



RI TRANSPARENCY REPORT

2020

KAS BANK

About this report

This report is an export of the individual Signatory organisation responses to the PRI Service Provider Reporting Framework during the 2020 reporting period. It shows your responses to mandatory indicators, as well as responses to voluntary indicators that your organisation has agreed to make public. You will be able to access the public RI Transparency report of your organisation and that of other signatories on the [PRI website](#).

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 an **Index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Index

The Index summarises the response status for the individual indicators and modules. It can be used by stakeholders as an 'at a glance' summary of reported information and to identify particular themes or areas of interest.

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

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator.
🔍	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.

Index

Organisational Overview			
Indicator	Short description	Status	Disclosure
OO 01	Basic information	✓	Public
OO 02	Reporting year	✓	Public
OO 03	Signatory category and services	✓	Public
OO 04	Other offerings/business activities	🔒	n/a
OO 05	Breakdown of ESG coverage	✓	Asset mix disclosed in OO 06
OO End		✓	-

Strategy and Governance			
Indicator	Short description	Status	Disclosure
SG 01	Responsible investment policy	✓	Public
SG 02	Norms used to develop policies	✓	Public
SG 03	Policy offerings to clients	✓	Public
SG 04	ESG/RI in business offerings	✓	Public
SG 05	Outsourcing of services	✓	Private
SG 06	Providing training/education	✓	Public
SG 07	Applying, advancing and promoting the PRI principles	✓	Public
SG 08	Actions taken to promote responsible investment	✓	Public
SG 09	Long term trends	✓	Public
SG 10	Interaction with asset owners	🔒	n/a
SG 11	Aligning approach with investor goals	✓	Public
SG 12	ESG recommendations not aligned with investor goals	✓	Public
SG 13	Seeking feedback from clients	✓	Public
SG 14	Managing conflicts of interest	✓	Public
SG End		✓	-

Reporting			
Indicator	Short description	Status	Disclosure
REP 01	Product type	✓	Public
REP 02	Reporting frameworks/standards/guidelines	✓	Public
REP 03	Incorporating ESG	✓	Public
REP 04	ESG in materiality analysis	✓	Public
REP 05	Assuring ESG	✓	Public
REP End		✓	-

Confidence building measures

Indicator	Short description	Status	Disclosure
CM1 01	Other product offerings, processes and/or activities	✓	Private
CM1 02	Assurance of responses	✓	Private
CM1 End	Module confirmation page	✓	-

KAS BANK

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01

Mandatory

Public

Descriptive

OO 01.1 Select the location of your organisation's headquarters.

Netherlands

OO 01.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2 - 5
- 6 - 10
- 11 - 50
- >50

OO 01.3 Indicate the regions where you have offices.

- Africa/Middle East
- Asia (excluding Japan & Korea)
- Australasia
- Canada
- Continental Europe
- Japan & Korea
- Nordic
- South America
- UK & Ireland
- US

OO 01.4 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

400

Reporting Year

OO 02

Mandatory

Public

Descriptive

OO 02.1 Indicate the year end date for your reporting year.

31/12/2019

Signatory category and services

OO 03

Mandatory

Public

Gateway

OO 03.1

Indicate which of the following categories reflect your core offering or main business activity:

- Reporting
- Active Ownership Services
- Investment consultancy
- Research and Data Provision
- Other, specify (1)
- Other, specify(2)

OO 03.2

Indicate any other business activities that your organisation offers. Indicate whether you wish to report on these business areas.

- Active Ownership Services
- Investment consultancy
- Research and Data provision
- Other, specify (3)
- Other, specify (4)
- None of the above

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Strategy and Governance

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Policy on ESG beliefs

SG 01

Mandatory

Public

Gateway

SG 01.1

Describe how your organisation's philosophy incorporates environmental, social and governance factors, and the link to your business offerings.

We have defined strategic priorities that convey our ambition and core values. The propagation of our strategic priorities helps us with our commitment to enabling prosperity for future generations, we actively monitor these priorities.

