Appendix 2. SFDR Template NHG/Low LTV 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

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.

Product name: NHG/Low LTV Sub-fund
Legal entity identifier: Not applicable

ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS

Did this financial product have a sustainable investment objective?

☐ Yes	☑ No
☐ It made **sustainable investments with an environmental 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
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ 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	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It made **sustainable investments with a social objective:** ___%	☑ It promoted E/S characteristics, but **did not make any sustainable investments**

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 Fund sustainability performance was measured using the following indicators:

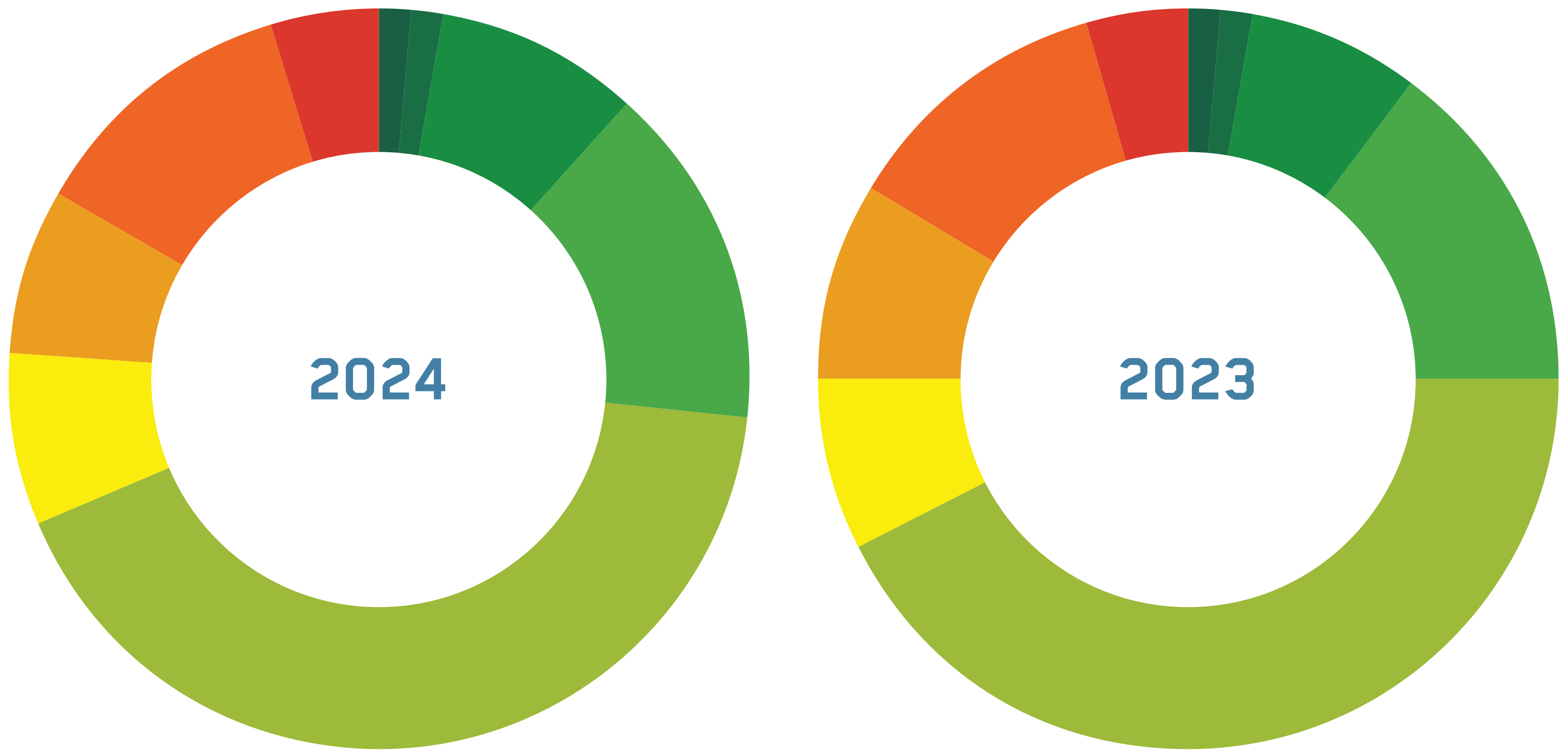
1. Energy label distribution.	The graphs are shown on the right
2. Average carbon emissions*	2023: 2,223 KG
3. The number of customers assisted with challenges in their financial situation, broken down into the categories job coach, budget coach or assistance from the Preventive Management & Special Servicing Department.	Like last year, the job coach, budget coach or assistance from Preventive Management & Special Servicing Department was not used in 2024 for the Fund.

