

Sustainability Related Disclosure

Sustainable Finance Disclosure regulation

PGGM Credits Fund

(CR Fonds)

This document provides you with information about this financial product in relation to the Sustainable Finance Disclosure Regulation. The information is required by law to help you understand the sustainability characteristics and/or objectives and risks of this financial product.

(a) Summary Dutch		
This section summarizes all the information contained in the different sections below about the financial product that promote environmental or social characteristics.		
Naam financieel product	PGGM Credits Fund	
Classificatie product	Artikel 8 SFDR	
b. Geen duurzame beleggingsdoelstelling	van toepassing (geen duurzame beleggingsdoelstelling)	
c. Ecologische of sociale kenmerken	We promoten de volgende E/S kenmerken. Ecologisch: klimaatverandering, klimaatmitigatie, duurzaam gebruik en bescherming van water en aarde. Sociaal: mensenrechten, gezond leven, werknemersomstandigheden, bestrijding van (poging tot) omkoping en afpersing.	
d. Beleggingsstrategie	Door de opname van ESG factoren creëren een verantwoorde beleggingsbasis. Daarnaast verschuiven we onze beleggingen van bedrijven die niet voldoen aan onze minimale ESG vereisten, naar bedrijven die daar wel aan voldoen.	
e. Aandeel beleggingen	≥75% aligned met E/S kenmerken. ≤25% niet aligned	
f. Monitoring ecologische of sociale kenmerken	<i>Uitsluitingen</i>	van toepassing
	<i>OECD-screening</i>	van toepassing
	<i>CO₂-doelstelling</i>	niet van toepassing
g. Methodologieën	Voorafgaand aan de belegging worden bedrijven uitgesloten op basis van onze uitsluitingenlijst beschikbaar op de website . Daarnaast volgt een OECD-screening voor overtredingen en negatieve impact. Daarnaast heeft dit mandaat een CO2 plafond die een limiet stelt op de hoeveelheid tonnen uitgestoten CO2 per miljoen dollar omzet. Deze CO2 intensiteit wordt berekend op basis van scope 1, 2 en 3 “upstream”. Waarbij voor scope 3 alleen de volgende sub-sectoren meegenomen worden: Integrated Oil & Gas, Oil & Gas Exploration & Production, Coal & Consumable Fuels and the Automobile Manufacturers sub-sector.	
h. Databronnen en -verwerking	<i>Uitsluitingen</i>	Sustainalytics
	<i>OECD-screening</i>	Sustainalytics
	<i>Geschatte data</i>	van toepassing
i. Methodologische- en databeperkingen	<i>Ontbrekende data</i>	van toepassing
j. Due diligence	Op basis van OECD-standaarden en het Global Compact van de VN	
k. Engagementbeleid	van toepassing	
l. Aangewezen referentiebenchmark	De benchmark is de “Bloomberg Euro Agg Corp 75% ex Financials ex Tobacco 25% “ en wordt ten behoeve van PGGM aangepast door Bloomberg. De benchmark is toegewezen om het fonds zich gedeeltelijk te laten richten op de ecologische en sociale kenmerken die het promoot.	