This makes them the link to our CSR focus areas. In line with our ambition to make prosperity possible for future generations, our CSR policy is focused on our social contribution.

This means that we see our added value in the relationship we have with our stakeholders and society. Our strategic priorities form our pillars within which we have an effect and in which we have defined the focus areas of our CSR policy.

SG 01.2

Indicate whether you have policies that formalise the incorporation of your ESG beliefs in your business offerings.

Yes

SG 01.3

Indicate the components/types of your internal policy and provide the URL and/or an attachment of the document/s if they are publicly available.

Policy components/types

Policy setting out your overall ESG/RI approach

Public availability

- URL
- Attachment
- Not publicly available

Formalised guidelines on environmental factors

Formalised guidelines on social factors

Public availability

- URL
- Attachment
- Not publicly available

Formalised guidelines on corporate governance factors

Public availability

- URL

URL

<https://www.caceis.kasbank.com/en/about-us/investor-relations/corporate-governance/>

- Attachment
- Not publicly available
- Formalised guidelines on engagement approach
- Formalised guidelines on (proxy) voting approach
- Other, specify (1)
- Other, specify (2)
- None of the above

SG 01.4 Indicate how these are put into practice internally across the organisation.

- Regular employee training on RI/ESG
 - Regular RI/ESG policy awareness building for employees
 - Establishment of policy review committee/team
 - Remuneration linked to achieving ESG objectives
 - Annual performance incentives
 - Other, specify (1)
 - Other, specify (2)
 - Other, specify (3)
- No

SG 02

Mandatory

Public

Descriptive

SG 02.1

Indicate what frameworks and guidelines you have used to develop your organisation's policies. Tick all that apply.

- UN Principles for Responsible Investment
- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- UN Sustainable Development Goals
- International Bill of Human Rights
- International Labour Organisation Conventions
- IFC Performance Standards
- United Nations Convention Against Corruption
- OECD Principles of Corporate Governance
- OECD Guidelines for Multinational Enterprises
- GRI standards
- Other, specify (1)

The Dutch Corporate Governance Code

- Other, specify (2)
- Other, specify (3)
- None of the above

SG 03	Mandatory	Public	Descriptive
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SG 03.1 Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.

	Off the shelf	Tailored
Asset class-specific RI guidelines	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sector-specific RI guidelines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Screening/exclusions policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Engagement policy	<input type="checkbox"/>	<input type="checkbox"/>
(Proxy) voting policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out within the Investment Policy Statement (IPS)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out in a freestanding RI policy	<input type="checkbox"/>	<input type="checkbox"/>
Multi-year RI implementation project plan	<input type="checkbox"/>	<input type="checkbox"/>
Conflict of interest management policy	<input type="checkbox"/>	<input type="checkbox"/>
Stockbroker allocation policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Securities lending policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

SG 03.2

Provide a brief description of the key elements, any variations, or exceptions applying to these policies.

We do not advise clients on their policies. we only provide extensive compliance reporting with tailored investment guidelines.

SG 04

Mandatory

Public

Descriptive

SG 04.1

Briefly describe how you include ESG/RI factors as part of your business offerings.

Business area

Reporting

How you include ESG/RI factors

KAS BANK offers ESG Screening and compliance monitoring services. This service means that KAS BANK monitors pension funds and investment funds or mandates are adhered to by the fund manager and reports in case of violation of the mandate.

In addition KAS BANK provides Class Action and Proxy Voting services. KAS BANK offers support in participating in class actions or submitting claims.

SG 04.2

Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI within the organisation.

Roles present in your organisation	Oversight/accountability for ESG/RI	Implementation of ESG/RI
Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Operating Officer (COO), Chief Information Officer (CIO)	<input type="checkbox"/>	<input type="checkbox"/>
Other chief-level staff	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; display: inline-block;">Please specify</div> COO	<input type="checkbox"/>
Other heads of department	<input checked="" type="checkbox"/> <div style="background-color: #0070C0; color: white; padding: 2px; display: inline-block;">Please specify</div> Managing Directors	<input type="checkbox"/>
Dedicated ESG/RI staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other role, specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

SG 04.3

Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities.

