

AEAM DUTCH MORTGAGE FUND

Disclaimer: This document is not marketing material. It contains information about this Fund (the product) in relation to the Sustainable Finance Disclosure Regulation. The information is legally required to help you understand the sustainability characteristics and/or objectives and risks of this fund. It is recommended to read this document together with other relevant documentation on this product so you can make an informed decision about whether to invest. Definitions used in this document have the same meaning as those used in the Fund prospectus.

(a) Summary

This product promotes environmental and social characteristics by investing in mortgage receivable from originators that at a minimum offer preferential lending conditions for more energy efficient properties and dedicated lending for certain sustainability projects homeowners may wish to undertake. In the due diligence, the product considers certain principal adverse impact indicators. The majority of the investments in the product are aligned with the environmental and social characteristics. The manager uses a wide variety of internal and external data from several sources as inputs for its decision.

For a translation of this summary in one of the official languages of a member state where this financial product is made available, please refer to section (m) Summary Translations furtheron in this document.

(b) No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

When funds aims to make one or more sustainable investments:

How the sustainable investments do not significantly harm any of the sustainable investment objectives?

Not applicable

How are the Principal Adverse Impacts (PAI) taken into account?

Not applicable

Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights?

Not applicable

(c) Environmental or social characteristics of the financial product

What environmental and/or social characteristics are promoted by this financial product?

This fund invests in mortgage receivables from originators who actively promote environmental considerations as part of their underwriting and lending process. No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

(d) Investment strategy

What is the investment strategy used to meet the environmental or social characteristics promoted by this financial product?

The Fund will invest predominantly in mortgage receivables as described in the Fund's investment policy.

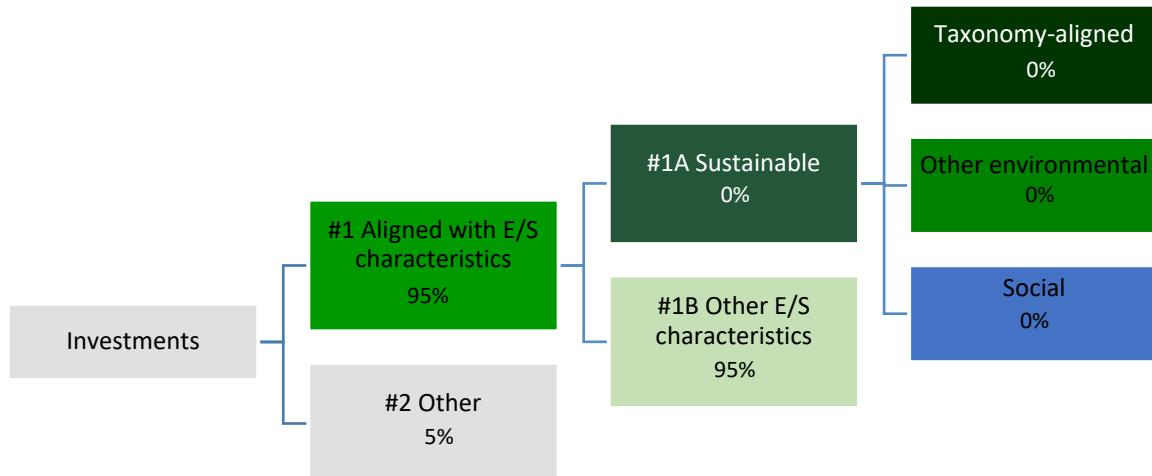
The Investment Manager selects mortgage originators for inclusion in the fund based on an evaluation of their loan underwriting criteria with respect to the consideration of environmental factors which enable the promotion of environmental characteristics. As a minimum, the originator should actively offer sustainability loans for every borrower and favourable financing conditions for homes with superior energy performance. The originator should also be able to report on the sustainability indicators.

The Fund does not commit to a minimum rate to reduce the scope of investments prior to the application of the investment strategy.

What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

The underlying investments in this Fund are not companies. Therefore, the investments cannot be screened against good governance criteria.

(e) Proportion of the investments



#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 qualified as sustainable investments.

(f) Monitoring of environmental or social characteristics

How are the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product monitored throughout the lifecycle of the financial product and the related internal or external control mechanisms?

The strategy is implemented in the investment process by evaluating the originators at least semi-annually in line with service-level agreements. The Investment Manager also receives semi-annual ESG reports based on quarterly data from the originator which includes the disclosure and tracking of relevant environmental characteristics.

(g) Methodologies

What are the methodologies to measure how the social or environmental characteristics promoted by the financial product are met?

The Investment Manager checks if the originator actively offers sustainability loans for every borrower and favourable financing conditions for homes with superior energy performance. Therefore, the sustainability indicators used to measure the attainment of the ESG characteristics this strategy promotes is the number of sustainability loans and the number of loans with favourable financing conditions. The originator should also be able to report on the sustainability indicators.

(h) Data source and processing

How are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?

