



ASR Renewable  
Infrastructure Debt Fund  
Annual report 2023

## General information

# ASR Renewable Infrastructure Debt Fund

### Supervisory Board

Mr. B. Vliegthart (chairman)

Mr. R.M.W.J. Beetsma

Mr. O.J. Labe

### Office address of the Manager

ASR Vermogensbeheer N.V.

Archimedeslaan 10

3584 BA Utrecht

Website: [www.asrvermogensbeheer.nl](http://www.asrvermogensbeheer.nl)

Commercial Register of the Chamber of Commerce in Utrecht, number 30227237

### Board of the Manager

Mr. P. Klijnsmit

Mr. M.R. Lavooi

Mrs. J.H.L. de Jong-Kortman

### Legal owner of the investments

Stichting Juridisch Eigenaar ASR Renewable Infrastructure Debt

Archimedeslaan 10

3584 BA Utrecht

### Depositary

BNP Paribas S.A., Netherlands branch

Herengracht 595

1017 CE Amsterdam

### External Auditor

KPMG Accountants N.V.

Papendorpseweg 83

3528 BJ Utrecht

### Legal Advisor of the Manager

NautaDutilh N.V.

Beethovenstraat 400

1082 PR Amsterdam

### Date of incorporation

28 December 2022

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# Management Board report

## General

ASR Vermogensbeheer N.V. (hereinafter referred to as 'a.s.r. vermogensbeheer' or 'the Manager') is the AIF (Alternative Investment Fund) manager of the ASR Renewable Infrastructure Debt Fund (the 'Fund'). a.s.r. vermogensbeheer has its registered office in Utrecht and is listed in the Commercial Register of the Chamber of Commerce in Utrecht under number 30227237. a.s.r. vermogensbeheer is wholly owned by ASR Nederland N.V. (hereinafter referred to as 'a.s.r.' or 'ASR Nederland'). a.s.r. vermogensbeheer does not employ any staff members. All activities are carried out by employees of ASR Nederland.

### Management of investment institutions (collective asset management) – AIFM license

a.s.r. vermogensbeheer holds a license as manager of alternative investment institutions as referred to in Section 2:65 (1) (a) of the Financial Supervision Act (Wet op het financieel toezicht, "Wft"). This relates to the license under the AIFMD (Alternative Investment Fund Managers Directive). Pursuant to Section 1: 102, paragraph 2, of the Wft, the scope of the license is limited to the offering of participations in:

- investment institutions that invest in financial instruments; and
- investment institutions that invest in mortgage claims;
- investment institutions that invest in private loans (non-tradeable bonds or other non-tradeable debt instruments).

Under this license, a.s.r. vermogensbeheer acts as the manager of amongst other the following alternative investment institutions: ASR Duurzaam Amerikaanse Aandelen Fonds, ASR Vooruit Mixfondsen, ASR ESG IndexPlus Institutionele Fondsen, ASR ESG IndexPlus Fondsen, ASR Mortgage Fund, ASR Separate Account Mortgage Fund, ASR Private Debt Fund I, ASR Renewable Infrastructure Debt Fund, ASR Kapitaalmarkt Fonds, ASR Duurzaam Institutioneel Vermogensbeheer Beleggingsfondsen, ASR Wereldwijd Impact Aandelen Fonds, First Liability Matching N.V. and the Luxembourg alternative investment fund ASR Fonds SICAV ('Société d'investissement à Capital Variable').

The license of a.s.r. vermogensbeheer has been extended with a license to manage or offer money market funds (MMFs), on the basis of Article 4 of the Money Market Fund Regulation (MMFR).

a.s.r. vermogensbeheer also acts as the manager of a number of investment funds which are not subject to a license obligation. Pursuant to Section 1:13a (1) (g) of the Wft, the management of these investment vehicles is exempt from the obligations set out in the Wft and derived regulations, and the management is therefore not subject to supervision by the Dutch Authority for the Financial Markets (AFM). These are investment funds in which group companies of ASR Nederland N.V. invest, such as ASR Pensioen Mixfondsen, ASR Pensioen Staatsobligatiefonds 15+ Jaar, ASR Pensioen Staatsobligatiefonds 10-15 Jaar, ASR Pensioen Staatsobligatiefonds 20+ Jaar, ASR Beleggingsmixfondsen, ASR Beleggingspools, ASR Basisfondsen, ASR Paraplufonds, ASR Duurzaam Wereldwijd Aandelen Fonds and ASR Duurzaam Azië Aandelen Fonds.

### Providing investment services (amongst other individual asset management)

Pursuant to Section 2:67a(2), paragraphs (a), (b) and (d), of the Financial Supervision Act (Wft), a.s.r. vermogensbeheer is also permitted to offer the following investment services to both professional and non-professional investors:

- (a) Managing individual assets;
- (b) Providing investment advice on financial instruments;
- (d) Receiving and forwarding orders with regard to financial instruments.

These services are regulated in the Wft and the MiFID II (Markets In Financial Instruments Directive). On this basis, a.s.r. vermogensbeheer acts as an individual asset manager on behalf of the group companies of ASR Nederland N.V., such as entities subject to supervision and for third parties with external mandates.

## Profile

### Structure of the Fund

ASR Renewable Infrastructure Debt Fund (hereinafter "the Fund") is classified as an Alternative Investment Fund (AIF) and was established on 28 December 2022. The Fund is structured as a closed-end tax transparent fund and is formed for an indefinite period of time. The Fund is open to Professional Investors only.

The ASR Renewable Infrastructure Debt Fund is a financial product that has a sustainable investment objective. As such, it is classified as an Article 9 product under the Sustainable Finance Disclosure Regulation (SFDR).

### Investment objective and philosophy of the Fund

The Fund offers Participants the opportunity to invest in Renewable Infrastructure Loans, which are offered to project companies based in selected European jurisdictions and the United Kingdom, active in the business of constructing and/or operating renewable energy infrastructure projects and/or any related business that are aimed at or contribute to the 'energy transition' that meet all criteria and standards under the Taxonomy Regulation. This includes, among others, projects regarding offshore and onshore wind, solar and/or hydrogen and (battery) storage. The Fund offers the possibility to diversify investment portfolios given the generally low correlation of renewable infrastructure debt investments with traditional asset classes and therefore allows Participants to enhance the risk return profile of their overall investment portfolio. The Fund allows Participants to actively contribute to the energy transition away from fossil fuel in a scalable manner.