* 2024 is not available.

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

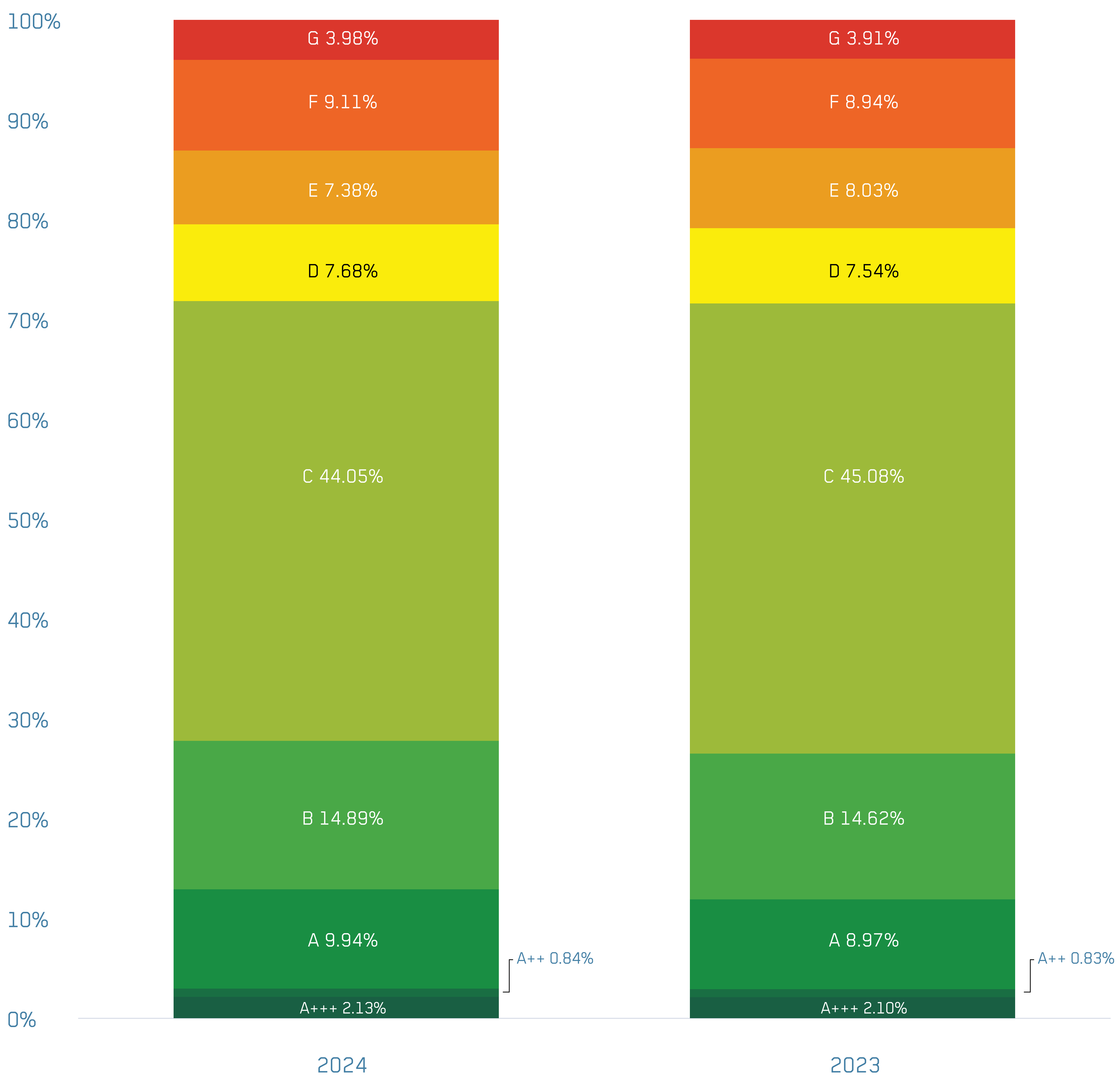
...and compared to previous periods?

