



Artikel 10 statement |

ASR Euro Geldmarkt Fonds

LEI-code: 222100Z8Q4QUL1BN5A87

Jaarversie 2025

Inhoud

Toelichting financiële product	3
1. Samenvatting	3
2. Geen duurzame beleggingsdoelstelling	3
3. Ecologische- of sociale kenmerken van het financiële product	4
4. Beleggingsstrategie	5
5. Aandeel beleggingen	6
6. Monitoring ecologische of sociale kenmerken	6
7. Methodologieën voor ecologische of sociale kenmerken	6
8. Databronnen en Dataverwerking	7
9. Methodologische- en databeperkingen	8
10. Due diligence	8
11. Engagementbeleid	8
12. Aangewezen referentiebenchmark	8

Toelichting financiële product

Dit financiële product belegt volledig door in:

- AEAM Money Market Euro Fund (ISIN-code NL0010055695)

Meer informatie over dit fonds, inclusief de duurzaamheidskenmerken, is te vinden op de website van [a.s.r.](#) en [Aegon Asset Management](#).

1. Samenvatting

Deze sectie geeft een samenvatting van de 'Duurzaamheidsinformatie' die hierna in meer detail gegeven is.

Dit financiële product promoot ecologische of sociale (E/S) kenmerken, maar heeft geen duurzame beleggingsdoelstelling. Naast het toepassen van deze kenmerken, belegt het financiële product voor minimaal 0% van het belegde vermogen in duurzame beleggingen.

Voor de onderliggende beleggingen bij Aegon Asset Management verlangt AVB van Aegon Asset management (hierna: externe vermogensbeheerder) dat zij zich bij haar beleggingen inspent om zoveel mogelijk in lijn met het [Beleid voor Verantwoord Beleggen van ASR Vermogensbeheer N.V.](#) (hierna: 'verantwoord beleggingsbeleid van AVB') te beleggen.

2. Geen duurzame beleggingsdoelstelling

Heeft dit financiële product een duurzame beleggingsdoelstelling? Zo nee, worden er wel duurzame beleggingen gedaan?

Dit financiële product promoot ecologische/sociale (E/S) kenmerken, maar heeft geen duurzaam beleggingsdoelstelling. Minimaal 0% van het belegde vermogen wordt geïnvesteerd in duurzame beleggingen.

Hoe doen de duurzame beleggingen die het financiële product gedeeltelijk beoogt te doen, geen ernstige afbreuk aan ecologische of sociale duurzame beleggingsdoelstellingen? Hoe is hierin rekening gehouden met de indicatoren voor ongunstige effecten?

Om te voorkomen dat de beleggingen ernstige afbreuk doen aan ecologische of sociale duurzame beleggingsdoelstellingen wordt er rekening gehouden met de negatieve effecten die deze beleggingen ook kunnen hebben. Dit kan door middel van bijvoorbeeld uitsluitingen en/of actief aandeelhouderschap, maar ook door het meten van 'ongunstige effecten op duurzaamheidsfactoren' en het reduceren van deze effecten binnen de beleggingen. De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

This Fund avoids investing in companies we identify as having significant adverse impact on sustainability factors

including, but not limited to, climate change, biodiversity, human rights, and good health. The Fund does this by adhering to the exclusions list in the Aegon AM NL Sustainability Risks and Impacts Policy. In addition to the aforementioned exclusion policies, the fund also focuses on investments with a the best ESG Risk score for the majority of the portfolio deemed to satisfactorily promote environmental and/or social characteristics. The ESG Risk score is based on our internal methodology that categorises companies on a scale of 1 to 5, with a score of 1 being the best performer in a best in class approach.

Hoe zijn de duurzame beleggingen afgestemd op de OESO-richtlijnen voor multinationale ondernemingen en de leidende beginselen van de VN inzake het bedrijfsleven en mensenrechten?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

The Investment Manager is required to assess the good governance practices of issuers. It is expected that companies conduct their operations in accordance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles (UNGPs) on Business and Human Rights, and the UN Global Compact principles. To identify potential breaches of these norms, the corporate holdings of the portfolio are periodically screened using external specialized research, such as controversies, that indicate actual or potential breaches of international norms and standards. Please refer to the Aegon AM NL Sustainability Risks and Impacts Policy for further details of this process. In addition, material governance risks are systematically considered in our proprietary issuer research.

3. Ecologische of sociale kenmerken van het financiële product

Wat zijn de ecologische- en sociale kenmerken die het financiële product promoot?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

This Fund avoids investing in companies we identify as having significant adverse impact on sustainability factors including, but not limited to, climate change, biodiversity, human rights, and good health. The Fund does this by adhering to the exclusions list in the Aegon AM NL Sustainability Risks and Impacts Policy. In addition to the aforementioned exclusion policies, the fund also focuses on investments with a the best ESG Risk score for the majority of the portfolio deemed to satisfactorily promote environmental and/or social characteristics. The ESG Risk score is based on our internal methodology that categorises companies on a scale of 1 to 5, with a score of 1 being the best performer in a best in class approach.