The Fund applies the ESG Policy and the requirements of Annex 5 (refer to the Information Memorandum) to contribute to the objectives of the Paris Climate Agreement by aiming to invest exclusively in projects that as far as reasonably possible support the energy transition and the objectives of the EU Green Deal. To achieve the investment objective, the Renewable Infrastructure Loans in which the Fund invests have amongst other the following characteristics at origination:

- The Fund will invest in Renewable Infrastructure Loans which are granted (i) to companies with registered office in, and/or (ii) in relation to projects located in The Netherlands, Belgium, Luxembourg, Germany, Italy, France, Denmark, Finland, Ireland, Austria, Spain, the United Kingdom, Sweden, Liechtenstein, Norway and Switzerland.
- The Fund invests in Renewable Infrastructure Loans granted to companies operating in a range of renewable energy technologies including but not limited to: on- and offshore wind, solar generation and new technologies such as (battery) storage, hydrogen, floating offshore wind.
- The Fund invests in Renewable Infrastructure Loans denominated in Euro only.
- The Fund invests in Renewable Infrastructure Loans that are not in arrears at the time of investment.
- The Fund aims to invest in fully drawn facilities, provided, however that the Fund may invest from time to time in facilities including ancillary facilities that have an undrawn nature.
- At least 90 percent of the aggregate principal amount of Renewable Infrastructure Loans in which the Fund invests will at the time of investment by the Fund be ranked as the most senior loan(s) to the project company.
- Maximum 10 percent of the aggregate principal amount of Renewable Infrastructure Loans in which the Fund invests will at the time of investment by the Fund be junior or mezzanine loans.
- The Fund intends to hold each investment until the maturity date.
- The maximum weighted average life of the portfolio of Renewable Infrastructure Loans shall be 12 years.
- The Fund will predominantly invest in Renewable Infrastructure Loans with floating interest rates.
- The Fund may invest in amortising, sculpted or fixed loan repayment structure. The Fund may invest in Renewable Infrastructure Loans that may be prepaid by borrowers without make whole.
- The Fund shall target a minimum investment of twenty million euro (EUR 20,000,000) and maximum of one-hundred and fifty million euro (EUR 150,000,000) per Renewable Infrastructure Loan.
- The aim is to construct a diversified portfolio for the Fund, with at least seven different borrowers, whereby borrowers who are Affiliates are counted as one borrower, measured from the second anniversary of the Fund Launch, except when in certain circumstances, seven different borrowers may not be achievable.
- The Fund will invest in Renewable Energy Loans to borrowers located in Spain and Italy for a maximum aggregate percentage of 25% of the Fund's size.

**Manager and Legal Owner**

The Fund has a Manager and a Legal Owner. The Manager of the Fund is a.s.r. vermogensbeheer. a.s.r. vermogensbeheer holds a license issued by the Dutch Authority for the Financial Markets ('AFM') as referred to in Section 2:65 and 2:67a, paragraph 2(a), (b) and (d) of the Financial Supervision Act (Wet op het financieel toezicht).

The Legal Owner of the Fund is Stichting Juridisch Eigenaar ASR Renewable Infrastructure Debt Fund. The Legal Owner has its registered office in Utrecht and is registered in the Commercial Register of the Chamber of Commerce under number 87583925.

The relationship between the Manager and the Legal Owner is set out in an agreement ('Agreement of Management and Custody'). This agreement governs the appointment of the Manager and determines the conditions under which the Manager is charged with the management of the Fund's assets.

**Depositary**

BNP Paribas S.A., Netherlands branch has been appointed Depositary of the Fund. The Depositary is an entity subject to regulatory supervision whose legal responsibilities include monitoring cash flows, complying with investment policy and verifying the ownership of the financial assets within the Fund.

**Alternative Investment Fund Managers Directive (AIFMD)**

a.s.r. vermogensbeheer holds an AIFMD license and meets the requirements applicable to an AIFM, a more detailed description of which can be found in the report of the Manager. These requirements include the appointment of an independent depositary and having a risk management policy, a conflict of interest policy, an outsourcing policy, a remuneration policy (see also [www.asr.nl](http://www.asr.nl)) and a fund assets valuation policy. The requirements also relate to the annual reporting and capital requirements for the Manager and the Depositary.

**Investment committee**

If an Investment Committee is installed (after the minimum threshold regarding the number of Participants is reached), the following acts of the Manager require the prior written approval of the Investment Committee:

- (a) credit approvals exceeding the amount of EUR 75 million (seventy-five million euro);
- (b) commencement of a material litigation;
- (c) transactions or agreements which involve a conflict of interest on the part of either the Manager or any of its Affiliates, or a Participant.

As at 31 December 2023, the minimum threshold is not reached.

**Supervisory Board**

The Fund has a Supervisory Board. The Supervisory Board is responsible for supervising the Manager's policy and performance of tasks and the general state of affairs within the Fund. The Supervisory Board is also charged with supervising compliance by the Manager with the Fund Governance Code and advises the Manager. The Supervisory Board's tasks and activities are set out in the Fund Conditions and the Supervisory Board regulations as referred to in Article 19 of the Fund Conditions. In fulfilling their duties, the members of the Supervisory Board will focus on the interest of the Fund and the collective interests of all participants in the Fund.

**Meetings of participants**

A Meeting of Participants is held at least once a year, subject to the relevant provisions of the Information Memorandum.

**Distribution of interest income and repayments**

The Fund Manager shall, where possible, distribute the Distributable Interest (Interest and fees that the Fund receives minus the fees paid and other costs and charges) of the preceding month to the Participants, in proportion to the Participations they hold in the Fund on the last day of the preceding calendar month. The Distributable Repayments (including repayments on loans) are used for re-investing, unless a Participant chooses to use its pro rata share of the Distributable Repayments for redemption or has requested the Fund Manager to exit the Fund.

**Costs and fees**

The Fund does not charge any costs for the issue and redemption of Participations. The Manager charges the following fees:

- a yearly Management Fee of 0.35% of the yearly average of the Net Asset Value;
- a yearly Servicing Fee of 0.05% of the yearly average of the Net Asset Value;
- an Upfront Management Fee of 50% of the net upfront fees received by the Fund in connection with a new investment in a Renewable Infrastructure Loan.

Besides, the following costs shall be paid out of the Fund Assets: investment expenses, such as transaction fees, purchase fees, special situation expenses, costs for external legal consults, negative interest payable, costs of funding (short term working capital and/or temporary overdraft, expert advisor costs incurred by the Fund Manager related to an impaired Renewable Infrastructure Loan and which cannot be charged to the relevant creditor.

**Transactions with related parties**

Where transactions are conducted with parties related to ASR Nederland, they will take place on the basis of conditions in line with the market. Where such transactions take place outside a regulated market, they will be carried out on an arm's length basis. If the transaction with a related party involves the issue and/or purchase of participation rights in an investment institution, the consideration will be calculated in the same way as for any other participant. In that case, an independent value assessment will not take place.

**Available documentation**

The articles of association of the Manager and the Depositary are available for inspection at the offices of the Manager. A copy of the Manager's license and of the Articles of Association can be obtained free of charge. Current information about the Fund, as well as the Information Memorandum, the annual report and the semi-annual report can be obtained from the Manager free of charge upon written request. This information will also be published on the Manager's website.

**Complaints**

Complaints may be submitted in writing to the Manager at the following address.

ASR Vermogensbeheer N.V.  
Archimedeslaan 10  
3584 BA Utrecht  
The Netherlands

The Manager is registered with the Netherlands Financial Services Complaints Tribunal (KiFiD).



## Report of the Manager

### Key figures

During 2023, the ASR Renewable Infrastructure Debt Fund's Net Assets increased to €232 million. This increase was mainly due to new loans provided. Refer to section 'return and portfolio policy' for a description of the developments within the portfolio.