(a) Summary English		
This section summarizes all the information contained in the different sections below about the financial product that promote environmental or social characteristics.		
Name financial product	PGGM Credits Fund	
Classification----- product	Article 8 SFDR	
b. No sustainable investment objective	applicable (No sustainable investment objective)	
c. Environmental or social characteristics of the financial product	Environmental characteristics promoted are climate change mitigation and sustainable use and protection of water and soil. Social characteristics promoted regard Human Rights, Healthy living, Employment Relations, Combating Bribery, Bribe Solicitation and Extortion.	
d. Investment strategy	We apply a responsible basis for our investments, by including ESG factors in our investment decisions. The Beliefs and Foundations for Responsible Investment specify strict minimum standards for our investments.	
e. Proportion of investments	≥75% aligned with E/S characteristics, ≤25% non-aligned	
f. Monitoring of environmental or social characteristics	<i>Exclusions</i>	applicable
	<i>OECD-screening</i>	applicable
	<i>CO₂-target</i>	not applicable
g. Methodologies	In order to measure the attainment of the above E/S characteristics, we apply sustainability indicators.	
h. Data sources and processing	<i>Exclusion</i>	Sustainalytics
	<i>OECD-screening</i>	Sustainalytics
	<i>Estimate data</i>	applicable
i. Limitations to methodologies and data	<i>Missing data</i>	applicable
j. Due diligence	Based on OECD standards and the UN Global Compact Principles	
k. Engagement policies	applicable	
l. Designated reference benchmark	The benchmark is the Bloomberg Euro Agg Corp 75% ex Financials ex Tobacco 25% and customized by Bloomberg on behalf of PGGM. The benchmark is designated to partly align this product with the environmental and social characteristics that it promotes.	

(b) No sustainable investment objective

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

(c) Environmental or social characteristics of the financial product

What are the environmental or social characteristics that the financial products promotes?

- Environmental characteristics promoted are climate change mitigation and sustainable use and protection of water and soil.
- Social characteristics promoted regard Human Rights, Healthy living, Employment Relations, Combating Bribery, Bribe Solicitation and Extortion.
- A reference benchmark has been designated for the purpose of attaining environmental and social characteristics which includes the environmental characteristic climate mitigation.

(d) Investment strategy

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

We apply a Responsible Basis for our investments, by including ESG factors in our investment decisions, The PGGM Beliefs and Foundations for Responsible Investment specify strict minimum standards for our investments. The minimum standards are applicable to all our investee companies and include exclusions and OECD screening. With these minimum standards we shift our investments from companies and investments that do not meet our minimum ESG requirements to companies and investments that do.

The minimum ESG requirements are binding elements in our investment strategy and consists of the following elements:

Exclusions

Before a new investment is made, a check takes place in order to ensure that the companies/government bonds are not listed on the exclusion list. The trading system should prevent any buying orders in these securities. The exclusion list is updated at least twice a year and after the exclusion list is updates, the existing portfolio is checked again and securities of companies/government bonds on the exclusion list, are sold.

OECD screening

In the OECD screening companies are given a score based on incidents within their own production locations and in the supply chain. Very severe and severe violation will lead to an exclusion of the companies involved, unless a severe violation occurs at a large company. In that case we prefer to first engage with the company as engagement with the larger companies could have more effect then just divesting. In case the engagement does - within a reasonable timeframe – however not lead to indicated changes, the company will also be excluded.

The OECD screening is used for pre-investment as well as periodic monitoring of the portfolio. The OECD screening list is updated twice a year.

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?

PGGM assesses the companies it invests in also with regard to good governance practices (GGP), in particular with respect to sound management structures, employee relations remuneration of staff and tax compliance. For this we have developed a screening method together with Sustainalytics based on the UN Global Compact Principles and OECD Guidelines for Institutional Investors. In particular Principle 3-6 UN Global Compact and Chapter II, V, X and XI OECD Guidelines for Multinational Enterprises are relevant.

