Achmea's SRI Policy | Appendix C

Company and country exclusion policy

Appendix C: Company and country exclusion policy

Exclusion of companies and countries

Achmea does not invest directly in:

- Countries, companies and individuals that are on the NL terrorism sanctions list, EU sanctions list and the UN sanctions list.
- Companies that violate international standards on a structural basis, such as in the area of human rights. This concerns standards as stated in the principles of the UN Global Compact, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights.
- Companies that do not meet the requirements of good governance as set out in the SFDR. This concerns in particular:
  - Good management structures;
  - Relations with employees;
  - Remuneration of the personnel involved, and;
  - Compliance with tax legislation.
- Companies that participate directly or through a subsidiary in which > 50% is held or through a joint venture in which a controlling interest is held, focusing on development, testing, production, sale, trade and maintenance of nuclear weapons and weapons that are considered controversial by the Dutch government. Achmea considers weapons controversial if these weapons cause disproportionate suffering and victims and do not discriminate between civilian and military targets. Controversial weapons continue to cause many casualties and disrupt after the conflict economy and society. This includes nuclear, biological and chemical weapons, landmines and cluster munitions. See Table 1 for an overview.
- Countries where those in power systematically violate human rights and countries where non-proliferation treaty is being violated. The performance of the countries in the Freedom in the World index, the ITUC Global Rights index and the Corruption Perception Index as a starting point used in drawing up a country exclusion list.
- State-owned companies affiliated with countries excluded from investment. A company is considered a state-owned company if the state owns more than 50% of the shares.

Table 1: Exclusion criteria for controversial weapons

Weapons	Activities subject to the exclusion criteria
Nuclear weapons	• Development, testing, production, distribution and maintenance of nuclear munitions. • Development, production, distribution and maintenance of missiles used primarily for the delivery of nuclear munitions. • Development, production, distribution and maintenance of submarines equipped with ballistic missiles. Activities **not** subject to the exclusion criteria: Development, production, distribution and maintenance of launch platforms for conventional munitions that could also potentially deliver nuclear weapons transfer, such as bombers.
Chemical weapons	Development, production, distribution and maintenance of chemical weapons.
Biological weapons	Development, production, distribution and maintenance of biological and toxin weapons.
Anti-personnel mines	Development, production, distribution and maintenance of anti-personnel mines
Cluster munitions	Development of production and distribution of cluster munitions with unguided 'submunitions' without back-up self-destruct fuses (rockets, grenades, bombs, etc.) and essential components thereof. Development and production of unguided submunitions without back-up self-destruct fuses. Activities **not** subject to the exclusion criteria: Development, production and maintenance of launch platforms not only intended for cluster munitions, such as aircraft, artillery and rocket launchers.
White Phosphorus	Development, production, distribution and maintenance of white phosphorus weapons
Depleted uranium ammunition	Development, production, distribution and maintenance of depleted uranium ammunition.

- Companies that apply international standards on a structural basis violate, such as in the area of labour rights. This concerns standards as stated in the principles of the UN Global Compact, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights.
- Companies that structurally violate environmental standards based on the principles of the UN Global Compact and the OECD guidelines for multinational companies.
- Companies that produce tobacco or e-cigarettes (vapes) directly or through a subsidiary in which a > 50% interest is held or through a joint venture in which a controlling interest is held.

Achmea has a restrictive policy with regard to fossil fuels.

Companies are excluded from investment if more than 5% of a company's turnover comes from:

- From electricity generation from thermal coal (including brown coal, bituminous, anthracite and steam coal).

Companies are excluded from investment if more than 1% of a company's turnover comes from:

- From coal-related activities. The extraction of thermal coal and its sales to external parties are relevant in determining coal-related revenue. Revenue from Due to data limitations, coal trade is not yet included in this calculation.
- From the extraction of tar sand oil.
- From the extraction of shale gas and oil.
- From the extraction of oil and gas in the Arctic region.
- From the extraction of conventional oil and gas, unless one of the following conditions are met:
  - invest a growing share of their capital expenditures (CAPEX) in renewable energy:
  - at least 15% by 2025
  - at least 30% from 2026
  - at least 50% from 2030
  - a good combined TPI (Transition Pathway Initiative) have score:
  - Management Quality score 4 and
  - Carbon Performance Alignment score for 2035 and 2050 of less than 2 degrees
  - have an Implied Temperature Rise score that shows whether this companies operate in line with a 2 degree warming path or less.
  - be part of an ongoing engagement process with Achmea, and meet one of the above criteria before the end of 2026.

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