Achmea IM Climate Infrastructure Fund

1. Summary

The Achmea IM Climate Infrastructure Fund (in the following mentioned as "Fund") aims to positively contribute to the environmental objective "combat climate change and its impact" by investing in renewable energy infrastructure from wind, solar, water and biomass as well as energy storage systems. The Fund aims to invest at least 90% of its portfolio in sustainable investments that are aligned with the pursued environmental objectives. This will be achieved through investments either in EU Taxonomy aligned investments with a direct contribution to the environmental objective "climate change mitigation" as defined under article 10 the EU Taxonomy Regulation ("Taxonomy-aligned investments") or other environmentally sustainable investments in accordance with article 2 (17) of the Sustainable Finance Disclosure Regulation (SFDR) that have a measurable positive contribution to the United Nations Sustainability Development Goals (UN SDG) #7 "Affordable and clean energy" and #13 "Climate Action". To measure the contribution to the environmental objective the fund uses sustainability indicators as described in the annex to the fund prospectus.

The investment strategy of the fund comprises of generating returns by making Investments in, and building a diversified portfolio of clean energy assets, such as onshore and offshore wind farms, solar PV farms, hydropower plants, or other renewable infrastructure investments. Those may be operational or under construction. Additionally, other target assets particularly in the battery energy storage system sector directly or indirectly through Portfolio Companies will be part of the investment strategy.

While pursuing the environmental objective the fund assures that it does not cause significant harm to any other environmental or social objective. This is ensured through a multifaceted due diligence and monitoring process before acquisition and during the lifetime of the investments. The fund considers principle adverse impact indicators during the investment decision and monitoring of the investments and aims to reduce potential adverse impacts through appropriate and project specific measures. For direct contractors it will be ensured that the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights adhered to. In general, the compliance with good governance practices is an essential part of the investment strategy. For detailed information, please refer to the pre-contractual annex of the fund prospectus.

2. No significant harm to the sustainable investment objective

The investment process foresees the binding performance of a robust due-diligence process which includes the screening of the do no significant harm criteria.

For investments which aim to be aligned with the EU-Taxonomy the screening criteria are integrated into the process according to the 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 SFDR art. 2(17), the fund applies the Principle Adverse Impact Indicators (PAIs) as set out in Annex 1 of the delegated regulation (EU) 2022/1288 to perform the assessment whether the projects cause significant harm. The fund has defined thresholds for the PAIs that must be met before an investment decision can be made in order to make a positive investment decision. After the investment decision, the limits are monitored continuously to ensure that no significant harm occurs during the holding phase. The thresholds are based either on alignment to regulatory requirements or based on research to ensure that they represent reasonable assumptions. The binding investment process ensures that investments are excluded before the investment decision in case they cause significant harm.

Principal adverse impacts
Principal adverse impacts on sustainability factors are considered throughout all stages of the investment. After acquisition, the performance of the investments with regards to the principal adverse impact indicators is 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	Applicability**	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 **: indicates whether a PAI is applicable or excluded due to being not relevant NA: Not Applicable				

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 Portfolio 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 for more information.

3. Sustainable investment objective of the financial product

Through its investments the Partnership aims to positively contribute to the environmental objective "combat climate change and its impact" by investing in renewable energy infrastructure from wind, solar, water and biomass as well as energy storage systems. 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 the Sustainability Development Goals of the United Nations #7 "Affordable and clean energy" and #13 "Climate Action. These Investments will be considered to be sustainable investments according to SFDR art. 2 (17).

4. Investment strategy

The investment strategy of the Partnership comprises of generating returns 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 Portfolio Companies.

Good governance
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 Portfolio Companies or Intermediate Holding Companies).

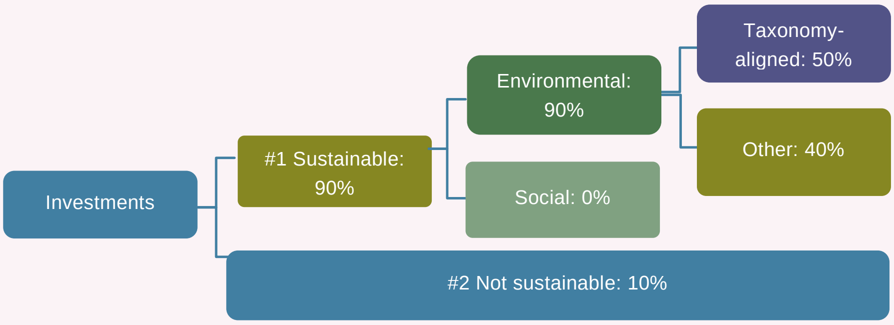
Depending on the development phase (i.e. construction or operating phase), the Partnership is assessing the relevant directly engaged developers, general contractors and facility managers with respect to their adherence to defined good governance principles such as compliance with applicable labour and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

The Portfolio Manager also applies a good governance screening to investee 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 investee companies always comply with good governance standards during the lifetime of the asset the Portfolio Manager has implemented an ongoing screening.

5. Proportion of investments

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 the category #2 Not sustainable. The investments included under "#2 Not sustainable" consist of cash. The purpose of these investments is to enable effective and efficient portfolio management. This proportion of investments is aimed to be as small as possible.



#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.

