

# Engagement guidelines

Investment Management



Mei 2022

Engagement Guideline (if applicable to, and applied when we enter into engagement with a particular company)	Relevant codes	
<p><b>1 Internationally accepted codes, standards and initiatives</b></p> <p>Across all sectors, companies should respect the OECD Guidelines for Multinational Enterprises, and apply other internationally accepted codes, standards and initiatives addressing social, environmental and sustainable corporate citizenship and internationally accepted reporting standards. And we expect companies to play a positive role in their supply chain, in relation to Environmental, Social and Governance themes. For example by integrating relevant conditions into supplier codes of conduct, contracts and agreements with clients and suppliers.</p> <p><i>On all Engagement guidelines, companies should report in accordance with leading sustainability reporting frameworks such as the GRI principles and guidelines, the international Integrated Reporting Framework or the Sustainability Accounting Standards Board standards (SASB).</i></p>		
<p><b>2 Adult entertainment</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with pornography and adult entertainment practices.</p>	Global Compact	1, 2
	Human Rights	1 – 5, 23
	International Labour Organisation (ILO)	8
	Rio	1
<p><b>3 Alcohol</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with alcohol sale or production.</p>	Global Compact	1, 2
	Human Rights	1 – 3
	ILO	8
	Rio	1
<p><b>4 Gambling</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with gambling practices.</p>	Global Compact	1, 2
	Human Rights	1 – 3
	ILO	8
	Rio	1

<p><b>5 Tobacco</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with tobacco sale.</p> <p>Achmea does not invest in tobacco producers. This is not a specific topic for engagement.</p>	<table border="1"> <tr> <td>Global Compact</td> <td>1, 2</td> </tr> <tr> <td>Human Rights</td> <td>1 – 3</td> </tr> <tr> <td>ILO</td> <td>8, 37</td> </tr> <tr> <td>Rio</td> <td>1, 8</td> </tr> </table>	Global Compact	1, 2	Human Rights	1 – 3	ILO	8, 37	Rio	1, 8						
Global Compact	1, 2														
Human Rights	1 – 3														
ILO	8, 37														
Rio	1, 8														
<p><b>6 Human rights</b></p> <p>Based on the used internationally accepted codes, companies should equally respect the rights of all human beings. They should specifically safeguard non-discrimination of women and protect the vulnerable rights of children.</p> <p>Companies should have adequate policy, systems and reporting addressing human rights issues relating to (local) business. We expect companies to implement due diligence processes regarding their impact on human rights in relation to all their operations, including establishing or participating in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.</p> <p>On behalf of their international business activities in weak political and governance administration regions, they ensure solid and fair corporate governance, so minimising risks of violating human rights. Furthermore they have to implement free, prior and informed consent (FPIC) and grievance mechanisms when developing new projects.</p> <p>Companies respect the right of workers to earn a living wage.</p> <p>Companies are expected</p> <ul style="list-style-type: none"> <li>• to strictly and without reservation, adhere to all human rights as described in the United Nations Guiding Principles on Business and Human Rights (UNGPs), explicitly including efforts to avoid conflicts regarding land rights when acquiring / extracting / developing natural resources, doing this only with the voluntary, prior and informed consent (FPIC) of the peoples that have the customary property rights</li> <li>• to adhere to UN/GC Women’s Empowerment Principles.</li> </ul> <p>We engage with companies with a large exposure to potential human rights risks to encourage these companies to report under the UNGP reporting framework.</p> <p>Achmea encourages companies in the extractive industries to adopt the voluntary principles on Security and Human Rights.</p> <p>Achmea expects businesses to set up processes to provide remedy and reparation to victims of human rights abuses they have caused or are involved in.</p>	<table border="1"> <tr> <td>Global Compact</td> <td>1, 2, 10</td> </tr> <tr> <td>Human Rights</td> <td>All</td> </tr> <tr> <td>ILO</td> <td>8</td> </tr> <tr> <td>Rio</td> <td>1</td> </tr> <tr> <td>Anti-Corruption</td> <td></td> </tr> <tr> <td>Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security (FAO)</td> <td></td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	Global Compact	1, 2, 10	Human Rights	All	ILO	8	Rio	1	Anti-Corruption		Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security (FAO)		OECD Guidelines for Multinational Enterprises	
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OECD Guidelines for Multinational Enterprises															

