

Disclosure of Principal Adverse Impacts of Investment decisions on sustainability factors

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Summary

ABN AMRO Investment Solutions considers the principal adverse impacts of its investment decisions on sustainability factors (PAIs) and has decided to publish this report on a voluntary basis.

ABN AMRO Investment Solutions, as a subsidiary of a banking group, ABN AMRO Bank N.V., and with fewer than 500 employees, is not obliged to publish separately either a statement of intent or a report on the principal adverse impacts. However, we recognize the importance of reporting on principal adverse impacts.

This report covers the reference period from 1 January to 31 December 2024. Please note that ABN AMRO Investment Solutions uses external data providers to verify the alignment of investments with the policies, standards and reference principles cited in this document. The tables below present the negative impacts of the investment portfolios managed by ABN AMRO Investment Solutions in 2024, an analysis of the results as well as the remediation actions. The results reflect the implementation of the responsible investment policy¹ of ABN AMRO Investment Solutions conducted in 2024 in its investment portfolios. This policy defines the degrees of ESG involvement of the portfolios managed and the related obligations in terms of exclusions, inclusions, engagement and voting at general meetings, as well as highlighting the consideration of ESG risks and negative impacts. ABN AMRO Investment Solutions publishes its Responsible Investment Policy and this report in the "Sustainability" section of its website².

The principal adverse impacts are generally

integrated into the investment processes through the following actions:

Exclusions. Certain securities are excluded from ABN AMRO Investment Solutions' investment universe to minimize the associated adverse impacts especially when they are deemed imminent and irremediable (activities related to controversial weapons, for example). Other exclusions (sectoral or normative) may apply depending on the sustainability objectives of the investment portfolios. The exclusions that are applied to a large part of the investment portfolios are those related to controversial weapons, tobacco, non-compliance with the United Nations Global Compact and respect for the principle of good governance.

Engagement. ABN AMRO Investment Solutions sees engagement as an important tool for improving best practices to maximizing positive and minimizing negative ESG impacts. ABN AMRO Investment Solutions can strengthen its commitments by relying on the actions carried out either by its external investment managers or by its parent company ABN AMRO Bank N.V. (directly or by its service provider specialized in collaborative engagement). ABN AMRO Investment Solutions continues its engagement efforts through its voting rights where appropriate.

DNSH. Application of the "Do No Significant Harm" principle, i.e. the principle of no significant harm to other ESG factors. This principle ensures that portfolios that claim to pursue certain sustainable objectives do not significantly harm other sustainable objectives. This principle applies to specific investment portfolios of ABN AMRO Investment Solution

¹ [AAIS Responsible Investment Policy](#)

² [Welcome to ABN AMRO Investment Solutions](#)

Disclosure of principal adverse impacts of investment decisions on sustainability factors (Table I)

Indicators applicable to investee companies

The impacts were calculated based on the average of quarterly observations over the year under review.

Adverse Sustainability Indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reporting period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas (GHG) emissions	1. GHG emissions	Scope 1 GHG emissions	533,378.5	601,475.4	<Unit: Tonnes of CO2 equivalent>	According to certain percentages of turnover and depending on the type of investment fund, excluding companies active in: • thermal coal mining • thermal coal power generation • Arctic drilling, shale gas and oil sands. Engagement with selected companies on their decarbonization plans. In addition, some portfolios consider these indicators as part of the DNSH.
		Data Coverage	91.0%	93.9%	We are seeing a reduction in GHG emissions, while assets under management have remained relatively stable overall. These improved results are correlated with our exclusions and our climate policy.	
		Scope 2 GHG emissions	139,255.6	174,351.0		
		Data Coverage	91.0%	93.9%		
		Scope 3 GHG emissions	6,341,248.4	7,979,569.8		
		Data Coverage	9.0%	93.9%		
		GHG Total Emissions	7,013,882.6	8,755,396.2		
		Data Coverage	91.0%	93.9%		
	2. Carbon footprint	Carbon footprint	529.7	638.5	<Unit: Tonnes of CO2 equivalent per million euros of enterprise value including cash>	ABN AMRO Investment Solutions has joined the Net Zero Asset Managers (NZAM) market initiative, affirming its commitment to carbon neutrality by 2050 or sooner. In this context, ABN AMRO Investment Solutions is gradually including climate issues in investment strategies.
		Data Coverage	91.0%	93.9%	Results improved by 108.80 units and correlated with our exclusions and our climate policy.	
	3. GHG intensity	GHG intensity of investee companies	1,275.8	1,303.9	<Unit: Tonnes of CO2 equivalent per million euros of revenue>	
		Data coverage	94.0%	94.8%	Results improved by 28.1 units and correlated with our exclusions and our climate policy.	
	4. Exposure to companies active in the fossil fuel sector	Share of investment in companies active in the fossil fuel sector	5.0%	5.1%	<% of total number of investee enterprises>	
		Data Coverage	97.0%	95.1%	Results improved by 0.01 units and correlated with our exclusions and our climate policy.	
	5. Share of non-renewable energy consumption and production from non-renewable energy sources	Non-renewable energy consumption	54.0%	56.1%	<% of total energy consumption>	
		Data Coverage	59.0%	62.9%	Results improved by 2.1 units and indirectly correlated with our exclusions and our climate policy.	