6. Monitoring of sustainable investment objective

The fund prospectus allows the fund only to invest in projects described in the investment strategy. Only projects will be considered in line with the line with the fund’s investment strategy e.g., asset class, region, development stage. For each investment before the acquisition a standardized assessment is performed to ensure that the investments either meet the definition of sustainable investments under SFDR art. 2 (17) or the EU taxonomy.

The indicators to measure the attainment are calculated for sustainable investments according to SFDR art. 2 (17) on an ongoing basis. The indicators can be found in the pre-contractual disclosures. Additionally, the DNSH assessment of the investments is performed and documented via calculating the PAI indicators and monitoring the thresholds defined.

For EU taxonomy aligned investments the indicators used are defined as the metrics and thresholds in the EU taxonomy itself. Here, an ongoing monitoring of the compliance with the thresholds is performed by the portfolio manager. The DNSH assessment is also conducted on an ongoing basis.

7. Methodologies

The indicators used to measure the attainment of the sustainable investment objective sustainable investments according to SFDR art. 2 (17) are:

- Energy Produced (measured in kWh)
- Annual Avoided Emissions (measured in avoided CO2 emissions per year)

The produced energy of the projects is derived from the project specific production data in the ongoing reporting of the portfolio manager.

The calculation of the annual avoided emissions is based on internally developed methodologies which are scientifically validated. Therefore, the attainment is ensured for each project which is in line with the binding investment strategy.

For investments which are sustainable investments according to the EU Taxonomy the attainment is achieved once the assert complies with the criteria of the EU taxonomy.

8. Data sources and processing

The portfolio manager only uses data which is already internally available or gathered from direct contractors such as Engineering Procurement and Construction (EPC) managers or Operation & Maintenance (O&M)

Companies. The data quality is assessed within the responsibility of the portfolio managers internal teams such as asset management and investment management. The data processing (calculation) is performed within the portfolio manager's internal IT-systems. As of now it is not expected to estimate data. It may however, be the case that data have to be estimated or approximated. In those cases this will be disclosed in the annual reporting under SFDR art. 11.

9. Limitations to methodologies and data

Limitations to methodologies and data which will affect the attainment of the sustainable investment objective are not expected to arise. However, if this will be the case it will be disclosed in the annual reporting under SFDR art. 11 and on this website.

10. Due diligence

The due diligence which is carried out for every project before acquisition is organised according to the four-eye-principle at the portfolio manager. The annual audits conducted by an external audit firm act as a third line-of-defense. The due diligence procedure is extensively described in the PPM, which is available on request.

11. Engagement policies

Engagement is not an active part of the investment strategy. However, engagement with local communities and contractors is an important part of proactively reducing potential sustainability risks.

Engagement regarding compliance with good governance standards by investee companies is deemed unnecessary as such compliance is contractually covered, please refer to 4. above.

12. Attainment of the sustainable investment objective

Not applicable

DISCLAIMER

Achmea Investment Management B.V. ("Achmea IM") has compiled the information contained in this document with the utmost care. This information is only intended for qualified investors and/or professional investors as defined in the Dutch Act on Financial Supervision ("Wft").
This document is or constitutes (i) no offer or invitation to purchase, sell or trade financial instruments (within the meaning of Article 1:1 Wft), (ii) no recommendation or investment advice (within the meaning of Article 1:1 Wft), (iii) no research and (vi) no legal or tax advice. Please consult, where appropriate, a legal adviser or tax consultant. Achmea IM advises you not to base your (investment) decision entirely on the information contained in this document. Achmea IM will not be liable for any loss or damage that may result from such an (investment) decision.
The information in this document is (partly) based on information which Achmea IM has acquired from information sources that are considered reliable. Achmea IM does not guarantee the reliability of the information acquired from those sources. The information in this document is for information purposes only and is not intended to confer any legal rights on you. All information reflects a particular point in time, unless explicitly stated otherwise. The provision of this document after the original publication date is no guarantee that the information contained herein is still accurate and complete on such later date. Achmea IM has the right to change this information without notice. Any reference to returns on investments is for information and clarification purposes only. In doing so, Achmea IM does not make a forecast for the return on or share price movements of those investments. The value of your investment may fluctuate and results achieved in the past are no guarantee for the future. The information in this document is based on assumptions made by Achmea IM. It is possible that other assumptions will be made than the assumptions made by

Achmea IM. The conclusions drawn by Achmea IM are therefore not necessarily correct and/or complete.
You may copy the information in this document only for your personal use. Information about an investment fund managed by Achmea IM may contain marketing communication. Please refer to the private placement memorandum and the fund terms of the investment fund before making any final investment decisions. You may not republish, reproduce, distribute or disclose the information without the written consent of Achmea IM. All information (text, photographs, illustrations, graphic material, trade names, logos, word and figurative marks) remains the property of or licensed by Achmea IM and is protected by copyrights, trademark rights and/or intellectual property rights. No rights or licences are transferred when using or accessing this information.

Published by:
Achmea Investment Management B.V., with its registered office and place of business in Zeist (Trade Register no. 18059537), The Netherlands. Achmea IM is registered with the Netherlands Authority for the Financial Markets ("AFM") in Amsterdam as manager of alternative investment funds as defined in Article 2:65a of the Wft and is authorised under this licence to provide investment services as listed in the register maintained by the AFM.