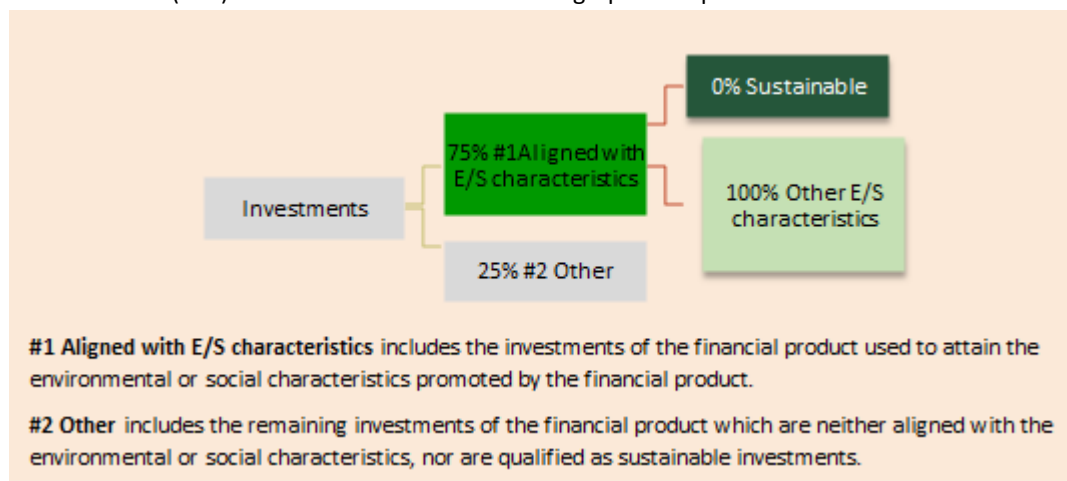
In case a company does not follow good governance practises based on OECD-Screening, they are excluded

(e) Proportion of investments

The planned asset allocation is an investment portfolio of bonds. The Investment Grade Credit fund can directly invest in bonds from corporates with euro denomination. The core focus is on high grade

companies. A moving cash balance and the use of interest rate futures with the purpose of hedging are also part of the planned asset allocation.

The percentage of the investments aligned with the E/S characteristics (#1) promoted is 75% and the percentage of the investments aligned with other (#2) is 25%. The financial product does not intend to invest in sustainable investments, resulting in 0% of sustainable investments and 100% investments in other E/S characteristics (#1B). See the flow chart below for a graphical representation



(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 what are the related internal or external control mechanisms?

Exclusions

We choose to exclude certain investments. This prevents investments managed by PVBV from contributing financially to certain practices that have a negative impact on sustainability factors and that therefore do not match the standards and values of PVBV, its clients and their participants. We adhere to a strict lower limit, which applies to all PGGM funds managed by PVBV and all public and private segregated mandates for individual clients managed by PVBV. The companies in the benchmark that do not meet the criteria of the lower limit will be placed on a list referred to as the exclusion list. This list is regularly updated, at least twice per calendar year. We use external data providers (such as Sustainalytics, Trucost and Bloomberg) and our own analyses to compile the list of exclusions. The list of exclusions is available on [our website](#).

Agreements have been made with all internal and external managers regarding compliance with the exclusion lists. For our internal managers, PVBV has set up monitoring, management and compliance systems, in Bloomberg, among others. This should prevent trading in companies that are on the exclusion list. External managers are responsible for complying with and monitoring the exclusion list in accordance with the contractual agreements. Every external manager has to make a compliance statement once a month, confirming to PVBV that the external manager has complied with all agreements with PVBV. This includes the correct implementation of the exclusion list. This compliance statement must be signed off by an independent compliance officer. PVBV monitors compliance with the obligations and the external managers also adhere to the obligations. Furthermore, PVBV also checks its funds and mandates after every trading day to ensure that no investments have been made in companies that are on the exclusion list.

OECD screening

In the OECD screening, companies are given a score based on incidents within their own production locations and in the supply chain.

To assess the seriousness of the negative impact of companies on people and the environment, we have developed a screening method together with Sustainalytics regarding the UN Global Compact principles and OECD Guidelines for Institutional Investors. Companies are given a score based on incidents within their own production locations and in the supply chain.

Very severe and severe violation will lead to an exclusion of the companies involved, unless a severe violation occurs at a large company. In that case we prefer to first engage with the company as engagement with the larger companies could have more effect than just divesting. In case the engagement does - within a reasonable timeframe – however not lead to indicated changes, the company will also be excluded.

The OECD screening is used for pre-investment as well as periodic monitoring of the portfolio. The OECD screening list is updated twice a year.

