



# Assurance de groupe pour salariés

## Document précontractuel de durabilité

Informations précontractuelles relatives aux produits financiers visées à l'article 8, paragraphes 1, 2 et 2 bis, du règlement (UE) 2019/2088 et à l'article 6, premier alinéa, du règlement (UE) 2020/852, et conformément à l'article 20 du règlement délégué (UE) 2022/1288

Version : 05/06/2023

Les informations sur la durabilité contenues dans ce document de produit précontractuel ont été préparées au mieux par NN Insurance Belgium SA/NV sur la base des informations actuellement disponibles pour les gestionnaires d'actifs. Toutefois, la réglementation imposant à ces gestionnaires de fortune de mettre ces informations à disposition n'est entrée en vigueur que le 1er janvier 2023. Les informations contenues dans ce document peuvent être modifiées et/ou complétées en fonction des informations que les gestionnaires d'actifs fourniront dans les mois à venir.



## 1. Intégration des risques liés à la durabilité

Conformément au règlement européen (UE) 2019/2088 sur la divulgation de la finance durable (SFDR), NN Insurance Belgium est tenue de divulguer des informations sur sa politique d'intégration des risques de durabilité dans son processus décisionnel en matière d'investissement.

NN Insurance Belgium applique *Responsible Investment Framework Policy* de NN Group (ci-après dénommée la « RI Framework policy ») disponible à l'adresse suivante : <https://www.nn-group.com/sustainability/responsible-investment/responsible-investment-policy-framework.htm>. Cela soutient « l'intégration systématique des facteurs environnementaux, sociaux et de gouvernance (ci-après, les « facteurs ESG ») dans le processus d'investissement, gérant ainsi à la fois les risques et les opportunités. Dans ce contexte, NN Insurance Belgium considère que les facteurs ESG sont « les questions environnementales, sociales et d'emploi, le respect des droits de l'homme et la lutte contre la corruption ».

Cette RI Framework policy fournit donc des conseils à NN Insurance Belgium pour prendre des décisions d'investissement plus éclairées, en optimisant le profil risque/rendement des portefeuilles d'investissement, tout en tenant compte des valeurs fondamentales du groupe NN dans le processus d'investissement. Cette façon d'intégrer les risques de durabilité dans le processus décisionnel d'investissement garantit que les activités de NN Insurance Belgium sont mieux alignées sur les objectifs et les attentes plus larges de la société en matière de durabilité.

Dans la RI Framework policy, NN Insurance Belgium définit le risque ESG comme « le risque d'implication (in)directe dans la violation des normes et standards écologiques et sociaux ». Le SFDR utilise le terme « risque de durabilité », tandis que NN Group utilise le terme « risque ESG » dans la RI Framework policy. Ces termes sont considérés comme équivalents.

La RI Framework policy s'applique à toutes les classes d'actifs, tant aux actifs propres de NN Insurance Belgium qu'aux actifs des clients tels que définis dans la police RI Framework. Toutefois, selon le gestionnaire d'actifs, la RI Framework policy sera appliquée de la manière distincte suivante.

### *i. Application lorsque NN Insurance Belgium investit dans des fonds de placement gérés par des gestionnaires de fortune externes*

Les fonds d'investissement gérés par des gestionnaires de fortune externes ne peuvent pas être soumis à la RI Framework policy de NN Group. Par conséquent, les stratégies de la RI en particulier ne peuvent pas être appliquées à ces fonds d'investissement. Pour la même raison, la NN Group Restricted List (liste de restrictions) ne peut pas être appliquée. Ceci est une liste d'entreprises et d'obligations d'État de certains pays dans lesquels les investissements ne sont pas autorisés.



Cependant, NN Insurance Belgium surveille la composition du fonds et interroge les gestionnaires d'actifs sur sa politique d'investissement responsable, y compris les listes de restrictions (liste des entreprises, secteurs,...) dans lesquelles les investissements ne peuvent pas être effectués.

Compte tenu, entre autres, des stratégies RI et des critères d'exclusion, NN Insurance Belgium estime que l'impact probable des risques ESG sera faible sur la performance des produits financiers mis à disposition par NN Insurance Belgium.

L'évaluation de l'incidence probable des risques ESG tient compte des réglementations et orientations pratiques actuellement disponibles. Il peut donc être révisé à mesure que le cadre réglementaire et les orientations pratiques évoluent.