Due to the lack of ESG data relevant to these asset classes from specialist data providers, Aegon Asset Management teams try to work to obtain ESG information directly from the originator. When possible, portfolio managers engage with the originator to obtain data and additional information in relation to ESG.

What measures are taken to ensure data quality?

Given the lack of accounting standards and, in turn, standardised data from data providers and issuers of this type of debt/transaction, a systematic assessment of data quality is challenging and occurs on a case by case basis by the portfolio managers in the context of the overall investment due diligence.

How is data processed?

Data is processed by the portfolio managers to align with our internal standards. Data obtained from issuers is stored in internal locations with restricted access rights.

What proportion of the data is estimated?

Data obtained from public sources and data from originators may be estimated to some extent, however no systematic measures are available to establish whether such data has been estimated and how accurately.

(i) Limitations to methodologies and data

What are potential limitations to the methodologies or data sources and how do such limitation not affect how the environmental or social characteristics promoted by the financial product are met?

Limitations are tied to the data obtained directly from originators, its availability and accuracy.

(j) Due diligence

What due diligence is carried out on the underlying assets of the financial product (including the internal and external controls)?

Aegon AM follows an internal proprietary research process using the data obtained from originators on a case by case basis. ESG data obtained from originators is used as a basis and complement to a holistic analysis of the overall investment which also considers other types of data from other sources.

(k) Engagement policies

What is the engagement policy applied, in the case that engagement is part of the environmental or social investment strategy (including any management procedures applicable to sustainability-related controversies in investee companies)?

This Fund is subject to Aegon AM's Active Ownership Policy, which can be found at www.aegonam.com. For a description of procedures applicable to sustainability related controversies in investee companies for this Fund, we refer to the Sustainability Risks and Impact Policy as referred to in section (d) Investment strategy.

(I) Designated reference benchmark

Has an index been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product?

No, there are no ESG index available for strategies investing in mortgage receivables.

When fund has a designated reference benchmark

How is that index aligned with the environmental and social characteristics promoted by the financial product?

Not applicable.

What input data is used for the reference benchmark?

Not applicable.

Which methodologies are used to select the data in the reference benchmark?

Not applicable.

Which rebalancing methodologies are used for the reference benchmark?

Not applicable.

How is the reference benchmark calculated?

Not applicable.

If information is available on the website of the benchmark administrator, this is the hyperlink to the website:

Not applicable.

(m) Summary Translations



Oversigt

Dette produkt fremmer miljømæssige og sociale karakteristika gennem investering i realkreditgæld fra udstedere, der som minimum tilbyder favorable lånebetingelser til mere energieffektive ejendomme samt dedikeret udlån til visse bæredygtighedsprojekter, som boligejere ønsker at foretage. I forbindelse med due diligence tager produktet hensyn til visse væsentlige indikatorer for negative påvirkninger. Størstedelen af investeringerne i produktet er i overensstemmelse med de miljømæssige og sociale karakteristika. Forvalterens beslutninger er baseret på en lang række interne og eksterne data fra flere forskellige kilder.



Zusammenfassung

Dieses Produkt bewirbt ökologische und soziale Merkmale, indem es in Hypothekenforderungen von Kreditgebern investiert, die mindestens Vorzugskonditionen für energieeffizientere Immobilien und spezielle Kredite für bestimmte Nachhaltigkeitsprojekte anbieten, die Hausbesitzer möglicherweise durchführen möchten. Im Rahmen der Due Diligence-Prüfung berücksichtigt das Produkt bestimmte wesentliche negativen Auswirkungen. Der Großteil der Investitionen in das Produkt sind an den ökologischen und sozialen Merkmalen ausgerichtet. Der Verwalter verwendet eine Vielzahl an internen und externen Daten aus verschiedenen Quellen als Grundlage für seine Entscheidung.



Resumen

Este producto promueve características medioambientales y sociales mediante la inversión en créditos hipotecarios de entidades emisoras que, como mínimo, ofrecen condiciones de préstamo preferentes para propiedades más eficientes desde el punto de vista energético y préstamos dedicados a determinados proyectos de sostenibilidad que los propietarios deseen emprender. En el proceso de diligencia debida, el producto tiene en cuenta determinados indicadores de las principales incidencias adversas. La mayoría de las inversiones del producto se ajustan a las características medioambientales y sociales. El gestor utiliza una amplia variedad de datos internos y externos de diversas fuentes a la hora de tomar decisiones.



Yhteenvetö

Tämä tuote edistää ympäristöön ja yhteiskuntaan liittyviä ominaisuuksia sijoittamalla kiinteistövakuudellisiin arvopapereihin, jotka tarjoavat vähintään edulliset lainausehdot energiatehokkaimille kiinteistöille ja lainoitusta tietylle kestävyysprojekteille, joihin asunnonomistajat saattavat haluta ryhtyä. Huolellisessa tarkastuksessa tuote ottaa huomioon tietyt pääasialliset haitallisia vaikutuksia koskevat indikaattorit. Pääosa tuotteen sijoituksista vastaa ympäristöön ja yhteiskuntaan liittyviä ominaisuuksia. Rahaston hoitaja käyttää päästötä tehdessään laajasti eri lähteistä saatavia erilaisia sisäisiä ja ulkoisia tietoja.