<p><b>7 Military activities and weapons</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with</p> <ul style="list-style-type: none"> <li>▪ turnover generation from military activities, or</li> <li>▪ sale or production of (essential parts of) weapons</li> <li>▪ dual use products</li> </ul> <p>For dual use products we find it important that companies prevent unintended use of their products for military purposes and that companies comply with regulation on the trade in controversial arms as defined by the common military list of the EU.</p> <p>In order to prevent controversial arms trade based on the common military EU list, companies have to adhere to the criteria mentioned in the EU Council Common Position, defining common rules governing control of exports of military technology and equipment (Dec. 2008).</p>	<table border="1"> <tr> <td>Global Compact</td> <td>1, 2, 10</td> </tr> <tr> <td>Human Rights</td> <td>1 – 11</td> </tr> <tr> <td>ILO</td> <td>8</td> </tr> <tr> <td>Rio</td> <td>1, 24</td> </tr> <tr> <td>Anti-Corruption</td> <td></td> </tr> </table>	Global Compact	1, 2, 10	Human Rights	1 – 11	ILO	8	Rio	1, 24	Anti-Corruption											
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<p><b>8 Extractive business operations</b></p> <p>Producers and retailers have to take care of social and ecological issues inherent to the extractive business and supply chain, like Food &amp; Agriculture, Mining and Oil and Gas extractive operations.</p> <p>We encourage them to focus on sustainable practices in the conduct of their business activities and doing business to support suppliers with adaptation to climate change.</p> <p>They minimize the environmental burden of their activities by –among others– minimizing industrial waste and carry out an environmentally responsible processing of it.</p> <p>Further on, (used) site rehabilitation is part of the investment- and exploitation plan of the concession. In case that the consequences of mining are uncontrollable for the environment, companies are expected to refrain from exploration activities.</p> <p>Extractive business companies are expected to use lessons learned regarding health and ecosystem effects from closed extractive operations, in exploration plans of new operations. They should also reduce their mining waste (tailing), and treat such waste responsibly with adequate tailing risk management, monitoring of waste sites (dams) and with a 'zero accidents' (failure) target for waste storage sites.</p> <p>They have to abstain from business practices, including through their supply chain, that cause</p> <ul style="list-style-type: none"> <li>- deforestation of high conservation value / High Carbon Stock forest, both in the tropics and in temperate regions</li> <li>- radioactive and toxic pollution caused by uranium mining</li> </ul>	<table border="1"> <tr> <td>Global Compact</td> <td>1, 2, 10</td> </tr> <tr> <td>Human Rights</td> <td>1 – 7, 12, 18, 19, 20, 23, 24, 25, 29</td> </tr> <tr> <td>ILO</td> <td>8, 10, 16, 18, 19, 20, 34</td> </tr> <tr> <td>Rio</td> <td>1, 5, 6, 8, 12, 22</td> </tr> <tr> <td>Anti-Corruption</td> <td></td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> <tr> <td>OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas</td> <td></td> </tr> <tr> <td>Paris Agreement on climate change</td> <td></td> </tr> <tr> <td>Global Investor Statement on Climate Change</td> <td></td> </tr> <tr> <td>Task Force on Climate-related Financial Disclosures</td> <td></td> </tr> </table>	Global Compact	1, 2, 10	Human Rights	1 – 7, 12, 18, 19, 20, 23, 24, 25, 29	ILO	8, 10, 16, 18, 19, 20, 34	Rio	1, 5, 6, 8, 12, 22	Anti-Corruption		OECD Guidelines for Multinational Enterprises		OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas		Paris Agreement on climate change		Global Investor Statement on Climate Change		Task Force on Climate-related Financial Disclosures	
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- surface waters tailings disposal
- elimination of peatland for agricultural production
- removal of mountaintops all over the world.

## Carbon Disclosure Project

In case of irreversible damage to the environment in areas where repairs are nearly impossible, companies are expected, at the start of a mining project, to compensate with biodiversity plans.

Companies are expected to respect the communities of artisanal and small-scale miners and improve local sustainable economic and social development.

Especially in areas where nature repairs are nearly impossible, companies should refrain from activities that cause irreversible damage to the environment.

