

ANNEX II

Pre-contractual disclosure template for the financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852.

Product name: NNEK Vermogensbeheer Curvo
 Legal entity identification code (LEI): 724500ZGELQXO6RZ9664
 NNEK Vermogensbeheer Curvo strategies:

Curvo Protective
Curvo Calm
Curvo Smooth
Curvo Energetic
Curvo Growth

Ecological and/or social characteristics (E/ S characteristics)

☒ ☒ ☐ Yes
 ☒ ☐ ☒ No

☐ A minimum share of **environmentally sustainable investments** will be made: ____%

☐ in economic activities identified as environmentally sustainable in the EU taxonomy
 ☐ in economic activities not classified as environmentally sustainable in the EU taxonomy

☐ A minimum share of **sustainable investments with a social objective** will be made: ____%

☐ The product **promotes ecological/social (E/S) features**, and while it does not have sustainable investments as a target, it will include a minimum share of sustainable investments of ____%.

☐ with an environmental objective in economic activities identified as environmentally sustainable in the EU taxonomy
 ☐ with an environmental objective in economic activities not classified as environmentally sustainable in the EU taxonomy
 ☐ with a social objective

☒ The product promotes E/S features but **will not make sustainable investments**

What environmental and/or social characteristics does this financial product promote?



This product promotes both environmental and social characteristics but the investment policy does not commit to sustainable investments within the meaning of Regulation (EU) 2019/2088 ("SFDR"), nor to investing in economic activities that qualify as "environmentally sustainable" under the Taxonomy Regulation (EU 2020/852).

This product promotes the following ecological and social features:

- Mitigating (the effects of) climate change
- Improvement on social issues and working conditions

NNEK has not identified a reference benchmark for achieving these environmental and/or social characteristics.

- **What sustainability indicators measure the achievement of each of the environmental or social characteristics promoted by this financial product?**
 - Percentage of fund managers that have signed the United Nations Principle for Responsible Investing (UNPRI).
 - Percentage of funds in the strategies with a qualification of Article 8 SFDR product or higher.
 - Monitoring signals when a fund in which NNEK invests in turn invests more than 1% in companies in the categories below:
 - Controversial weapons
 - Tobacco
 - Thermal carbon
 - Monitoring signals when a fund in which NNEK invests in turn invests in companies that do not comply with the UNGC principles.
- **What are the objectives of the sustainable investments that the financial product partially aims to make and how does the sustainable investment contribute to those objectives?**

Since the product only promotes ecological and social features, the above question does not apply.
- **How do the sustainable investments that the financial product partly aims to make not seriously compromise environmental or social SRI objectives?**

Since the product only promotes ecological and social features, the above question does not apply.
- **How have indicators of adverse effects on sustainability factors been taken into account?**

Since the product only promotes ecological and social features, the above question does not apply.
- **How are SRIs aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

Since the product only promotes ecological and social features, the above question does not apply.

The EU taxonomy establishes the “no serious impairment” principle, which means that taxonomy-aligned investments should not seriously impair the objectives of the EU taxonomy and is accompanied by specific EU criteria.

The “no serious impairment” principle applies only to the underlying investments of the financial product that take into account the EU criteria for environmentally sustainable economic activities. The underlying investments of the remainder of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Other sustainable investments must also not seriously compromise environmental or social objectives.



Does this financial product take into account the main adverse effects on sustainability factors?



Yes, NNEK tests whether key adverse impacts on sustainability factors are taken into account for the selected funds.

These are for companies:

- Greenhouse gas emissions intensity
- Water consumption intensity
- Fossil fuels
- Negative impact on biodiversity
- Social and employee aspects subdivided into:
 - o Female board members
 - o No human rights policy
 - o No anti-corruption policy

And for governments:

- CO2 emission intensity
- Human rights offenders

NNEK reports on this in its asset management report for the fourth quarter of each year.



What investment strategy does this financial product employ?

The premise of the Social Responsibility Policy is that NNEK wants to avoid investing in companies that exhibit unacceptable behaviour and leave the planet and people worse off. The companies and governments in which NNEK invests through funds are assessed on three factors: Environmental (environment), Social (people and society) and Governance (good governance). NNEK invests in third-party investment funds. The fund manager must have signed the UNPRI. The fund manager must also apply some form of engagement, for example by entering into dialogue with companies and governments and by voting with sustainability as a principle at shareholders' meetings.