Résumé

Ce produit promeut des caractéristiques environnementales et sociales en investissant dans des créances hypothécaires d'émetteurs qui, au minimum, offrent des conditions de prêt préférentielles sur des biens plus économies en énergie et des prêts dédiés sur certains projets durables que les propriétaires souhaiteraient entreprendre. Dans le cadre du devoir de diligence, le produit prend en compte certains principaux indicateurs d'incidence négative. La majorité des investissements dans le produit sont alignés sur des caractéristiques environnementales et sociales. Le gestionnaire utilise une grande variété de données internes et externes provenant de plusieurs sources pour prendre ses décisions.



Sažetak

Ovaj proizvod promiče ekološka i društvena obilježja ulaganjem u kreditiranja na temelju hipoteke od inicijatora koji u najmanju ruku nude povlaštene uvjete kreditiranja za energetski učinkovite nekretnine i namjensko kreditiranje za određene projekte održivosti koje vlasnici nekretnina žele pokrenuti. U dubinskoj analizi proizvod razmatra određene čimbenike glavnih negativnih

učinaka. Većina ulaganja u proizvod u skladu su s ekološkim i društvenim obilježjima. Upravitelj upotrebljava širok raspon internih i eksternih podataka iz nekoliko izvora kao ulazne čimbenike za svoju odluku.

Sintesi

Questo prodotto promuove le caratteristiche ambientali e sociali investendo in crediti ipotecari da parte di cedenti che come minimo offrono condizioni di prestito preferenziali per proprietà immobiliari a maggiore efficienza energetica e prestiti dedicati per determinati progetti di sostenibilità che i proprietari di immobili potrebbero voler intraprendere. Nella due diligence, il prodotto considera alcuni principali indicatori di impatto negativo. La maggior parte degli investimenti nel prodotto sono in linea con le caratteristiche ambientali e sociali. Il gestore utilizza un'ampia varietà di dati interni ed esterni provenienti da diverse fonti come input per le sue decisioni.

Samenvatting

Dit product promoot ecologische en sociale kenmerken door te beleggen in hypothecaire leningen van verstrekkers die op zijn minst preferentiële leenvoorraarden bieden voor energiezuiniger vastgoed en toegevoegde leningen voor bepaalde duurzaamheidsprojecten die huiseigenaren mogelijk willen doen. In het kader van due diligence houdt het product rekening met bepaalde belangrijke indicatoren voor ongunstige effecten. Het grootste deel van de beleggingen in het product is afgestemd op de ecologische en sociale kenmerken. De beheerder gebruikt een grote verscheidenheid aan interne en externe gegevens uit verschillende bronnen als input voor zijn beslissing.

Sammendrag

Dette produktet fremmer miljømessige og sosiale egenskaper ved å investere i boliglånsfordringer fra opphavspersoner som minimum tilbyr fortrinnsrett utlånsbetingelser for mer energieffektive egenskaper og dedikert utlån for visse bærekraftprosjekter som huseierne ønsker å gjennomføre. I selskapsgjennomgangen vurderer produktet visse sentrale indikatorer for negativ innvirkning. De fleste investeringene i produktet er i tråd med miljømessige og sosiale egenskaper. Forvalteren bruker et bredt utvalg av interne og eksterne data fra flere kilder som grunnlag for beslutningen sin.

Resumo

Este produto promove características ambientais e sociais através do investimento em hipotecas a receber de originadores que, no mínimo, oferecem condições preferenciais de empréstimo para propriedades mais eficientes em termos energéticos e empréstimos dedicados a determinados projetos de sustentabilidade que os proprietários podem querer empreender. Na devida diligência, o produto considera determinados indicadores de impacto adverso principais. A maioria dos investimentos no produto está alinhada com as características ambientais e sociais. O gestor utiliza uma grande variedade de dados internos e externos provenientes de várias fontes como a base para a sua decisão.

Sammanfattning

Denna produkt främjar miljörelaterade och sociala attribut genom att investera i hypoteksfordringar från originatorer som till ett minimum erbjuder förmånliga låne villkor för mer energieffektiva fastigheter och dedikerad utlåning till vissa hållbarhetsprojekt som bostadsägare kan vilja genomföra. I företagsbesiktningen beaktar produkten vissa huvudsakliga indikatorer för negativa konsekvenser. Merparten av investeringarna i produkten är anpassade till de miljörelaterade och sociala egenskaperna. Investeringsförvaltaren använder en mängd olika interna och externa data från flera källor som beslutsunderlag.