Thermal coal companies show how they align with the energy transition path under the Paris Agreement, by phasing out thermal coal production by 2030.

Oil and gas companies focus their future investments as much as possible on projects with renewable energy sources instead of fossil fuels. They should

- reduce their carbon footprint
- bring their investment in new oil field locations, in the period until 2040, back to nil, in order to contribute to an-almost-emission free energy supply in 2050
- bring their investments in extraction/production of tar sand oil and shale gas and -oil, in the period until 2030, back to nil
- eliminate the use of flaring, ultimately by 2025.

Oil and gas companies are encouraged to

- focus their investments in natural gas -as a necessary intermediate step to an emission-free energy supply- on methane emissions from nil in 2030 at the latest
- incorporate SBT's (Science Based Targets) in their corporate strategy, to set GHG emission reduction targets which contribute to an (almost) CO<sub>2</sub> neutral energy supply in 2050
- report transparent on their carbon targets via the Carbon Disclosure Project (CDP)
- publish their (in)direct GHG emissions according to TCFD

Companies have to carry out supply chain due diligence and demand traceability of suppliers to minimise the risk of being complicit in the use or sale of minerals mined in areas of armed conflict and traded illicitly to finance the fighting and human rights abuse related to the extraction of the minerals.

<p><b>9 Labour standards</b></p> <p>Based on the used internationally accepted codes, companies are expected to</p> <ul style="list-style-type: none"> <li>▪ protect labour rights</li> <li>▪ promote employee participation through employee council and financial participation</li> <li>▪ comply with internationally accepted labour standards.</li> </ul> <p>Achmea has a specific focus on the topic of labour standards and actively encourages companies to develop a labour standards risk management approach and a labour standards policy that adheres to at least the four fundamental principles and rights at work from the ILO (freedom of association, effective recognition of the right to collective bargaining, elimination of forced or compulsory labour, abolition of child labour and the elimination of discrimination in respect of employment and occupation).. Companies in which Achmea invests should further:</p> <ul style="list-style-type: none"> <li>- respect legal maximum working hours;</li> <li>- adhere to fair recruitment practices;</li> </ul> <p>Companies should have a clear (management) system to monitor compliance with international labour standards, and establish procedures to identify and resolve abuse of labour standards.</p>	<table border="1"> <tr> <td>Global Compact</td> <td>3 – 6</td> </tr> <tr> <td>Human Rights</td> <td>20, 23 – 27</td> </tr> <tr> <td>ILO</td> <td>All</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	Global Compact	3 – 6	Human Rights	20, 23 – 27	ILO	All	OECD Guidelines for Multinational Enterprises			
Global Compact	3 – 6										
Human Rights	20, 23 – 27										
ILO	All										
OECD Guidelines for Multinational Enterprises											
<p><b>10 Equal opportunities and gender</b></p> <p>Based on internationally accepted codes such as the OECD Guidelines for Multinational Enterprises, companies should promote equal opportunities and diversity for all (potential) personnel, including e.g. migrant workers who are vulnerable for deprivation of labour rights, on grounds of ethnicity and country of origin.</p> <p>Companies should specifically safeguard non-discrimination of employees and clients in relation to gender and should have a zero-tolerance policy in regards to discrimination in relation to gender and physical, verbal and sexual intimidation. Companies should have adequate policies, practices and monitoring in place to put these expectations into practice.</p> <p>In addition, companies should guarantee that at least 30% of the senior functions are filled by women and enable this by taking sufficient actions in relation to training programs, recruitment processes and enabling facilities.</p>	<table border="1"> <tr> <td>Global Compact</td> <td>6</td> </tr> <tr> <td>Human Rights</td> <td>23</td> </tr> <tr> <td>ILO</td> <td>22, 33 – 35</td> </tr> <tr> <td>Rio</td> <td>20</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	Global Compact	6	Human Rights	23	ILO	22, 33 – 35	Rio	20	OECD Guidelines for Multinational Enterprises	
Global Compact	6										
Human Rights	23										
ILO	22, 33 – 35										
Rio	20										
OECD Guidelines for Multinational Enterprises											