## **2. Classification des fonds (options d'investissement)**

Pour les assurances de groupes l'organisateur a le choix parmi 46 fonds d'investissement sous-jacents, dont certains promeuvent des caractéristiques écologiques et/ou sociales ou poursuivent un objectif d'investissement durable. Le fonds interne investit à 100% dans le fonds d'investissement sous-jacent. L'objectif et la politique d'investissement du fonds interne sont 100% conformes à l'objectif et à la politique d'investissement du fonds d'investissement sous-jacent.

Sur la base des informations fournies par le gestionnaire d'actifs des fonds d'investissement sous-jacents, ces fonds d'investissement sous-jacents ont été classés au titre de l'article 6, 8 ou 9 du SFDR.<sup>123</sup>

30 fonds (65,22 % du nombre total de fonds) sont classés au titre de l'article 8 du SFDR, 6 fonds (13,04 % du nombre total de fonds) sont classés au titre de l'article 9 du SFDR et 10 fonds (21,74 % du nombre total de fonds) sont classés au titre de l'article 6 du SFDR.

Pour les fonds relevant des articles 8 et 9, de plus amples informations sur les caractéristiques durables sont disponibles sur la page produit de notre site web sous « Documents nécessaires » :

[MultiPlan et MultiPlan+ : l'assurance de groupe flexible sans lourdeurs administratives | NN Belgium – Assurances](#)

[Alto Cash Balance : l'assurance de groupe avec capitalisation collective pour les PME et grandes entreprises | NN Belgium – Assurances](#)

[Alto Bonus : récompensez les performances exceptionnelles avec un plan de pension bonus | NN Belgium – Assurances](#)

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<sup>1</sup> Article 6 SFDR: le fonds ne promeut pas les caractéristiques écologiques et/ou sociales et ne poursuit pas d'objectifs d'investissement durable.

<sup>2</sup> Article 8 SFDR: le fonds promeut les caractéristiques écologiques et/ou sociales.

<sup>3</sup> Article 9 SFDR: le fonds poursuit un objectif d'investissement durable.



## [Alto Defined Contribution: l'assurance de groupe avec capitalisation collective pour les grandes entreprises | NN Belgium – Assurances](#)

Les informations relatives à la prise en compte des principaux effets négatifs des décisions d'investissement sur les facteurs de durabilité inclus par les fonds d'investissement sous-jacents sont disponibles dans les informations précontractuelles relatives à chacune de ces options d'investissement. Toutefois, lors du choix des options d'investissement pour ce produit, la prise en compte de ces principaux effets négatifs n'a pas été déterminante.

### **3. Classification du produit**

NN Insurance Belgium SA a classé ce produit au titre de l'article 8 SFDR car il favorise les caractéristiques écologiques et/ou sociales. Pour que le produit puisse être classé au titre de l'article 8 SFDR pour le preneur d'assurance, le produit financier doit être investi dans au moins une des options d'investissement classées aux articles 8 ou 9 de la liste ci-dessous et au moins une de ces options de placement doit être détenue pendant la période pendant laquelle le produit est détenu. .

Liste des fonds d'investissement:

Nom du fonds interne	Nom du gestionnaire d'actifs, nom du fonds d'investissement sous-jacent et code ISIN	Classification SFDR
NN Life Patrimonial Defensive Fund	NN Investment Partners bv NN (L) Patrimonial Defensive LU0119196938	8
NN Life Patrimonial Balanced Fund	NN Investment Partners bv NN (L) Patrimonial Balanced LU0119195963	8
NN Life Patrimonial Aggressive Fund	NN Investment Partners bv NN (L) Patrimonial Aggressive LU0119195450	8
NN Life Patrimonial Balanced European Sustainable Fund	NN Investment Partners bv NN (L) Patrimonial Balanced European Sustainable LU1444115874	8
NN Life Emerging Markets Debt Fund	NN Investment Partners bv NN (L) Emerging Markets Debt (Hard Currency) LU0546915058	8
NN Life Multi-Asset Factor Opportunities Fund	NN Investment Partners bv NN (L) Multi-Asset Factor Opportunities LU2055071596 Informations sur les effets négatifs sur la durabilité: <a href="#">Sustainable Finance Disclosure Regulation   Responsible Investing   Goldman Sachs Asset Management (gsam.com)</a>	6
NN Life Euro High Dividend Fund	NN Investment Partners bv NN (L) Euro High Dividend	8