## Developments affecting the Fund during the reporting period

### *Transfer of fund activities to Aegon Asset Management*

In October 2022, ASR Nederland and Aegon N.V. (hereinafter 'Aegon') announced that a.s.r. would take over Aegon's Dutch operations. This transaction is completed on 4 July 2023. The agreements made between the two parties include a long-term agreement between a.s.r. vermogensbeheer and Aegon Asset Management (hereinafter 'Aegon AM') to the effect that, among other things, the investment portfolios relating to the Dutch operations will come under the management of a.s.r. vermogensbeheer, while the management of the ASR (Separate Account) Mortgage Fund, ASR Private Debt Fund I and ASR Renewable Infrastructure Debt Fund will be transferred to Aegon AM. The intended date of transfer of these investment funds is 1 July 2024. The current governance of the Fund will be maintained as much as possible. The expected changes after 1 July 2024 are mainly focused on positions of a number of parties involved (such as fund manager, auditor, depository and administrator).

## Risk management

### Manager's risk structure

Risk management is the continuous and systematic risk monitoring of the organization and its activities in order to consciously take risks, reduce the likelihood of risks materializing or limit the consequences of such events. The objectives are controlled and ethical business practices, compliance with the laws and regulations and to act in the interest of the Participants. The key to this is ensuring that the main risks that affect management are identified and clarified so that appropriate management measures can be taken and the effectiveness of these measures can be monitored.

In order to comply with article 15, paragraph 1 of the AIFMD, a distinction has been made for the functional and hierarchical relationships between the risk management of funds and the risk management of a.s.r. vermogensbeheer. The director responsible for risk management at a.s.r. vermogensbeheer reports on risk management in relation to funds subject to supervision directly to the CEO (Chief Executive Officer) of ASR Nederland N.V. The risk management of a.s.r. vermogensbeheer complies with the Risk Charter that applies within ASR Nederland N.V. In accordance with the Risk Charter, a.s.r. vermogensbeheer reports for the risk management of a.s.r. vermogensbeheer to the CFO (Chief Financial Officer) of ASR Nederland N.V., via the Manager's CFRO (Chief Financial and Risk Officer) and ASR Nederland N.V.'s Finance & Risk director.

a.s.r. vermogensbeheer applies the 'Three lines of defense' model as its risk management model. This model clearly sets out the responsibilities in relation to risk management. The business units within the first line of defense are responsible for the adequate management of the risks related to the business operations in the relevant business unit. The second line of defense is responsible for implementing an integrated and effective risk management framework for the first line of defense and monitoring risk management. The second line of defense is formed at ASR Nederland N.V. level and consists of the Group Risk Management division and the Integrity division (including Compliance). The Audit division forms the third line of defense and is responsible for independently assessing the effectiveness of the risk management system, the internal control structure and the soundness of the governance structure.

**Risk management**

The Manager uses a system of risk management measures to ensure that the Fund continuously comply with the requirements set out in the Fund Conditions and in the legal frameworks.

The Fund is sensitive to market movements in general (market risk), as well as to fluctuations in the interest rate risk, liquidity risk and credit risk. However, the maximum loss for Participants is limited to the value of the Participations they hold. The main risks involved in investing in the Fund are described in the following table. An overview of all risk factors can be found in section 9 of the Information Memorandum.

Defined risk	Explanation and mitigating measures
Credit risk	<p>The Fund is largely exposed to the borrower’s creditworthiness (credit risk). Credit risk is defined as the risk that a borrower will fail to meet its contractual obligations in accordance with agreed terms of the loan at any time during the term of the loan i.e. defaulting on interest and or repayment obligations, breaching financial covenants and other liabilities.</p> <p>This risk is managed by a credit approval process, in which a credit analysis is carried out and approval of the Credit Committee is needed before the loan can be acquired. If the investment concerns an investment amount in excess of EUR 75 million, approval from the Fund’s Investment Committee is needed. Before the Investment Committee is installed, the Fund cannot acquire loans in excess of EUR 75 million.</p>
Sustainability risk	<p>The creditworthiness of the Renewable Infrastructure Loans in the Fund may be affected by a range of sustainability risks, including climate change. Given the nature of the Fund’s investments which are driven by renewable energy generating capacity, sustainability risks are key risk factors assessed during the credit analysis and approval process by the Fund Manager. Structural changes in wind patterns and solar hours may have a profound effect on the yield and creditworthiness of the Fund Assets. In addition, effects of climate change (including hail, hurricane, flooding and increased sea level) may have an impact on the borrowers’ assets, which may or may not be covered by insurance. Sustainability risks may as such affect the value of the Fund’s Assets and as a result, may result in a lower return for the Participants</p>
Counterparty risk	<p>Counterparty risk is the risk that business will be conducted with an unreliable or uncreditworthy party. Customer due diligence procedures and measures apply for the purpose of managing this risk. The aim of these customer due diligence procedures and measures is to manage financial and/or non-financial losses resulting from the acceptance of potentially undesirable participants and transaction parties.</p>
Concentration risk	<p>The Fund contains a limited number of investments and there may be a concentration of loans to companies in the same industry, while some sectors are completely excluded. As a result, the performance of a number of investments or a particular industry can affect the total fund return. To (partially) mitigate the concentration risk, limits are set in place by the Manager on exposures to single borrowers or sectors as described in the Investment Policy.</p>
Liquidity risk	<p>Liquidity risk is the risk that the Fund will not be able to obtain the financial resources required to meet its obligations on time, and the risk that Participants will not have sufficient opportunity to withdraw from the Fund within a reasonable timeframe. The Fund invests in Renewable Infrastructure Loans which are not tradeable by nature and therefore there is no (or very limited) liquidity. Redemption will primarily take place through the distribution of Distributable Repayments available to the Fund. Participants cannot rely on any other form of exit except at the discretion of the Fund Manager and the availability of liquidity.</p> <p>The Participations are non-transferable and will in principle not be redeemed. Participants may exit the Fund by requesting the Manager to redeem their Participations, but the Manager is not obliged to grant a redemption request. This entails that redemption may not be possible or be possible only to a very limited extent.</p>

Defined risk	Explanation and mitigating measures
Operational risk	Operational risk is the risk that errors will not be identified timely or that fraud may occur due to failing or inadequate internal processes, human error or system limitations, and unexpected external events. The Manager has a system that involves monitoring procedures, measuring defined constraints and identifying where limits have been exceeded to allow swift and appropriate action and risk mitigation. An escalation procedure is available as an additional tool for the rapid resolution of situations where limits have been exceeded.
Interest-rate risk	The interest rate on the loans is mainly based on the risk-free floating interest rate plus a margin for credit risk. With a rising (declining) interest rate, the return on the loans therefore increases (decreases). However, the return on fixed rate loans has a negative correlation with the interest movement. Holding fixed rate loans in the Fund increases interest rate sensitivity hence increasing the duration of the Fund.
Prepayment risk	<p>The performance of the Fund may be affected by early redemption on loans. The Renewable Infrastructure Loans can be redeemed or called before the legal term. The degree to which loans are repaid early is influenced by changes in interest rates or a variety of economic, geographic and other factors over which the Manager has no control. The amount of early redemptions cannot be predicted.</p> <p>Prepayment risk can be (partially) mitigated if a penalty provision is attached to a loan, whereby the borrower must make a payment to the lender in an amount that the lender will forgo if the borrower pays the loan off early. The penalty clause, which benefits the Fund’s return, may not compensate the Fund completely for the missed return.</p>
Valuation risk	In the absence of a liquid market for Renewable Infrastructure Loans, the fair value of the individual Fund Assets will be determined in accordance with the Valuation Method. Although the Valuation Method is in conformity with market standards and is periodically reviewed by the Manager, there is a risk of the Net Asset Value being calculated incorrectly by the Manager.