(g) Methodologies

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

In order to measure the attainment of the above E/S characteristics, we apply the following sustainability indicators:

- Number of companies that are active in the fossil fuel sector which (i) do not commit themselves to the Paris Climate Agreement and the increased ambitions of COP26 and (ii) do not have a convincing and verifiable climate transition strategy.
- Number of companies involved in the production of tobacco and/or tobacco products (for example cigarettes, cigars, chewing tobacco etc.) and companies which are (co-)owners of companies engaged in the production of tobacco and/or tobacco products (with regard to ownership, PGGM applies the principle of controlling interest, meaning an interest in a joint venture and/or an interest of 30% or more in a listed company);
- Number of companies deriving more than 5% of their total revenues from producing (mining) thermal coal or more than 30% from power generation using thermal coal;
- Number of companies deriving more than 1% of their total revenues from producing oil out of tar sands/oil sands;
- Number of companies involved in the production and distribution of controversial weapons (1. Weapons of mass destruction (a) nuclear weapons, b) chemical weapons and c) biological weapons) and 2. Weapons with a considerable risk of casualties (including among civilians) during and/or after military conflict (a) anti-personnel mines, b) cluster bombs and c) munitions with depleted uranium);
- Number of companies deriving more than 1% of their total revenues from Arctic oil drilling;
- Number of investments in liquid equities and credit of Russian and Belarus companies, defined as (1) companies that are identified as 'Russian' or 'Belarus' by the benchmark providers, and/or (2) that have the majority of their business in Russia, according to our data providers ('country of risk');
- Number of bonds (including inflation-linked government bonds and other debt securities – without a predefined purpose – of central government and local authorities) issued by states on which the UN Security Council and/or the Council of the European Union have imposed restrictive measures (sanctions), if these are targeted at the country itself or the incumbent government and concern a weapons embargo or relate to a situation of gross and systematic violation of human rights, or if there is possible deployment of controversial weapons.

- Number of companies that violate the UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Number of companies that show lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises

(h) Data sources and processing

- What are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?
- What measures are taken to ensure data quality?
- How is data processed?
- What is the proportion of data that are estimated?

Data sources

PGGM Credits Fund makes use of ESG data from the following external data vendors:

- Exclusions and minimum sustainability requirements:
 - Sustainalytics: ESG data is used as input for screening methodology, based on OECD Guidelines for Multinational Enterprises and UN Global Compact Principles

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SDI Asset Owners Platform

PGGM, APG and two large foreign asset management companies have founded the Sustainable Development Investments Asset Owner Platform (SDI-AOP). As part of the SDI-AOP, a methodology has been developed to determine in an automated way if a company within the investment universe substantially contributes to the UN Sustainable Development Goals (SDGs).

Data quality and processing

When selecting data vendors, multiple aspects of data quality are assessed, including the completeness of the data for the intended investment universe of the product, the methodology and data quality controls performed by the data vendor. Data vendors are evaluated prior to the date of contract extensions.

The screening methodology on OECD Guidelines for Multinational Enterprises and UN Global Compact Principles is part of a wider and partly qualitative process in which the data driven results are checked and validated manually for every company that is flagged as a result of the screening.

The CO2 data of Trucost is validated annually, by performing controls on both absolute and relative year-on-year changes in the CO2 scope 1 and 2 absolute emissions and intensity data.

Data collection and further processing of ESG data is performed in multiple ways. The guiding principle for this is to automate the data collection and further processing as much as possible in order to reduce operational risk; e.g. by setting up automated data collection from secured SFTP-locations or by collecting the data from our data distribution partner (FactSet).

