing

Our investment principles cover in detail our investment philosophy. It contains information about our long-term investment horizon, our definitions and rules on ESG and RI investing, as well as rules regarding ESG integration approaches (definitions of minimum requirements regarding every single portfolio constituent and strict portfolio limits). Additionally, we offer our clients "Co2-neutral" portfolios and a transparent ESG-reporting (as well as full transparency on yourSRI.com).

SG 01.5

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

In practice, our investment policy is based on three pillars:

- 1. Exclusion criteria (e.g. weapons, electricity generation by nuclear power, ... additionally, a company is excluded from our investment universe if it has a "red flag" from our reserach partner MSCI ESG Research, e.g. because of violation of UN Global Compact Principles)
- 2. ESG integration into all our investment decisions (based on ESG research from MSCI ESG)
- 3. Theme and impact investing: Investing into sustainability themes like e.g. solar power

 \bigcirc No

I confirm I have read and understood the Accountability tab for SG 01

I confirm I have read and understood the Accountability tab for SG 01

SG 01 CC	Voluntary	Public	Descriptive	General
----------	-----------	--------	-------------	---------



SG 01.6 CC Indicate the climate-related risks and opportunities that have been identified and factored into the investment strategies and products, within the organisation's investment time horizon.

Portfolio managers include climate change scenarios, risk and opportunities into their investment decisions.

Portfolio managers review asset class and portfolio sensitivity to climate change.

Portfolio manager measure portfolio carbon footprint and conduct risk analyzis compared to benchmarks.

Portfolio managers should allocate portions of their portfolio to companies which develops solutions for climate change.

SG 01.7 Indicate whether the organisation has assessed the likelihood and impact of these climate risks? CC O Yes No SG 01.9 Indicate whether the organisation publicly supports the TCFD? CC Yes \bigcirc No Indicate whether there is an organisation-wide strategy in place to identify and manage material SG 01.10 climate-related risks and opportunities CC O Yes No

SG 01.11 CC Describe how and over what time frame the organisation will implement an organisation-wide strategy that manages climate-related risks and opportunities.

We are currently working at developing such a strategy. However, the topic is difficult and a lot of corporate divisions have to be included. Therefore we are looking forwards for final results in 12 to 24 months.

SG 1.12 CC	Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.				
☑ Public PRI Climate Transparency Report					
☐ Annual fir	☐ Annual financial filings				
□ Regular c	☐ Regular client reporting				
☐ Member communications					
□ Other					

SG 02 Mandatory Public Core Assessed PRI 6

New selection options have been added to this indicator. Please review your prefilled responses carefully.



SG 02.1

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

☑ Policy setting out your overall approach

URL/Attachment ☑ URL **URL** {hyperlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/} ☐ Attachment (will be made public) ☑ Asset class-specific RI guidelines **URL/Attachment ☑** URL URL {hyperlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/das-wie-undwarum-des-achtsamen-investierens/} ☐ Attachment (will be made public) ☑ Screening / exclusions policy **URL/Attachment ☑** URL URL {hyperlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/} ☐ Attachment (will be made public) \square We do not publicly disclose our investment policy documents Indicate if any of your investment policy components are publicly available. Provide URL and an SG 02.2 attachment of the document. ☑ Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

☑ URL



	URL
{hyperlink	::https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/}
□ Attachme	nt
☐ Your investme	nt objectives that take ESG factors/real economy influence into account
☑ Time horizon o	of your investment
	URL/Attachment
☑ URL	
Ŭ OKL	
	URL
	::https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/das-wie-und- es-achtsamen-investierens/}
□ Attachme	·
✓ ESG incorpora	
E 200 incorpora	mon approaches
	URL/Attachment
☑ URL	
	URL
	::https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/das-wie-und- es-achtsamen-investierens/}
☐ Attachme	nt
☑ Reporting	
	URL/Attachment
☑ URL	
	URL
{hyperlink Factshee	::https://www.private-banking.at/app/uploads/2017/12/20171204- t_premium_selection_equity-1.pdf}
□ Attachme	nt
✓ Climate chang	е
3	
	URL/Attachment



 $\ensuremath{\square}$ URL

URL

{hyperlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/klimaneutrales-investieren/}

□ Attachment

☐ We do not publicly disclose any investment policy components

SG 03 Mandatory Public 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.

There are solutions for potential conflicts of interest in our intern Code of Conduct. Additionally, if there is no solutions through our Code of Conduct (provided by the compliance department), we push the conflict to our ESG investment committee. This constist of four people from different departments of our bank and is the highest-ranked decision-making-committee.

 \bigcirc No

Objectives and strategies

SG 05 Mandatory Public Gateway/Core Assessed General

SG 05.1

Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- O Less frequently than annually
- O Ad-hoc basis
- O It is not set/reviewed

Governance and human resources

SG 07 Mandatory Public Core Assessed General

SG 07.1

Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.



Roles					
☐ Board members or trustees					
☑ Internal Roles (triggers other options)					
Select from the below internal roles					
☑ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee					
☑ Oversight/accountability for responsible investment					
☐ Implementation of responsible investment					
$\hfill \square$ No oversight/accountability or implementation responsibility for responsible investment					
☐ Other Chief-level staff or head of department, specify					
☑ Portfolio managers					
☑ Oversight/accountability for responsible investment					
☑ Implementation of responsible investment					
$\hfill \square$ No oversight/accountability or implementation responsibility for responsible investment					
☑ Investment analysts					
☐ Oversight/accountability for responsible investment					
☑ Implementation of responsible investment					
$\hfill \square$ No oversight/accountability or implementation responsibility for responsible investment					
☑ Dedicated responsible investment staff					
☑ Oversight/accountability for responsible investment					
☑ Implementation of responsible investment					
$\hfill \square$ No oversight/accountability or implementation responsibility for responsible investment					
☐ Investor relations					
☐ Other role, specify (1)					
☐ Other role, specify (2)					
☑ External managers or service providers					
☐ Oversight/accountability for responsible investment					
☑ Implementation of responsible investment					
☐ No oversight/accountability or implementation responsibility for responsible investment					

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Portfolio manager and investment analysts have to implement ESG-issues and exclusion criteria in all their investment decisions. They rely primarly on research from service providers (MSCI ESG research, CSSP AG). Additionally, we have an ESG investment committee, which get-together on a quarterly basis. This is the highest decision-making committee for ESG issues.

SG 07.3

Indicate the number of dedicated responsible investment staff your organisation has.