Adverse Sustainability Indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS –(following)						
Greenhouse gas (GHG) emissions (see above)	5. (see above) Share of the energy consumption and production of investee enterprises from non-renewable energy sources, compared to renewable energy sources, expressed as a percentage of total energy sources	Non-renewable energy production	2.0%	2.3%	<% of total energy production>	See above
		Data Coverage	91.0%	93.1%	The results improved by 0.3 units and is indirectly correlated with our exclusions and our climate policy.	
	6. Energy Intensity per high impact climate sector Energy consumption in GWh per million euros of revenue of investee companies, per high impact climate sector	Agriculture, forestry and fishing	0.16	1.1	<GWh per million euros of turnover > Although we do not have a specific policy in place related to these sectors, these indicators, which are improving overall, are likely the result of the ESG selection processes of our external investment managers by delegation, which are more granular.	According to certain percentages of turnover and depending on the type of investment fund, excluding companies operating in: <ul style="list-style-type: none"> • Thermal coal mining • Thermal coal power generation • Arctic drilling, shale gas and oil sands. Engagement with select companies on their decarbonization plans.
		Data Coverage	79.2%	56.4%		
		Mining and quarrying	0.91	1.6		
		Data Coverage	80.5%	83.8%		
		Manufacturing	0.33	1.4		
		Data Coverage	90.9%	90.1%		
		Electricity, gas, steam and air conditioning supply	1.94	2.0		
		Data Coverage	43.7%	42.7%		
		Water supply: sewage, waste management and remediation activities	1.05	1.1		
		Data Coverage	86.7%	82.1%		
		Construction	0.32	3.8		
		Data Coverage	55.9%	60.7%		
		Wholesale and retail trade; Repair of motor vehicles and motorcycles	0.07	0.1		
		Data Coverage	63.8%	76.3%		
		Transportation and storage	0.07	1.0		
		Data Coverage	70.1%	62.7%		
		Accommodation and food services activities	0.39	4.9		
		Data Coverage	60.6%	66.8%		

Adverse Sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS - Following						
Biodiversity	7. Activities negatively affecting biodiversity sensitive areas	Share of investments in investee companies with sites/establishments located in or near biodiversity sensitive areas where activities of those investee companies negatively affect those areas	0.06%	0.08%	<% of total number of investee enterprises> These indicators are slightly improved by 0.02 units and remain close to zero; Overall, the negative impact measured for our portfolios by this indicator is low. Although we do not yet have a specific policy in place related to Biodiversity, our exclusion policy allows us to avoid investing in certain sectors deemed harmful to biodiversity (tobacco, GMO etc.) In addition, our external investment managers can apply additional constraints to further limit the negative impacts on biodiversity in sensitive areas.	According to certain percentages of turnover and depending on the type of investment fund, we exclude of companies carrying out activities with high pressure on biodiversity such as the manufacture of Genetically Modified Organisms, the exploration and exploitation of coal and unconventional fossil fuels, the exploitation and production of palm oil. In addition, some portfolios consider this indicator as part of the DNSH.
		Data Coverage	95.4%	95.6%		
Water	8. Emissions to water	Tonnes of emissions to water from investee companies, per million euro invested, expressed as a weighted average	0.3	0.3	<Weighted average tonnes of emissions to water per million euros of enterprise value including cash> The measurements are almost identical from one year to the next and close to zero. Unfortunately, the coverage rate is too low to draw any conclusions. We do not have a specific policy directly addressing discharges to water from companies, but some of our delegated external investment managers may have policies in place to minimize discharges to water from the activities of the companies in which they invest.	According to certain percentages of turnover and depending on the type of investment fund, excluding companies carrying out activities with high pressure on water resources such as the manufacture of Cannabis, special leather and fur and Genetically Modified Organisms. In addition, some portfolios consider this indicator as part of the DNSH.
		Data Coverage	4.0%	4.8%		
Waste	9. Hazardous waste ratio	Tonnes of hazardous and radioactive waste generated by investee companies, per million euro invested, expressed as a weighted average	1.1	2.4	<Weighted average tonnes of hazardous and radioactive waste per million euros of enterprise value including cash> The indicators are up by 1.3 units compared to last year. Unfortunately, the coverage rate is too low to draw any conclusions. We do not have a specific policy addressing hazardous and radioactive waste. However, some of our delegated external managers may have policies in place that minimize or even prohibit the generation of such waste by the companies in which they invest.	According to certain percentages of turnover and depending on the type of investment fund, exclusion of companies carrying out activities likely to generate hazardous waste such as the exploitation of certain non-conventional fossil fuels. However, nuclear activities are not formally excluded (unless considered controversial weapons). In addition, some portfolios consider this indicator as part of the DNSH.
		Data Coverage	40.3%	39.1%		