Table 1: main risks

No limits were exceeded and no incidents occurred in the reporting period that have had a material impact on the Fund. Furthermore, no significant changes or improvements to the risk management system were required.

One of the purposes of the annual report is to provide an insight into the risks that have materialized during the reporting period. The best way to obtain this insight is by reviewing this risk section in conjunction with the risk management paragraph as included in Section ‘ASR Renewable Infrastructure Debt Fund’, which provides more detailed information on the specific portfolio risks.

**Fund governance and policy regarding conflicts of interest**

In order to provide the Participants with guarantees that the management of the Fund will be carried out in a controlled and ethical manner and that the services will be provided with due care as referred to in the Wft, the Manager has drawn up a code of conduct. This code of conduct has the aim of ensuring that the Manager acts in the interests of the participants in its investment funds and structures the organization of the Manager in a way that prevents conflicts of interest.

An important part of fund governance is the presence of a Supervisory Board that supervises the management of the Dutch AIFMD investment funds by the Manager. This supervisory body has the task of monitoring compliance by the Manager with its obligation to act in the interests of the participants in its investment funds.

In addition, the Manager has drawn up a policy regarding conflicts of interest for all its activities. The principles underlying the policy are the avoidance and management of conflicts of interest that could be disadvantageous to clients of the Manager, and the equal and fair treatment of clients.

The Fund Governance Code and the conflict of interest policy can be found on the Manager’s Website.

**Personnel**

The Manager does not employ any personnel. As at 31 December 2023 204 employees and 198 FTEs were subcontracted by a.s.r. vermogensbeheer pursuant to an employee loan agreement with ASR Nederland N.V. The personnel expenses, which are charged to a.s.r. vermogensbeheer consist entirely of fixed remuneration (AIFMD Article 22, paragraph 2 e). The Manager does not share in the investment performance as remuneration for the management of the investment funds, hence there is no question of 'carried interest' (the share of the profit of the Fund intended for the Manager of the Fund as remuneration for the management).

The table below includes the total remuneration with regard to the employees loaned by the Manager (numbers according to the end of the reporting period position). Allocation of these amounts to the Fund is not possible since relevant information is not available. Further information about the remuneration policy is included on the website ([www.asr.nl](http://www.asr.nl)).

Personnel expenses (in euros)	01-01-2023 to 31-12-2023	No. of employees
Identified Staff	3,262,092	8*
Employees	28,964,242	196
<b>Total</b>	<b>32,226,334</b>	<b>204</b>

\* The Identified Staff per December 31, 2023 exists out of three Management Board members and five Identified Staff members.

## Sustainability policy

### a.s.r. as a sustainable investor

This section describes a.s.r.'s approach to sustainable investing. It explains how a.s.r. deals with its own investments, and also how a.s.r. vermogensbeheer addresses sustainability in its fund management activities. The following section is not specific to the Fund.

Since 2007 a.s.r. has employed a formally approved investment policy that is applied to all investments, both own investments and investments for third parties. This policy has been further tightened in subsequent years and is reviewed annually, or more frequently if necessary. The investment policy focuses on sustainable and responsible investing, as well as impact investing. A regular update on this is given in our quarterly reports on sustainable investments.

All investments managed by a.s.r. vermogensbeheer are screened using our Socially Responsible Investment (SRI) policy (see [www.asrvermogensbeheer.nl](http://www.asrvermogensbeheer.nl)) for social and environmental aspects and management criteria, etc. Countries and companies that do not meet the requirements are excluded. These include producers of controversial or conventional weapons and tobacco, the gambling industry, companies that extract coal and companies that derive most of their profits from unconventional oil and gas, the production of coal-fired electricity and nuclear energy.

In addition, a.s.r. assesses companies on their compliance with international agreements such as the OECD guidelines and UN guidelines such as the Global Compact.

a.s.r. ensures full compliance with its own SRI policy for both investments in its own funds and direct investments in equities and bonds, through implementation of this SRI policy by its internal investment departments, its internal compliance process and independent external assurance from Forum Ethibel.

Regarding funds managed by an external manager, a.s.r. requires the external managers of these investment funds to strive to invest in line with a.s.r.'s sustainability policy as far as possible. a.s.r.'s aim in this respect is that these investment funds should invest in line with the United Nations Principles for Responsible Investment (UN PRI), the United Nations Global Compact (UN GC) and standards defined by the Dutch Association of Insurers relating to the exclusion of investments in controversial weapons.

a.s.r.'s investment policy is forward-looking and sustainability is an essential part of the strategy. a.s.r. believes that the integration of sustainability factors in the management of its investments contributes directly to the reduction of risks (both financial and reputational) and has a positive impact on long-term performance. The SRI policy of a.s.r. is embedded in internal investment practice in the following ways:

### Exclusion criteria for countries and companies

a.s.r. applies a strict exclusions policy for controversial activities and controversial behaviour, which applies to all internally managed portfolios, both for its own investments and investments for third parties. Twice a year, a.s.r. publishes a revised list of excluded companies and once a year a revised list of excluded countries ([www.asrvermogensbeheer.nl](http://www.asrvermogensbeheer.nl)).

### ESG integration / best-in-class investments

Our portfolios are at minimum characterized by above average ESG scores. Companies are analyzed on a large number of ESG criteria taking into account the materiality for the respective sector/industry. The overall ESG score allows us to identify the best ESG scoring companies on a certain sector. The ESG screening is carried out using external data suppliers where ESG themes such as the following ones are analyzed:

- Environment;
  - Strategic management of environmental risks including loss of biodiversity and the use of water;
  - (Forward looking) Carbon data;
- Labor Rights / Human Resources;
- Human Rights & Community Involvement;
- Corporate Governance & Ethical Behavior.

This is implemented at the level of the individual fund (and subfunds if applicable).

### Climate and energy transition

The 'climate change and energy transition' theme has been an explicit part of a.s.r.'s investment policy since 2016. a.s.r. has analysed the risks for its own investment portfolio in two ways: both bottom-up – taking account of stranded assets and changing business models in, for example, the mining and energy sectors – and top-down, in the Strategic Asset Allocation (SAA) based on climate scenarios.

a.s.r. has set the following CO2 reduction targets: 65% reduction in 2030 compared to base year 2015 for the most important asset classes for own account (equities, corporate bonds and government bonds, real estate and mortgages). As well as preventing negative impact, a.s.r. aims to make a positive contribution to the energy transition. To this end, a.s.r. will increase the current impact investing exposure to a total of €4.5 billion in 2024. This budget may also be allocated to other sustainability themes important to a.s.r., such as health, vitality, inclusion and financial self-sufficiency. We are currently evaluating how these targets can be adjusted by consolidating the Aegon investments. In addition, a.s.r. has developed and implemented a strategy to further scale back investments in the fossil sector in three phases during the period 2022-2024.