Number

3

I confirm I have read and understood the Accountability tab for SG 07

I confirm I have read and understood the Accountability tab for SG 07

Promoting responsible investment

SG 09 Mandatory Public Core Assessed PRI 4,5

SG 09.1

Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Select all that apply

 $\ensuremath{\square}$ Principles for Responsible Investment



Your organisation's role in the initiative during the reporting period (see definitions)

☑ Basic
☐ Moderate
☐ Advanced
☐ Asian Corporate Governance Association
☐ Australian Council of Superannuation Investors
□ AFIC – La Commission ESG
□ BVCA – Responsible Investment Advisory Board
□ CDP Climate Change
□ CDP Forests
□ CDP Water
☐ CFA Institute Centre for Financial Market Integrity
\square Code for Responsible Investment in SA (CRISA)
☐ Code for Responsible Finance in the 21st Century
☐ Council of Institutional Investors (CII)
□ Eumedion
☐ Extractive Industries Transparency Initiative (EITI)
☐ ESG Research Australia
☐ Invest Europe Responsible Investment Roundtable
☐ Global Investors Governance Network (GIGN)
☐ Global Impact Investing Network (GIIN)
☐ Global Real Estate Sustainability Benchmark (GRESB)
☐ Green Bond Principles
☐ 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 Sustainable Insurance
$\hfill\square$ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
☐ Responsible Finance Principles in Inclusive Finance
☐ Shareholder Association for Research and Education (Share)
☐ United Nations Environmental Program Finance Initiative (UNEP FI)
☐ United Nations Global Compact
☐ Other collaborative organisation/initiative, specify

SG 10 Mandatory Public Core Assessed PRI 4

SG 10.1

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

Yes

SG 10.2

Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

☑ Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

We try to educate our Clients regarding RI. Also we implemented a Magazin, called "achtsames investieren", which biannually covers RI-Topics and ESG-Investment themes.

Frequency of contribution

- O Quarterly or more frequently
- Biannually
- Annually
- O Less frequently than annually
- O Ad hoc
- Other
- ☑ Provided financial support for academic or industry research on responsible investment

Description

Once in a year, we invite an international guest Speaker to our nearby University of applied Services to speak about latest Trends in ESG-investing. In the Framework of a cooperation we Focus to provide indeep insights and better understanding of responsible Investment.

Frequency of contribution

- O Quarterly or more frequently
- O Biannually
- Annually
- O Less frequently than annually
- O Ad hoc
- Other
- ☐ Provided input and/or collaborated with academia on RI related work
- $\ensuremath{\square}$ Encouraged better transparency and disclosure of responsible investment practices across the investment industry



Description

We have implemented a deep ESG-reporting coverage of our Portfolio. Also all our Clients can live-check our Portfolio regarding ESG-criteria, UN Global Compact Compliance and Business Involvement Exposure on yourSRI.com

	Frequency of contribution
Quarterl	y or more frequently
○ Biannua	ılly
 Annually 	y .
O Less fre	quently than annually
O Ad hoc	
○ Other	
☐ Spoke public	ly at events and conferences to promote responsible investment
☐ Wrote and pu	ublished in-house research papers on responsible investment
☐ Encouraged	the adoption of the PRI
☐ Responded to	o RI related consultations by non-governmental organisations (OECD, FSB etc.)
	ublished articles on responsible investment in the media
	Description
We regularly	publish articles on our Website and in newspapers.
	Frequency of contribution
O Quarterl	y or more frequently
○ Biannua	ılly
 Annually 	V
○ Less fre	quently than annually
Ad hoc	
○ Other	
☐ A member of	PRI advisory committees/ working groups, specify
☐ On the Board	of, or officially advising, other RI organisations (e.g. local SIFs)
☐ Other, specify	y
No	

New selection options have been added to this indicator. Please review your prefilled responses carefully.

Public

Core Assessed

Outsourcing to fiduciary managers and investment consultants



PRI 4

Mandatory

SG 12

	SG 12.1 Indicate whether your organisation uses investment consultants.							
	☐ Yes, we use investment consultants							
	$\ensuremath{ riangledown}$ No, we do not use investment consultants.							
	ESG issue	es in asset allocation						
SG 1	3 Ma	ndatory	Public	Descriptive	PRI 1			
	SG 13.1	Indicate whether the organisation description of the scenario analysi						
	☐ Yes, to a	ssess future ESG factors						
	☑ Yes, to a	ssess future climate-related risks and	opportunities					
		Describe						
	We use E	Bloomberg-data and Excel Tools to ev	/aluate climate risks	for different Companies.				
	□ No, not to	o assess future ESG/climate-related i	ssues					
	SG 13.2 Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.							
		We do the following						
	✓ Alloca	tion between asset classes						
	□ Deterr	nining fixed income duration						
	☑ Alloca	tion of assets between geographic ma	arkets					
	Sector	weightings						
	\square Other,	specify						
	□ We do	not consider ESG issues in strategic	asset allocation					
SG 1:	3 CC Vol	luntary	Public	Descriptive	General			
		rantar y	1 dbiio	Босоприче	Conorai			
	SG 13.4 CC	Describe how the organisation is upportunities, including how the ar						
	☐ Initial assessment							
	☑ Incorporation into investment analysis							
	Describe							

Portfolio manager compare their portfolio carbon emissions and climaterisk-ranking (based on climetricts) to their benchmarks. Additonally, they have looked into their portfolio in 2019 to deeply analyze risks regarding extreme weather conditions. In 2019, ESG-team will consider further action regarding the implementation of climate-related scenario analysis.



☐ Inform ac	☐ Inform active ownership				
☐ Other					
SG 13.5 CC	Indicate who uses this analysis.				
☐ Board me	embers, trustees, C-level roles, Investment Committee				
☑ Portfolio r	managers				
☐ Dedicated	d responsible investment staff				
☐ External r	managers				
✓ Investmer	nt consultants/actuaries				
☐ Other					
SG 13.6 CC	Indicate whether the organisation has evaluated the impacts of climate-related risk, beyond the investment time-horizon, on the organisations investment strategy.				
Yes					
	Describe				
Climate-re	Climate-related issues are analyzed until 2050, which is beyond the investment-time horizon (up to 7 years).				
○ No					
SG 13.7 CC	Indicate whether a range of climate scenarios is used.				
○ Yes, including analysis based on a 2°C or lower scenario					
Yes, not i					
O No, a ran	○ No, a range is not used				
SG 13.8 CC	Indicate the climate scenarios the organisation uses.				



Provider	Scenario used		
IEA	☐ Beyond 2 Degrees Scenario (B2DS)		
IEA	☐ Energy Technology Perspectives (ETP) 2 Degrees scenario		
IEA	☐ Sustainable Development Scenario (SDS)		
IEA	□ New Policy Scenario (NPS)		
IEA	☐ Current Policy Scenario (CPS)		
IRENA	□ RE Map		
Greenpeace	☐ Advanced Energy [R]evolution		
Institute for Sustainable Development	☐ Deep Decarbonisation Pathway Project (DDPP)		
Bloomberg	☑ BNEF reference scenario		
IPCC	☐ Representative Concentration Pathway (RCP) 8.5		
IPCC	□ RPC 6		
IPCC	□ RPC 4.5		
IPCC	□ RPC 2.6		
Other	□ Other (1)		
Other	□ Other (2)		
Other	□ Other (3)		

SG 14	Mandatory to Report Voluntary to Disclose	Public	Additional Assessed	PRI 1



SG 14.1

Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

\checkmark	Changing demographics
	Climate change
	Resource scarcity
V	Technological developments
	Other, specify(1)
	Other, specify(2)

SG 14.2

☐ None of the above

Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- ☑ Established a climate change sensitive or climate change integrated asset allocation strategy
- ☑ Targeted low carbon or climate resilient investments

Specify the AUM invested in low carbon and climate resilient portfolios, funds, strategies or asset classes.

	trillions	billions	millions	thousands	hundreds
Total AUM			20	000	000
Currency	EUR				
Assets in USD			22	817	863

Specify the framework or taxonomy used.

