

ANNEX III – DISCLOSURES UNDER SFDR

pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Achmea IM Climate Infrastructure Fund

Legal Entity Identifier: 724500VM3EL8ZRWTW510

Sustainable Investment Objective

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

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

Does this financial product have a sustainable investment objective?

☒ ☒ ☒ Yes

☐ ☐ ☐ No

- ☒ It will make a minimum of **sustainable investments with an environmental objective**: 90%
- ☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ It will make a minimum of **sustainable investments with a social objective**: %

- ☐ It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of % of sustainable investments
- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective
- ☐ It promotes E/S characteristics, but **will not make any sustainable investments**



What is the sustainable investment objective of this financial product?

The Partnership aims to positively contribute to the environmental objective “combat climate change and its impact” by investing in renewable energy infrastructure investments. This will be achieved through investments either in EU Taxonomy aligned Investments with a direct contribution to the environmental objective “climate change mitigation” or Investments that have a measurable positive contribution to Sustainability Development Goals of the United Nations #7 “Affordable and clean energy” and/or #13 “Climate Action”. These Investments will be considered to be sustainable investments according to article 2(17) SFDR.

The Partnership shall not invest in companies, that to the knowledge of the AIFM, fall into the exclusion criteria for EU Paris-aligned benchmarks as set out in Article 12(1)(a) to (g) of Delegated Regulation (EU) 2020/1818 (PAB benchmarks).

Sustainability indicators measure



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

how the sustainable objectives of this financial product are attained.

- Energy produced (measured in kWh)
- Annual avoided emissions (measured in avoided CO₂e emissions per year)



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

The investment process foresees the binding performance of a robust due-diligence process which includes the screening of the do not significant harm criteria.

For Investments which aim to be aligned to the EU Taxonomy, the screening criteria are integrated into the process according to technical screening criteria in Annex 1 of the Delegated Regulation (EU) 2021/2139 supplementing Regulation (EU) 2020/852.

For investments that aim to be “sustainable investments” according to article 2(17) SFDR, the Partnership applies the Principle Adverse Impact Indicators as set out in Annex 1 of the Delegated Regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 to perform the assessment whether the projects cause significant harm.

The binding investment process ensures that investments are excluded before the investment decision is made in case they cause significant harm.

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.

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

The principle adverse impact indicators are taken into account as do not significant harm indicators for sustainable investments according to article 2(17) SFDR as part of the due diligence process for each acquisition.

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

The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are applicable to the directly engaged general contractors, property and facility managers as far as contracted by the Partnership (or any Project Companies or Intermediate Holding Companies).

Depending on the development phase (i.e. construction or operating phase), the Partnership is assessing the relevant directly engaged developers, general contractors and facility managers with respect to their adherence to defined good governance principles such as compliance with applicable labour and social laws and regulations or health and safety laws and regulations. The minimum safeguard standards are applied by law or imposed by contract. The Partnership excludes companies which fail to meet its good governance requirements as set out in the respective policies of the AIFM and the Portfolio Manager. Please refer to the good governance section of this annex for more information.



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

☒ Yes, the Partnership considers principal adverse impacts (PAI) on sustainability factors.

Principle adverse impacts on sustainability factors are considered throughout all stages of the investment. For acquisition, during the due diligence process the consideration of principle adverse impacts on sustainability factors is ensured. For each principle adverse impact indicator, a threshold is defined where applicable. In order for a project to be acquired the PAI indicators thereof must be below the defined thresholds, where applicable.

After acquisition, the performance of the Investments with regards to the principle adverse impact indicators are monitored. If adverse impacts are identified the Partnership aims to reduce the adverse impacts with appropriate measures.

In general, a continuous improvement of the indicator's performance will be pursued.

The Partnership discloses according to article 11(2) of Regulation (EU) 2019/2088 information on the principal adverse impacts on sustainability factors in the Partnership's annual report (when available).