Estimated data

For the exclusion list we use several data providers and -sources, like Sustainalytics*) and Truecost:

(i) **Product Involvement**

- *Coal*: Estimate: approx. 50% of the revenue from coal
- *Tar Sand*: Estimate: no data available (we expect <50%)

- *Arctic Drilling*: Reported: approx. 24%, Estimated: approx. 76%
- *Tobacco Production*: Reported: approx. 55%, Estimated: approx. 45%

(ii) **Controversial Weapons Radar**

The use of estimations in the **CWR** data is **minimal - less than 1% of total data points**. The only data point (out of dozens of others) which uses estimations is the Defense revenue data. This data point does not refer specifically to revenues derived from controversial weapons, but rather the overall proportion of revenues derived from defense related activities and has no impact on the company's evidence of activity or category of involvement.

(iii) **Country Screening**

The country screening focusses on states on which sanctions have been imposed by the UN Security Council and/or the European Union. Sustainalytics consults reputable third-party sources for both treaty and sanctions research.

*) In terms of data sources, Sustainalytics typically uses for research across its products (these differ per product) company reports, media reports, governmental sources and NGO reports, as well as data from third party data sources, a list of which is available at: [Legal Disclaimer \(sustainalytics.com\)](https://www.sustainalytics.com/legal-disclaimer).

(i) Limitations to methodologies and data

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

Missing ESG data

The most prominent limitation to methodologies and data is the lack of availability of complete and consistent ESG data caused by incomplete, inadequate and/or non-standardized reporting by investee companies in the field of sustainability and sustainability risks. This is a challenge faced by the entire asset management industry, but the expectation is that this will improve over time as more companies adhere to existing initiatives and standards on sustainability (risk) reporting (e.g. CDP, TCFD, PCAF) and because of new legislation in this area (e.g. the EU's Corporate Sustainability Reporting Directive in 2024).

In order to mitigate the risk of missing or inconsistent ESG data, we use multiple external data vendors and we make use of ESG data of the parent company if ESG data of an issue is not directly available. Furthermore, we will estimate ESG data based on sector averages or portfolio averages where needed.

Limitations to GHG methodologies

Since absolute GHG emissions (financed emissions), footprint and intensity indicators all make use of financial data (i.e. EVIC and revenue data) these indicators can be impacted by market factors like inflation, volatility in asset prices and FX effects. Still, this is inherent to all commonly used GHG methodologies. PGGM is committed to follow industry standards with regards to GHG calculations and reporting. Most noticeably, PGGM aims to follow the Partnership for Carbon Accounting Financials (PCAF) Global GHG Accounting & Reporting Standard and the Task Force on Climate-related Disclosures (TCFD) framework if possible.

(j) Due diligence

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

Due diligence

We start by performing a due diligence process into (potential) investments, in order to identify any negative impact an investment may have on sustainability. We do this based on the OECD standards (incorporated in the IMVB covenant) and the UN Global Compact Principles. We consider the following:

- The probability and seriousness of the negative impact;
- The allocation percentage of the company within the portfolio;
- The extent to which the company contributes to the clients' focus areas and 'sustainable world' objectives.
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For the selection and assessment of external investors, the External Management department uses the following approach:

We aim to select external managers who share the ESG beliefs that we hold at PVBV and who pay attention to ESG risks and opportunities in their investment decision-making processes. We expect external managers to adhere to our views when it comes to responsible investment. In assessing the external managers, we look at the extent to which they are clear frontrunners/opinion-formers in relation to ESG and the extent to which ESG integration is a visible component of the organisation and processes. The investment performance of the external investors are also tested, both in relation to financial and social objectives. Instead of the return in euros, we look more closely at factors including the portfolio's ESG scores and the sustainability impact it has achieved. The ESG performance of the external managers is tested against the mandate's ESG objective as well as compared to the performance of other managers managing a comparable mandate.

For the due diligence of the investments we manage, we use data from several sources: non-governmental organisations (NGOs), specialised data providers, the media and the companies themselves. PVBV then does additional research itself.

In order to establish the seriousness of the negative impact of companies on people and the environment, we have developed a screening method in cooperation with Sustainalytics. This is based on the OECD guidelines for institutional investors. Companies are given a score based on incidents within their own manufacturing sites and incidents in the supply chain.

