

# Appendix 2:

# Annex IV, SFDR

# periodic disclosure

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**

ASR Dutch Farmland Fund (the 'Fund')

**Legal entity identifier:**

724500Q41C88OY4A2N91

## Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

Yes

No

It made **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 made **sustainable investments with a social objective:** \_\_\_%

It promoted **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 0%<sup>1</sup> 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 promoted E/S characteristics, but **did not make any sustainable investments**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

<sup>1</sup> The Fund's investments are not eligible to the screening criteria for sustainable investments under the SFDR and EU Taxonomy.

**Sustainability indicators**

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

**To what extent were the environmental and/or social characteristics promoted by this financial product met?**




The Fund promotes various environmental and social characteristics which are set out in its ESG policy. The Fund's vision on Environment, Social and Governance (ESG) is to accommodate the interests of tenants and investors in the best possible way by managing a portfolio of assets that have long-term value from both a financial and a social perspective, and to achieve this in a sound and responsible manner, with engaged & aware partners and employees. To work towards these goals, the Fund has developed an Environment, Social and Governance (ESG) strategy around three themes:

1. Environmental           Dedicated to decarbonisation
2. Social:                 Making a positive impact on society
3. Governance:         Compliant with sustainability regulations

The Fund does not use a formal benchmark to compare its results with those of its peers.

## How did the sustainability indicators perform?

Table 8 ESG goals and results 2023




	Objective 2023	Realised 2023	
<b>Environmental</b>			
<b>Sustainable productivity and sustainable farmer's income</b>			
	Soil use - Portfolio contributes to food supply (% of portfolio)	≥ 80%	97.0%
	Soil quality - Tenant participation in 'Open bodemindex' (% of portfolio)	≥ 10%	16.2%
	Green leases for new ground lease agreements for arable farmers	≥ 60%	79.2%
	Green leases for new ground lease agreements for dairy farmers	≥ 90%	90.1%
	Green leases for existing agreements	≥ 10%	16.0%
	<b>Reduction in greenhouse gas emissions</b>		
	Carbon footprint (tons CO <sub>2</sub> -equivalent per hectare)	≤ 15.2	15.3
	Allocate suitable farmland for renewable energy (# of projects / year)	≥ 5	3
	Expand our emission reduction plan with nitrogen emissions and water quality	Design plan	Plan designed
	<b>Climate change adaptation and promotion of biodiversity</b>		
Climate adaptation - landscape elements (# of projects / year)	≥ 5	2	
Making agricultural land available for the development of sustainable initiatives and alternative crops (# hectares)	100	43	
Improve local biodiversity	Design plan	In progress	
<b>Social</b>			
<b>Community &amp; Tenants</b>			
	Tenant satisfaction	≥ 7.5 /10	7.6
	Active tenant participation programme (# of events / year)	≥ 2	3
	Facilitate young farmers (# of hectares new young farmers ground leases / year)	150	594
	Facilitate and publish agricultural confidence index (# of publications / year)	4	4
	<b>Our employees</b>		
	Employee satisfaction rating (eMood® score)	≥ 7.5	7.7
<b>Personal development</b>			
- Training (% of annual salaries)	≥ 1%	1.3%	
- Sustainable employability (% of annual salaries)	≥ 1%	1.0%	
Health & well being (eMood® vitality score)	≥ 7.5	7.6	
<b>Governance</b>			
	Alignment with sustainability guidelines	✓	✓
	- SDGs	✓	✓
	- SFDR article 8	✓	✓
	Sound business practices	✓	✓

### ... and compared to previous periods?

During 2022, the Fund has changed the structure in its sustainability indicators from 3P's (Planet, Partners and People) to ESG (Environmental, Social and Governance). However, the sustainability indicators itself have not been changed. The performance of some of the key sustainability indicators compared to the previous period (2022) are listed below.

The tenant participation in 'Open bodemindex' increased significantly in 2023 compared to 2022 (16.2% in 2023 vs. 8.2% in 2022) and well above the target of 10%. The Fund performed well above the target of facilitating young farmers to start their agricultural business (594 hectares in 2023 vs, 16 new clients in 2022). in 2023 vs, 7.4 in 2022).