DISTRIBUTION OF THE ENERGY LABELS IN THE PORTFOLIO BASED ON COLLATERAL (LAST 2 YEARS)



Key for outer ring:	2024	2023
Energy label A+++	1.49%	1.47%
Energy label A++	1.49%	1.47%
Energy label A	8.96%	7.35%
Energy label B	14.93%	14.71%
Energy label C	41.79%	42.65%
Energy label D	7.46%	7.35%
Energy label E	7.46%	8.82%
Energy label F	11.94%	11.76%
Energy label G	4.48%	4.41%

DISTRIBUTION OF THE ENERGY LABELS IN THE PORTFOLIO BASED ON TOTAL RESIDUAL DEBT
(LAST 2 YEARS)



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

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. CO_2 emissions are also taken into account.

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.

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.

What were the top investments of this financial product?

Achmea Mortgages 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.

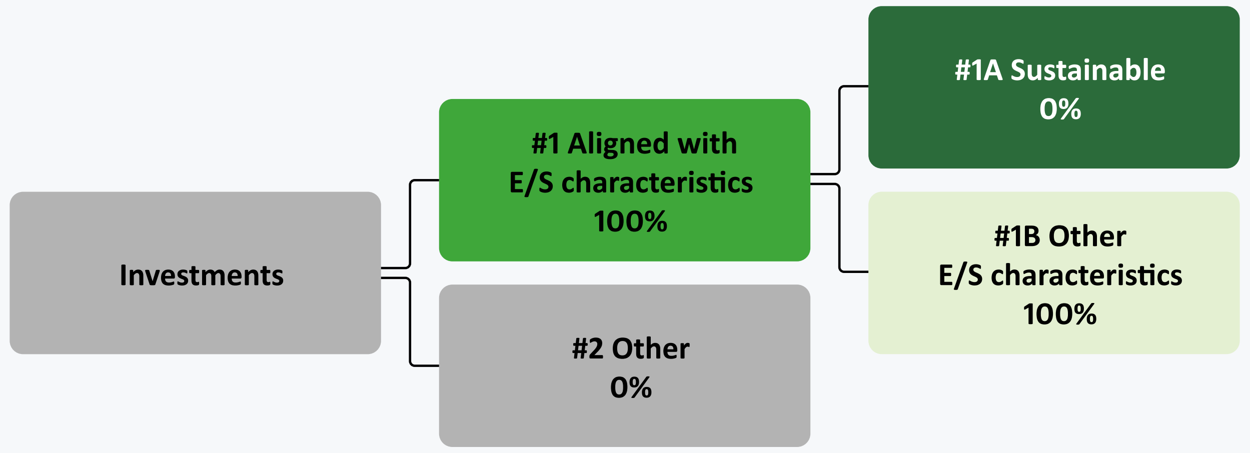
The ESG policy is aimed at encouraging sustainability in the mortgage portfolio. We enter into dialogue with consumers to encourage them to make their homes more sustainable. We do this by informing consumers about co-financing sustainability in the mortgage. In this way we contribute to reducing climate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

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?



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualifiedd as sustainable investments.

#1 Aligned with E/S characteristics includes the investments of the financial product used to meet the ecological or social characteristics promoted by the financial product in accordance with the binding elements of the investment strategy.