<p><b>11 Health &amp; safety and antibiotics</b></p> <p>Based on internationally accepted codes, companies should care for health and safety of all personnel, suppliers and surrounding communities of production locations according to the precautionary principle.</p> <p>Companies should strive to create a culture where health and safety are part of a preventive culture that ensures good health and safety practices by implementing a clear management system to monitor and, if needed, take corrective measures to comply with norms on labour- and health and safety regulation.</p> <p>In case of accidents companies have an adequate, periodically tested contingency plan.</p> <p>We expect companies e.g. in the agriculture and food value chain to limit the use of antibiotics to prevent an increase in antimicrobial resistance.</p>	<table border="1"> <tr> <td>ILO</td> <td>37 – 39</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	ILO	37 – 39	OECD Guidelines for Multinational Enterprises			
ILO	37 – 39						
OECD Guidelines for Multinational Enterprises							
<p><b>12 Job creation and development</b></p> <p>Based on internationally accepted codes, companies should advance job creation, job security and employee training and development.</p>	<table border="1"> <tr> <td>Human Rights</td> <td>26</td> </tr> <tr> <td>ILO</td> <td>16, 25, 30, 31, 32</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	Human Rights	26	ILO	16, 25, 30, 31, 32	OECD Guidelines for Multinational Enterprises	
Human Rights	26						
ILO	16, 25, 30, 31, 32						
OECD Guidelines for Multinational Enterprises							
<p><b>13 Environmental policy, sustainable operations, systems and reporting</b></p> <p>Companies should apply internationally general accepted codes, standards and initiatives addressing social, environmental and sustainable corporate citizenship and internationally accepted reporting practices, for instance regarding the processing of raw food and mining materials, as well as the production and/or assembling of (semi-)finished products.</p> <p>Mining companies are expected to operate in accordance with the ICMM Principles of the International Council on Minerals &amp; Metals or metal specific standards or initiatives.</p> <p>Business sectors in the manufacturing industry should adhere to industry-specific standards and initiatives aimed at making the supply chain more sustainable, e.g. the OECD due diligence guidance for minerals from conflict-affected and high-risk areas</p> <p>Companies are encouraged to report on their carbon targets via the Carbon Disclosure Project (CDP).</p> <p>Achmea wants to improve the environmental policies of companies.</p> <p>Achmea encourages all companies to:</p> <ul style="list-style-type: none"> <li>- reduce CO<sub>2</sub> emissions scope 1 and 2, both in absolute measure and relative per unit of production.</li> <li>- embrace the ‘Science Based Targets’ approach for setting carbon emission reduction targets.</li> <li>- when participating in in offsetting CO<sub>2</sub>, to have these offsets certified (Gold Standard or similar).</li> </ul> <p>When companies appear to lobby against (intended) legal- or other measures</p>	<table border="1"> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> <tr> <td>Global Compact</td> <td>7 – 9</td> </tr> <tr> <td>Rio</td> <td>All</td> </tr> </table>	OECD Guidelines for Multinational Enterprises		Global Compact	7 – 9	Rio	All
OECD Guidelines for Multinational Enterprises							
Global Compact	7 – 9						
Rio	All						

to be taken by a country, lower government entity or economic zone in which they operate, to combat climate change, Achmea will call upon the company to end such subversive behavior.

**14 Raw materials, water use and resource optimization-technologies**

Based on internationally accepted codes, companies should

- promote the focus on resource optimization especially when it comes to use of among others water and energy, in products and services
- monitor their water use carefully to prevent water scarcity, especially where this can harm ecosystems or endanger local communities in their livelihoods.
- carry out environmental impact assessments for new activities;
- actively research, monitor and adequately address potentially conflicting interests with stakeholders related to the use or consumption of water and carry out an impact assessment on water use in water scarce areas. Based on this data, companies should take sufficient mitigation measures to avoid any negative impact on water quality and quantity from existing or new activities (such as water extraction or pollution). This is in particular the case if these activities conflict with water needs of the local population or vulnerable ecosystems;
- prevent emissions of polluting substances to soil, water and atmosphere during the production phase, and strive to implement Best Available Techniques (BAT) at all times;- produce products and process mineral resources and raw materials according to generally accepted initiatives or standards.

