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Appendix 3. SFDR Template Non-NHG Sub-fund

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Achmea Dutch Mortgage Fund Non-NHG
Legal entity identifier: Not applicable

Environmental and/or social characteristics

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

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

Did this financial product have a sustainable investment objective?

Yes No

It made **sustainable investments with an environmental objective**: ____%

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

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

It made **sustainable investments with a social objective**: ____%

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 88.1% of sustainable investments

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

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

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

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Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

The Fund encourages customers in making their homes more sustainable and taking energy-saving measures in order to have mortgages in its portfolio that relate to energy-efficient homes. In addition, the Fund aims to achieve a financially sustainable housing situation for its mortgage customers. This is done by offering support to customers in the event of major changes in their financial situation. No benchmark has been designated for achieving the environmental or social characteristics promoted by the Fund.

How did the sustainability indicators perform?

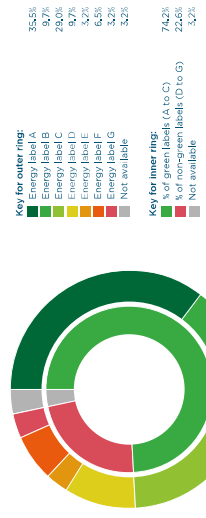
The Achmea Dutch Mortgage Fund - Non-NHG sustainability performance was measured using the following indicators:

1. Energy label distribution
The graphs are shown on the right
2. Average carbon emissions
N/A
3. The number of customers assisted with challenges in their financial situation, broken down into the categories job coach, budget coach or assistance from the Preventive Management and Special Credits Department
The job coach and budget coach were not used in this financial year.

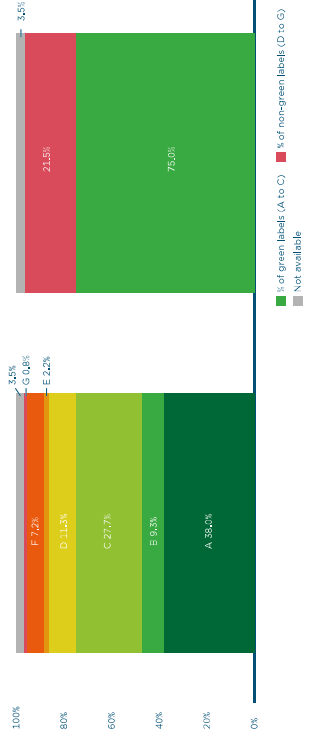
...and compared to previous periods?

Due to the lack of economic activities, investments and obligations between the date of establishment of the Fund at 26 July 2021 and 31 December 2022, there were no financial figures to report. Therefore there are no comparative figures for the Sub-fund.

DISTRIBUTION OF THE ENERGY LABELS IN THE PORTFOLIO BASED ON COLLATERAL



DISTRIBUTION OF THE ENERGY LABELS IN THE PORTFOLIO BASED ON TOTAL RESIDUAL DEBT



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

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?
Not applicable

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?
Not applicable

How were the indicators for adverse impacts on sustainability factors taken into account?
Not applicable

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:
Not applicable

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

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

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



How did this financial product consider principal adverse impacts on sustainability factors?

The two main adverse effects on sustainability factors applied from mortgage legislation are energy efficiency (measured by energy labels for properties built through 2020 and the BENG2 standard for properties built after 2020) and exposure to fossil fuel activities. CO₂ emissions are also taken into account.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

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What were the top investments of this financial product?

Syntrus Achmea opts for investments with financial and social returns. For us, investing in mortgages is the best way to achieve stable financial returns over the long term, combined with social impact for our clients and minimal risks. Our ESG policy is an important part of our long-term strategy. Together with our stakeholders, we are working towards a sustainable future.

The ESG policy is aimed at encouraging sustainability in the mortgage portfolio. We enter into dialogue with consumers to encourage them to make their homes more sustainable. We do this by informing consumers about co-financing sustainability in the mortgage. In this way we contribute to reducing climate risks, achieving the goals of the climate agreement and limiting global warming.

We also have an eye for the social aspect. In case of arrears, we help the customer to find a structural solution and act in the customer's interest where home preservation is the goal. This gives the customer insight and grip on his/her financial situation and financial future. We make efforts to prevent payment problems through analysis and preventive customer contact based on the AFM guideline. For example, it is possible to offer a client interest rate mediation in order to meet mortgage payments and prevent foreclosure or to restructure the mortgage. We also offer the possibility of using a budget or job coach. The goal is as much home preservation as possible.

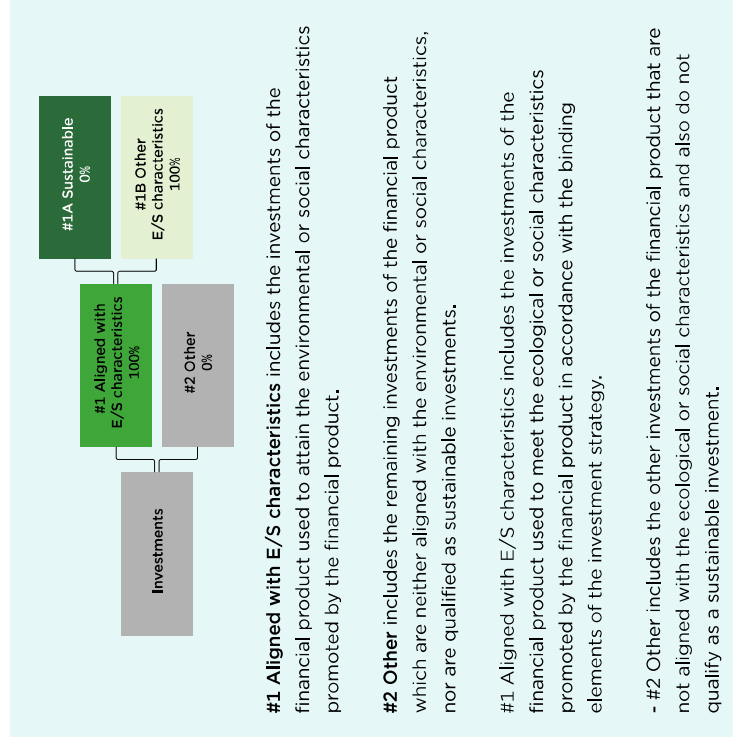
*Cash is not included in the portfolio investments.