PAI no.	*	PAI	Application	Limit
1	M	GHG Emissions Scope 1 & Scope 2 & Scope 3	Applicable	Defined
2	M	Carbon footprint	Applicable	Defined
3	M	GHG intensity of investee companies	Applicable	Defined
4	M	Exposure to companies active in the fossil fuel sector	Excluded	NA
5	M	Share of non-renewable energy consumption & production	Applicable	Defined
6	M	Energy consumption intensity per high impacts climate sector	Excluded	NA
7	M	Activities negatively affecting biodiversity-sensitive areas	Applicable	Defined
8	M	Emission to water	Applicable	Defined
9	M	Hazardous waste and radioactive waste ratio	Applicable	Defined
10	M	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Applicable	Defined
11	M	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Applicable	Defined
12	M	Unadjusted gender pay gap	Excluded	NA
13	M	Board gender diversity	Applicable	Defined
14	M	Exposure to controversial weapons anti-personnel mines, cluster munitions, chemical weapons and biological weapons	Excluded	NA

15	A	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average	Applicable	Defined
16	A	Share of investments in entities without policies on the protection of whistleblowers	Applicable	Defined
* M: Mandatory, A: Additional NA: Not Applicable				

☐ No



What investment strategy does this financial product follow?

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

The investment strategy of the Partnership comprises of generating returns and contributing positively to the environmental objective “combat climate change and its impact” (as further set out in Chapter 4 and this Annex III) by making Investments in, and building a diversified portfolio of, (a) clean energy assets, such as onshore and offshore wind farms, solar pv farms, hydropower plants or other renewable infrastructure investments, the projects which may be operational or under construction, and (b) other target assets particularly in the battery energy storage system sector directly or indirectly through Intermediate Holding Companies and/or Project Companies.

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

As set out in the investment strategy, the Investments need to contribute to the defined environmental objective. The criteria to identify such investments are set out in the binding investment process and the mandatory due diligence based on the do no significant harm (DNSH) requirements. The Partnership cannot invest in projects which do not follow this binding process or in investments which are subject to the AIFM’s and the Portfolio Manager’s exclusion policy.

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

The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are applicable to the directly engaged general contractors, property and facility managers as far as contracted by the Partnership (or any Project Companies or Intermediate Holding Companies).

Depending on the development phase (i.e. construction or operating phase), the Partnership is assessing the relevant directly engaged developers, general contractors and facility managers with respect to their adherence to defined good governance principles such as compliance with applicable labour and social laws and regulations or health and safety laws and regulations. The minimum safeguard standards are applied by laws and regulations or imposed by contract.

The Portfolio Manager also applies a good governance screening to Project Companies. The Partnership must invest in companies that comply with good governance practices. Companies that perform poorly in the field of good governance are excluded prior acquisition.

To ensure that the Project Companies always comply with good governance standards during the lifetime of the asset the Portfolio Managers has implemented an ongoing screening process.

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



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

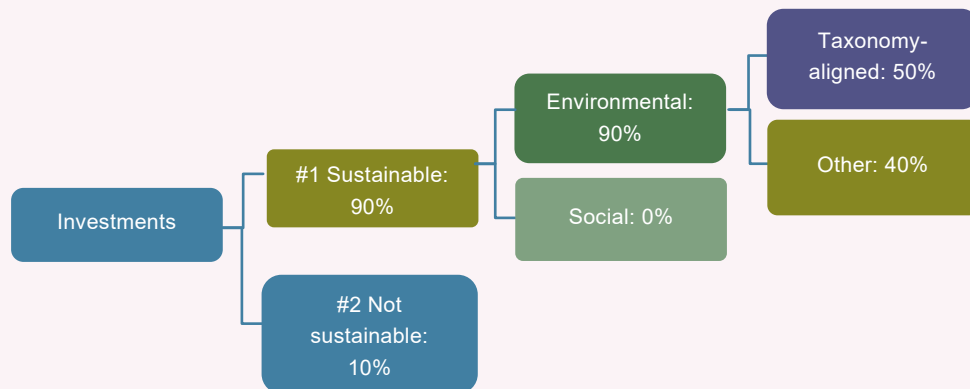
Asset allocation

describes the share of investments in specific assets.

90% of the portfolio will fit in category #1 Sustainable. These Investments solely have environmentally sustainable objectives. At least 50% of the portfolio is aligned to the EU Taxonomy and 40% of the portfolio otherwise qualifies as sustainable. The Partnership aims to achieve this at the end of the Investment Period. At most 50% of the portfolio is not aligned to the EU Taxonomy. At most 10% of the investments are in category #2 (Not Sustainable). This proportion of Investments is aimed to be as small as possible.

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.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.



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

The Partnership does not use derivatives on a fund level.