- Staff training on ESG/RI incorporation
- Including ESG/RI knowledge factors in personal development goals
- Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals
- Including ESG in selection requirements when hiring new employees
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)

SG 04.4

Indicate whether your organisation has any ESG/RI linked incentives for its employees.

- Yes
- No
- Not applicable, we ensure that employees incorporate ESG/RI into services through other mechanisms.

SG 06**Mandatory****Public****Descriptive****SG 06.1**

Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.

- Board/trustee training
- Investment manager training
- Regulatory bodies/authorities or public policy makers
- Corporate executive training
- ESG analyst training
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)
- None of the above

SG 07**Mandatory****Public****Descriptive**

SG 07.1

Describe how your organisation applies, advances and promotes the PRI Principles.

Compliance monitoring offers our clients a second opinion on the investment activities of the fund manager. Compliance monitoring is based on the data from Fund Accounting. KAS BANK checks and reports to the client if the fund manager does not act in accordance with the agreed investment guidelines. The Investment Management Services (IMS) department is responsible for compliance monitoring. The client's investment policy and the investment guidelines derived from it for the fund manager are the starting point for the controlling function. In consultation with the client, it is decided what should be checked and reported and at what time. Based on this report, the client can, if desired, set out corrective actions.

In addition, it is agreed whether the fund manager will also be reported.

SG 08**Mandatory****Public****SG 08.1**

Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoken publicly at events and conferences to promote responsible investment
- Written and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Written and published articles on responsible investment in the media
- Policy engagements and other interactions
- Other, specify
- None of the above

SG 09**Mandatory****Public****Descriptive****SG 09.1**

Indicate which of the following long-term trends are addressed in your product outputs.

- Changing demographics

SG 09.2

Explain how this long-term trend affects your product outputs.

In a rapidly changing world, with increasing uncertainties, building capital resources is an important part of the social foundation. Increasingly, people are taking this responsibility into their own hands and preparing themselves for the increasing individualisation and digitisation of our society. We are the bank that helps them realise their goals with our knowledge and by developing unique and sustainable administrative and banking services and solutions.

- Climate change
- Resource scarcity
- Technology developments

SG 09.2

Explain how this long-term trend affects your product outputs.

New technology enables fundamental change. In a society where technology and a growing economy offer us more prosperity, we strive for greater financial security. To achieve this, we build up pension funds, we save money for our children and take out insurance.

We aim for security for both now and in the future. For ourselves and for future generations.

Other, specify (1)

Other, specify (2)

None of the above

SG 11**Mandatory****Public****Descriptive****SG 11.1**

Describe how you typically align your organisation's philosophy and approach to ESG/RI with your investor clients' goals.

Describe

KAS BANK has a responsibility within the financial supply chain. Next to compliance with laws and regulations related to responsible investment, we constantly review our attitude towards companies in which we invest and the low risk profile which KAS BANK pursues to ensure both are balanced.

KAS BANK signed the climate statement. KAS Bank has developed a product for its clients, such as pension funds, that shows daily whether their investments comply with the UN Global Compact Principles, the list of guidelines drawn up by the United Nations in the areas of human rights, labour, the environment and the fight against corruption. This allows customers to better implement their sustainability policy.

This is not relevant for my organisation

SG 12**Mandatory****Public****Descriptive****SG 12.1**

Describe what steps you take, if any, when your ESG recommendations are not in line with your investor clients' goals.

Describe

This is not relevant for my organisation

SG 13**Mandatory****Public****Descriptive****SG 13.1**

Indicate whether you seek feedback from clients on your RI/ESG services and product offerings

Yes

SG 13.2

Describe how you use this feedback in your RI/ESG services and product offerings.

We ask our clients for feedback on all our product offerings in client service reviews.

No

SG 14**Mandatory****Public****Descriptive**

SG 14.1

Indicate whether your organisation has a policy for managing potential conflicts of interest.

Yes

SG 14.2

Describe how you manage potential conflicts of interest.