Table 8 ESG goals and results 2022

		Objective 2022	Realised 2022
1 	<b>Planet</b>		
	<b>Sustainable productivity and sustainable farmer's income</b>		
	Soil quality - Tenant participation in 'Open bodemindex' (% of total hectares)	≥ 5%	8.2%
	Soil use - Portfolio contributes to food supply (% of portfolio)	≥ 80%	97.2%
	Green leases for new ground lease agreements	≥ 50%	50.0%
	Number of tenants that apply to the good agricultural principles (common agricultural policy European Union)	≥ 50%	84.0%
	<b>Reducing greenhouse gas emissions</b>		
	Paris proof roadmap	Design	In progress
	Allocate suitable farmland for renewable energy (# of projects, yearly)	≥ 5	4
	<b>Adapting and building resilience to climate change</b>		
	Transition roundabout (# of projects)	≥ 1	-
	Climate adaptation - landscape elements (# of projects, yearly)	≥ 5	3
2 	<b>Building long-term relationships with sustainable partners</b>		
	Tenant satisfaction	≥ 7.5 /10	7.4
	Active strategic partnership for sector development (# of partners)	≥ 2	2
	Facilitate young farmers to start their agricultural business based on conditions which lead to lower cash outflows (# young farmers)	≥ 5	16
	Active tenant participation programme (# of events, yearly)	≥ 2	1
3 	<b>People</b>		
	Employee satisfaction rating	≥ 94/100	91
	Personal development		
	- Training (% annual salaries)	≥ 1%	2.1%
	- Sustainable employability (% annual salaries)	≥ 1%	1.0%
	Health & Well being	Improvement of vitality score	7.4
	Diversity, Equity & Inclusion	Execute diversity, equity and inclusion policy	Improved Score in Denison Organizational Success Survey: 66 (2021: 48)
Sound business practises: implementation sustainability in risk control framework	Further implementation of SFDR	Compliant with current implementation targets	

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

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

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The Fund promotes one of the climate and environmental objectives as included in article 9 of the Taxonomy Regulation, being the objective 'climate mitigation'. The Fund promotes this objective in its underlying investments, by promoting the stabilization of greenhouse gas concentrations in the atmosphere at a level which prevents dangerous anthropogenic interference with the climate system consistent with the long-term temperature goal of the Paris Agreement.

The Fund has activities for which low-carbon alternatives are not yet available but is dedicated to measure, report on and reduce the emissions from the portfolio. The objectives as presented in the table above go beyond carbon emissions only. These strategic ESG objectives are part of every investment decision the Fund makes. The Fund's GHG intensity increased in 2023 with 0.8 tons CO<sub>2</sub>-equivalent per hectare. The GHG intensity figures are published on page 43 in the annual report.

● **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

The Fund does not significantly harm any other of the environmental objectives (i.e., climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems), for the following reasons: To ensure that the sustainable investment in which the Fund invests do not significant harm to any environmental or social objective, various environmental or social sustainability related subjects were monitored, more specifically the indicators for adverse impacts on sustainability factors applicable to rural real estate assets.

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

The Fund considered principal adverse impacts on sustainability factors as per its ESG Policy by measuring and monitoring the negative impact on sustainability factors. The adverse impact indicators on sustainability factors that we consider are aligned with the ESG Policy and strategic areas of interest and are chosen taking into account materiality, data quality and availability. The following principal adverse impacts are taken into consideration in this statement for investments in rural real estate assets:

i) **Exposure to fossil fuel through rural real estate assets**

The Fund considered principal adverse impacts on sustainability factors as per its ESG Policy by measuring and monitoring the negative impact on sustainability factors. The adverse impact indicators on sustainability factors that we consider are aligned with the ESG Policy and strategic areas of interest and are chosen taking into account materiality, data quality and availability. The following principal adverse impacts are taken into consideration in this statement for investments in rural real estate assets:

ii) **Greenhouse gas emission**

Coinciding with its Paris Proof target, the Fund has set the objective to reduce its GHG emissions, measured in tons of CO<sub>2</sub>-equivalent per hectare, achieving a significant reduction of GHG emission. The Fund has set ambitious objectives to reduce emissions in its portfolio, even more ambitious than the objectives mentioned in the national Climate Agreement for the agriculture sector as presented by the Dutch Ministry of Agriculture, Nature and Food Quality.

The Fund's GHG intensity increased in 2023 with 0.8 tons CO<sub>2</sub>-equivalent per hectare. The GHG intensity figures are published on page 43 in the annual report.

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

The Fund is committed to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. As such, a.s.r. real estate has implemented policies, processes and procedures to ensure alignment with aforementioned guidelines which are continuously improved.



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

The Fund considers principal adverse impacts on sustainability factors by drawing up its own annual ESG policy which sets out specific sustainability objectives, including the Fund's considered adverse impacts on sustainability factors. The Fund's principal adverse impacts on sustainability are disclosed on page 113 in the annual report.



