Goldman Sachs | Asset Management

RESPONSIBLE INVESTMENT POLICY

(Applicable for former NN Investment Partners entities)

For professional use only

March 2023

SCOPE

This Responsible Investment Policy is applicable to the assets managed solely by the following (former NN Investment Partners) legal entities (collectively referred to in this policy as "The Asset Manager", "we", "us" or "our"):

- Goldman Sachs Asset Management B.V.
- Goldman Sachs Advisors B.V.
- Altis Investment Management B.V.
- Goldman Sachs Asset Management Co., Ltd.
- Goldman Sachs Investment Management (Singapore) Ltd.
- Goldman Sachs Asset Management Belgium S.A.
- NN Investment Partners North America LLC
- NN Investment Partners Towarzystwo Funduszy Inwestycyjnych S.A.

In addition, this policy only applies to the following fund ranges:
- Goldman Sachs (B) Fund
- Goldman Sachs (B) Invest
- Goldman Sachs Cayman Funds II
- Goldman Sachs Emerytura SFIO
- Goldman Sachs Funds III
- Goldman Sachs Funds IV
- Goldman Sachs Funds V
- Goldman Sachs Funds VI
- Goldman Sachs Funds VII
- Goldman Sachs Lux Investment Funds II
- Goldman Sachs Lux Investment Funds III
- Goldman Sachs Lux Investment Funds IV
- Goldman Sachs Paraplufonds 1 N.V.
- Goldman Sachs Paraplufonds 2 N.V.
- Goldman Sachs Paraplufonds 3 N.V.
- Goldman Sachs Paraplufonds 4 N.V.
- Goldman Sachs Paraplufonds 5 N.V.
- Goldman Sachs Parasol FIO
- Goldman Sachs Perspektywa SFIO
- Goldman Sachs Securitisation Fund (I)
- Goldman Sachs SFIO

For the avoidance of doubt, this Responsible Investment Policy does not apply to any other entity that is part of Goldman Sachs Group Inc.

INTRODUCTION

At Goldman Sachs Asset Management, we strive to advance sustainable and inclusive economic growth by putting our clients' capital to work. Within our range of strategies we offer innovative investment strategies that potentially allow clients to benefit from sustainability-related opportunities while considering sustainability risks.

We believe in the power and potential of responsible investing, which emphasizes the competitive advantages of companies that invest in their own structure, people and community. At its core is the conviction that companies with better business ethics, respect for human dignity and environmental responsibility will create more economic value over the long term.

We believe the integration of environmental, social and governance (ESG) factors plays an important role in active investment management, enabling us to unlock potential financial value by identifying risks and opportunities in a rapidly changing market. For our clients, this means their money can be directed to companies and projects that are poised to thrive in the shift to a greener, more inclusive economy.

OBJECTIVE

The objective of this Responsible Investment Policy is to effectively address the (sustainability) risks that relate to ESG issues. These risks cover a full spectrum, from individual asset risk and business model risk to political and regulatory risk. In addition, this policy reflects how we implement responsible investing, including how we deal with the adverse impacts of investment decisions. This approach is based on four key building blocks: the application of restriction criteria; the execution of active ownership in the form of engagement and voting activities; the systematic incorporation of ESG risks and opportunities into the investment process; and transparent reporting.

We invest in accordance with international and sector specific standards and initiatives. Examples include the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, The UN Guiding Principles for Business and Human Rights (UN GP) and the Principles for Responsible Investment.

This policy is aligned with regulatory requirements, The Asset Manager’s investment approach and risk appetite, and the best interests of our clients. It reflects risk perspectives and requirements resulting from applicable legislation such as the Sustainable Finance Disclosure Regulation (SFDR), which forms part of the EU’s Sustainable Finance Action Plan. Furthermore, it takes into account our commitments arising from our status as a PRI signatory.

GOVERNANCE

We have an RI governance structure in place in which multi-disciplinary expertise is embedded and mandated to oversee, drive, and implement RI regulatory requirements.

We make sure the relevant people are involved in decision-making, that recommendations are shared and decisions are efficiently implemented.

In this governance structure, the Manco Board[1] and the Global Stewardship team have an important role in making recommendations and decisions related to policies and the engagement process.