	LU0127786431	
NN Life Health & Well-being Fund	NN Investment Partners bv NN (L) Health & Well-being LU0119214772	9
NN Life Global Sustainable Equity Fund	NN Investment Partners bv NN (L) Global Sustainable Equity LU0119216553	8
NN Life European Sustainable Equity Fund	NN Investment Partners bv NN (L) European Sustainable Equity LU0991964320	8
NN Life Euro Fixed Income Fund	NN Investment Partners bv NN (L) Euro Fixed Income LU0546917773	8
NN Triodos Global Equities Impact Fund	Triodos Investment Management Triodos Global Equities Impact Fund LU0278271951	9
NN Triodos Euro Bond Impact Fund	Triodos Investment Management Triodos Euro Bond Impact Fund LU0278272504	9
NN Flossbach Von Storch Multiple Opportunities II Fund	Flossbach von Storch Flossbach von Storch Multiple Opportunities II RT LU1038809395	8
NN Pictet Global Megatrend Selection Fund	Pictet Asset Management Pictet Global Megatrend Selection LU0386882277	8
NN M&G Dynamic Allocation Fund	M&G Investments M&G (Lux) Dynamic Allocation Fund LU1582988058	8
NN M&G Optimal Income Fund	M&G Investments M&G (Lux) Optimal Income Fund LU1670724373	8
NN M&G Global Listed Infrastructure Fund	M&G Investments M&G (Lux) Global Listed Infrastructure Fund LU1665237704	8
NN R Valor Fund	Rothschild & Co Asset Management Europe R-co Valor FR0011261197	8
NN R-co Valor Balanced Fund	Rothschild & Co Asset Management Europe R-co Valor Balanced FR0013367281	8
NN Threadneedle Global Smaller Companies Fund	Columbia Threadneedle Investments Threadneedle (Lux) Global Smaller Companies LU0570870567	8
NN Threadneedle Global Focus Fund	Columbia Threadneedle Investments Threadneedle (Lux) Global Focus LU0757431068	8
NN Ethenea ethna-aktiv Fund	ETHENEA Independent Investors S.A. Ethna-AKTIV -T- LU0431139764	8

NN Insurance Belgium SA, entreprise d'assurances agréée par la BNB sous le numéro 2550 pour les Branches 1a, 2, 21, 22, 23, 25, 26 et prêteur en crédit hypothécaire agréé par la FSMA sous le numéro de code 0890270057. Siège social : Avenue Fonsny 38, B-1060 Bruxelles, Belgique - RPM Bruxelles - TVA BE 0890.270.057 - BIC : BBRUBEBB - IBAN : BE28 3100 7627 4220. - [www.nn.be](http://www.nn.be) - FSMA: Rue du Congrès 12-14, 1000 Bruxelles, [www.fsma.be](http://www.fsma.be). BNB: boulevard de Berlaimont 14, 1000 Bruxelles, [www.nbb.be](http://www.nbb.be)



NN FFG European Equities Sustainable Moderate Fund	Acadian FFG European Equities Sustainable Moderate LU0945616984	9
NN FFG Global Flexible Sustainable Fund	Funds For Good FFG Global Flexible Sustainable LU1697917083	8
NN BlackRock Global Allocation Fund	BlackRock BGF Global Allocation Fund A2 EUR (CAP) LU0171283459 Informations sur les effets néfastes sur la durabilité: pas encore disponibles	6
NN DNCA Invest Eurose Fund	DNCA Investments DNCA Invest Eurose LU0284394235	8
NN Nordea Global Real Estate Fund	Nordea Asset Management Nordea Global Real Estate Fund LU0705259769	8
NN Nordea Global Climate and Environment Fund	Nordea Asset Management Nordea Global Climate and Environment Fund LU0348926287	9
NN Capital Group Global Allocation Fund	Capital Group Capital Group Global Allocation Fund (LUX) B EUR LU1006075656 Informations sur les effets néfastes sur la durabilité: pas encore disponibles	6
NN Schroder Global Energy Transition Fund	Schroders Schroder ISF Global Energy Transition LU2390151400	9
NN JPM US Technology Fund	JPMorgan Asset Management JPM US Technology Fund LU0159052710	8
NN Carmignac Patrimoine Fund	Carmignac Gestion Carmignac Patrimoine A EUR Acc FR0010135103	8
NN Carmignac Emergents Fund	Carmignac Gestion Carmignac Emergents A EUR Acc FR0010149302	9
NN JP Morgan Euro Liquidity Fund	JPMorgan Asset Management JP Morgan euro liquidity fund LU0088882138 Informations sur les effets néfastes sur la durabilité: pas encore disponibles	6
NN Fidelity America Fund	Fidelity International Fidelity Funds - America Fund LU0251127410	8
NN Fidelity World Fund	Fidelity International Fidelity Funds - World Fund LU1261432659	8