Our sustainable equity strategy uses CO2- and carbon filters and reduces carbon emissions by 70 % compared to MSCI World.

$\hfill\square$ Phase out your investments in your fossil fuel holdings
$\ensuremath{\boxtimes}$ Reduced portfolio exposure to emissions intensive or fossil fuel holdings
$\hfill\square$ Used emissions data or analysis to inform investment decision making
$\ensuremath{\boxtimes}$ Sought climate change integration by companies
$\hfill \square$ Sought climate supportive policy from governments
☐ Other, specify
☐ None of the above



Indicate which of the following tools the organisation uses to manage climate-related risks and SG 14.3 opportunities. ☑ Scenario analysis ☐ Disclosures on emissions risks to clients/trustees/management/beneficiaries ☑ Climate-related targets ☑ Encouraging internal and/or external portfolio managers to monitor emissions risks $\hfill\square$ Emissions-risk monitoring and reporting are formalised into contracts when appointing managers ☐ Weighted average carbon intensity ☑ Carbon footprint (scope 1 and 2) ☑ Portfolio carbon footprint ☑ Total carbon emissions ☑ Carbon intensity $\hfill\square$ Exposure to carbon-related assets ☐ Other emissions metrics ☐ Other, specify ☐ None of the above

SG 14 CC	Voluntary	Public		General
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SG 14.6 CC Please provide further details on these key metric(s) used to assess climate related risks and opportunities.



Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Climate-related targets	☐ All assets ☐ Majority of assets ☑ Minority of assets	Risk management	co2/Million invested	based on MSCI ESG Research data.
Carbon footprint (scope 1 and 2)	☐ All assets ☐ Majority of assets ☑ Minority of assets	Risk management	co2/Million invested	based on MSCI ESG Research data.
Portfolio carbon footprint	☐ All assets ☐ Majority of assets ☑ Minority of assets	Risk management	co2/Million invested	based on MSCI ESG Research data.
Total carbon emissions	☐ All assets ☐ Majority of assets ☑ Minority of assets	Risk management	co2/Million invested	based on MSCI ESG Research data.
Carbon intensity	☐ All assets ☐ Majority of assets ☑ Minority of assets	Risk management	co2/Million invested	based on MSCI ESG Research data.

SG 14.7 CC

Describe in further detail the key targets.



Targettype	Time Frame	Description	Attachments
☐ Absolute target☐ Intensity target			
☐ Absolute target ☐ Intensity target			
☐ Absolute target☐ Intensity target			
☐ Absolute target☐ Intensity target			
☐ Absolute target☐ Intensity target			

SG 14.8 CC Indicate whether climate-related risks are integrated into overall risk management and explain the risks management processes for identifying, assessing, and managing climate-related risks.

- O Process for climate-related risks is integrated into overall risk management
- Process for climate-related risks is not integrated into our overall risk management

Please describe

Portfolio management is doing further research, how to integrate climate risk into overall risk management. Due to the technical complexity of the project, results will hopefully be available at the beginning of 2020.

SG 14.9 CC Indicate whether the organisation undertakes active ownership activities to encourage TCFD adoption.

- O Yes
- No, we do not engage

SG 15	Mandatory to Report Voluntary to Disclose	Public	Descriptive	PRI 1

SG 15.1

Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

Yes

SG 15.2 Indicate the percentage of your total AUM invested in environmental and social themed areas.

%

10



SG 15.3

Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description. Area ☑ Energy efficiency / Clean technology Asset class invested ☑ Listed equity % of AUM 3 ☐ Fixed income - SSA ☐ Fixed income - Corporate (financial) \square Fixed income - Corporate (non-financial) ☐ Fixed income - Securitised □ Property ☐ Hedge funds Brief description and measures of investment We invest into energy efficent theme fonds & select equities and bonds from energy efficient companies. ☐ Renewable energy ☐ Green buildings ☐ Sustainable forestry ☐ Sustainable agriculture ☑ Microfinance Asset class invested ☐ Listed equity ☐ Fixed income - SSA ☑ Fixed income - Corporate (financial)

% of AUM

2

☐ Fixed income - Corporate (non-financial)

☐ Fixed income - Securitised

☐ Property

☐ Hedge funds



Brief description and measures of investment We invest into microfinance funds (singe funds & fund of funds). ☐ SME financing ☐ Social enterprise / community investing ☐ Affordable housing □ Education ☑ Global health Asset class invested ☑ Listed equity % of AUM 3 ☐ Fixed income - SSA ☐ Fixed income - Corporate (financial) ☐ Fixed income - Corporate (non-financial) \square Fixed income - Securitised ☐ Property ☐ Hedge funds Brief description and measures of investment We invest into health theme fonds & select equities and bonds from health companies with very good ESG-ratings. Asset class invested ☑ Listed equity % of AUM 2 ☐ Fixed income - SSA ☐ Fixed income - Corporate (financial) ☐ Fixed income - Corporate (non-financial) ☐ Fixed income - Securitised ☐ Property



☐ Hedge funds

Brief description and measures of investment

We invest into water theme fonds & select equities and bonds from companies related to the water business.

 $\hfill\square$ Other area, specify

 \bigcirc No

Asset class implementation not reported in other modules

SG 16 Mandatory Public Descriptive General

SG 16.1

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
Fixed income - Securitised	So far we have never invested in an asset class, where leading industry standards regarind the ESG-integration or other RI issues have been missing. If this would be the case, we would contact PRI-officials regarding help and would try to discuss and agree on our plans with PRI-officials.

SG 17.1

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		
Fixed income - SSA	see the question regarding "internally managed assets" before.		
Fixed income - Corporate (financial)	see the question regarding "internally managed assets" before.		
Fixed income - Corporate (non-financial)	see the question regarding "internally managed assets" before.		
Fixed income - Securitised	see the question regarding "internally managed assets" before.		
Property	see the question regarding "internally managed assets" before.		
Hedge funds - DDQ	Select whether you use the PRI Hedge Fund DDQ • Yes • No		
Hedge funds	see the question regarding "internally managed assets" before.		

Communication

SG 19	Mandatory	Public	Core Assessed	PRI 2, 6
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SG 19.1

Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Caution! The order in which asset classes are presented below has been updated in the online tool to match the Reporting Framework overview.