In 2023, a.s.r. vermogensbeheer continued with phase 2 of its Fossil Exit Strategy. We are in discussions with the remaining conventional oil and gas companies in our portfolios to gain insight into whether these companies have robust and ambitious plans to become 'Paris-aligned'. In addition, we have made a start with phase 3, which focuses on the biggest emitters and companies further along in the fossil chain. We expect these companies to likewise have robust and ambitious plans to achieve alignment with the Paris climate goals.

### Recognition for a.s.r.'s responsible investment policy

A study conducted by the Dutch Association of Investors for Sustainable Development (VBDO) found that a.s.r., was 'leading' on the issue of biodiversity and working conditions in supply chains. VBDO published its findings for the 2023 Annual General Meetings season at the end of June. a.s.r.'s biodiversity strategy and targets are cited as examples to follow in the sector.

### Reporting under the EU Transparency Regulation ('SFDR')

The above text describes the sustainability policy generally applied by the Manager. It also applies to investments made by a.s.r. for its own account. The way the Manager implements its sustainability policy differs for each fund under its management. A detailed account of the sustainability performance achieved by the Fund is presented in Appendix 2.

### The ESG policy of the ASR Renewable Infrastructure Debt Fund

ASR Nederland's sustainability policy (the SRI Policy) contains the criteria and standards for various sustainability topics. This policy is continuously amended on the basis of new insights and expectations. The Fund invests exclusively in projects that are aligned – at minimum – with the climate change mitigation criteria and thresholds under the EU Taxonomy for Sustainable Activities.

Part of the Fund's investment selection process are the following criteria:

- The Fund's investment policy is to make, hold and manage investments in Renewable Infrastructure Loans that meet criteria and standards under the EU Taxonomy Regulation.
- The Fund invests in Renewable Infrastructure Loans granted to companies operating in a range of renewable energy technologies including but not limited to: on- and offshore wind, solar generation and new technologies such as battery storage, hydrogen, floating offshore wind.
- The Fund applies the SRI Policy to contribute to the objectives of the Paris Climate Agreement by investing exclusively in projects that support the energy transition and the objectives of the EU Green Deal.

The Fund Manager selects investments based on the investable universe as defined in the Fund Manager's sustainability policy ("SRI Policy") and the EU Taxonomy for Sustainable Activities. In adherence to the requirements under the EU Taxonomy for Sustainable Activities the Fund will also comply with the "Do No Significant Harm" (DNSH) principle and applicable Minimum Social Safeguards. In order to comply with the relevant principle adverse impact indicators the Fund Manager sends out a questionnaire about the fulfilment of the relevant principle adverse impact indicators to all projects (the Borrowers) in Renewable Infrastructure Loans projects before it grants a loan. After a positive assessment has been done a loan can be granted.

## Market developments and outlook

### Economic developments in 2023

With growth of around 3%, the global economy fared slightly better in 2023 than expected a year ago. This was mainly due to the US economy, which performed significantly better than expected. In the US, consumer spending remained at a high level, helped by COVID-19 savings and historically low unemployment. In addition, high government spending, partly under the Inflation Reduction Act, provided an additional growth impetus. In contrast, the eurozone economy balanced on the edge of recession all year. Europe continued to be hampered by ailing industry (particularly unfavourable to Germany, for example), disappointing world trade (particularly unfavourable to the Netherlands, for example) and the war in Ukraine. The Chinese economy also experienced a difficult year. The faltering real estate sector in particular continued to put pressure on the economy.

While the development of the global economy in 2023 was not entirely favourable, there was mostly good news to report from the inflation front. The inflation wave of 2022, which in recent history had its equal only in the stagflation of the late 1970s and early 1980s, largely disappeared during 2023. Whereas headline inflation in the eurozone was still above 10% towards the end of 2022, a year later it had fallen to less than 3% year-on-year. A similar but slightly less extreme narrative applies to the US: there, inflation fell from 9% year-on-year in June 2022 to 3.4% by the end of 2023. Meanwhile, China has even slipped back into deflation, with inflation at -0.3% year-on-year by the end of 2023.

To combat inflation, the Fed raised US base rates from 0% to 5.25% in 2022 and 2023, while the ECB's European base rate went from -0.5% to 3.5% in less than a year. However, rapidly easing inflationary pressures during 2023 did not go unnoticed by interest rate markets either. Whereas until recently the motto seemed to be 'higher for longer', interest rate markets have increasingly started to anticipate, especially in the last quarter of 2023, that central banks are not only done with rate hikes, but will also soon start to cut their base rates again.

### Financial markets in 2023

For investors, 2023 turned out to be an unexpectedly good year, helped by a rally in the fourth quarter. As a result, almost all asset classes ended up in positive territory. For the entire year, US equities led the way, with a return of over 20% (in euros). Asian equities and emerging markets lagged, mainly due to the ailing Chinese stock market, but still delivered positive returns of 6-8% across 2023. This was similar to returns on European bonds (both government and corporate), which were mainly due to falling capital market rates. The bad performer of 2023 was the US dollar, which depreciated by 3% against the euro.

### Economic and financial market outlook

For the global economy as a whole, 2024 seems to be comparable to last year, with growth again expected to be around 3%. At the regional level, the outlook varies. This is partly due to different interest rate expectations. The effects of the relatively steep US interest rate path in recent years are not expected to be felt in full until 2024. In addition, the exhaustion of COVID-19 savings and limited scope for additional government spending may also hamper the growth of the US economy. For Europe, the growth outlook is also not particularly good, but after the stagnation of 2022 and 2023, there is potential for some growth recovery. In China, the authorities seem to intend to maintaining the current 5% growth target, but it cannot be ruled out either that they will settle for lower (and perhaps more realistic) growth of around 4.5%. For other emerging economies, the outlook is relatively favourable from a macro perspective, partly because they have mostly raised interest rates earlier than in most developed economies and can now cut interest rates again earlier and/or have already reduced them. Globally, geopolitical risk remains higher than average, due to military conflicts in Ukraine and the Middle East amongst others and elections in many countries, including presidential elections in the United States in November 2024.

As for the inflation outlook, the most plausible scenario for the period ahead seems to be that inflationary pressures will gradually ease further towards the 2% inflation targets of central banks in the eurozone and the US. In the short term, base effects may cause some volatility in this respect. Given this inflation picture, expecting 2024 to be a year of interest rate cuts by central banks rather than interest rates remaining high seems justified in our view. The question is, however, whether financial markets have not entered an 'exaggeration phase' after the recent movements. The amount and pace of interest rate cuts now being priced in only seems plausible in a scenario where not only do inflationary pressures continue to fall at a rapid pace, but also growth prospects come under severe pressure. In such a scenario, current interest rate levels may be appropriate, but share prices seem to be (excessively?) high.