Firstly, conflicts of interest should be avoided where possible. Conflicts of interest which may not be avoided, should be managed appropriately. KAS BANK has adopted several measures designed to prevent conflicts of interest from adversely affecting the interests of the client:

- the administrative organisation and organisational arrangements ensure a sufficient degree of independence between the different services and activities exercised by the Bank;
- policies and procedures are in place to manage potential conflicts of interest; these policies and procedures are maintained on a regular basis and compliance is monitored;
- fees or commissions from third parties in relation to (investment) services to the client are only allowed if these have been clearly disclosed to the client beforehand and if the fee or commission enhances the quality of the relevant service and does not impair compliance with the Bank's duty to act in the best interest of the client;
- all employees of KAS BANK are subject to internal rules for treatment of price sensitive and other confidential information;
- all employees of KAS BANK are subject to rules of conduct with respect to personal account dealing; in addition, a restricted list is applicable and all personal account transactions should be reported;
- all employees are subject to rules of conduct with respect to accepting and offering gifts and invitations for entertainment. The receipt of gifts and invitations should be reported. The receipt of gifts should be limited to gifts where the commercial value is small;
- additional activities and functions of employees (not part of their employment with KAS BANK) are subject to restrictions; specific functions are subject to prior written approval of the managing board.

SG 14.3

Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.

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- fees or commissions from third parties in relation to (investment) services to the client are only allowed if these have been clearly disclosed to the client beforehand and if the fee or commission enhances the quality of the relevant service and does not impair compliance with the Bank's duty to act in the best interest of the client;
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- additional activities and functions of employees (not part of their employment with KAS BANK) are subject to restrictions; specific functions are subject to prior written approval of the managing board.

No

KAS BANK

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Reporting

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Type of reporting and assurance

REP 01	Mandatory	Public	Gateway
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REP 01.1 Indicate the type of reporting that you prepare on behalf of clients. Tick all that apply.

- Integrated reporting
- RI reporting
- Sustainability reporting
- Financial reporting
- Other, specify (1)
- Other, specify (2)
- None of the above

REP 01.2 Indicate whether your services include any variety of third party assurance or certification/labelling scheme of clients' ESG/RI data, processes or products.

- Yes

REP 01.3 Indicate the type of assurance or certification/labelling scheme services that you provide.

- Third party assurance of data points
 - Third party assurance of the implementation of RI/ESG processes
 - Third party assurance of a public RI/ESG report
 - External ESG audit of holdings
 - RI Certification or labelling scheme, specify
 - Other, specify
- No

Reporting frameworks/standards/guidelines

REP 02	Mandatory	Public	
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REP 02.1 Indicate what reporting frameworks/ standards/ guidelines you typically use when preparing reports for clients. Tick all that apply.

- OECD Guidelines for Multinational Enterprises
- OECD Principles of Corporate Governance
- ILO
- ISO, specify
15022, 20022

- UN Global Compact
- GRI
- SASB
- IIRC
- PRI
- CDP
- Stewardship code
- Task Force on Climate-related Financial Disclosures (TCFD) recommendations
- Other, specify (1)
- Other, specify (2)

Incorporating ESG

REP 03

Mandatory

Public

REP 03.1 Indicate whether you incorporate ESG factors into your reporting products for clients.

- Yes, we systematically do
- Yes, we occasionally do
- No, we do not

ESG in materiality analysis

REP 04

Mandatory

Public

Descriptive

REP 04.1 Indicate whether ESG is part of the materiality analysis you perform when preparing clients' reports.

- Yes, ESG is systematically part of the materiality analysis
- Yes, ESG is occasionally part of the materiality analysis
- No, ESG is not part of the materiality analysis

REP 04.2 If no, explain why not.

our materiality is based on the input we receive from all our stakeholders and not just the clients

Assurance standards and assuring ESG

REP 05

Mandatory

Public

Descriptive

REP 05.1

List the standards and certifications that have an ESG/RI component, that you typically use to assure client organisations' reporting data/processes or products against.

- ISAE 3000
- ISAE 2403
- ISO standard, specify
- AAFOI/06
- Regional code, specify
- AA1000AS
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

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