As PVBV invests in many different investment categories, there is a wide range of possible adverse impacts. These include climate change, human rights such as employment rights, or water shortages. Out of the possible adverse impacts, PVBV has identified climate change as the most important adverse sustainability impact.

When we identify that an investment comes with negative sustainability effects, we can take various measures. We can move to exclusion, or we can use active shareholding to attempt to change the situation. In other words: based on our findings, we will decide whether we want to invest in a specific company, and if so, how we take up a position as the (active) shareholder.

(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)?

Active and involved shareholding

PVBV uses its influence as a shareholder to constantly monitor developments in the companies in its portfolio and, where necessary, making improvements in the area of ESG. We do this by engaging in conversation (dialogue), by implementing predefined improvements in the area of ESG (engagement), by exercising our voting rights and, in extreme cases, by issuing legal proceedings.

i) Dialogue and engagement

PVBV has a Responsible Investment (RI) team for setting up, monitoring and reporting on the implementation of engagement. RI uses an assessment framework (see 'Figure: Assessment Framework for Implementation of Engagement' in the Responsible Investment Implementation Framework) to establish the

most appropriate way to implement engagement - as established in the policy. Depending on the theme and/or sector, RI uses various (external) data sources and data providers. Information is also involved via our membership organisations and collaborations with like-minded institutional investors. PVBV monitors the progress of executed engagement processes by recording these in an Engagement Data Base (EDB) that we ourselves have built. At the end of the engagement programs and processes, PVBV will establish whether the engagement program has had the desired result. This is where PVBV distinguishes between successful and unsuccessful engagements.

In the event of (a reactive or proactive) engagement, we distinguish between engagement to prevent, mitigate or resolve negative issues in the investment portfolio ('sound basis') and reinforcing the positive contribution to the Sustainable Development Goals (SDGs) that are a focus area ('sustainable world'). In the event of a reactive approach, PGGM will monitor whether there is (a risk of) an incident. As concerns the sound basis, a screening in accordance with the OECD standards (incorporated in the IMVB covenant) is used in order to discuss with clients which companies they wish to engage with.

(ii) Voting (proxy voting)

PVBV will cast active and informed votes on behalf of its clients. PVBV does this on the basis of publicly accessible voting guidelines (the [Global Voting Guidelines](#)) that are evaluated and updated annually. In order to cast votes, PVBV uses a specialist voting service provider (Glass Lewis). This voting service provider also gives voting advice based on PVBV's aforementioned voting guidelines. This voting platform allows PVBV to vote remotely in the listed portfolio companies. Every quarter, a sample is used to verify whether the voting advice is in line with the voting guidelines at PVBV and the voting service provider itself will make a compliance statement to confirm compliance.

(iii) Legal proceedings

PVBV has set up internal systems that enable it to monitor on a worldwide scale where possible proceedings relating to our investments (in listed companies) could be conducted in the interest of its clients. PVBV will look into those opportunities and will provide its clients with reasoned advice as to whether or not to get involved in these proceedings, and if so, in what capacity. Where appropriate, we will use a specialist law firm to conduct a feasibility analysis and/or to conduct proceedings, whether or not jointly with other affected institutional investors.

(I) Designated reference benchmark

Has an index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product? If yes, how that index is aligned with the environmental or social characteristics promoted by the financial product, and where can one find information with regards to input data, methodologies used to select those data, the rebalancing methodologies and index calculations?

The benchmark is designated to partly align this product with the environmental and social characteristics that it promotes. The benchmark is adjusted for the negative effects on Health & wellbeing (tobacco). Note that the portfolio does exclude on the negative effects on Human Rights (controversial weapons, UN/EU sanctions, OECD and UN Global), Health & wellbeing (tobacco) and Climate change (Coal and tar Sand, OECD, and UN Global Impact).

The Benchmark is partly customised by Bloomberg on behalf of PGGM. The Benchmark will be adjusted accordingly or a new benchmark will be constructed should a different investment strategy be adopted.