1 The Manco Board overseeing funds managed within the legal entities as specified on page 2.

RESPONSIBLE INVESTING IMPLEMENTATION

Our Responsible Investing approach as scoped within this policy combines four building blocks to implement responsible investing: restriction criteria, ESG integration, engagement and voting, and transparent reporting. By incorporating these four building blocks consistently within our investment process, we are better able to fulfil our clients' responsible investing ambitions and their financial goals. This section lays out the mandatory minimum requirements for the assets in scope.

A key part of the approach to Responsible Investing is that where possible and feasible, we aim to mitigate the negative impacts of our investments on the sustainability factors. These negative impacts are also called adverse impacts, whereby the most significant adverse impacts are referred to as principal adverse impacts. These principal adverse impacts can occur in different areas, such as related to environmental, social and employee matters, human rights, corruption and bribery matters. The exact application can differ between asset classes and strategies, but is always part of the four before-mentioned building blocks. We continuously seek additional ways to mitigate adverse impacts in a robust and meaningful way and will include additional adverse impacts in our approach in line with the SFDR requirements.

Global Norms

The Global Stewardship Team has developed a process for evaluating companies that have been identified by third party data providers as in violation of the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises (amongst other global norms), and/or companies which are applying poor governance practices.

We also believe that the global norms align with related frameworks 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

Our process centers on four primary steps:
- **Identify:** We leverage multiple third party data providers to generate a list of potential violators of Global Norms.
- **Review:** Using the vendor generated list, we evaluate each of the issues raised at the companies, considering the external data providers' assessment as well as additional sources to create an assessment.
- **Evaluate:** Using the results of the review, we assign each company to one of three tiers:
  - **Tier 1:** We believe that this company has an ongoing global norms violation with insufficient remediation
  - **Tier 2:** The company may have had a global norms violation, but some remediation has taken place OR there is a serious allegation of wrongdoing where the situation is still developing
  - **Tier 3:** The company is not currently considered a global norms violator
- **Monitor:** We review and retier the list on a semi-annual basis, and seek to conduct ongoing monitoring to identify potential new issues.

Following the tiering process, the Global Stewardship Team seeks to take appropriate stewardship actions related to the companies, for example seeking to engage with companies or take voting action as appropriate.

Various investment teams may seek to implement portfolio monitoring or construction actions based on the results of the tiering process.

Restriction criteria

Norms-based responsible investing criteria

We have developed norms-based responsible investing criteria to which issuers need to adhere. These criteria apply to all types of strategies[2] and are a reflection of relevant laws, our values, and internationally recognized standards such as the UN Global Compact principles, the UN Guiding principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. These norms-based RI criteria form the basis of a set of restrictions, but we can choose to make the criteria more or less strict or add more elements to our restrictions approach. These criteria reflect the minimum requirements that the entities in which we invest[3] need to fulfil and are periodically updated and revised.

A key element is the belief in inclusion over exclusion. However, before we start analysing and selecting individual investments, we form an opinion on the investable universe in general and apply this to all our assets under management, which is a key step in our due diligence of the adverse impacts of our investment decisions. In the event that there are strong indications that an issuer may have failed to meet any of our minimum requirements, we have to determine whether this constitutes a violation. This information on potential violations can come from external ESG research, input from our own investment staff, or from other parties, such as NGOs or media sources.

The Asset Manager determines the eligible investment universe by excluding controversial activities that is not in line with the norms-based responsible investing criteria.

2 Where possible and feasible, depending on for example the nature of the investment and availability of reliable data.
3 Within the scope as defined for this policy

Exclusion

Our Exclusion List is publicly available on the Responsible Investing policies page of our website:
www.gsam.com/responsible-investing/en-INT/professional/asset-management/responsible-investing-policy-documents

There are additional restriction criteria applicable to our sustainable and impact strategies.

Violation areas and criteria

Violations can currently occur in relation to the following areas[4]:

- **Governance**
- **Human rights**
- **Labour rights**
- **The environment**
- **Bribery and corruption**

In these areas, The Asset Manager's norms-based RI criteria consist of two main categories: controversial activities and controversial conduct. The latter also includes the Global Norms process.

The following section sets out the rationales behind these norms-based RI criteria in more detail and the resulting (firm-wide) restrictions.