If you are transferring data from an offline document, please check your response carefully.

Selection, Appointment and Monitoring

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- O We disclose to clients/beneficiaries only.
- We disclose to the public

Listed equity - Incorporation



Do you disclose?
 We do not proactively disclose it to the public and/or clients/beneficiaries We disclose to clients/beneficiaries only. We disclose it publicly
The information disclosed to clients/beneficiaries is the same
● Yes○ No
Disclosure to public and URL
Disclosure to public and URL
 Broad approach to ESG incorporation Detailed explanation of ESG incorporation strategy used
Frequency
☑ Quarterly or more frequently
□ Biannually
□ Annually □ Less frequently than annually
□ Ad-hoc/when requested
URL
{hyperlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/das-wie-und-warum-des-achtsamen-investierens/}
URL

{hyperlink:https://www.private-banking.at/app/uploads/2017/12/20171204-Factsheet_premium_selection_equity-1.pdf}

Listed equity - Engagement

Do you disclose?

- $\ensuremath{ \bullet}$ We do not disclose to either clients/beneficiaries or the public.
- $\ \bigcirc$ We disclose to clients/beneficiaries only.
- \bigcirc We disclose to the public

Fixed income



Do you disclose?	
O We do not disclose to either clients/beneficiaries or the public.	
○ We disclose to clients/beneficiaries only.	
The information disclosed to clients/beneficiaries is the same	
○ No	
losure to public and URL	

Disclosure to public and URL

Disclosure to public and URL

Broad approach to RI incorporation

Detailed explanation of RI incorporation strategy used

Frequency

Quarterly
Biannually
Annually
Less frequently than annually
Ad hoc/when requested

 $\label{thm:perlink:https://www.private-banking.at/ueber-uns/verantwortungsbewusstes-investieren/8-prinzipien-dernachhaltigen-geldanlage/\}$



URL

Volksbank Vorarlberg e. Gen.

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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.



01	Mano	datory	P	Public		tev	/ay			PRI
SAM	01.1	Indicate to impler	which of the following ESG inc ment on your behalf for all your	orporation strate listed equity an	gies d/or	yo fixe	u re ed in	equire your acome ass	external m ets:	nanag
		Active	investment strategies							
			Active investment strategies	Listed Equity	,					
		:	Screening	V						
		-	Thematic							
		ı	Integration	V						
		1	None of the above							
		Passiv	re investment strategies							
		P	assive investment strategies	Listed Equit	у					
		S	Screening	V						
		Т	hematic							
		Ir	ntegration	V		T				

	Selec	tion				
SAM	02	Man	ndatory	Public	Core Assessed	PRI 1
	SAM 0	2.1	Indicate what RI-related information documentation for your external ma		typically covers in the majority of	selection

None of the above



	LE				
Your organisation's investment strategy and how ESG objectives relate to it	$\overline{\mathbf{V}}$				
ESG incorporation requirements	\checkmark				
ESG reporting requirements	\checkmark				
Other					
No RI information covered in the selection documentation					

SAM 02.2

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

	LE			
Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements	V			
Assess the quality of investment policy and its reference to ESG	V			
Assess the investment approach and how ESG objectives are implemented in the investment process	V			
Review the manager's firm-level vs. product-level approach to RI	V			
Assess the ESG definitions to be used	V			
Other				
None of the above				

ESG people/oversight



	LE				
Assess ESG expertise of investment teams	V				
Review the oversight and responsibilities of ESG implementation					
Review how is ESG implementation enforced /ensured	V				
Review the manager's RI-promotion efforts and engagement with the industry	V				
Other					
None of the above					

Process/portfolio construction/investment valuation

	LE				
Review the process for ensuring the quality of the ESG data used	V				
Review and agree the use of ESG data in the investment decision making process					
Review and agree the impact of ESG analysis on investment decisions	V				
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)	V				
Review and agree manager's ESG risk framework	V				
Review and agree ESG risk limits at athe portfolio level (portfolio construction) and other ESG objectives					
Review how ESG materiality is evaluated by the manager	V				
Review process for defining and communicating on ESG incidents					
Review and agree ESG reporting frequency and detail	V				
Other, specify					
None of the above					

	SAM 02.3	Indicate the selection process and its ES	G/RI com	oone	ents				
	☐ Review E	SG/RI responses to RfP, RfI, DDQ etc.							
	☑ Review re	sponses to PRI's Limited Partners' Respon	sible Inve	stme	ent [ue D	iligen	nce Questionnaire (LP DDQ)	
	☑ Review p	ublicly available information on ESG/RI							
	☐ Review a	ssurance process on ESG/RI data and proc	esses						
	☑ Review P	RI Transparency Reports							
	☐ Request a	and discuss PRI Assessment Reports							
	☐ Meetings	with the potential shortlisted managers cover	ering ESG	/RI	then	nes			
	☐ Site visits	to potential managers offices							
	☐ Other, sp	ecify							
	SAM 02.4	When selecting external managers does	your orga	nisa	tion	set a	ny of	the following:	
				П	1		$\overline{\mathbf{H}}$	7	
			LE						
		ESG performance development targ	lets —	\vdash	-	+	+	_	
		200 performance development targ	jets 🗆						
		ESG score	V						
								_	
		ESG weight							
				\vdash		4	\vdash	_	
		Real world economy targets							
		Other RI considerations		\vdash	-	+	+	_	
		Cities IXI considerations							
		None of the above						_	
	Monitoring								
	-Monntornit								
M 0	5 Mar	ndatory Pub	olic		Co	re A	ssess	sed PRI1	

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates



SAM 05.1

	LE			
ESG objectives linked to investment strategy (with examples)	V			
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund	V			
Compliance with investment restrictions and any controversial investment decisions	V			
ESG portfolio characteristics	V			
How ESG materiality has been evaluated by the manager in the monitored period	V			
Information on any ESG incidents	V			
Metrics on the real economy influence of the investments				
PRI Transparency Reports	V			
PRI Assessment Reports				
RI-promotion and engagement with the industry to enhance RI implementation	V			
Changes to the oversight and responsibilities of ESG implementation				
Other general RI considerations in investment management agreements; specify				
None of the above				

SAM 05.2

When monitoring external managers, does your organisation set any of the following to measure compliance/progress



	LE				
ESG score	V				
ESG weight					
ESG performance minimum threshold					
Real world economy targets					
Other RI considerations					
None of the above					

Outputs and outcomes SAM 09 Mandatory Public Additional Assessed PRI 1,6 SAM 09.1 Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

☑ Add Example 1



Topic or issue	Emerging Debt Fund Selection
Conducted by	☑ Internal staff
Asset class	☐ All asset classes
	☑ Listed Equity
Scope and process	We have been looking for a fund in the emerging debt section. Therefore we analyzed all funds and also did a ESG-analysis for all the fund. We found that in emerging market debt, ESG-filters help to significantly improve performance. Therefore we finally selected a fund, which uses a strong sustainability filter.
Outcomes	Invest into a special ESG emerging market debt fund & significant outperformance during 2018.
☐ Add Ex	ample 2
☐ Add Ex	ample 3
☐ Add Ex	ample 4
☐ Add Ex	ample 5
☐ Add Ex	ample 6
☐ Add Ex	ample 7
□ We are	not able to provide examples