4. Beleggingsstrategie

Welke beleggingsstrategie is er gebruikt om de ecologische- en sociale kenmerken van het financiële product te bereiken?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

The fund is a standard money market fund with a variable intrinsic value and can invest, directly or indirectly, in money market instruments denominated in euros and with a weighted average remaining time to maturity of up to one year. The investment process seeks, in the first place, to protect the capital and to add value by pursuing an active policy regarding duration and selection of countries, industries and individual money market instruments. The fund complies with the requirements set out in the Money Market Fund Regulations. The investment policy first aims to protect the assets and, in addition, outperform the benchmark which is 3 Month Euribor.

The strategy excludes a number of securities issued by entities identified according to a set of ESG exclusion criteria listed in the Aegon AM NL Sustainability Risks and Impacts Policy using the broadest available coverage universe from our specialist ESG data vendors. These entities form our Exclusion List and is updated annually. Therefore, key sustainability indicators to measure the attainment of the ESG characteristics this strategy promotes measure the share of investments in companies identified to be engaging in the excluded activities. A full list of these excluded activities and sustainability indicators can be found in the Aegon AM NL Sustainability Risks and Impacts Policy.

Second, the Investment Manager uses a proprietary methodology to assign an ESG risk category to each security, which are used as sustainability indicators. The proprietary methodology seeks to identify and assess ESG factors that are relevant to the issuers and the industries in which they operate. Those ESG factors are incorporated and integrated in the security selection, credit assessment and portfolio construction process. Based on this analysis, securities are assigned an ESG risk category, with 1 representing the lowest risk ESG category, and 5 representing the highest.

Wat is het beoordelingsbeleid voor praktijken op het gebied van goed bestuur van de ondernemingen waarin is belegd?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

The Investment Manager is required to assess the good governance practices of issuers. It is expected that companies conduct their operations in accordance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles (UNGP) on Business and Human Rights, and the UN Global Compact principles. To identify potential breaches of these norms, the corporate holdings of the portfolio are periodically screened using external specialized research, such as controversies, that indicate actual or potential breaches of international norms and standards. Please refer to the Aegon AM NL Sustainability Risks and Impacts Policy for further details of this process. In addition, material governance risks are systematically considered in our proprietary issuer research.

5. Aandeel beleggingen

Minimaal 0% van de beleggingen zullen duurzame beleggingen zijn. De beleggingen van dit financiële product zijn grotendeels afgestemd op E/S kenmerken. Overige beleggingen niet afgestemd op E/S kenmerken kunnen bestaan uit geldmiddelen, kasequivalenten en derivaten. Deze beleggingen wordt gebruikt voor diversificatiedoeleinden, efficiënt portefeuillebeheer en risicobeheer. Er bestaan geen ecologische of sociale minimumwaarborgen voor deze beleggingen. Verder worden er geen derivaten gebruikt voor de verwezenlijking van de ecologische of sociale kenmerken die dit financiële product promoot.

6. Monitoring ecologische of sociale kenmerken

Hoe worden de ecologische of sociale kenmerken, en de daarvoor gebruikte indicatoren, over de gehele levensduur van het financiële product gemonitord?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

The Investment Manager conducts annual screening of the broadest investment universe and utilizes third-party ESG data to determine which issuers breach the policy's exclusion and watch list criteria on an annual basis. These issuers are added to the exclusion and watch list. Exclusions are integrated in Portfolio Risk Control processes, with ex-ante controls and daily ex-post monitoring to ensure the Fund adheres to the list. The strategy is also implemented in the investment process by assessing the ESG risk category of the investment using the methodology described and assigning an ESG risk category to the investment. In case a security is downgraded and this causes a breach of the ESG risk category limits, the Investment Manager will re-position the portfolio to comply with the above limits. The ESG risk categories are integrated in Portfolio Risk Control processes with ex-post monitoring.

7. Methodologieën voor ecologische of sociale kenmerken

Welke methodologieën worden gebruikt om te meten hoe de door het financiële product gepromote ecologische of sociale kenmerken worden behaald?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

The strategy excludes a number of securities issued by entities identified according to a set of ESG Exclusion Criteria listed in the Aegon AM NL Sustainability Risks and Impacts Policy using the broadest available coverage universe from our specialist ESG data vendors. These entities are listed in the Exclusion List attached to the same policy, and is updated annually. Therefore, the key sustainability indicators to measure the attainment of the ESG characteristics this strategy promotes is the share of investments in companies and government-issued debt from countries identified to be engaging in the excluded activities. A full list of these excluded activities and sustainability indicators can be found in the Aegon AM NL Sustainability Risks and Impacts Policy.