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

From the proportion of sustainable investments in this Partnership, at least 55.55% is aligned with the EU Taxonomy. This equals 50% of all Investments. There is no external assurance ex ante for the EU Taxonomy alignment of the Investments. However, the due diligence for each Investment is based on reports which are provided by external recognized service providers. For the reporting of the EU Taxonomy share in the periodic reports, the AIFM reserves the right to report the share along all three Key Performance Indicators (KPIs): turnover, capital expenditure and operating expenditure. Given the heterogeneity of development stages in the scope of the Partnership's investment policy, reporting along all three KPIs allows for a more complete picture of the Partnership's contribution to its sustainable investment objective. This is because an EU Taxonomy share by turnover would mainly include operating assets, generating a revenue. Reporting on capital expenditures would further allow to represent the contributions to the sustainable investment objective from Project Companies within the development or construction phase. Further, given the complexity of renewable energy assets, reporting in addition on the EU Taxonomy share by operational expenditure allows a further perspective on the Partnership's contribution to its sustainable investment objective. Reporting on all three KPIs therefore enhances the transparency and completeness of the Partnership's performance.

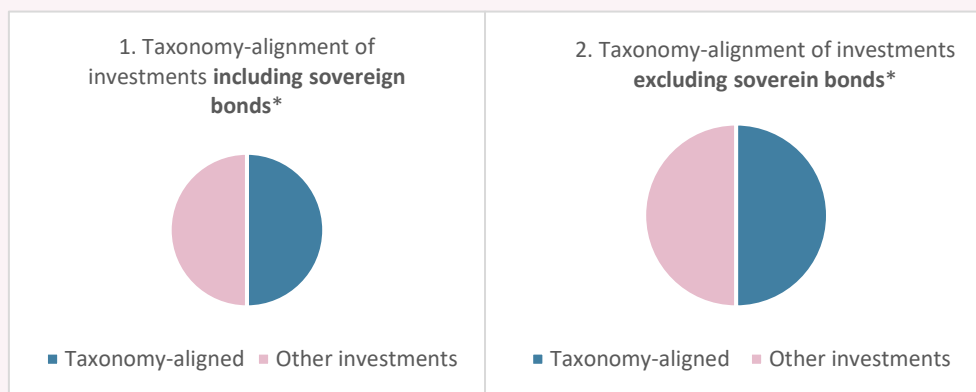
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

● **Yes:** ☐ [specify below, and details in the graphs of the box]

☐ In fossil gas ☐ In nuclear energy

No ☒

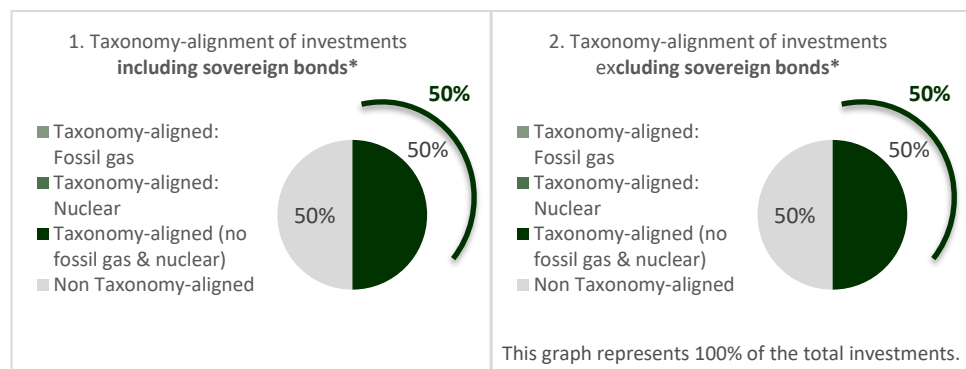
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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



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

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.



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

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

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - 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.

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

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



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy, is 44.44%. This equals 40% of all Investments.



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

The minimum share of sustainable investments with a social objective is 0%.



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

The Investments included under “#2 Not sustainable” consist of cash. The purpose of these Investments is to enable effective and efficient portfolio management. There are no minimum environmental or social safeguards applied to these Investments.



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

No, the Partnership does not use a specific index designated as a reference benchmark to meet the sustainable investment objective.

- *How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?*

Not applicable, because the Partnership does not use a benchmark.

- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable, because no index is applied.

- *How does the designated index differ from a relevant broad market index?*

Not applicable, because no index is applied.

- *Where can the methodology used for the calculation of the designated index be found?*

Not applicable, because no index is applied.



Where can I find more product specific information online?

More product-specific information can be found on the website:

<https://www.achmeainvestmentmanagement.nl/institutioneel/beleggingsfondsen/achmea-im-climate-infrastructure-fund>.