**What were the top investments of this financial product?**

**Top investments of this financial product**

Largest investments <sup>1</sup>	Sector	% Assets	Country
Rural real estate	Farmland	100%	The Netherlands

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is:

<sup>1</sup> Please see page 31 in the Fund's annual report for the top 10 Assets



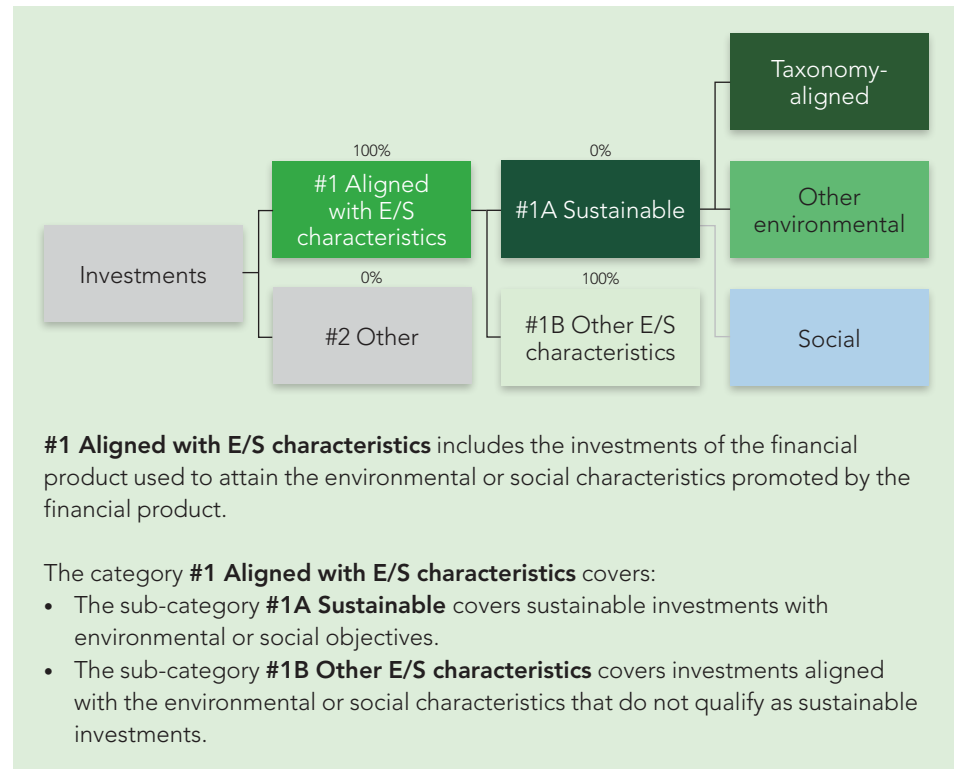
**What was the proportion of sustainability-related investments?**

All investments align with the E/S characteristics of the Fund.

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

**What was the asset allocation?**

The asset allocation of the Fund is 100% towards direct rural real estate assets. All assets of the Fund align with the E/S characteristics, since the Fund’s objectives apply to the entire portfolio. As at 31 December 2023, no distinction can be made between sustainable and other E/S characteristics under the SFDR using the PAI indicators. As at 31 December 2023, none of the Fund’s investments are eligible under the EU Taxonomy.



**In which economic sectors were the investments made?**

All of the Fund’s investments are in direct rural real estate.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the 'greenness' of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.

**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.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.



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

The current Delegated Act does not provide for any relevant technical screening criteria for the Fund. As soon as relevant technical screening criteria will be published with respect to the economic activities of the Fund, the relevant disclosures under this section will be updated to the extent relevant and required.

#### Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?

Yes

No

In fossil gas

In nuclear energy

#### What was the share of investments made in transitional and enabling activities?

The Fund has not set an objective for a minimum share of transition and enabling activities. However, the Fund's activities can be classified as transitional activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance. The Fund has set ambitious objectives to further reduce emissions in its portfolio, even more ambitious than the objectives mentioned in the national Climate Agreement for the agriculture sector as presented by the Dutch Ministry of Agriculture, Nature and Food Quality. With its green lease discount for farmers that meet our sustainability criteria, the Fund promotes the transition of the Dutch agriculture sector.

#### How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

Not applicable.



#### What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The current Delegated Act does not provide for any relevant technical screening criteria for the Fund. As soon as relevant technical screening criteria will be published with respect to the economic activities of the Fund, the relevant disclosures under this section will be updated to the extent relevant and required.



#### What was the share of socially sustainable investments?

The Fund has various social objectives for its portfolio. These objectives include the increase of tenant satisfaction & participation, facilitating of young farmers and employee development programs. The 2023 tenant satisfaction survey, which was held in the second quarter of 2023, revealed a number of areas in which there was room for improvement in tenant satisfaction and the quality of services provided by a.s.r. real estate and its contractors. The survey showed an average score of 7.6 out of 10, above the Fund's target of 7.5. Contributing to ground mobility and the continuity of the sector are important social objectives of the Fund. Our Young Farmer Ground Lease product contributes to achieving these objectives. In 2023, 37 new contracts were signed (594 hectares). All these new contracts include sustainability criteria.



<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.





**What investments were included under 'other', what was their purpose and were there any minimum environmental or social safeguards?**

None, as all the investments of the Fund are classified as investments that align with E/S characteristics.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

Please see the table under the question 'How did the sustainability indicators perform?' To see what actions have been taken to meet the environmental and social characteristics.



**How did this financial product perform compared to the reference benchmark?**

This question is not applicable, as no specific index has been designated as a reference benchmark.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.