NNEK further selects funds based on the classifications 'not socially aware', 'ESG investment fund' or 'impact investment fund'. For funds that only invest in European government bonds, NNEK applies the principle that these funds qualify as an 'ESG investment fund', even if sustainability criteria are not explicitly included in that fund's selection process. The reasoning behind this is that NNEK has established that Euro countries score highly in the SDG ranking on a global scale.

NNEK aims to have at least 90 per cent of its strategies consist of ESG investment funds and/or impact funds. As far as possible, NNEK avoids investing in funds that in turn invest in companies involved in the production of tobacco or controversial weapons, or involved in thermal coal production/extraction. NNEK monitors the funds it invests in for such investments. For monitoring, NNEK uses external independent data providers such as MSCI and/or Morningstar. When a fund invests more than 1% one of these categories of investments, it generates a signal. When NNEK finds, based on its monitoring, that a fund selected in its strategies selected fund has invested more than 1% of its fund assets in a company or companies involved in either the production of tobacco or the production of controversial weapons or the extraction/production of thermal coal, NNEK will enter into discussions with the relevant fund manager regarding this excess. NNEK will ask the fund manager to provide an explanation of this overshoot based on NNEK's monitoring. If NNEK agrees with the fund manager's

explanation, NNEK will continue to invest in this fund. When NNEK does not agree with the fund manager's explanation, NNEK will inform the fund manager and indicate that if the overshoot is not reduced, NNEK may decide to stop investing in the fund.

NNEK excludes investing in funds that in turn invest in companies that do not comply with the standards of the United Nations Global Compact (UNGC). The UNGC is a global sustainability initiative that calls on companies to adhere to 10 principles on human rights, labour, environment and anti-corruption. NNEK monitors the funds it invests in for compliance with UNGC principles. For monitoring, NNEK uses external independent data providers such as MSCI and/or Morningstar. When a fund fails to comply with UNGC principles, this results in a signal. In case NNEK receives a signal based on its monitoring that a fund does not comply with the UNGC principles, NNEK contacts the relevant fund manager about it. It could be the case that a fund manager has a different opinion on non-compliance with a UNGC principle than the data providers used by NNEK. When NNEK agrees with the fund manager's explanation, NNEK will continue to invest in this fund. When NNEK does not agree with the fund manager's explanation, NNEK will inform the fund manager and indicate that if the fund does not still start complying with the UNGC principles, NNEK may decide to stop investing in the fund. Finally, all funds in which NNEK invests follow good governance practices.

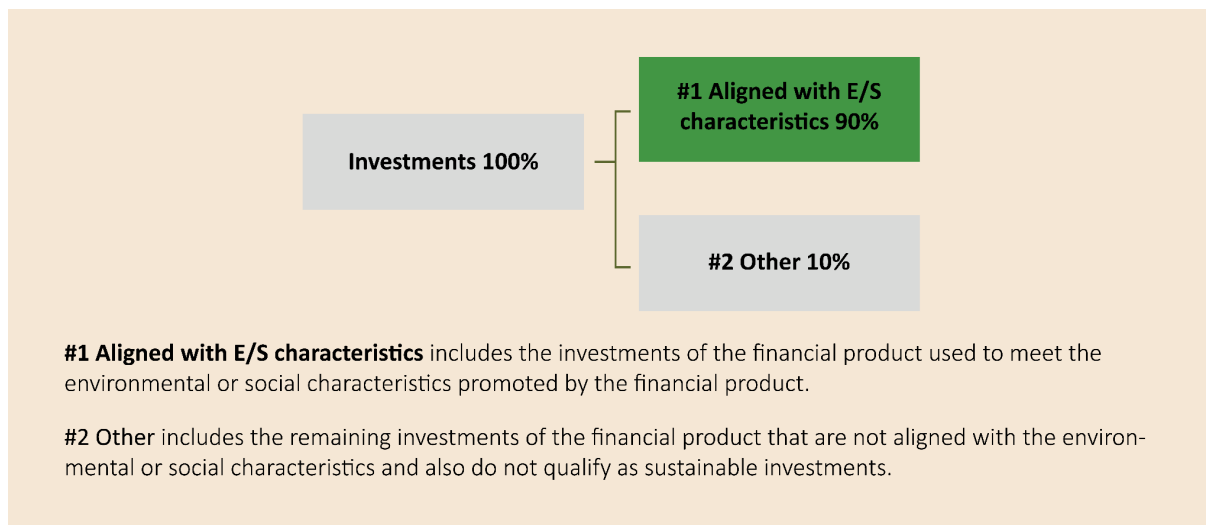
- **What binding elements of the investment strategy were used in selecting investments to meet all the environmental and social characteristics promoted by this financial product?**
 - 100% of fund managers must have signed the UNPRI.
 - At least 90% of the investments in the strategies must be an Article 8 SFDR product or higher.
 - Register monitoring signals when a fund in which NNEK invests in turn invests more than 1% in companies in the categories:
 - Controversial weapons
 - Tobacco
 - Thermal carbon
 - Register monitoring signals when a fund in which NNEK invests in turn invests in companies that do not comply with UNGC principles.
- **What is the pledged minimum percentage for limiting the investment space considered before the implementation of that investment strategy?**