Categories	
Controversial activities	• Controversial Weapons • Arms trade to entities that are subject to arms embargoes • Tobacco production • Oil sands extraction • Mining of thermal coal
Controversial conduct	• **Countries:** Sovereign issuers involved in severe and systematic violations of Human Rights, against which arms embargoes have been issued by the UN Security Council and FATF 'call for action' list.
Global Norms	• **Corporates:** Issuers that severely and systematically violate the UNGC principles and/or the UN GP on Business and Human rights and/or the OECD Guidelines.

Controversial activities

Development, production, maintenance or trade of controversial weapons

The Asset Manager considers certain weapons to be controversial due to their disproportionate and indiscriminate impact on the civilian population. This is the case for anti-personnel landmines, cluster munitions, biological weapons, chemical weapons, depleted uranium ammunitions, and white phosphorus weapons.

We restrict companies that are involved in activities such as production, research and development, sale or trade, maintenance, system integration and testing of products or services that are considered dedicated and essential for the lethal use of these type of weapons. In defining these weapons, we follow widely accepted international conventions or, where those are not available, we have developed our own criteria applying a precautionary principle.

Separate criteria have been developed for nuclear weapons in addition to the criteria above, since they have a different character from other weapon types. The Asset Manager restricts companies that are involved in nuclear weapon activities and that: (i) are domiciled in countries that are not signatories to the Non-Proliferation Treaty, or (ii) contribute to nuclear weapons programmes of non-NATO member states.

The controversial supply of arms

The Asset Manager considers the trade of arms to certain countries or non-state actors as controversial, due to the high risk that these arms will be used to commit severe human rights violations or prolong conflict.

We restrict companies that demonstrably engage in activities related to making weapons, weapon systems, or related material or services available to (i) countries that are subject to a UN or EU arms embargo that is targeting the central government or (ii) non-state actors sanctioned by the UN or EU. Not in scope are companies that have such activities in relation to humanitarian missions or to (peacekeeping) military missions that have been commissioned by the international community.

4 It should be noted that specific activities may be related to one or more areas. For example, controversial weapons and arms trade to embargoed entities relate to human rights, while an activity such as tobacco production relates to human rights, labour rights and the environment.

Tobacco production

The Asset Manager has concerns regarding public health as well as the economic burden that smoking places on society. We therefore restrict companies that are involved in the production of tobacco products. Producers are restricted when tobacco products account for 50% or more of their revenues.

Oil sands extraction

Oil sands, also known as tar sands or crude bitumen, is a form of heavy oil found in sand and rock. Oil sands can be mined and processed to extract the oil-rich bitumen, which is then refined into oil. We recognize that oil sands development poses serious environmental and social challenges, as it leads to higher greenhouse gas emissions than conventional crude oil. Furthermore, the production of oil sands and its transport via pipelines generates significant human rights concerns and is a serious contributor to local environmental pollution. We have assessed the engagement potential for companies in the sector and has concluded that engagement is not expected to achieve the desired results.

We therefore restrict companies whose business models are dependent on the extraction of oil sands. This is defined as deriving more than 20% of their revenues from oil sands extraction. In addition, we restrict on a firm-wide basis pipeline operators that are involved in oil sands transportation projects that are in dispute, and when engagement is not expected to achieve the desired results. These restrictions significantly contribute to de-risking our portfolios in terms of our carbon footprint.

Mining of thermal coal

Thermal coal is predominantly used for power and heat generation. Of all fossil fuel energy sources, thermal coal generates the highest volume of greenhouse gas emissions when combusted. We recognize that meeting the ambitions set out by the Paris Agreement will require the world to replace fossil fuels with low-carbon energy sources.

We therefore restrict companies whose business models are dependent on the mining of thermal coal. This is defined as deriving more than 20% of their revenues from mining thermal coal. Metallurgical coal or coking coal (a key raw material in steel production) is not governed by this criterion.

www.gsam.com/responsible-investing/en-INT/professional/asset-management/responsible-investing-policy-documents

Identifying corporate issuers
For each issuer, the corporate tree needs to be analysed in order to decide which issuing parties are considered in-scope of being in violation:

1. **A company itself is in violation**
2. **A company owns a majority stake (>50%) of a company that is in violation**
3. **A company has more than 50% of its shares owned by a company that is in violation**

For involvement in controversial weapons, the ownership threshold under item 2 is set at 25% or more.