In addition, the Investment Manager uses a proprietary methodology to assign an ESG risk category to each security, which are used as sustainability indicators. The proprietary methodology seeks to identify and assess ESG factors that

are relevant to the issuers and the industries in which they operate in. Those ESG factors are incorporated and integrated in the credit assessment and portfolio construction process. Based on this analysis, securities are assigned an ESG risk category, with 1 representing the lowest ESG risk, and 5 representing the highest risk. For more details on the indicators and thresholds used, please refer to the Fund investment policy.

8. Databronnen en dataverwerking

- Hoe worden de databronnen gebruikt om elk van de ecologische- of sociale kenmerken te bereiken die worden gepromoot door het financiële product?
- Welke maatregelen worden er genomen om de datakwaliteit te waarborgen?
- Hoe wordt de data verwerkt?
- Welk deel van de data wordt geschat?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

External ESG data providers, Sustainalytics and MSCI, have been selected as data sources to produce exclusion lists for the attainment of each of the environmental or social characteristics promoted by the financial product where that product is exclusion-based.

Data quality is monitored and ensured by the external provider chosen to deliver the data. Data quality is assessed and maintained across several dimensions as defined by each provider. These assurance processes are proprietary to the vendor and Aegon Asset Management has reviewed their reports concerning data quality and assurance. The external providers provide assurance that all commercially reasonable steps are undertaken to guarantee adherence to a quality framework. Upon the identification of data issues, data inaccuracies or technical/application defects, the error is to be investigated and resolved as per the vendor's incident management framework.

Aegon AM currently receives external ESG data via two delivery channels: via third party applications (Blackrock Aladdin, Bloomberg), as well as via the external vendors' own data portal. Access rights to third party systems are restricted in accordance with the relevant contractual agreements. Data downloaded directly from the vendor's own data portal is stored in internal locations with restricted access rights. Data in Aladdin is processed by applying an issuer transversal logic. It operates by taking each security in position and resolving it to the issuer it uses for ESG data inheritance per the defined asset resolution rollup. Once that issuer is defined, a check is performed by the system to confirm if that issuer has coverage for the measure requested. For exclusion-based strategies, exclusionary criteria assessments are performed based on Sustainalytics and MSCI data retrieved directly from the vendors' systems. We process this data by applying our own exclusion criteria to the raw data, in line with the applicable Sustainability Risks and Impacts Policy.

The proportion of estimated versus reported data will vary per each underlying data point needed for the calculation for that ESG metric. For certain metrics, external ESG data providers make available further information on the underlying data, indicating the source of the data: estimation based on a proprietary model or issuer disclosures. Additionally, data obtained from public sources may also be estimated to some extent.

9. Methodologische en databeperkingen

Wat zijn de mogelijke beperkingen aan de eerder genoemde methodologieën en data? Hoe zijn deze van invloed op de wijze waarop de ecologische of sociale kenmerken die door het financiële product worden gepromoot worden behaald?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

Where data is reported by issuers such as companies, data limitations are tied to availability of reported data by such issuers as well as the coverage of issuers by external ESG data providers. Where data is estimated, limitations are tied to the accuracy of the proprietary estimation methodologies of external ESG data providers.

10. Due diligence

Welke due diligence wordt uitgevoerd op de onderliggende activa van het financiële product (inclusief de interne en externe controles)?

De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

Aegon AM always maintains at least two ESG data providers and utilises multiple data metrics from their data sets for funds promoting ESG characteristics. This allows Aegon AM to compare different sources to allow sufficient certainty that the promoted ESG characteristics can be reasonably attained. The data used will be specific to each fund.

11. Engagementbeleid

Wat is het toegepaste engagementbeleid?

Voor een fonds in beheer bij een externe beheerder verlangt AVB dat deze externe beheerder zich inspannt om zo veel mogelijk in lijn met het verantwoord beleggingsbeleid van AVB te beleggen. De externe vermogensbeheerder heeft over dit thema de volgende informatie op zijn website opgenomen:

This Fund is subject to Aegon AM's Active Ownership Policy, which can be found at www.aegonam.com. For a description of procedures applicable to sustainability related controversies in investee companies for this Fund, we refer to the Sustainability Risks and Impact Policy as referred to in section (d) Investment strategy.

12. Aangewezen referentiebenchmark

Is er een index aangewezen als referentiebenchmark om te voldoen aan de ecologische- of sociale kenmerken gepromoot door het financiële product?

Niet van toepassing.