Adverse Sustainability Indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reference period
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises	Share of investment in companies that have been involved in violations of the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises	0.08%	0.02%	<% of the total number of investee companies> The results are close to zero and reflect our responsible investment policy regarding the exclusion of companies that do not comply with the United Nations Global Compact & the OECD Guidelines on Large Companies as well as those that do not align with our good governance criteria.	Exclusion of companies that do not comply with the United Nations Global Compact. Depending on the type of investment fund, exclusion of companies that do not comply with the OECD guidelines.
		Data Coverage	99.7%	95.1%		
	11. Lack of processes and compliance mechanisms to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises	Share of investment in investee companies without a policies to monitor compliance with the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises, or grievance/complaints handling mechanisms to address such violations	47.1%	42.2%	< % of total number of investee enterprises> The result is down by 4.9 units. Our responsible investment policy makes it possible to exclude companies that contravene the Pact and the OECD principles but does not specifically address the point of the associated control policy. Not having this type of process in place does not necessarily indicate that the company is in violation.	Exclusion of companies that do not comply with the United Nations Global Compact. Depending on the type of investment fund, exclusion of companies that do not comply with the OECD guidelines.
		Data Coverage	94.9%	93.7%		
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	9.9%	11.2%	<% average pay gap> The result is an improvement of 1.3 units; However, the coverage rate is too low to exploit the result. Moreover, we do not have a specific policy to address this indicator directly.	This indicator is the subject of particular attention during the vote at the General Meetings of Shareholders (AGM), on gender parity.
		Data Coverage	11.5%	7.6%		
	13. Board Gender diversity	Average ratio female to male board members in investee companies	38.4%	37.5%	<% of women in total membership> The result is an improvement of 0.9 units. We do not have a specific policy to address this indicator. However, our delegated external investment managers may have policies in place to improve gender diversity within the governance bodies of the companies in which they invest.	This indicator is part of our criteria for analysing good corporate governance that can lead to exclusion (depending on the type of investment fund). This indicator is also the subject of commitments with certain companies. We support most of the resolutions at AGMs aimed at parity on company boards of directors.
		Data Coverage	76.3%	78.7%		
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons or biological weapons)	Share of investment in investee companies involved in the manufacture or selling of controversial weapons	0.0%	0.0%	<% of total number of investee enterprises> The result is close to zero. Our responsible investment policy excludes controversial weapons.	Exclusions of companies engaged in controversial weapons activities.
		Data Coverage	96.7%	95.1%		

Indicators applicable to investments in sovereign and supranational.

Adverse Sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reference period
Environment	15. GHG intensity	GHG Intensity of Investee countries	307.9	312.3	<p><Tonnes of CO2 equivalents per million euros of products></p> <p>The result is an improvement of 4.4 units. Our responsible investment policy excludes, for some of our portfolios, countries that have not ratified the Paris climate agreements, but does not directly address the level of GHG emissions to be considered.</p>	Depending on the type of investment portfolio, exclusion of government bonds from countries that have not ratified the Paris Agreement.
		Data Coverage	76.3%	80.4%		
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (in absolute number and as a proportion of the total number of investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	<p>"Nb de pays = 3</p> <p>(Soit 0,17% du nombre total de pays bénéficiaires)"</p>	<p>"Nb de pays = 7</p> <p>(Soit 0,15% du nombre total de pays bénéficiaires)"</p>	<p>< Number of countries and % of total number of investee countries></p> <p>The results/indicators are close to zero and in line with our policy on excluding countries subject to sanctions.</p>	Depending on the type of investment portfolio, this indicator is taken into account by the portfolio manager. The definition of the "social norm" includes elements of national policy assessment, the standards of which differ according to the investment area.
		Data Coverage	72.7%	76.3%		