Achmea wishes to engage with companies on energy efficiency and green production. Companies will be encouraged to conduct life cycle analysis to guide choices for production materials and reduce the materials 'footprint' of their products. Companies should also report on efforts and results regarding reduction of material use.

Companies that manufacture plastic (-products) are expected only to expand manufacturing capacity if they can legitimize the expansion, taking into account the environmental impact, public health and safety.

Global Compact	7 – 9
Rio	4, 7, 8, 15, 23
AWS International Water Stewardship Standard	
Int. Code of Conduct on the Distribution and Use of Pesticides (FAO)	
4Rs of Nutrient Stewardship (TFI)	
OECD Guidelines for Multinational Enterprises	

<p><b>15 Electric utilities and fossil fuel intensive industries</b></p> <p>Electricity- and fossil fuel intensive companies should have adequate policies to align their operations with international climate change goals.</p> <p>Electric utilities should structurally reduce their GHG emissions and switch to other, less burdensome- or CO<sub>2</sub> neutral fuels. Substantial coal based power generation is unacceptable.</p> <p>Electric utilities should</p> <ul style="list-style-type: none"> <li>▪ reduce their carbon emissions</li> <li>▪ invest in smart grids and electricity storage systems, which integrate renewable energy sources into the energy distribution system</li> <li>▪ accelerate their future investments in cleaner energy generation: from coal to gas and from gas to renewable energy sources</li> </ul> <p>Electric utilities are encouraged to</p> <ul style="list-style-type: none"> <li>▪ incorporate SBT's (Science Based Targets) in their corporate strategy, to set GHG emission reduction targets which contribute to an (almost) CO<sub>2</sub> neutral energy supply in 2050</li> <li>▪ report transparent on their carbon targets via the Carbon Disclosure Project (CDP)</li> <li>▪ publish their (in)direct GHG emissions according to TCFD and have in 2025 at the latest, duly substantiated strategic (investment) plans, which contribute to an (almost) CO<sub>2</sub> neutral energy supply in 2050</li> </ul> <p>Fossil fuel intensive industries (such as refining industry, chemical industry, metal industry) and industries producing energy intensive products (such as automotive and aerospace)</p> <ul style="list-style-type: none"> <li>▪ publish their (in)direct GHG emissions according to TCFD and have duly substantiated strategic (investment) plans to reduce these emissions.</li> <li>▪ accelerate their investments in products that make use of renewable energy sources.</li> </ul>	<table border="1"> <tr> <td>Global Compact</td> <td>7 – 9</td> </tr> <tr> <td>Rio</td> <td>4, 7, 8, 15, 23</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> <tr> <td>Paris Agreement on climate change</td> <td></td> </tr> <tr> <td>Global Investor Statement on Climate Change</td> <td></td> </tr> <tr> <td>Task Force on Climate-related Financial Disclosures</td> <td></td> </tr> <tr> <td>Carbon Disclosure Project</td> <td></td> </tr> </table>	Global Compact	7 – 9	Rio	4, 7, 8, 15, 23	OECD Guidelines for Multinational Enterprises		Paris Agreement on climate change		Global Investor Statement on Climate Change		Task Force on Climate-related Financial Disclosures		Carbon Disclosure Project	
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Task Force on Climate-related Financial Disclosures															
Carbon Disclosure Project															
<p><b>16 Hazardous substances, PVC and phthalates</b></p> <p>Based on the internationally accepted codes, standards and initiatives, companies should have an adequate policy on how to responsibly deal with sale or production of hazardous substances, including PVC or phthalates.</p> <p>We urge companies to reduce the usage of hazardous chemicals, which are identified and are expected to be banned by law. We expect companies to adhere to the Stockholm treaty regarding Persistent Organic Pollutants (POP's) and phthalates, the Basel convention on control of Trans Boundary Movements of Hazardous Waste and the Rotterdam convention on the Prior Informed Consent Procedure for Hazardous Chemicals and Pesticides in International Trade.</p>	<table border="1"> <tr> <td>Global Compact</td> <td>7 – 9</td> </tr> <tr> <td>Rio</td> <td>4, 7, 8, 15, 23</td> </tr> <tr> <td>OECD Guidelines for Multinational Enterprises</td> <td></td> </tr> </table>	Global Compact	7 – 9	Rio	4, 7, 8, 15, 23	OECD Guidelines for Multinational Enterprises									
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OECD Guidelines for Multinational Enterprises															