For majority-owned subsidiaries (item 3) an exception can be granted if there is strong evidence that the sub-sidiary is not involved in any of the business activities or behaviour for which the parent company is excluded. Such exceptions will not be granted if the parent company is excluded because of involvement in business activities that relate to controversial weapons and/or controversial supply of arms.

Countries[5]

We restrict sovereign issuers involved in severe and systemic violations of Human Rights and thus restrict countries against which arms embargoes have been imposed by the United Nations Security Council. Countries on the global money laundering and terrorist financing watchdog, Financial Action Task Force list, that are subject to a “Call for Action” are also restricted.

Identifying sovereign issuers
The following issuers are considered in scope in the case of country-related restrictions:

1. **Sovereigns (countries)**
2. **Sub-sovereigns (states, provinces, municipalities)**
3. **Quasi-sovereigns (government-related or government- backed issuers, such as agencies)**

It should be noted that when a country is restricted based on the stipulations of this policy document, this does not automatically lead to the restriction of corporate issuers that are active in the restricted country.

Additional restriction criteria (for specific sustainable and impact strategies)

In addition to the firmwide restrictions criteria, we apply more stringent restrictions for specific sustainable and impact strategies. For these strategies, we avoid investments that are not in line with the ‘do no significant harm’ principle. As a result, additional restrictions related to below mentioned business activities are applied as these activi-

5 In addition to this, The Asset Manager needs to adhere to all applicable sanction laws and regulations through application of the Financial Economic Crime (FEC) policy.

ties are contradictory to sustainable development and may detract from the ability to reach sustainability objectives. In some cases, tighter restrictions are applied for business activities that are already restricted for all assets.

- Adult entertainment
- Arctic drilling
- Fur & specialty leather
- Gambling
- Nuclear energy
- Oil sands extraction (additional restrictions)
- Shale oil & gas
- Thermal coal mining (additional restrictions)
- Tobacco (additional threshold restrictions)
- Weapons (additional threshold restrictions)

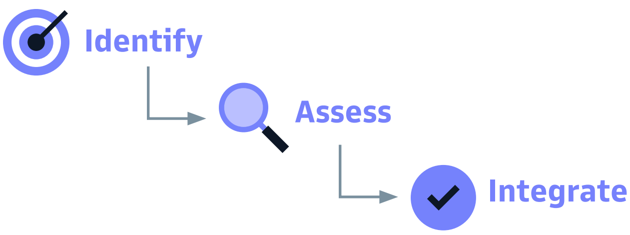
Please refer to Appendix I for a more detailed description and related thresholds.

ESG Integration

ESG integration relates to evaluating environmental, social and governance factors in the investment case in light of their potential impacts on financial returns. We believe that systematically integrating ESG factors into the investment and decision-making process enhances investment decision-making and long-term risk-adjusted returns.

ESG integration explicitly includes identifying the sustainability risks related to an investment as part of our investment due diligence process, quantifying these risks (to the greatest extent possible), and then incorporating them into the investment case and decision-making process. This is done in a consistent and auditable manner to ensure ESG or sustainability factors relating to an investment or investment proposal are sufficiently understood or recognized and includes monitoring the investment on an ongoing basis. Where possible and feasible, these risks are also addressed as part of both engagement and voting, with the aim of reducing their potential financial impact and negative impact on society as a whole.

A three-step approach to ESG integration is applied: identify, assess, and integrate.



1. **Identify**
   The first step towards ESG integration is to identify material ESG issues at company, sector and country level.

2. **Assess**
   - In the case of investments in companies , we evaluate each company's performance on material ESG issues. Next we examine how well these translate into the business strategy and what opportunities they offer. Finally, we discuss and analyse potential controversies and their impact as part of this process.
   - In the case of investments in sovereign bond issuers, we analyse and evaluate a country's performance based on ESG factors and potential controversial issues. We use this information to compare different countries with each other.

3. **Integrate**
   Finally, we incorporate these ESG analyses into the investment cases and they are taken into account throughout the investment process.