Other indicators for principle adverse impact (Tables II et III)

Indicators applicable to investment in investee companies

Adverse Sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reference period
Emissions	4. Investments in companies without initiatives to reduce their carbon emissions	Share of investee companies without initiatives to reduce their carbon emissions aimed at aligning with the Paris Agreement	39.9%	42.2%	<p><% of the total number of investee enterprises></p> <p>The indicators /results are in improvement of 2.3 units. Our responsible investment policy does not directly address this indicator; However, our policy contains restrictions on investment in certain high-carbon emitting sectors. In addition, some sustainable portfolios take this indicator into account.</p>	We engage with certain companies on their decarbonization plans and support shareholder resolutions on our voting policy.
		Data Coverage	96.6%	96.4%		

Indicators applicable to investments in sovereign and supranational

Adverse Sustainability indicator		Metric	Impact 2024	Impact 2023	Explanation	Actions taken, planned actions and targets identified for the next reference period
Human Rights	20. Average human rights performance	Average human rights performance of investee countries, using a quantitative indicator explained in the column provided	58.87	60.32	<p><Average performance of countries' quantitative indicators></p> <p>The score obtained using the Sustainalytics methodology is above the arithmetic mean of 50 (scale from 0 to 100; the best score being the highest). This score includes, among other things, an assessment of the population's access to freedom of expression, the social and political stability of the country, the quality of its conventions on fundamental human rights, etc.</p> <p>The indicator is down slightly by 1.45 points but remains around 60 points and well above the average of 50 points. This indicator is not directly addressed by our responsible investment policy but may be used by certain portfolios.</p>	Depending on the type of investment portfolio, we exclude government bonds from countries that have not ratified the international human rights convention on the worst forms of child labour.
		Data Coverage	72.7%	76.3%		

Description of policies to identify and prioritise principal adverse impacts on sustainability factors.

ABN AMRO Investment Solutions' "Responsible Investment Policy" (the Policy) applies to all funds managed by ABN AMRO Investment Solutions³. It has been constructed to reduce the sustainability risks and principal adverse impacts of our investment products. It covers our exclusions, our corporate "good governance" approach and ESG due diligence processes, our sustainability indicators including those to measure sustainability objectives, a description of our main external providers of non-financial data, our shareholder engagement policy (voting and engagement) and, finally, our approach to climate change. The Policy sets out how we classify each investment portfolio based on its ESG characteristics and/or sustainability goals, as well as how it considers principal adverse impacts. The Policy is approved by ABN AMRO Investment Solutions' management and Executive Committee and is tracked in detail in our risk management and operational controls processes. At the time of writing this report, the latest version of the Policy published on our website dates from January 2025. The ESG team within the Investment Department, led by the Chief Investment Officer of ABN AMRO Investment Solutions, is responsible, among other things, for coordinating the sustainability strategy of the investment portfolios. The team, under the supervision of the Head of ESG, consists of three full-time ESG analysts. The ESG team plays a key role in supporting all ABN AMRO Investment Solutions teams in implementing sustainability regulations, disseminating best practices, and evolving processes, methodologies, and tools dedicated to responsible investment. ESG analysts offer comprehensive support on all ESG-related issues, ensuring a consistent integration of ESG criteria within the company.

Each financial product managed by ABN AMRO Investment Solutions is internally classified into a specific category and comes with exclusions for direct investment in companies and countries that are deemed incompatible with our responsible investment approach.

ABN AMRO Investment Solutions has defined four levels of exclusions depending on its type of fund and the SFDR regime applied.

The funds managed⁴ by ABN AMRO Investment Solutions apply different ESG selectivity policies depending on the objectives sought. ABN AMRO

Investment Solutions has defined common investment selection criteria for its sustainable funds based, but not only, on the United Nations Sustainable Development Goals. To find out more about the exclusions and our fund types, please see our Policy on our website.

To measure the performance of principal adverse ESG impacts, we use external data providers, primarily Sustainalytics and ISS. To produce this report, we observed that from one provider to another (i) data may differ (ii) methodologies may differ (iii) data coverage may differ. To calculate the indicators of sustainability adverse impacts in this report, we have therefore used the two external data providers mentioned above, whose data can either be reported or estimated. To date, we do not collect data directly from the companies themselves. ABN AMRO Investment Solutions may engage with the data provider to address any gaps in the data and ensure its quality, collection and storage. It should be noted that the indicators published in this report are the result of the average of four quarterly observations of the portfolios over the year under review. The coverage rates of some indicators are low and therefore make their use difficult. ABN AMRO Investment Solutions is working to remedy this by enriching its issuing databases and looking for additional data providers.