<p><b>17 Biodiversity</b></p> <p>Based on the used internationally accepted codes, companies should have a policy to protect (foster) biodiversity.</p> <p>Companies should adhere to the principles of UNESCO World Heritage Convention, Ramsar convention on wetlands and CITES treaty, in order to protect biodiversity and natural capital in general.</p> <p>Companies should prevent impact on the population of animals listed on the IUCN Red List of Threatened Species and prevent the release of exotic species in sensitive ecosystems.</p> <p>Companies should minimise the negative effects of offshore exploration and extractive activities on the marine system and habitat of marine mammals.</p> <p>Companies are expected to develop an Environmental Impact Assessment and/or a Rapid Biodiversity Assessment, in accordance with the standards of the Global Reporting Initiative.</p> <p>Companies with biomass energy production should source biomass that has no adverse impact on food availability and / or protected areas in the production region. They adhere to the Roundtable on Sustainable Biomaterials Principles.</p> <p>Companies prevent adverse impact in areas classified by the IUCN as category I-V.</p>	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	OECD Guidelines for Multinational Enterprises	
<p><b>18 Forestry</b></p> <p>Based on the used internationally accepted codes, standards and initiatives, companies should have an adequate policy on how to responsibly deal with sale or production of tropical hardwood and should avoid purchasing and processing illegally processed wood.</p> <p>Forestry companies, plantation owners and manufacturers of wood based products should respect forest areas, especially High Carbon Stock, to protect biodiversity conservation and foster carbon storage. They should commit to reducing their climate impact and refrain from deforestation.</p> <p>Production forests, plantations for wood exploitation and the products produced with this wood, should be FSC certified. Construction companies are engaged to use FSC certified wood.</p> <p>In activities, such as ongoing operations, new concessions, acquiring of land rights or clearances, corporations should respect legal, social and cultural requirements and free, prior and informed consent from local and indigenous communities. Especially in case of unclarity regarding ownership rights or when customary land use is in place.</p>	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	HCS forests (HCS Approach)	
	Principles for responsible forest management (FSC)	
	Ramsar Convention on wet lands	
	Chain of custody certification (FSC)	
OECD Guidelines for Multinational Enterprises		

<b>19 Nuclear power</b> Taking into account developments regarding safety and waste storage, based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with ownership or operation of nuclear power plants, or services used in nuclear power plants.	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	OECD Guidelines for Multinational Enterprises	
<b>20 Ozone depleting chemicals</b> Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with use, sale or production of ozone depleting chemicals, in line with the Montreal treaty.	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	OECD Guidelines for Multinational Enterprises	
<b>21 Renewable energy</b> Based on the used internationally accepted codes, companies should promote the use or production of renewable energy.  Because big hydropower dams cause negative social and ecological consequences, hydroelectric power producing companies are expected, when constructing water infrastructure projects, to adhere to the principles of the World Commission on Dams.	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	OECD Guidelines for Multinational Enterprises	
	Principles of the World Commission on Dams	
<b>22 Animal testing</b> Based on the used internationally accepted codes, companies should test on animals only for medical purposes, and only if animal testing is proved necessary and no alternative for animal testing can be found.  Achmea encourages companies to use the five freedoms to ensure animal welfare and to apply the three R's of Reduce, Refine or Replace the use of animal testing.	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
	(principle) Five Freedoms of animal welfare	
<b>23 Fur</b> Based on the used internationally accepted codes, companies should have adequate policy on how to responsibly deal with sale or production of fur.	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23