In the economic scenario that seems most likely to us, that of gradually declining inflationary pressures combined with moderate growth prospects, equities seem less overvalued, but bond yields have slipped too far downwards.

Based on this scenario, we see long-term interest rates increasing from current levels rather than falling further, which is unfavourable for both government and corporate bonds. For equities, the outlook in this scenario is mixed, but we still see some scope for further price recovery for listed real estate (although to varying degrees for various market segments, e.g. residential vs. offices), which, although up around 25% in the last two months of 2023, is still down around 30% compared with two years ago. The relative attractiveness of cash will diminish as central banks start cutting interest rates, but that is not the case for now. With a current ECB base rate of 4%, the risk-free rate of return is still high from a historical perspective.

### **Developments in the infrastructure debt market**

The renewable infrastructure debt market has been a critical component of financing for renewable energy projects, including wind, solar, and hydropower developments. Investors, including institutional players and specialized funds, have shown increasing interest in this market as they seek stable, long-term returns and contribute to the global transition to sustainable energy sources.

One notable trend in the renewable infrastructure debt market is the growing diversification of investors. Traditional institutional investors such as pension funds, insurance companies, and asset managers continue to play a significant role. However, there has been an increasing presence of new entrants, including sovereign wealth funds, family offices, and impact-focused funds. This broadening investor base reflects the attractiveness of renewable infrastructure debt as an asset class with stable cash flows and a positive environmental impact.

Collaborations between public and private sectors have been instrumental in fostering the growth of the renewable infrastructure debt market. Governments, development banks, and international organizations often work in partnership with private investors to create financial structures that support the development of renewable energy projects. This collaboration helps mitigate risks, lower financing costs, and create a conducive environment for institutional investors to participate in the renewable infrastructure debt market.

#### *Offshore wind*

The offshore wind industry has been attracting significant investment as governments, corporations, and financial institutions recognize its potential as a key contributor to the transition to renewable energy. Several financing trends and mechanisms have been shaping the funding landscape for offshore wind projects.

One significant trend is the increasing size of offshore wind turbines. In an effort to improve efficiency and reduce the levelized cost of energy (LCOE), manufacturers have been developing larger and more powerful turbines. These turbines have taller towers and longer blades, allowing them to capture more wind energy and generate higher electricity output. This trend is driven by advancements in materials, design, and construction techniques, enabling the deployment of turbines in deeper waters where wind resources are often stronger and more consistent.

Floating offshore wind is another area of notable development. While traditional fixed-bottom offshore wind turbines have been successful in shallow waters, floating platforms open up the possibility of harnessing wind energy in deeper seas where fixed foundations are impractical. Floating wind farms have the potential to significantly expand the available offshore wind resource, making it feasible to generate clean energy in regions with deep waters, such as the coastlines of Japan, California, and parts of Northern Europe.



## ASR Renewable Infrastructure Debt Fund

The Fund offers Participants the opportunity to invest in Renewable Infrastructure Loans, which are offered to project companies based in selected European jurisdictions and the United Kingdom, active in the business of constructing and/or operating renewable energy infrastructure projects and/or any related business that are aimed at or contribute to the 'energy transition' that meet all criteria and standards under the EU Taxonomy Regulation. The ASR Renewable Infrastructure Debt Fund is a financial product that has a sustainable investment objective. As such, it is classified as an Article 9 product under the Sustainable Finance Disclosure Regulation (SFDR).

Characteristics	ASR Renewable Infrastructure Debt Fund
Management fee*	0.35% of the total assets of the Fund (exclusive of VAT, if applicable)
Servicing fee	0.05% of the total assets of the Fund (exclusive of VAT, if applicable)

Table 2: Fund charges

### Return and portfolio policy

The Net Assets saw an increase in 2023 to € 232 million.

	Net Assets (x €1,000)	Return	Dividend per share (x €1)*
31-12-2023	232,290	4.62%	25.90

Table 3: Return

\* This relates to the dividend declared with regard to the financial year, not the dividend paid during the financial year.

Value movement per participation in €	2023
Income	33.22
Changes in value	14.56
Costs	-2.79
<b>Result after tax</b>	<b>44.99</b>

Table 4: value movement

Amounts per participation are based on the average number of participations during the reporting period (9 measurement points during the reporting period).

Total investments in the Fund increased further during the year, from €0 to €223 million (nominal amount), with €78 million in uncalled commitments. The fund has made 4 investments in 2023 of which 2 in offshore wind and 2 in onshore wind projects. As of year-end 2023 ASR Schadeverzekering N.V. and ASR Levensverzekering N.V. are the only participants. In the first 8 months, the fund was 73% invested and the performance and the Fund's YTD return were 4.62%.

In June, the Fund distributed the dividend for the Q2 2023 to the participants, which amounted to €927 thousand or €5.75 per share. The Q3 dividend was declared at €1.15 million or €7.47 per share and Q4 dividend was declared at €2.8 million or €12.68 per share. With regard to the financial year 2023, the Fund distributed a total of €4.8 million in dividend.

**Risk management:**

The main portfolio-specific risks associated with the Fund are:

*Concentration risk:*

If multiple investments are made in the same sector, geographical area or investment category, concentrations can occur in these sectors, areas or categories resulting in a risk that this concentration will make the investment portfolio as a whole more sensitive to general and specific market movements in these sectors, areas and categories. The Manager will seek to limit the risk to the investor to an acceptable level by setting limits on exposures to single borrowers.

Loan portfolio by Energy Class	31-12-2023
On-shore wind power	43.54%
Off-shore wind power	56.46%

Table 5: portfolio breakdown by Energy Class

Loan portfolio by Country	31-12-2023
Netherlands	77.75%
France	22.25%

Table 6: portfolio breakdown by country

The percentages in the above and below tables have been calculated based on the market value of loans.

*Sustainability risks:*

The creditworthiness of the Renewable Infrastructure Loans in the Fund may be affected by a range of sustainability risks, including climate change. Given the nature of the Fund’s investments which are driven by renewable energy generating capacity, sustainability risks are key risk factors assessed during the credit analysis and approval process by the Fund Manager. Structural changes in wind patterns and solar hours may have a profound effect on the yield and creditworthiness of the Fund Assets. In addition, effects of climate change (including hail, hurricane, flooding and increased sea level) may have an impact on the borrowers’ assets, which may or may not be covered by insurance. Sustainability risks may as such affect the value of the Fund Assets and as a result, may result in a lower return for the Participants.

*Interest-rate risk:*

The interest rate on the loans is primarily based on the risk-free floating interest rate (EURIBOR or such interest reference rate that substitutes EURIBOR) plus a margin for credit risk. With arising (declining) interest rate, the absolute return on the loans therefore increases (decrease).

## In Control Statement

The Manager's description of its business operations meets the requirements of the Financial Supervision Act (Wet op het financieel toezicht, "Wft"). The Manager has reviewed various aspects of its business operations during the past reporting period. In the course of these activities, no findings were made that would lead to the conclusion that the description of the structure of the business operations does not meet the requirements as set out in the Wft and related legislation. The Manager has also not come across any findings that indicate that the business operations do not function effectively or not in accordance with the description. We therefore declare with a reasonable degree of certainty that the business operations functioned in accordance with the stated description in 2023.