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Direct - Listed Equity Incorporation

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ESG incorporation in actively managed listed equities

lmpl	lementat	ion processes				
01	Manda	atory		Public	Gateway	PRI 1
LE	El 01.1		d listed ed	quities and (2) the	and/or combination of stra e breakdown of your actives (+/- 5%)	
ES	SG incorp	oration strategy (sele	ct all that	apply)		
	☐ Scre	ening alone (i.e. not co	mbined wi	th any other stra	tegies)	
	☐ Ther	natic alone (i.e. not con	nbined witl	h any other strate	egies)	
	☐ Integ	gration alone (i.e. not co	mbined w	ith any other stra	itegies)	
	☑ Scre	ening and integration st	rategies			
	-	active listed equity to egy is applied	80	%		
		natic and integration stra	_			
	-	active listed equity to egy is applied (+/- 5%)	10	%		
	☑ All th	nree strategies combine	d			
	-	active listed equity to egy is applied	10	%		
	□We	do not apply incorporation	on strateg	ies		
		Total actively mana	ged listed	equities		

100%



LEI 01.2

Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

We use ESG incorporation strategies in all our investment decisions. First of all, potential companies will be ESG screened and controversies screened. After the first screen, we try to industry-rank companies based on their ESG-score to identify the rank of our company within the industry. Additionally, thematic investments are incorporated into our investment portfolios.

(A) Implementa	ation: Screening			
LEI 04	Mandato	ory	Public	Descriptive	PRI 1
	LEI 04.1 Indicate and describe the type of screening you apply to your internally managed active liequities.				
	Type of scr	reening			
	✓ Negative/	exclusionary screening			
	Screened	Indicate and describe the type of screening you apply to your internally managed active listed equities. reening //exclusionary screening d by duct //vity etor //ironmental and social practices and performance porate governance Description exclusion lists, predominantly based on the exclusion lists from the Norwegian Pension Fund. best-in-class screening d by duct //vity			
	□ Proc	-			
	□ Activ				
	☑ Sect				ed active listed
			nd performance		
	,	Ŭ			
		Description			
	We have	exlusion lists, predominantly bas	ed on the exclusior	n lists from the Norwegian Pensio	n Fund.
	☑ Positive/b	pest-in-class screening			
	Screened	d by			
	□ Proc	duct			
	☐ Activ	vity			
	Sect Sec	tor			
	☑ Cou	ntry/geographic region			
	☑ Envi	ironmental and social practices a	nd performance		
		porate governance			



Description

Best-in-Class-Screening is based on industry clusters. Additionally, we build rankings based on the ESG-performance of our universe based on the scoring on the different E,S and G-score.

✓ Norms-based screening

Screened by

- ☑ UN Global Compact Principles
 ☐ The UN Guiding Principles on Business and Human Rights
 ☐ International Labour Organization Conventions
 ☐ United Nations Convention Against Corruption
 ☐ OECD Guidelines for Multinational Enterprises
 ☑ Other, specify
 - ILO Declaration on Fundamental Principles and Rights at Work

Description

MSCI ESG Controversies is designed to provide timely and consistent assessments of ESG controversies involving publicly traded companies and fixed income issuers. The evaluation framework used in ESG Controversies is designed to be consistent with international norms represented in numerous widely accepted global conventions, including the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact

LEI 04.2

Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

Criteria are reviewed in our ESG committee on a quarterly basis. Clients are informed through our ESG-newsletter, if there are substantial changes to some companies.

LEI 05 Mandatory Public Core Assessed PRI 1



	LEI 05.1	Indicate which processes your analysis.	organisation us	es to ensure screening is based on	robust	
	☐ Comprehe	ensive ESG research is undertak	cen or sourced to	determine companies' activities an	d products.	
	☐ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies					
		research and data used to identify staff, the internal audit function or		be excluded/included is subject to in	ternal audit	
	☑ Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.					
	☐ Trading p	latforms blocking / restricting flag	ged securities o	on the black list		
		tee or body with representatives ne or all screening decisions	independent of	the individuals who conduct compar	y research	
	☐ A periodic	c review of the quality of the rese	arch undertaken	or provided is carried out		
	☐ Review a	nd evaluation of external researc	h providers			
	☐ Other, sp	ecify				
	☐ None of the	he above				
	LEI 05.3	Indicate how frequently third page	arty ESG ratings	are updated for screening purpose	S.	
	Quarterly or more frequently					
	○ Bi-annually					
	○ Annually					
	○ Less frequently than annually					
(B) Implementa	ation: Thematic				
LEI 07	Mandato	pry	Public	Descriptive	PRI 1	
	LEI 07.1	Indicate the type of sustainabil	ity thematic fund	ds or mandates your organisation ma	anages.	
	☑ Environm	entally themed funds				
		nemed funds				
	☐ Combinat	tion of themes				
(C) Implementa	ation: Integration of ESG fac	ctors			
LEI 08	Mandato	ory	Public	Core Assessed	PRI 1	
	LEI 08.1			search as part of your investment ar y portfolios that is impacted by this a		



ESG issues	Proportion impacted by analysis
Environmental	
	Environmental
	O <10%
	● 10-50%
	○ 51-90%
	O >90%
Social	
	Social
	O <10%
	● 10-50%
	○ 51-90%
	O >90%
Corporate	
Governance	Corporate Governance
	O <10%
	⊚ 10-50%
	○ 51-90%
	O >90%

LEI 09	Mandato	ory	Public	Core Assessed	PRI 1
	LEI 09.1	Indicate which processes your robust analysis.	organisation uses	to ensure ESG integration is base	ed on a
		ensive ESG research is undertak	en or sourced to de	etermine companies' activities an	d products
	☐ Companies are given the opportunity by you or your research provider to review ESG research on the and correct inaccuracies				
		ty ESG ratings are updated regul	arly.		
	☐ A periodic	review of the internal research i	s carried out		
		d, regular ESG specific meetings vestments team	between responsil	ole investment staff and the fund	manager or
	☑ ESG risk	profile of a portfolio against benc	hmark		
	☐ Analysis o	of the impact of ESG factors on in	nvestment risk and	return performance	
	☐ Other, sp	ecify			
	□ None of the state of the	he above			



LEI 09.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.				
○ <10%					
○ 10-50%	O 10-50%				
○ 51-90%					
● >90%					
LEI 09.3	Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.				
O Quarterly	or more frequently				
Bi-Annua	lly				
O Annually					
O Less freq	uently than annually				
LEI 09.5	Describe how ESG information is held and used by your portfolio managers.				
☑ ESG info	rmation is held within centralised databases or tools and it is accessible by all relevant staff				
☑ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff					
	☑ Systematic records are kept that capture how ESG information and research was incorporated into investment decisions				
☐ Other, sp	ecify				
□ None of t	he above				



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Reported Information

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Direct - Listed Equity Active Ownership

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Overview

LEA 01 Mandatory Public Core Assessed PRI 2

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 01.1

Indicate whether your organisation has an active ownership policy.