#2 Other includes the other investments of the financial product that are not aligned with the ecological or social characteristics and also do not qualify as a sustainable investment.

Asset allocation describes the share of investments in specific assets.

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. Achmea Mortgages 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 Taxonomy1?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☑ No

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.

What was the share of investments made in transitional and enabling activities?

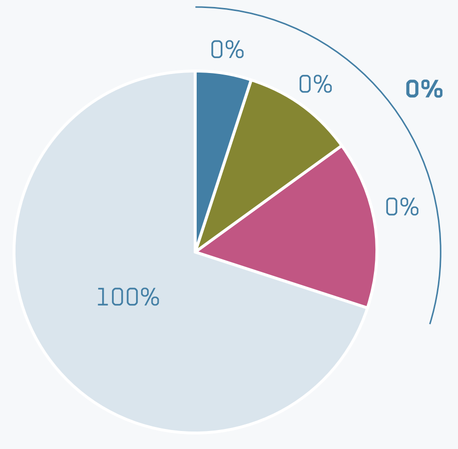
Not applicable

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

Not applicable

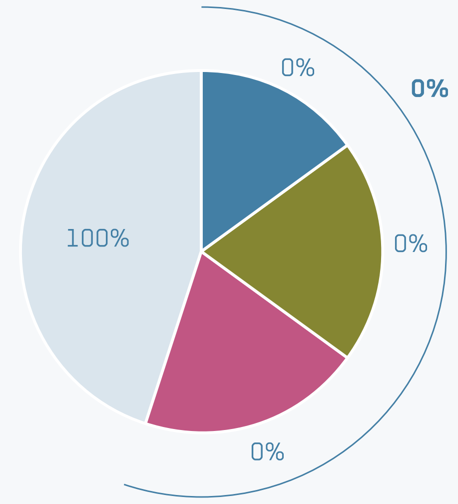
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

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] 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.

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 has been done to meet ESGs during the reference period?

To encourage energy efficiency, we have undertaken the following activities:

- Consumers with a Centraal Beheer mortgage can easily purchase sustainability solutions in the 'Climate Store' to implement energy-saving measures and have them installed by professional installers. The Climate Store is part of the "Duurzaam Woongemak" platform, where consumers can download a sustainability profile of their home. Next, they can head to the Climate Store to purchase energy-saving measures and find installers to implement them. The Climate Store was launched in February 2024 for consumers with a Centraal Beheer mortgage.
- With this platform, Achmea effectively becomes a onestopshop for sustainable living, offering both competitive home financing products and arranging the implementation of sustainability upgrades
- We believe sustainable advice is important and encourage advisors 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 advisor. The customer and advisor do the online scan on Duurzaam Woongemak together determine what sustainability upgrades the customer can make, how much they will cost, and how much the customer stands to save.
- We encourage advisors to address sustainability in their conversations. As such, advisors must tick off whether sustainability was discussed in the HDN system for monitoring purposes.
- The green loan part was introduced in October 2023 as a key product adjustment to further accelerate the sustainability of the portfolio and is available to both existing and new customers.
- The green loan part consists of an amount of up to €25,000 that consumers can borrow for energy-saving measures or to improve the energy efficiency of residential real estate. The green loan part also qualified for a discount of 80 basis points compared to the standard mortgage rate and must be repaid within 15 years based on an annuity repayment schedule. These conditions applied until the end of 2024. They will be extended in 2025, and we will also introduce a blue loan part. See our ESG chapter for more information.
- We feel responsible for contributing to information and education aimed at improving financial literacy, opportunities for sustainability and access to climate adaptation measures. Beyond promoting sustainability, we believe this also contributes to equal opportunities.
- We aim to minimize greenhouse gas emissions in our mortgage portfolios and our own operations and encourage consumers to reduce their emissions. Our innovative efforts in this field include the Climate Store and actively supporting consumers in making their homes more sustainable.

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.

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.

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