The Fund's asset management is carried out by ASR Nederland N.V. staff employed by the Manager under an employee loan agreement. The Manager has issued an ISAE 3402 Type II report and has obtained an assurance report on this. This report confirms the Manager's view regarding the investment and other processes.

Utrecht, 28 March 2024

ASR Vermogensbeheer N.V.

On behalf of ASR Renewable Infrastructure Debt Fund

The management,

Mr. P. Klijnsmit (director)

Mr. M.R. Lavooi (director)

Mrs. J.H.L. de Jong-Kortman (CFRO)

# Supervisory Board Report

According to the law and its rules of procedure, the Supervisory Board is responsible for supervising the manager’s policy and performance of tasks and the general state of affairs within the funds it supervises, all in the interest of the participants. The Supervisory Board also protects the interests of the participants by supervising compliance by the manager with the Fund Governance Code and advising the manager. The board is responsible for the quality of its own activities. Members are appointed for a term of four years and will retire periodically by rotation in accordance with a schedule to be determined by the board. The board has not set up any committees due to its size.

## Composition and rotation schedule

The board’s composition, organization and procedures comply with the applicable Corporate Governance Code of Conduct. The members are independent within the meaning of best practice provision III. 2.1 of this code.

The members have established the following rotation schedule:

Name	Current term expires	Reappointment possible
Mr. Vliegenthart	December 2024	Yes
Mr. Labe	December 2025	Yes
Mr. Beetsma	December 2026	Yes

Members may serve on the board for a maximum of twelve years, unless the Supervisory Board decides otherwise.

## Procedures

Four meetings with the Manager took place in the reporting year. During the meetings in the reporting year the Manager provided the board with extensive information on the features and set-up of the funds, and the investment policy. The board also obtained extensive information on the governance structure and the collaboration between the asset management departments involved in daily management activities. One of the ways in which the Manager prepared the topics discussed during the meetings was by means of monthly and quarterly reports. The board concluded that these documents provided the clear information it requested. Open discussions have taken place with the Manager regarding policy and the current state of affairs within the individual funds, during which the Supervisory Board paid special attention to the following topics:

- the 2022 external audit report;
- the manager’s ISAE 3402 type 2 statement;
- the 2022 annual report;
- self-assessment Supervisory Board;
- compliance report;
- performance and risk management overviews, including the complaints and incidents register;
- the integration of activities as part of the long-term partnership with Aegon Asset Management.

## Word of thanks

We thank the Manager and the staff for their professional and enthusiastic commitment towards achieving the objectives.

Utrecht, 28 March 2024

Mr. B. Vliegenthart, chair

Mr. R.M.W.J. Beetsma

Mr. O. Labe

# Financial statements 2023

## ASR Renewable Infrastructure Debt Fund

## Balance sheet

Balance sheet as at 31 December 2023 (before profit appropriation x €1,000)

Balance sheet	31-12-2023
Investments	
Loans	221,973
<b>Total Investments</b>	<b>221,973</b>
Receivables	474
Other assets	
Cash	10,068
Current liabilities	-225
<b>Receivables and other assets less current liabilities</b>	<b>10,317</b>
<b>Assets less current liabilities</b>	<b>232,290</b>
Issued participation capital	226,385
Other reserves	-3,194
Revaluation reserve	3,194
Unappropriated result	5,905
<b>Total Net Assets</b>	<b>232,290</b>

## Profit and loss account

Profit and loss account for the period from 26 April 2023 until 31 December 2023 (x € 1,000)

Profit and Loss Account	26-04-2023 to 31-12-2023
Investment income	5,895
Realized changes in the fair value of investments	295
Unrealized changes in the fair value of investments	2,289
<b>Total operating income</b>	<b>8,479</b>
Management fee	-416
Service fee	-59
Other expenses	-20
<b>Total operating expenses</b>	<b>-495</b>
<b>Profit after tax</b>	<b>7,984</b>

## Cashflow statement

Cashflow statement for the period 26 April 2023 until 31 December 2023 (x €1,000)

Cashflow statement	26-04-2023 to 31-12-2023
Total investment result	7,984
Changes in the fair value of investments	-2,584
Purchase of investments (-)	-235,272
Sales of investments (+)	15,883
Increase (-)/Decrease (+) in receivables	-474
Increase (+)/Decrease (-) in liabilities	225
<b>Net cash flow from investment activities</b>	<b>-214,238</b>
Issue of participations	235,292
Redemption of participations	-8,907
Dividend	-2,079
<b>Net cash flow from financing activities</b>	<b>224,306</b>
<b>Movement in cash</b>	<b>10,068</b>
Cash per April 26	-
Cash per December 31	10,068
<b>Movement in cash</b>	<b>10,068</b>

## Principles of valuation and determination of results

### General

The ASR Renewable Infrastructure Debt Fund ('the Fund') was established on 28 December 2022 in the form of a mutual fund. The Fund is structured as a closed-end tax transparent fund.

The annual report of the Fund is prepared in accordance with Guideline 615 'Investment Institutions' of the Dutch Accounting Standards Board and Title 9 Book 2 of the Dutch Civil Code (Burgerlijk Wetboek, "BW"). All amounts included in the annual report are in thousands of euros, unless stated otherwise. The amounts stated in the tables are rounded figures, therefore rounding differences may occur. The Manager compiled the financial statements on 28 March 2024.

### Reporting period and comparative figures

The activities of the Fund commenced on 26 April 2023, therefore the annual report covers the period from 26 April 2023 to 31 December 2023. No prior period comparative figures are included.

### Foreign Currency

Transactions in foreign currency are converted at the rate of exchange on the transaction date. Assets and liabilities in foreign currency are converted into euros at the rate of exchange on the balance sheet date.

Currency differences arising from the conversion are presented in the profit and loss account under realized and unrealized changes in the fair value of investments.

No investments in foreign currency were recorded within the Fund as at 31 December 2023.

### Manager

a.s.r. vermogensbeheer is the manager within the meaning of Section 1.1 of the Financial Supervision Act (Wet op het financieel toezicht, hereinafter referred to as the Wft). The Manager is responsible for managing the fund assets in accordance with the investment policy and performing the participant administration and financial accounts. The Manager holds a license granted by the supervisory authority in accordance with Section 2:65 (1) (a) of the Wft and is included in the register kept by the Dutch Authority for the Financial Markets (Autoriteit Financiële Markten, "AFM").

### Legal Owner

Stichting Juridisch Eigenaar ASR Renewable Infrastructure Debt Fund I acts as the owner (the title holder) in a legal sense, in accordance with the general management and custody conditions, at the expense and risk of the Participants of the Fund. As set out in the Information Memorandum, the Foundation has been appointed as the Custodian of the Fund under the conditions of the Management and Custody Agreement.

### Depository

As set out in the Information Memorandum, the Manager appointed BNP Paribas S.A., Netherlands branch as the Depository for the Fund. The Depository is an entity under legal supervision whose legal duties include monitoring cash flows, compliance with the investment policy and ownership verification with regard to the financial assets of the investment funds.