By consistently following this approach, we ensure that all our investment decisions take into account potentially material ESG issues and opportunities wherever possible. Although the approach always includes these three steps, implementation may differ between strategies. For example, the type and quality of data and its availability can vary significantly. ESG integration for sovereign bond portfolios uses different data sources to those we use for analysing companies.

Engagement and voting

We are committed to promoting and exercising effective stewardship among the companies represented in the portfolios we manage on behalf of our investing clients. We evaluate companies' corporate strategies, investment and financing activities, management incentives, resource use, regulatory policies, and environmental impact, as well as overall effect on and engagement with consumers, workers, and the communities in which they operate to assess and promote long-term value creation.

The Global Stewardship Team drives the continued enhancement of our approach to stewardship and serves as a dedicated resource to our investment teams globally. The work of the Global Stewardship team is centered around three core activities:

- **Engagement** with company management of a subset of companies we are invested in.
- **Proxy voting** at companies that we have vote authority on.
- **Industry leadership** to collaborate, share insights and build best practices across the stewardship space

Engagement

Communication with companies and issuers is a key component of our approach to stewardship.

We classify and report on this activity using the definitions below:

Engagements		**Interactions**	
Instances where active dialogue or exchange of written communication with a company or issuer has occurred.		Other types of interactions where we are not actively participating in an exchange of views.	
Type	**Example**	**Type**	**Example**
Company 1x1	A meeting between one company and members of Goldman Sachs Asset Management only.	Conference	Attending an industry conference without meeting with a company 1x1 or in a small group meeting.
Company meeting (multiple investors)	A meeting between one company and members of Goldman Sachs Asset Management along-side other asset managers or analysts from other firms.	Investor Day	Attending an issuer's investor day to hear presentations.
Company Field Trip	Company organised field trip attended by Goldman Sachs Asset Management.	Annual Meeting	Attending or listening to a company's Annual General Meeting.

Categories of engagements

Our engagements with companies generally fall into one of the below four categories.

Thematic engagements	Proxy Related discussions	Providing ESG Feedback	Investment Research and Monitoring
• Thematic engagements from our stewardship framework or portfolio specific engagement plans. • Examples include our engagements on Net Zero, biodiversity and addressing global norms violations or targeted portfolio specfic engagements.	• Intended to help inform our proxy voting decisions. • Examples include meetings to discuss compensation plans and/or shareholder proposals.	• Conducted generally at the request of issuers to provide feedback on reporting or other matters. • Examples include questions from companies on our preference on ESG frameworks such as SASB or TCFD.	• Undertaken primarily to seek information or inform our investment decisions. • Examples include analysts engaging with companies on earnings, ESG or other strategic matters.

Sovereign, Supranational, Municipal and Agency engagements

There are fewer direct channels for engagement with sovereign, supranational, municipal and agency issuers relative to corporate issuers, but where possible we seek to meet with policymakers responsible for monetary and fiscal decisions, including those in treasury departments, government agencies and debt management offices. To express our views we also seek to express our views to supranational entities such as the IMF, World Bank and OECD. We are committed to engaging with sovereigns on their environmental policies with a focus on climate transition and environmental laggards, including countries with high greenhouse gas emissions. We aim to engage on the enhancement of climate-related metrics and disclosures, as well as information sharing on industry best practices

Our sovereign engagement may also serve to evaluate opportunities to allocate capital to ESG investments. Government road-shows organized by debt management offices to launch green, social and sustainability (GSS) bond issuances are a useful setting for dialogue on how we can participate in a country's sustainable growth.

Voting

Exercising our client's shareholder rights via proxy voting is an important element of the portfolio management service we provide to our advisory clients who have authorized us to address these matters on their behalf. As a fiduciary, our guiding principle in performing proxy voting is to seek to make decisions in the best interest of our clients by favoring proposals that in our view maximize a company's shareholder value. This reflects our belief that sound corporate governance can create a framework within which a company can be managed for the long-term benefit of share-holders.

For our Public investing businesses Goldman Sachs Asset Management has developed a customized Global Proxy Voting Policy (the Policy), to execute our voting responsibilities where clients have delegated proxy voting responsibility to us. We seek to up-date the Policy annually to incorporate current issues and evolving views about key governance topics. The Policy is tailored regionally and allows us to take a nuanced approach to voting that is region and country specific. Please refer to the Policy in full for more details on our approach.

