

MM 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?

The Fund invests in mortgages and/or Third Party Investment Managers' mortgages that actively promote environmental and/or social 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. To achieve the Investment Objective of the Fund, the Fund Manager may directly invest the Fund's Assets and/or may select one or more (specialized) Third Party Investment Managers and/or Funds to manage (part of) the Fund's Assets.

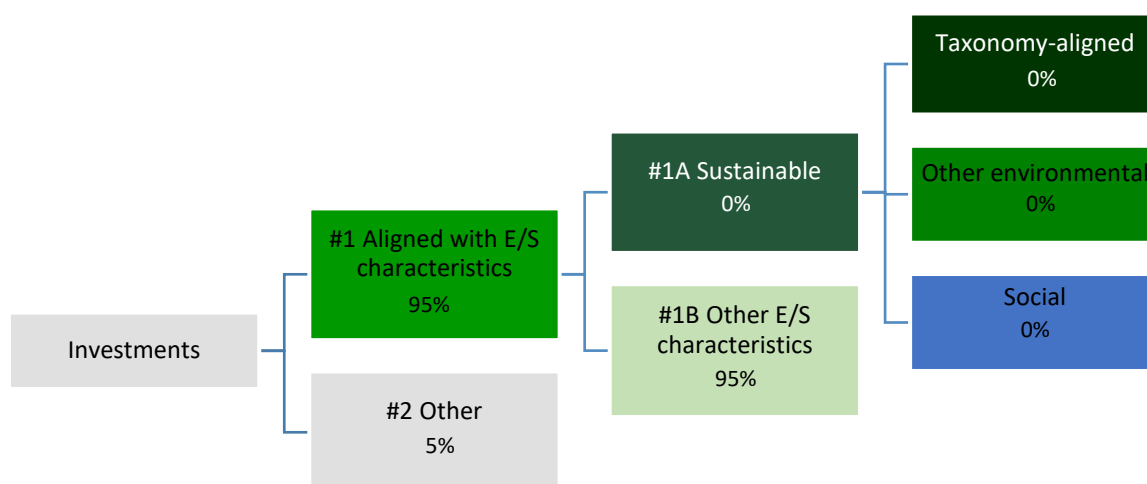
The Fund Manager selects Third Party Investment Manager(s) to manage the Fund's assets, where the promotion of environmental and/or social characteristics are part of the underwriting and lending process. Those factors, as mentioned before, may include, but are not limited to, offering of financing for improvement of energy label or motivating clients to improve the energy label of their properties. The Fund Manager may not select Third Party Investment Manager(s) that do not promote such characteristics as part of their underwriting and lending process.

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 Manager evaluates the Fund's investment approach and/or Third Party Investment Manager(s) at least annually. The Investment Manager also receives periodic reports from Third Party Investment Manager(s) disclosing the portfolio composition and environmental and social characteristics.

(g) Methodologies

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

The Fund Manager and/or Third Party Investment Manager(s) make(s) an assessment of environmental and social factors as part of the underwriting and lending process. Those factors include but are not limited to offering of financing for improvement of energy label, motivating clients to improve the energy label of their homes and energy label distribution of the portfolio. Those factors are used as sustainability indicators to measure the attainment of environmental and/or social characteristics. More details on the indicators are available on request.

(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



Samenvatting

Dit product promoot ecologische en sociale kenmerken door te beleggen in hypothecaire leningen van verstrekkers die op zijn minst preferentiële leenvoorwaarden bieden voor energiezuiniger vastgoed en toegewijde 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.