NN Insurance Belgium SA, entreprise d'assurances agréée par la BNB sous le numéro 2550 pour les Branches 1a, 2, 21, 22, 23, 25, 26 et prêteur en crédit hypothécaire agréé par la FSMA sous le numéro de code 0890270057. Siège social : Avenue Fonsny 38, B-1060 Bruxelles, Belgique - RPM Bruxelles - TVA BE 0890.270.057 - BIC : BBRUBEBB - IBAN : BE28 3100 7627 4220. - [www.nn.be](http://www.nn.be) - FSMA: Rue du Congrès 12-14, 1000 Bruxelles, [www.fsma.be](http://www.fsma.be). BNB: boulevard de Berlaimont 14, 1000 Bruxelles, [www.nbb.be](http://www.nbb.be)



NN Fidelity Pacific Fund	Fidelity International Fidelity Funds - Pacific Fund LU0368678339	8
NN Blackrock iShares core MSCI world fund	iShares Core MSCI World UCITS ETF IE00B4L5Y983 Informations sur les effets néfastes sur la durabilité: pas encore disponibles	6
NN Blackrock iShares core S&P 500 fund	iShares Core S&P 500 UCITS ETF IE00B5BMR087 Informations sur les effets néfastes sur la durabilité: pas encore disponibles	6
NN Blackrock iShares MSCI europe SRI fund	iShares MSCI Europe SRI UCITS ETF IE00B52VJ196	8
NN Life Multi Invest Low	Fund of fund Informations sur les effets néfastes sur la durabilité: <a href="#">Publication d'informations en matière de durabilité   NN Belgium – Assurances</a>	6
NN Life Multi Invest Medium Low	Fund of fund Informations sur les effets néfastes sur la durabilité: <a href="#">Publication d'informations en matière de durabilité   NN Belgium – Assurances</a>	6
NN Life Multi Invest Medium	Fund of fund Informations sur les effets néfastes sur la durabilité: <a href="#">Publication d'informations en matière de durabilité   NN Belgium – Assurances</a>	6
NN Life Multi Invest High	Fund of fund Informations sur les effets néfastes sur la durabilité: <a href="#">Publication d'informations en matière de durabilité   NN Belgium – Assurances</a>	6
NN Life Patrimonial future	NN (B) Fund Patrimonial Future CAP BE6313167197	8

**Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, 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.



**Sustainability**

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

**Product name:**

NN (L) Health & Well-being

**Legal entity identifier:**

549300JQ3YRBMT4JEJ16

## Sustainable investment objective

**Does this financial product have a sustainable investment objective?**

☒ ☐ **X** Yes

☐ ☐ ☐ No

☐ It will make a minimum of **sustainable investments 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

☒ It will make a minimum of **sustainable investments with a social objective: 50%**

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_% of sustainable investments

☐ with an environmental objective in economic activities that 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 promotes E/S characteristics, but **will not make any sustainable investments**

**What is the sustainable investment objective of this financial product?**

The Sub-Fund aims to improve the quality of human life by contributing to improving the physical and mental health of oneself and to the well-being of people around the globe. In order to achieve this, the Sub-Fund focuses on a number of themes aligned with this objective, including but not limited to decent living standards, fit body & mind, affordable healthcare and financial inclusion. The Sub-Fund invests in issuers that contribute positively to one or more of the UN SDGs based on the Sub-Fund's Sustainable Investment objective, for example SDG 1 No poverty, SDG 2 Zero Hunger, SDG 3 Good health and well-being, SDG 4 Quality education, SDG 6 Clean water and sanitation and SDG 7 Affordable and clean energy.

**What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The following sustainability indicators are used to measure the attainment of each of the sustainable investment objectives of the Sub-Fund:

- Number of issuers excluded from the investment universe based on the Exclusion List
- Average weighted ESG Rating against the Index/Benchmark
- Number of issuers involved in material violations of internationally recognised standards, for example: OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and



Human Rights and UN Global Compact.