To govern our proxy voting responsibilities, we have created an Asset Management Public Markets Business Proxy Voting Council, comprised of stakeholders from the Global Stewardship Team, equity investment teams, divisional management, legal and compliance. The purpose of the Proxy Voting Council is to bring together key stakeholders to annually review and recommend potential policy changes, discuss any potential changes to the voting process, and convene on voting topics that may arise during the year.

Transparent reporting

Transparent reporting is the fourth pillar of our responsible investing approach. For specific sustainable and impact strategies, we regularly report on ESG factors such as carbon footprints and intensity.

As an active signatory of the Principles for Responsible Investment (PRI), we report on our responsible investing approach in the PRI reporting cycle and assessment.

In addition, we report transparently on both the entity level and the financial product level in accordance with the requirements of EU SFDR. This is reflected in the relevant pre-contractual disclosures, website disclosures, and periodic disclosures.

For more information about SFDR and the classification of our products, please see our website: www.gsam.com/responsible-investing/en-INT/professional/about/sustainable-finance-disclosure-regulation.

We communicate our stewardship activities to our clients and stakeholders in several ways. Our Stewardship Report outlines the efforts of the Global Stewardship Team, which focuses on proxy voting and proactive, outcomes-based engagement initiatives, in an attempt to promote best practices and drive positive change. The report is released annually on our website. We disclose our voting publicly each year in a filing with the US Securities and Exchange Commission and on our website for all our US registered mutual funds. We also generally disclose our voting publicly on a quarterly basis on our website for company proxies voted according to our guidelines and recommendations.

Additionally, we can provide clients with portfolio-specific proxy voting and engagement reporting on a quarterly, semi-annual, or annual basis upon request. We have the ability to automate and customize these reports and welcome the opportunity to discuss the content and frequency of these reports with our clients subject to their needs.

RELATED DOCUMENTS

Access to all our responsible investing policy documents (listed below) can also be found on the RI policies page of our website:
www.gsam.com/responsible-investing/en-INT/professional/asset-management/responsible-investing-policy-documents

Our Approach to Stewardship
This document outlines the eight overarching principles that we follow in managing client assets.

Engagement Approach
This document gives an overview of our engagement activities and strategy.

Proxy Voting Policy
This document gives an in-depth explanation of the reasoning behind our voting policies and how these are implemented.

Exclusion List
This list gives a comprehensive overview of all excluded companies and sovereigns, including the reason for exclusion.

Responsible Investment Viewpoint Policy
This document gives an in-depth overview of the ESG criteria applied to specific sustainable and impact strategies, as well as our perspective on potentially unsustainable practices and issues.

PRI Transparency Report

APPENDIX I

Additional restrictions for specific sustainable and impact strategies

In addition to the other restrictions criteria, The Asset Manager applies more stringent restrictions in specific sustainable and impact strategies. For these strategies, we avoid investments that are not in line with the 'do no harm' principle. As a result, additional restrictions related to the activities outlined below are applied, as they are contradictory to sustainable development and may detract from the ability to reach sustainability objectives. For more details on the specific rationale behind these additional restrictions, please refer to the RI Viewpoint Policy.

In addition to the below criteria, for our sustainable and impact strategies that have received the Towards Sustainability label, we also adhere to the additional criteria as prescribed by the label. More information on the specific label criteria application can be found in the RI Viewpoint Policy.

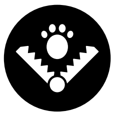
Adult entertainment

The adult entertainment sector can be contradictory to the principle of respecting human dignity and could be in violation of human rights. Issues faced by this sector include sexual violence, human trafficking, violation of health and safety standards, sub-standard wages, links with organized crime and discrimination. We apply a maximum of 5% of revenues on the production of adult entertainment and a 10% limit on the distribution.

Arctic drilling

Arctic drilling is considered part of the unconventional oil & gas sector and in particular poses higher risks of oil spills than conventional oil & gas. This has the potential to affect biodiversity, including local wildlife, and people in a destructive and irreversible way. Once an oil spill occurs, it is difficult to clean up and defuse. Safety is also an important issue, given the remote location of these activities. We apply a maximum of 10% of revenues of combined exposure to all forms of unconventional oil (defined as shale oil & gas, oil sands and arctic drilling).
In addition, our sustainable and impact strategies do not finance companies with expansion plans for unconventional oil & gas extraction.