○ Yes

No

LEA 01.4

Do you outsource any of your active ownership activities to service providers?

○ Yes

No

Engagement

LEA 02 Mandatory Public Core Assessed PRI 1,2,3

LEA 02.1

Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	☑ To influence corporate practice (or identify the need to influence) on ESG issues
	☑ To encourage improved/increased ESG disclosure
	\square To gain an understanding of ESG strategy and/or management
	☐ We do not engage via internal staff
Collaborative engagements	☐ To influence corporate practice (or identify the need to influence) on ESG issues
	☐ To encourage improved/inreased ESG disclosure
	\square To gain an understanding of ESG strategy and/or management
	☑ We do not engage via collaborative engagements
Service provider engagements	☑ To influence corporate practice (or identify the need to influence) on ESG issues
	☑ To encourage improved/increased ESG disclosure
	\square To gain an understanding of ESG strategy and/or management
	☐ We do not engage via service providers



LEA 02.2

Indicate whether your organisation plays a role in the engagement process that your service provider conducts.

O Yes

No

LEA 03 Mandatory Public Core Assessed PRI 2

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagements.

○ Yes

No

LEA 04 Mandatory Public Core Assessed PRI 2

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

Individual / Internal engagements	 All engagement activities Majority of engagement activities Minority of engagement activities We do not define specific objectives for engagement activities carried out by internal staff.
Service provider engagements	 All engagement activities Majority of engagement activities Minority of engagement activities We do not define specific objectives for engagement activities carried out by our service providers.

LEA 05 Mandatory Public Core Assessed PRI 2

LEA 05.1

Indicate if you monitor and/or review engagement outcomes.



Individual / Internal engagements	 Yes, in all cases Yes, in majority of cases Yes, in a minority of cases We do not monitor, or review engagement outcomes carried out by our internal staff.
Service provider engagements	 Yes, in all cases Yes, in majority of cases Yes, in minority of cases We do not monitor, or review engagement outcomes carried out by our service providers.

LEA 06 Mandatory Public Additional Assessed PRI 2,4

LEA 06.1

Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

○ Yes

No

LEA 08 Mandatory Public Gateway PRI 2

LEA 08.1

Indicate if you track the number of your engagement activities.

Type of engagement	Tracking engagements	
Individual / Internal staff engagements	 Yes, we track the number of our engagements in full Yes, we partially track the number of our engagements We do not track 	
Service provider engagements	 Yes, we track the number of our engagements in full Yes, we partially track the number of our engagements We do not track 	



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Reported Information

Public version

Direct - Fixed Income

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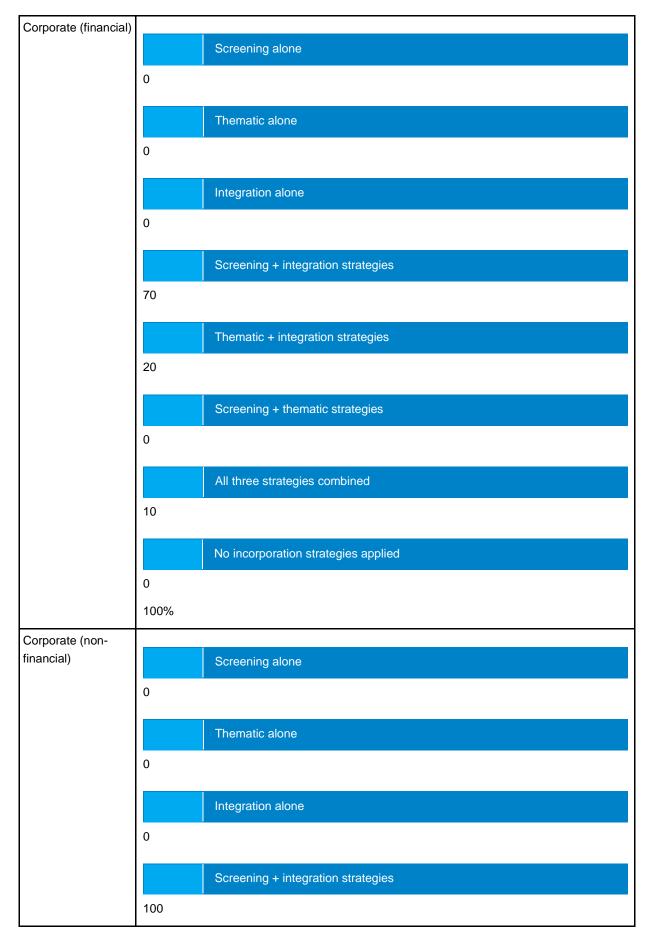
ESG incorporation in actively managed fixed income

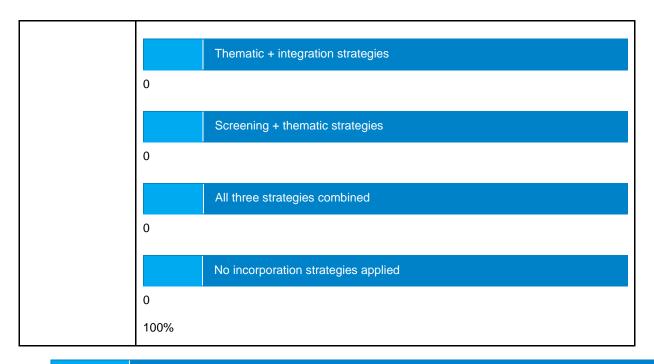
Implementation processes

FI 01	Mandatory	Public	Gateway	PRI 1

FI 01.1

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.





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

Integration of ESG-factors in fixed income is used because of the fact that research shows that companies with higher ESG-scores have lower default rates than companies with lower ESG-scores. Screening is used to identify companies which violate our internal exclusion criterias.