- Average weighted carbon intensity score against the Index/Benchmark
- Average weighted water intensity score against the Index/Benchmark
- Average weighted waste intensity score against the Index/Benchmark
- Percentage of Sustainable Investments

**Principal adverse impacts** are the most significant negative impact of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

● ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

Issuers that are classified as contributing to a sustainable investment are also required to meet the do no significant harm (DNSH) criteria of the Management Company's Sustainable Investment Framework. Any issuers that do not meet the DNSH test will not qualify as a sustainable investment. A proprietary quantitative or qualitative threshold for significant harm has been set for all 14 mandatory indicators relating to investee companies for adverse impacts on sustainability factors ("PAIs") set out in the regulatory technical standards supplementing SFDR. Additionally, all issuers with a very severe controversy are considered to be causing significant harm and excluded from qualifying as a sustainable investment.

*How have the indicators for adverse impacts on sustainability factors been taken into account?*

The Sub-Fund considers principal adverse impacts on sustainability factors across environmental and social pillars. The PAIs are taken into account through the application of the DNSH principle outlined above for the determination of sustainable investments as well as qualitatively through the Portfolio's investment approach.

In regard to the consideration of the PAIs as part of the DNSH assessment of an issuer, as noted above a proprietary quantitative or qualitative threshold for significant harm has been set for all 14 mandatory PAIs relating to investee companies are assessed using information from an external data provider. These thresholds for significant harm have been set on a relative or absolute basis against each PAI depending on the Management Company's assessment of the worst performing investments with respect to those PAIs. Where data is not available for a specific PAI a suitable proxy metric has been identified. If both PAI and proxy PAI data (where relevant) is not available and/or applicable to complete the DNSH assessment on an issuer, such issuer is generally excluded from qualifying as a sustainable investment.

*How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The Sub-Fund leverages the Management Company's proprietary approach to identifying and evaluating companies which, amongst other factors, are not considered to be aligned with global norms. Following this assessment, any companies which are considered to be in violation of these global norms (including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights) will be excluded from qualifying as a sustainable investment.



**Does this financial product consider principal adverse impacts on sustainability factors?**

- X** Yes, the Sub-Fund does consider Principal Adverse Impacts (PAIs) on Sustainability Factors. For the Sustainable Investments, PAI Indicators are taken into account as part of the DNSH assessment as described in the Sustainable Investment Framework. Furthermore, the Sub-Fund incorporates a selection of mandatory and optional PAI Indicators as part of the documented investment process of the Sub-Fund. The PAIs themselves are embedded within the Sub-Fund's investment process, via the restrictions criteria and Active Ownership, as well as via the Management Company's policy documents.

Information on how the Sub-Fund considered indicators for adverse impacts on sustainability factors will be available in the Sub-Fund's annual report.

No



**The Investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

## What investment strategy does this financial product follow?

### The Sub-Fund applies:

- Norms-based RI criteria
- ESG integration approach
- Active Ownership
- Sustainable Investment Framework
- MIT Criteria

### Norms-based RI criteria

The Sub-Fund applies the Management Company's norms-based responsible investment criteria that, as stipulated in the Management Company's Responsible Investment Policy, restricts investment in issuers involved in controversial activities and controversial behaviour.

In addition, the Sub-Fund applies additional restrictions on issuers with activities in oil and gas, airlines, mining, alcohol and nuclear energy exposure.

### ESG integration approach

The Sub-Fund integrates the information on environmental, social and governance factors for its investments based on the Management Company's ESG Integration approach. The first step towards ESG integration is to identify material ESG risk and opportunities. Secondly, the material ESG risks and opportunities are assessed and expressed via a number of ESG ratings. The final step of ESG Integration involves incorporating this ESG analysis into investment screening and stock selection of issuers.

At least annually, the Sub-Fund's initial investment universe is reduced by at least 20%, as a result of the application of a "Best-in-Universe" approach and the relevant exclusions and restrictions.

### Active Ownership

Active Ownership refers to dialogue and engagement with issuers and the exercise of voting rights – it is a tool used by the Management Company to influence issuers to adopt more sustainable behaviour and practices. Engagement occurs in three ways: thematic engagement, ESG dialogues and controversy engagement. Thematic engagement focuses on different themes that have a material impact on society, and where the Management Company believes engagement efforts can achieve beneficial change. Analysts and portfolio managers also maintain regular bottom-up dialogues with issuers on ESG subjects that the Management Company believes may have a material impact on their value.