What was the proportion of sustainability-related investments?

Portfolio investments consist exclusively of mortgages*. The properties fall into one of the two categories below:

What was the asset allocation?



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Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

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

In which economic sectors were the investments made?
The Fund has invested exclusively in the mortgage sector.

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

0% of investments are aligned with the EU taxonomy. In particular, the requirements of the EU taxonomy address home energy efficiency and climate adaptation measures. Currently, not all requirements of the EU taxonomy are final and the applicability of these requirements to mortgages is under investigation. Syntus Achmea will monitor the development of the legislation and the interpretation of the requirements of the EU taxonomy.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy?

Yes: In fossil gas In nuclear energy

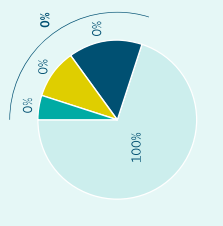
No

What was the share of investments made in transitional and enabling activities?
Not applicable

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?
Not applicable

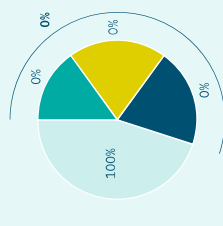
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments including sovereign bonds*



- Taxonomy-aligned: fossil gas
- Taxonomy-aligned: nuclear energy
- Taxonomy-aligned (no fossil gas and nuclear energy)
- Not aligned with taxonomy

2. Taxonomy-alignment of investments excluding sovereign bonds*



- Taxonomy-aligned: fossil gas
- Taxonomy-aligned: nuclear energy
- Taxonomy-aligned (no fossil gas and nuclear energy)
- Not aligned with taxonomy

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

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

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are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

This question is not applicable as the percentage of investments aligned with the EU taxonomy is 0%.



What was the share of socially sustainable investments?

Not applicable, no socially sustainable investments were made



What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

The environmental and social characteristics apply to all mortgages in the Fund, therefore no investments are included in the Other category



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

We can provide additional support to customers in financial difficulties.

Some examples:

- Although prices came down in 2023, many consumers still experience the consequences of the peak in energy prices and inflation. The Dutch are extremely reliable mortgage loan payers and will generally only stop paying their mortgage loan if something is well and truly wrong. In some cases, we will not find out until it is too late to effectively help them, which is why we actively urge customers to contact us if they are having financial problems. The earlier a customer contacts us, the better we can help them. We offer a comprehensive package of customized solutions, such as payment breaks, budget and job coaches, and restructuring the mortgage loan to repay other loans.

- Residual debt scheme. In the current market, history may repeat itself and customers can find themselves with a property whose value is lower than their outstanding mortgage loan. If their home is sold in a forced sale, the proceeds will not suffice to pay off the mortgage loan, leaving the customer with a residual debt. Because we are eager to provide financial assistance to customers in challenging times and want to offer the prospect of a brighter future, we have a residual debt scheme.

To achieve a financially sustainable living situation for our mortgage loan customers, we have undertaken the following activities:

- All customers whose mortgage loans have no guaranteed accrual have been approached and made aware of possible payment risks. These customers can perform a Mortgage Check in 'Mijn Omgeving' (My Environment); allowing them to check the future affordability of their home at any time.
- We have activated various customer groups and made them aware of the opportunities to make their homes more sustainable.
- On our service platform 'Duurzaam Woongemak' (Sustainable Living), we work with carefully selected suppliers who, in addition to providing advice, can also implement the sustainability upgrades. On the platform, borrowers get clear and direct insight into the costs and benefits of making their home more sustainable.
- With this platform, Achmea effectively becomes a one-stop-shop for sustainable living, offering both competitive home financing products and arranging the implementation of sustainability upgrades.
- We believe sustainable advice is important and encourage advisers to address sustainability in their advisory meeting.
- We help them do this with a new 'green' page in the interest rate offer in which we point out the benefits of sustainability to customers and refer them to the adviser. Together with the customer, the adviser does the online scan on 'Duurzaam Woongemak' in a few minutes to determine what sustainability upgrades the customer can make, how much they will cost, and how much the customer stands to save.
- In 2023 the Centraal Beheer label introduced The Green Loan part ('Groen Leningdeel'), which entitles customers who borrow extra to make sustainability upgrades to their home to an additional discount of 80 basis points on the standard mortgage rate. The Green Loan part was introduced in the second quarter of 2023.

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How did this financial product perform compared to the reference benchmark?

Not applicable.

How does the reference benchmark differ from a broad market index?

Not applicable.

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

Not applicable.

How did this financial product perform compared with the reference benchmark?

Not applicable.

How did this financial product perform compared with the broad market index?

Not applicable.