Fur & specialty leather

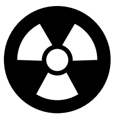


Investments in issuers with involvement in fur and specialty leather are restricted, because the production of fur and leather can be linked to violation of animal welfare. We apply a maximum of 5% of revenues on the production of fur and specialty leather and a maximum of 10% of revenues related to distribution or retail activities.

Gambling

Investments in gambling are restricted for our sustainable and impact fund range as this industry is often linked to addiction, compliance issues with underage gambling, bribery and corruption, and organized crime. As such, the gambling industry does not contribute to and may detract from enabling people to secure their financial future. We apply a maximum of 5% of revenues on gambling operations and a maximum of 50% of revenues related to specialized equipment and/or products or services that support gambling operations.

Nuclear energy



Companies and countries that are exposed to nuclear power generation should be capable of meeting essential requirements regarding safety and protection of populations and the environment. We closely follow developments and ESG issues relating to nuclear energy. We maintain a 0% threshold for electricity utilities constructing additional nuclear-based power production installations. We will also not finance existing nuclear power plants where construction commenced after 2019, unless it will be shut down upon expiry or maintenance is conducted purely to extend the life of the plant and will be subsequently be shut down upon expiry.

Oil sands extraction (additional restrictions)

The Asset Manager recognizes that oil sands development poses serious environmental and social challenges, as it leads to higher greenhouse gas emissions than conventional crude oil. Furthermore, the production of oil sands and its transport via pipelines generates significant human rights concerns and is a serious contributor to local environmental pollution. We apply a maximum of 5% revenues from oil sands extraction. In addition, we apply a maximum of 10% of combined revenues generated from all forms of unconventional oil (defined as shale oil & gas, oil sands and Arctic drilling).

Shale oil & gas

Shale oil, also known as tight oil, and shale gas are types of unconventional oil and gas which are trapped in shale formations that must be hydraulically fractured to extract. Producing shale oil & gas thus has a more destructive environmental impact than the production of conventional oil & gas. Examples of environmental and social risks associated with shale oil production are water stress, the risk of land contamination, pollution, leakage of greenhouse gas emissions, safety, and community impacts. The exploration of shale gas requires a large number of wells, leading to atmospheric pollution, air pollution, methane movement, high level of noise and water contamination. We apply a maximum revenue threshold of 10% of combined exposure to all forms of unconventional oil (defined as shale oil & gas, oil sands and Arctic drilling). In addition, our sustainable and impact strategies do not finance companies with expansion plans for unconventional oil & gas extraction.

Thermal coal mining (additional restrictions)

Thermal coal is predominantly used for power and heat generation. Of all fossil fuel energy sources, thermal coal generates the highest volume of greenhouse gas emissions when combusted. The Asset Manager recognizes that meeting the ambitions set out by the Paris Agreement will require the world to replace fossil fuels with low-carbon energy sources. We therefore restrict companies whose business models are dependent on the mining of thermal coal. For our sustainable and impact fund range, the revenue threshold is stricter, allowing for a maximum of 5% of revenues from coal extraction.

Tobacco (additional restrictions)

The Asset Manager has concerns regarding public health as well as the economic burden that smoking places on society. We therefore restrict companies that are involved in the production of tobacco products. For our sustainable and impact strategies, a tighter threshold applies. We restrict tobacco producers when tobacco products account for 5% or more of their revenues. We also apply a maximum of 10% on revenues from distribution or retail activities and from related products and services.

Weapons (additional restrictions)

In addition to the restrictions on controversial weapons and the controversial supply of arms, involvement in small arms and military contracting is also restricted for our sustainable and impact range because of their link to violence, crime and corruption. We apply a maximum revenue threshold of 5% for production of weapons or the supply of key and dedicated components.

In addition to the above criteria, for our sustainable and impact strategies that have received the Towards Sustainability label, we also adhere to the additional criteria as prescribed by the label. More information on the specific label criteria application can be found in the RI Viewpoint Policy.

DISCLAIMER