A fundamental view of the Management Company is its approach of inclusion over exclusion and thus an engagement led divestment approach is applied, via controversy engagement. In the case of any violations against items listed in the norms-based responsible investment criteria, assessment is first made to identify the possibility to engage with the issuer in question to address the violation. If engagement is deemed feasible, a formal engagement process must be started in order for the issuer to remain eligible for investment. If engagement is deemed to be unsuccessful, the issuer will be revisited by the Management Company.

In order to effectively represent clients in their role as shareholders, where possible and feasible, voting is also conducted as a tool to encourage issuers to change for the better and plays an important role in

holding the issuer accountable.

### **Sustainable Investment Framework**

The Sustainable Investments of the Sub-Fund adhere to the definition of 'Sustainable Investment' as per SFDR, which requires issuers to 1. contribute to an environmental or social objective, 2. do no significant harm and 3. follow good governance practices. The Sustainable Investment Framework leads to a binary outcome: an issuer will either qualify as a whole as a Sustainable Investment, or not at all. An issuer can be identified as contributing to an environmental or social objective based on 2 categories: 1. Product contribution (based on the activities of the issuer) and 2. Operational contribution (the way in which the issuer conducts its business).

### **MIT criteria**

The issuers that the Sub-Fund invests in are also required to meet the Management Company's proprietary MIT criteria: Material (the company's positive impact arising from their business is significant), Intentional (the company's impact is part of its mission, strategy and purpose) and Transformational (the company's solution is unique or innovative). As part of the MIT analysis, identification to a solution and contribution to one or more of the UN SDGs is required for each issuer.

#### ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

- **Exclusion based on the norms-based RI criteria.** The Sub-Fund, as per the Management Company's norms-based responsible investment criteria, will exclude investment in issuers involved in activities including but not limited to, the development, production, maintenance or trade of controversial weapons, the production of tobacco products, thermal coal mining and/or oil sands extraction. Additional restrictions apply for activities related to gambling, weapons, adult entertainment, fur & specialty leather, arctic drilling and shale oil & gas. Adherence to the norms-based responsible investment criteria is based on pre-set revenue thresholds, as stated in the Management Company's Responsible Investment Policy, and relies on third-party data. For the latest thresholds and activities, please refer to the Management Company's Responsible Investment Policy available on the website.

- **ESG Rating.** The average weighted ESG Rating of the Sub-Fund's issuers will be better than the Index/Benchmark.

- **Carbon intensity.** Average weighted carbon intensity lower than the Index/Benchmark

- **Water intensity.** Average weighted water intensity lower than the Index/Benchmark

- **Waste intensity.** Average weighted waste intensity lower than the Index/Benchmark

#### ***What is the policy to assess good governance practices of the investee companies?***

The Sub-Fund leverages a proprietary approach to identifying and evaluating global norms violators and issuers that may be engaged in poor governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

This proprietary approach seeks to identify, review, evaluate and monitor companies that are flagged by external data providers as being in violation of, or otherwise not aligned with, the United Nations Global Compact (UNGC) principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights as well as companies that have received high controversy scores (including significant governance controversies, severe labour rights controversies and severe tax compliance controversies). Following review of these external data inputs, companies that the Management Company believes to have an ongoing and serious violation and/or are considered to not be following good governance practices with insufficient remediation will be excluded from the Sub-Fund. This list of companies will be reviewed on a semi-annual basis. The

Management Company may not be able to readily sell securities that are intended for exclusion from the Portfolio at each semi-annual review (for example, due to liquidity issues or for other reasons outside of the Management Company's control), however, will seek to divest as soon as possible in an orderly manner and in the best interests of Shareholders.