<p><b>24 Intensive farming and meat sale</b></p> <p>From livestock farming companies we invest in, it must be clear to what extent they meet welfare requirements for livestock. Based on the used internationally accepted codes, companies should develop an adequate policy on farm animal welfare regarding</p> <ul style="list-style-type: none"> <li>- limitation of animal transport time to eight hours</li> <li>- elimination of extremely restrictive housing methods</li> </ul> <p>The farm animal welfare policy should minimally address the Five Freedoms of animal welfare.</p> <p>Companies should have adequate policies on</p> <ul style="list-style-type: none"> <li>- good aquaculture practices</li> <li>- labour standards</li> <li>- product quality and safety management</li> <li>- innovation management</li> <li>- reduction of antibiotics use <i>(NB: this is important from human health perspective)</i></li> </ul>	Global Compact	7 – 9
	Rio	4, 7, 8, 15, 23
<p><b>25 Genetically modified organisms</b></p> <p>Local laws provide the leading framework within which practices involving genetically modified organisms should be evaluated. If local laws do not fully cover new developments in this area, companies should have adequate policy, based on the used internationally accepted codes, on how to responsibly deal with products which contain or are developed through genetically modified organisms.</p>	UN Convention on Biological Diversity	
	Nagoya Protocol	
	Cartagena Protocol	
<p><b>26 Code of ethics</b></p> <p>Based on the used internationally accepted codes, companies should have adequate code of ethics or business principles which are pro-actively communicated to all employees and which are also publicly available.</p> <p>They are transparent about their public affairs activities and, if so, how they are involved in public policy engagement.</p>	Global Compact	10
	Human Rights	23 – 25
	ILO	8, 22
	Anti-Corruption	
	OECD Guidelines for Multinational Enterprises	

<p><b>27 Tax and Corruption</b></p> <p>Based on the used internationally accepted codes, companies should have adequate policy and procedures in place to prevent bribery and corruption within their organisation, e.g. risk management systems of which the effectiveness is monitored by analyzing how bribery and corruption incidents have been addressed.</p> <p>They are expected to have anti-corruption programmes and risk management systems in place, from which the effectiveness is monitored by analyzing, among others, how bribery, corruption incidents, tax evasion related activities have been addressed.</p> <p>Companies are expected</p> <ul style="list-style-type: none"> <li>- to publish their corporate organisational and governance structure and the way internal business activities and related financial transactions are organized and accounted for;</li> <li>- to be transparent about tax rulings with authorities of jurisdictions with which the company is involved and, if any, the resolvment of tax disputes;</li> <li>- to provide transparency on their beneficial owners, including name, legal status, and share of ownership, if applicable.</li> </ul> <p>Achmea engages on tax transparency. Companies should be transparent on their tax payments, and practice country-by-country reporting for the number of employees, costs, received subsidies, sums paid for concessions and the amount paid for different types of taxes. Such reporting should be in line with the base erosion and profit shifting (BEPS) Action Plan of the OECD. Also, we ask companies to provide an overview of its organisational structure, including subsidiaries, joint-ventures or local branches, and their ownership structure in jurisdiction with no or low corporate tax rates.</p>	Global Compact	10
	ILO	8, 10, 20
	Anti-Corruption	
	OECD Action Plan on Base Erosion and Profit Shifting	
	OECD Guidelines for Multinational Enterprises	
	Extractive Industries Transparency Initiative (EITI)	
<p><b>28 Supply chain standards</b></p> <p>Based on internationally accepted codes, companies should have adequate policy, systems and reporting on global supply chain standards, which they apply to all their business activities.</p> <p>Their procurement standards with contracting suppliers and subcontractors have to meet decent governmental, social and environmental criteria.</p>	ILO	20, 38
	Rio	10, 12
	OECD Guidelines for Multinational Enterprises	
<p><b>29 Commitment to society</b></p> <p>Based on the used internationally accepted codes, companies should show explicit commitment to society/charities.</p>	Human Rights	29
	Rio	1, 7
	OECD Guidelines for Multinational Enterprises	
<p><b>30 Poverty</b></p> <p>Based on the used internationally accepted codes, within their sphere of influence, companies should co-operate in the task of the global community to eradicate poverty.</p>	Rio	5, 8
	OECD Guidelines for Multinational Enterprises	