NNEK does not manage to limit the investment space with its investment strategy and therefore this question is not applicable.
- **What is the assessment policy for good governance practices of investee companies?**

The fund manager of a fund chosen by NNEK, is responsible for monitoring the companies chosen in the fund, and whether they adhere to good governance practices.

For its part, NNEK periodically monitors the fund manager in its monitoring of the companies in the fund and whether they adhere to good governance practices.

What asset allocation is planned for this financial product?



In what way does the use of derivatives meet the environmental or social characteristics promoted by the financial product?
 NNEK does not use derivatives so this question is not applicable.

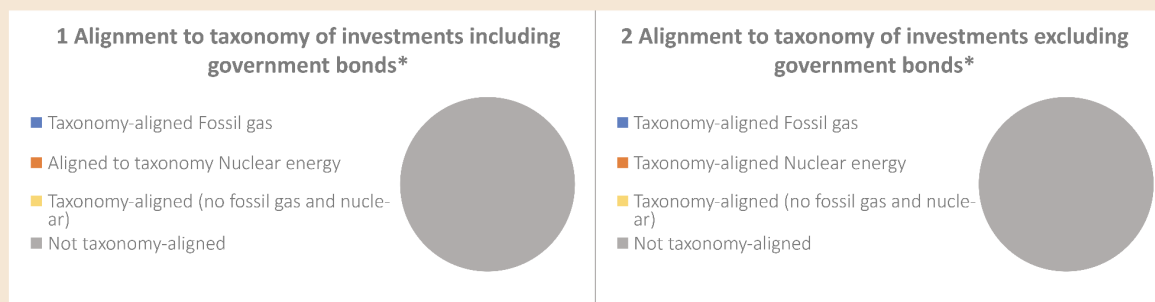


To what extent are environmentally sustainable investments aligned with the EU taxonomy?
 Since the product only promotes environmental and social features and does not make sustainable investments, the above question is not applicable.

Does the financial product invest in activities in the fossil gas and or nuclear sectors that comply with EU taxonomy?

☐ Yes ☐ In fossil gas ☐ In nuclear energy
☒ No

The two charts below show in green the minimum percentage of investments aligned with the EU taxonomy. As there is no suitable method to determine whether government bonds are aligned with the taxonomy*, the first chart shows the alignment with the taxonomy for all investments of the financial product, including government bonds, while the second chart shows the alignment with the taxonomy for only the investments of the financial product other than in government bonds.



- **What is the minimum share of investments in transition and enabling activities?**
0%.



- What is the minimum proportion of sustainable investments with an environmental objective that are not aligned with the EU taxonomy?**
0%.



- What is the minimum share of socially sustainable investments?**
0%.



- What investments are included in "#2 Other"? What are these for and are there any environmental or social minimum safeguards?**

These are investments in Article 6 SFDR products, which have not disclosed specific sustainability criteria. These investments do require the fund manager to have signed the UNPRI and that the fund does not contain companies that violate the UNGC.



- Has a specific index been identified as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics promoted by this financial product?**

NNEK has not designated a reference benchmark to determine whether its asset management portfolio is aligned with all the environmental or sustainable characteristics it promotes. As NNEK invests in a portfolio of different asset classes, this is also difficult to achieve in practice.



- Where can more product-specific information be found online?**

You can find more product-specific information on the website (in Dutch):

<https://www.nnek.nl/maatschappelijk-verantwoord/>