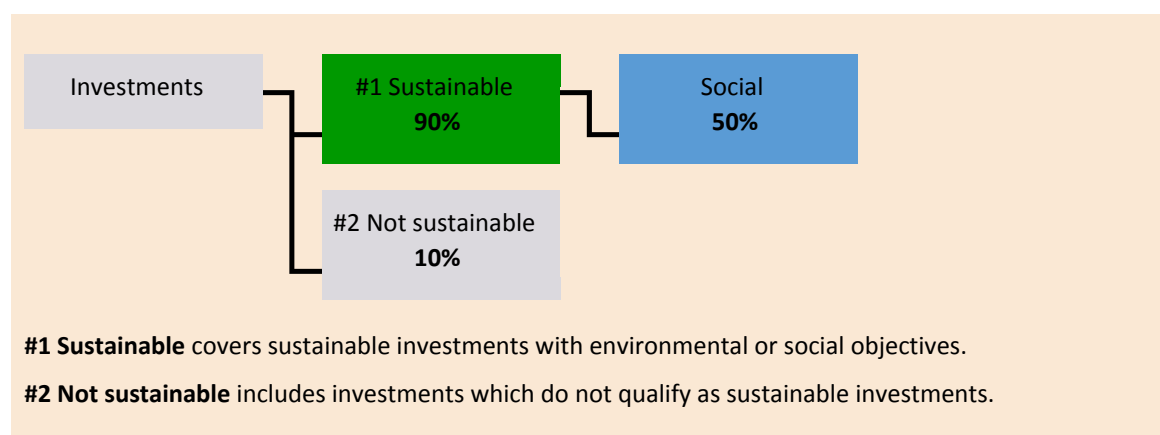


**Asset allocation** describes the share of investments in specific assets.

### What is the asset allocation and the minimum share of sustainable investments?

The asset allocation of the Sub-Fund towards Sustainable Investments is reflected in the table below.

At least 90% of the investments of the Sub-Fund are sustainable investments. The Sub-Fund does not commit to invest in sustainable investments with an objective that is aligned with the EU Taxonomy. A maximum of 10% of the investments of the Sub-Fund is estimated to be in the category 'other' and are not sustainable investments. These investments are mostly in cash and cash equivalents. Derivatives used for efficient portfolio management techniques and UCI's and UCITS that do not have a sustainable investment objective could be in this category as well.



### ● *How does the use of derivatives attain the sustainable investment objective?*

The use of derivatives is primarily meant to hedge investment risks. The investments do not affect the attainment of the sustainable investment objective.

### 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.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

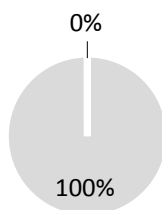
Whilst this Sub-Fund intends to make sustainable investments, it does not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the EU Taxonomy and therefore its portfolio alignment with such EU Taxonomy is 0%. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

As noted above, whether investments made by this product are sustainable investments is determined by reference to the Management Company's Sustainable Investment Framework for assessing the contribution of investments to environmental and/or social objectives. This product does not target one specific category of sustainable investments, but instead assesses all investments made pursuant to its overall investment strategy using the framework.

*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.*

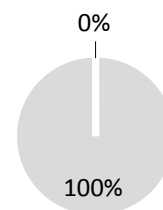
### 1. Taxonomy-alignment of investments including sovereign bonds\*

■ Taxonomy-aligned  
■ Other investments



### 2. Taxonomy-alignment of investments excluding sovereign bonds\*

■ Taxonomy-aligned  
■ Other investments



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

## What is the minimum share of investments in transitional and enabling activities?

The minimum share of investments in transitional and enabling activities is 0%.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

N/A



## What is the minimum share of sustainable investments with a social objective?

The minimum share of Sustainable Investments with a social objective is 50%



## What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

Investments included under 'not sustainable' includes cash used for liquidity purposes and derivatives for hedging purposes. The percentage shown is the planned percentage which may be held in these instruments but the actual percentage can vary from time to time.

These investments are not subject to any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.

**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

N/A – This question is not applicable as the Sub-Fund does not have a specific index designated as a reference benchmark to meet the sustainable investment objective.

● ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

N/A – The Sub-Fund does not have a specific index designated as a reference benchmark to meet the sustainable investment objective.

● ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

N/A – The Sub-Fund does not have a specific index designated as a reference benchmark to meet the sustainable investment objective.

● ***How does the designated index differ from a relevant broad market index?***

N/A – The Sub-Fund does not have a specific index designated as a reference benchmark to meet the sustainable investment objective.

● ***Where can the methodology used for the calculation of the designated index be found?***

N/A – The Sub-Fund does not have a specific index designated as a reference benchmark to meet the sustainable investment objective.



**Where can I find more product specific information online?**

More product-specific information can be found on the website: [www.nnip.com](http://www.nnip.com) by going to the product and or SFDR page.

### Disclaimer

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