<p><b>31 Access to medicine</b></p> <p>Based on the used internationally accepted codes, companies active in the pharmaceutical sector should develop policies and standards to improve access to medicine, in line with the criteria used to establish the Access to Medicine Index. We pay specific attention to fair pricing of medicines, in developing as well as in developed markets, and to the responsible business conduct of pharmaceutical companies.</p> <p>Actors in healthcare like hospitals and other healthcare suppliers are encouraged to patients direct access to healthcare and medication.</p>	<p>Human Rights 25</p> <p>WHO Constitution</p>
<p><b>32 Marketing practices formula producers</b></p> <p>Based on the used internationally accepted codes, companies active in the production of formula-milk should adhere to the International code on substitutes for breast-milk regarding marketing for their products as substitutes for breast-milk.</p>	<p>Human Rights 25</p> <p>WHO Constitution</p> <p>International Code on Substitutes for Breast-milk</p>
<p><b>33 Financial sector</b></p> <p>Based on the used internationally accepted codes, companies operating in the financial sector regarding their investment portfolio, are expected</p> <ul style="list-style-type: none"> <li>- to use generally accepted standards to measure the environmental, social and governance performance of their investee companies</li> <li>- to base their investing activities on international codes and declarations regarding sustainability related topics derived from the UN Sustainable Development Goals.</li> <li>- to abstain from excessive risky trade and investment activities on their own account resulting from derivatives exposure or other types of investments.</li> </ul> <p>Companies operating in the financial sector should be transparent about their tax payments to the countries in which they operate. They are expected not to be involved in money laundering. They should not carry out, cooperate with or provide advice about transactions with the main purpose of pursuing tax benefits.</p> <p>Companies operating in the financial sector should comply with expectations of society regarding financial institutions' responsibilities, namely the commitment to: accountability, transparency, sustainability and sustainable markets and regulations.</p>	<p>Global Compact</p> <p>UNEP FI Declaration</p> <p>IFC Performance Standards</p> <p>Equator Principles</p> <p>Principles for Responsible Investment (PRI)</p> <p>Principles for Sustainable Insurance (PSI)</p> <p>OECD Guidelines for Multinational Enterprises</p> <p>G4 Financial Services Sector Disclosure (FSSD)</p> <p>Green Bond principles</p> <p>FATF work group recommendations of the OECD Wolfsberg Principles</p>

### 34 Real estate

Based on the used internationally accepted codes, companies operating in the real estate sector are expected to focus on improvement of energy performance of their buildings portfolio, -when applicable in that specific country- through BAT-based energy reduction measures. The focus lies on improving energy performance of the buildings portfolio that meet EU 'energy neutral' qualification.

Construction companies are expected

- to use sustainable cement e.g. from companies that have signed the Cement Sustainability Initiative <sup>1)</sup>
- to focus on circular and –when appropriate and effective- on multi purpose building practices.
- to transform, in case of structural vacancy, the purpose of a building.

New and renovated real estate is expected to meet 'Very Good' BREEAM qualification or similar.

As part of our engagement on carbon management in the retail real estate sector we expect companies to use BAT-based measures regarding avoidance of greenhouse gas emissions.

Operators, who manage real estate, engage upfront with tenants about maintenance and/or renovation or adjustments on location or destination of real estate, which significantly affect their living pleasure and options.

Taking into account tenant rights and interests, real estate operators should carry out satisfaction surveys, work on removing of shortcomings and monitor progress.

Real estate funds should outperform the peer group of GRESB (Global Real Estate Sustainability Benchmark), but at least meet a 50 points score.

<sup>1)</sup> or other relevant industry code of conduct or certification scheme of comparable strength.

LEED

BREEAM

GRESB

EU Energy Performance of Buildings Directive

### 35 Fisheries sector and Aquaculture

Sea food, aquaculture and fishery companies operate according to the FAO Code of Conduct for Responsible Fisheries, or other relevant codes of conduct or certification schemes. Among other things, this means that they don't use fishing techniques which harm worldwide fish populations. Fishing should always be focused on preventing overfishing and biodiversity loss..

Moreover fishing operations should be certified according to the Marine Stewardship Council Fisheries Standard and or the MSC Chain of Custody Standard.

We expect companies to

- respect Marine Protected Areas, including so called 'no take-zones'
- limit their fishing as much as possible to the fish species on which their catches are focused, document catches, for tracing purposes
- take measures to prevent unintended loss of fishing gear, in order to prevent ghost fishing and pollution as much as possible.

Aqua Culture activities are certified according to standards that keep animal welfare into account, including nutrition, sufficient space, stress and pain.

FAO Code of Conduct for Responsible Fisheries

Marine Stewardship Council (MSC) criteria

Aquaculture Stewardship Council (ASC) criteria