FI 03	Manda	atory	Public	Additional Assessed	PRI 1
	FI 03.1	Indicate how you ensure that you	ır ESG research pro	ocess is robust:	
	☐ Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services				oducts
	☐ Issuers at correct inacc	re given the opportunity by you or you curacies	our research provic	ler to review ESG research on the	em and
	☑ Issuer infe	ormation and/or ESG ratings are up	dated regularly to	ensure ESG research is accurate	
	☑ Internal a	udits and regular reviews of ESG re	esearch are underta	aken in a systematic way.	
		ality/sustainability framework is creatinities for each sector/country.	ted and regularly սլ	odated that includes all the key E	SG risks
	☐ Other, sp	ecify			
	☐ None of the	he above			



FI 03.2	Describe how your ESG	G information or analysis is	s shared among your inv	vestment team.	
☑ ESG infor	☑ ESG information is held within a centralised database and is accessible to all investment staff				
☐ ESG infor	mation is displayed on fro	ont office research platforn	ns		
	☑ ESG information is a standard item on all individual issuer summaries, research notes, 'tear sheets', or similar documents				
✓ Investmer committee m		cuss ESG information on i	ssuers as a standard ite	em during investment	
☑ Records o	capture how ESG information	tion and research was inc	orporated into investme	nt decisions	
☐ Other, specify					
□ None of the above					
A) Implemer	ntation: Screening				
Manda	atory	Public	Gateway	PRI 1	

Select all that apply

FI 04.1

	Corpora	te (financial)	Corporate (non-financial)	
	\checkmark		\checkmark	
Negative/exclusionary screening				
	\checkmark		\checkmark	
Positive/best-in-class screening				
	\checkmark		V	
Norms-based screening				

Indicate the type of screening you conduct.

FI 04.2 Describe your approach to screening for internally managed active fixed income

Negative and norm-based screening is applied.

FI 06	Manda	atory	Public	Core Assessed	PRI 1
FI	06.1	Indicate which systems your orga breached in fixed income investm		sure that fund screening criteria a	re not



Type of screening	Checks
	☑ Analysis is performed to ensure that issuers meet screening criteria
Negative/exclusionary screening?	$\ensuremath{\square}$ We ensure that data used for the screening criteria is updated at least once a year.
	☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
	$\ensuremath{^{\square}}$ Audits of fund holdings are undertaken yearly by internal audit or compliance functions
	☐ Other, specify
	☐ None of the above
	☑ Analysis is performed to ensure that issuers meet screening criteria
Positive/best-in-class screening	$\ensuremath{\square}$ We ensure that data used for the screening criteria is updated at least once a year.
	☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
	$\ensuremath{\square}$ Audits of fund holdings are undertaken yearly by internal audit or compliance functions
	☐ Other, specify
	☐ None of the above
	☑ Analysis is performed to ensure that issuers meet screening criteria
Norms-based screening	$\ensuremath{\square}$ We ensure that data used for the screening criteria is updated at least once a year.
	☐ Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria
	$\ensuremath{^{\square}}$ Audits of fund holdings are undertaken yearly by internal audit or compliance functions
	☐ Other, specify
	☐ None of the above

(B) Implementation: Thematic FI 08 Mandatory Public Core Assessed PRI 1



FI 08.1	Indicate whether you encourage transparency and disclosure relating to the issuance of theme bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines
☑ We requir	e that themed bond proceeds are only allocated to environmentally or socially beneficial projects
	e the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of rhich themed bond proceeds are allocated
	e issuers to demonstrate a systematic and transparent process of disbursing themed bond eligible projects until all funds are allocated
	e issuers to report at least once per year on the projects to which proceeds have been allocated lescription of those projects

☐ Other, specify

☐ None of the above

FI 08.2

Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.

So far there was no such case. If this would happen, we would contact the issuer and ask again for the required documents. If the fail to deliver them, we would disinvest.

FI 09 **Mandatory Public Additional Assessed** PRI 1 Indicate how you assess the environmental or social impact of your thematic investments. FI 09.1 ☑ 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

☐ None of the above

(C) Implementation: Integration

Mandatory Public Descriptive PRI 1 FI 10

FI 10.1

Describe your approach to integrating ESG into traditional financial analysis.

We use ESG-information to model default risk.

We use ESG-data to compare different issuers.

We use ESG-data to adopt expected default rates.

FI 10.2

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



uance of themed

Corporate (financial)

The same approach is used for all fixed income investments.

Corporate (non-financial)

The same approach is used for all fixed income investments.

FI 11	IV	Mandato	ory	Public	Core Assessed	PRI 1
	FI 11.1	1	Indicate how ESG information is t	typically used as pa	art of your investment process.	

Select all that apply



	Corporate (financial)	Corporate (non-financial)	
ESG analysis is integrated into fundamental analysis	V	V	
ESG analysis is used to adjust the internal credit assessments of issuers.	V	V	
ESG analysis is used to adjust forecasted financials and future cash flow estimates.	V	☑	
ESG analysis impacts the ranking of an issuer relative to a chosen peer group.	V	✓	
An issuer's ESG bond spreads and its relative value versus its sector peers are analysed to find out if all risks are priced in.			
The impact of ESG analysis on bonds of an issuer with different durations/maturities are analysed.	V		
Sensitivity analysis and scenario analysis are applied to valuation models to compare the difference between base-case and ESG-integrated security valuation.		Ø	
ESG analysis is integrated into portfolio weighting decisions.	V	V	
Companies, sectors, countries and currency and monitored for changes in ESG exposure and for breaches of risk limits.	V	Ø	
The ESG profile of portfolios is examined for securities with high ESG risks and assessed relative to the ESG profile of a benchmark.	V	Ø	
Other, specify			

FI 12		Manda	atory	Public	Additional Assessed	PRI 1
	FI 12.	.1	Indicate the extent to which ESG	issues are reviewe	ed in your integration process.	

	Environment	Social	Governance
Corporate (financial)	Environmental	Social	Governance
	Systematically	○ Systematically	Systematically
	Occasionally	Occasionally	Occasionally
	O Not at all	O Not at all	O Not at all
Corporate (non-	Environmental	Social	Governance
financial)	Systematically	O Systematically	Systematically
	Occasionally	Occasionally	Occasionally
	O Not at all	○ Not at all	○ Not at all

FI 12.2 Please provide more detail on how you review E, S and/or G factors in your integration process.

Corporate (financial)

All the factors are based on MSCI ESG data. We use the models developed by MSCI ESG to incorporate them into our desicions.

Corporate (non-financial)

see above.

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Confidence building measures

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Confidence building measures **Public Additional Assessed** CM1 01 **Mandatory** General Indicate whether the reported information you have provided for your PRI Transparency Report this CM1 01.1 year has undergone: ☐ Third party assurance over selected responses from this year's PRI Transparency Report ☑ Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year ☐ Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) ☐ Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) ☑ Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) Whole PRI Transparency Report has been internally verified O Selected data has been internally verified ☐ Other, specify ☐ None of the above CM1 02 **Mandatory Public Descriptive** General CM1 02.1 We undertook third party assurance on last year's PRI Transparency Report O Whole PRI Transparency Report was assured last year O Selected data was assured in last year's PRI Transparency Report • We did not assure last year's PRI Transparency report O None of the above, we were in our preparation year and did not report last year. CM1 03 **Mandatory Public Descriptive** General We undertake confidence building measures that are unspecific to the data contained in our PRI CM1 03.1 Transparency Report:

☑ We adhere to an RI certification or labelling scheme



CM1 03.2	Which scheme?			
☐ Nationa	I SRI label based on the EUROSI	F Transparency gui	delines	
☐ B-corpo	pration			
☐ UK Ste	wardship code			
☐ GRESE	}			
□ Commo	odity type label (e.g. BCI)			
☐ Social I	abel			
☐ Climate	label			
□ RIAA				
	Specify			
yourSR	l Transparency			
<u> </u>				
	% of total AUM the schem	ne applies		
⊚ < :	25%			
O 25	-50 %			
O 50	-70 %			
○ >7	5 %			
	t independent/third party assuranc			/ report)
	ch are included in this year's PRI T	Fransparency Repor	t	
☑ ESG audit o	fholdings			
	Describe the present of exteri	nol/third party ESC	audit of holdings, including which	doto boo
CM1 03.4	been assured.	naviniu party ESG	addit of Holdings, including which	i uata nas
Daily public	available ESG-screening for our p	ublic fund holdings	via vourSRI com available	
Daily public	available 200 tologramy for our pr	abilo faria fiolalingo	via yourora.com available.	
☐ Other, speci	fy			
☐ None of the	above			
CM1 04 Manda	itory	Public	Descriptive	General
CM1 04.1	Do you plan to conduct third party	assurance of this ye	ear's PRI Transparency report?	
O Whole PRI	ransparency Report will be assure	ed		
Selected date	a will be assured			
CM1 04.2	Selected data will be assured			



What data will be assured
☐ Financial and organisational data
☐ Data related to RI activities
☐ RI policies
☐ RI processes (e.g. engagement process)
☑ ESG operational data of the portfolio
☐ Other
Relevant modules
☐ Organisational Overview
☐ Strategy and Governance
☐ Indirect – Manager Selection, Appointment and Monitoring
☑ Direct - Listed Equity Incorporation
☐ Direct - Listed Equity Active Ownership
☐ Direct - Fixed Income
○ We do not plan to assure this year's PRI Transparency report
CM1 04.2a Provide details related to the assurance that will be conducted
Expected date the assurance will be complete
30062019
Who will conduct the assurance
yoursri.com, CSSP AG headed in Vaduz, Liechtenstein
,
Assurance standard to be used
□ ISAE/ ASEA 3000
□ ISAE 3402
□ ISO standard
□ AAF01/06
□ AA1000AS
☐ IFC performance standards
□ ASAE 3410 Assurance Engagements on Greenhouse Gas Statements.
□ National standard
☑ Other
Specify
MSCI ESG-Data



	ed or equivalent sonable or equivalent			
05 M	andatory	Public	Descriptive	Gene
CM1 05.1		or over data points from	e over selected responses fron other sources that have sub	
	What data has been ass	sured		
☐ Finar	ncial and organisational data			
□ Data	related to RI activities			
□ RI Po	olicies			
☐ RI Pr	ocesses (e.g. engagement pro	ocess)		
☑ ESG	operational data of the portfoli	io		
☐ Othe	r			
	Relevant modules			
□ Orga	nisational Overview			
☐ Strate	egy and Governance			
☐ Indire	ect - Manager Selection, Appo	ointment and Monitoring		
✓ Direct	ct - Listed Equity Incorporation			
☐ Direc	ct - Listed Equity Active Owners	ship		
□ Direc	ct - Fixed Income			
	Who has conducted the	assurance		
no.				
	Assurance standard use	ed		
□ISAE	7/ ASEA 3000			
□ISAE	3402			
□ ISO s	standard			
□ AAF)1/06			
□ AA10)00AS			
□ IFC p	performance standards			
	E 3410 Assurance Engagemer	nts on Greenhouse Gas	Statements.	
☐ Natio	onal standard			
Othe	r			

Level of assurance sought



			Specify			
	У	our SRI ESG	G-classification.			
		Le	evel of assurance sought			
		_imited or equ	uivalent			
	\circ F	Reasonable c	or equivalent			
		Pl	ease provide:			
			Link to external assurance prov	vider's report [URL]		
	{hy	perlink:http://	-}			
			Link to original data source (if p	oublic) [URL]		
	{hy	perlink:http://	yoursri.com}			
CM1	07	Mandator		Public	Descriptive	General
CIVIT	U/	IVIAIIUALUI	V	Fublic	Descriptive	General
	CM1.0	Indic	cate who has reviewed/verified		e - or selected data of the - PRI Ti	ransparency
	CM1 (Indic				ransparency
		07.1 India	cate who has reviewed/verified ort . and if this applies to select			ransparency
	Who I	07.1 India Rep	cate who has reviewed/verified			ransparency
	Who I	07.1 India Rep	cate who has reviewed/verified ort . and if this applies to select			ransparency
	Who I	D7.1 Indic Rep has conduct O or other Ch	cate who has reviewed/verified ort . and if this applies to select	ted data please spe		ransparency
	Who I	has conduct	cate who has reviewed/verified ort and if this applies to select ed the verification hief-Level staff	ted data please spe		ransparency
	Who I	D7.1 Indic Rep has conduct O or other Ch	cate who has reviewed/verified ort . and if this applies to select ed the verification nief-Level staff Sign-off or review of responses	ted data please spe		ransparency
	Who I	Indicate Property of the Prope	cate who has reviewed/verified ort . and if this applies to select ed the verification nief-Level staff Sign-off or review of responses	ted data please spe		ransparency
	Who I ☑ CE	has conduct O or other Ch Sign-off Review of r	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses responses	ted data please spe		ransparency
	Who I ☑ CE	has conduct O or other Ch Sign-off Review of response	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses responses	ted data please spe		ransparency
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	Who I	has conduct O or other Ch Sign-off Review of real Board estment Com	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses esponses emittee Sign-off or review of responses	ted data please spe		ransparency
	Who I	has conduct O or other Ch Sign-off Review of re Board estment Com	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses esponses esponses sign-off or review of responses esponses	ted data please spe		ransparency
	Who I ☑ CE ☐ The ☑ Inve	has conduct O or other Ch Sign-off Review of restment Com Sign-off Review of restment Com Review of restment Com Sign-off Review of restment Com Sign-off Review of restment Com	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses esponses esponses esponses responses responses	ted data please spe		ransparency
	Who I ☑ CE ☐ The ☑ Inve ☐ Cor ☑ RI/I ☑ Inve	has conduct O or other Ch Sign-off Review of restment Com Sign-off Review of restment Com Sign-off Review of restment Com Sign-off Review of restment Team	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses esponses esponses esponses esponses esponses esponses esponses esponses	ted data please spe		ransparency
	Who I ☑ CE ☐ The ☑ Inv ☐ Co ☑ RI/I ☑ Inv ☐ Leg	has conduct O or other Ch Sign-off Review of restment Com Sign-off Review of restment Com Review of restment Com Sign-off Review of restment Com Sign-off Review of restment Com	cate who has reviewed/verified ort and if this applies to select ed the verification nief-Level staff Sign-off or review of responses esponses esponses esponses esponses esponses esponses esponses esponses	ted data please spe		ransparency