Nevertheless, ABN AMRO Investment Solutions considers that methodological and data limitations should not materially affect the environmental and/or social characteristics or sustainable objectives of the investment portfolios covered by this report.

Engagement and Voting Policies

Responsible management is at the heart of ABN AMRO Investment Solutions' investment philosophy, integrating both voting and engagement activities to encourage positive change and maintain ethical practices. To drive companies towards positive change, ABN AMRO Investment Solutions engages with investee issuers through its external investment managers or collaboratively, through its partner EOS (or an external party that engages with companies on sustainability issues to promote investor interests). In addition, even if committing to sovereign or supranational issuers requires specific expertise, some of ABN AMRO Investment Solutions' external investment managers carry out collaborative actions. In addition, for the investment portfolios it managed, ABN AMRO Investment Solutions assumes responsibility for the voting policy and its implementation to maintain consistency and

³ With some exceptions

⁴ Direct or indirect

alignment with its core values. ABN AMRO Investment Solutions uses the services of its external service provider ISS (advice on resolutions and voting automation). Voting at companies' shareholder meetings responsibly and in line with engagement actions will put additional pressure on the company to consider stakeholder concerns. ABN AMRO Investment Solutions exercises the shareholder rights attached to the eligible assets as defined in its voting policy. There is no minimum threshold in terms of number of securities or amounts held to vote.

In addition, ABN AMRO Investment Solutions joined the Net Zero Engagement Initiative (NZEI) in 2024. This initiative launched by the Institutional Investors Group on Climate Change (IIGCC) in 2023 aims to help IIGCC members align more of their investments with a net-zero emissions trajectory through collaborative engagement with companies. The NZEI initiative complements ABN AMRO Investment Solutions' commitment to the NZAM initiative by ensuring effective engagement with beneficiary companies, resulting in more impactful results.

Engagement and voting actions are, when appropriate, combined to help reduce the impact of certain adverse impacts. To find out more, please refer to our Responsible Investment Policy and Shareholder Engagement Report⁵ published on our website.

References to international norms and standards

The proper application of international norms and standards by ABN AMRO Investment Solutions' investment portfolios is reviewed using information provided by our external data provider, Sustainalytics. There is a clear link between these standards and principles and the main negative impacts. The level of alignment of investments with these standards and principles will determine their inclusion or exclusion in investment portfolios (depending on their typology).

ABN AMRO Investment Solutions adheres to various international codes of conduct and standards directly or through its parent company ABN AMRO Bank N.V. More specifically, ABN AMRO Investment Solutions applies investment restrictions to its portfolios in companies that are not compliant with the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights. These international standards represent values related to work ethics including human rights, relations at work and in the company, the environment and corruption.

In addition, our Policy is aligned with the United Nations Principles of Responsible Investment (or "UN PRI").⁶

Historical Comparison

Indicators for Companies

Environment. We have seen an improvement in almost all indicators over the period. This reduction in their impact sends a positive signal about the contribution of our climate policy. Thus, for example, we observe a reduction in GHG emissions of -11% - 20% on carbon footprint and -20% on carbon intensity. The share of investments in companies without initiative to reduce their carbon emissions is also decreasing but appears relatively high in absolute terms. The methodology used to report on this indicator by ISS is quite strict because any company that has not set or committed to set carbon reduction targets approved by the SBTi⁷ will be considered at risk and counted in this indicator, even if its climate commitments would appear to be in line with the Paris climate agreement.

Social questions. We have observed a slight improvement in the ratio of women to men within the governance bodies of the investee companies over the period, reflecting the interest shown by companies in this subject. There is still progressed to be made to get closer to 50% parity. It should be noted that good practices in this area depend on national regulations. We can't comment the indicator related to the gender pay gap because of its low coverage rate, which is not very representative (< 15%).

Sovereign or supranational indicators

As the number of sovereign and supranational indicators is more limited, it seems less relevant to make a general comment on their evolution. However, we can highlight a slight decrease in carbon intensity (-1.4%) and a slight deterioration in the average human rights score over the period (i.e. -1.45 points; the 2 scores, close to 60, are nevertheless above the average of 50).

⁵ [stewardship-report-en.pdf](#)

⁶ For more details, please refer to our [Responsible Investment Policy](#).

⁷ <https://sciencebasedtargets.org/about-us>