### Basis of preparation

The annual report is prepared on a going concern basis. An asset will be recognized in the balance sheet if it is probable that the future economic benefits will flow to the Fund and its value can be reliably determined. A liability will be recognized in the balance sheet if it is probable that its settlement can be associated with an outflow of funds and the extent of the amount can be reliably determined. The manner in which the asset management activities are structured may result in the legal ownership of an asset and/or liability, of which all or nearly all rights to the economic benefits and risks flow to the Fund, vesting with related parties.

Income is recognized in the profit and loss account if an increase in the economic potential associated with an increase in an asset or a decrease in a liability has taken place, the extent of which can be reliably determined. Expenses are recognized if a decrease in the economic potential associated with a decrease in an asset item or an increase in a liability has taken place, the extent of which can be reliably determined.



If a transaction results in (practically) all future economic benefits and risks with regard to an asset item or a liability being transferred to a third party, the asset item or the liability will no longer be recognized in the balance sheet. Furthermore, assets are no longer recognized in the balance sheet from the moment when the probability conditions of the future economic benefits and reliability of the value assessment can no longer be satisfied. A liability will no longer be recognized in the balance sheet from the moment when the probability conditions of the expected outflow of funds and reliability of the value assessment can no longer be satisfied.

### **Offsetting**

A financial asset and a financial liability are netted and entered in the balance sheet as a net amount if there is a legal or contractual right to settle the asset item and the liability whilst being netted at the same time, and there is in addition the intention to settle the items in this manner. The interest income and interest expenses associated with the financial assets and liabilities entered as netted will also be recognized as netted.

### **Related party transactions**

A related party is a party that can exert a predominant policy-setting influence on another party, or can exert a significant influence on the financial and business policy of the other party. Transactions with related parties are performed at rates in line with the market.

### **Investments**

The Fund invests in Renewable Infrastructure Loans. The loans are initially valued at purchase price (which is the nominal value, except for the initial portfolio which is acquired at fair value). Upfront fees received on provision of the loans are recorded as part of investment income. At the end of the reporting period the loans are valued at their fair value.

Unrealized and realized changes in the fair value of investments are recognized in the profit and loss account.

A revaluation reserve will be created for unrealized changes in fair value, insofar as the fair value exceeds the historic cost price, for the difference between the fair value and the historic cost price.

The fair value of a loan is determined by a discounted cashflow model. Cashflows for the drawn commitment are generated based on the forward curve with the relevant tenor. The latter might change over time depending on counterparty choices during each interest rate reset. Cashflows for the undrawn commitment are generated based on the applicable commitment fee.

The standard approach is only appropriate as long as a full repayment of the loan is expected. If a loan is transferred to the special care department of the originator, the valuation methodology will be based on an expected recovery approach.

### **Cash**

Bank account credit balances are stated at fair value, which is the nominal value. Cash includes current account credit balances with banks, any cash at bank and in hand and outstanding time and other deposits insofar as not included in the investments.

### **Other assets and liabilities**

Receivables are initially stated at fair value, including transaction costs. Receivables are subsequently revalued at amortized cost based on the effective interest method, without deducting impairment losses. Provisions are determined on the basis of individual assessment of the recoverability of the receivables.

Current liabilities, accruals and deferred income are initially stated at fair value. Current liabilities, accruals and deferred income are subsequently revalued at amortized cost based on the effective interest method. If there is no premium or discount and there are no transaction costs, the amortized cost is equal to the nominal value of the debt.

### **Determination of result**

The result is determined as the difference between income and expenditure. Income and expenditure are allocated to the period to which they relate. Results in foreign currencies are translated into euros at the exchange rates applicable on the transaction date.

**Changes in the fair value of investments**

Realized changes in value are determined by deducting the average cost price (including purchase costs) from the sales proceeds (including selling costs). Unrealized changes in value are determined by deducting the average cost price (including purchase costs) from the balance sheet value at the end of the reporting period.

The realized and unrealized changes in value of investments are presented in the period to which they relate as realized or unrealized changes in the fair value of investments respectively under investment income in the profit and loss account.

The changes in fair value of loans are in principle always unrealized since the loans are held to the end of the period of maturity, with the exception of the early repayment of the loans by the borrower.

Any purchase and sales costs of investments are included in the cost price or deducted respectively from the sales proceeds of the respective investments and therefore form part of the changes in fair value of investments.

**Income tax**

The Fund is a closed-end mutual fund and tax transparent, meaning that the fund is not tax liable for income tax and is not subject to the payment of dividend tax.

**Management fee**

Costs are charged to the Fund by the Manager for the management of the Fund Assets. The provisions made are transferred to the Manager on a monthly basis. The amount of the management fee is 0.35% on an annual basis (exclusive of Dutch VAT, if applicable).

**Servicing fee**

The Manager also receives a monthly service fee that is deducted from the Fund. The service fee covers other costs, such as:

- auditor, legal and tax advisor fees;
- costs associated with the preparation, printing and sending of the information memorandum, annual and semi-annual reports and any other documents relating to the Fund;
- costs associated with calculating and publishing the net asset values;
- costs associated with maintaining the participant register and keeping financial and investment accounting records;
- costs associated with meetings of participants or the investment committee.

The annual service fee is 0.05% (exclusive of Dutch VAT, if applicable). The Manager ultimately pays the costs actually incurred related to the service fee.

**Costs on the issue and redemption of Participations**

The Fund does not charge any costs on the issue and redemption of Participations.

**Cashflow statement**

The cashflow statement has been prepared according to the 'indirect method', whereby a distinction is made between cash flows from investment and financing activities. Cash relates to credit balances with banks that are available on demand. In the cash flow from investment activities, the result is adjusted for costs that are not expenditure and proceeds that are not revenue.

## Notes to the balance sheet and profit and loss account

### 1. Investments

The investments can be broken down as follows (x €1,000):

Investments	31-12-2023
Private loans	221,973
<b>Total investments</b>	<b>221,973</b>

The movement in investments during the reporting period was as follows (x €1,000):

Movement schedule of investments	Fair Value 26-04-2023	Purchases	Repayments	Revaluation	Fair Value 31-12-2023
Private loans	-	235,272	-15,883	2,584	221,973
<b>Total</b>	<b>-</b>	<b>235,272</b>	<b>-15,883</b>	<b>2,584</b>	<b>221,973</b>

These amounts also includes the refinancing of certain loans. The net present value calculation is used for the valuation of loans, using the standard approach as described in the principles of valuation. More information on the risk management with regard to the investments is available in sections Report of the Manager and ASR Renewable Infrastructure Debt Fund. A specification of the investments is presented in Appendix 1.

### 2. Receivables

The receivables have a term of less than one year and can be broken down as follows (x €1,000):

Receivables	31-12-2023
Accrued interest	474
<b>Total</b>	<b>474</b>

### 3. Cash

Cash relates to credit balances with banks that are available on demand.

### 4. Current liabilities

The current liabilities all have a term of less than one year and can be broken down as follows (x €1,000):

Current liabilities	31-12-2023
Management and servicing fee payable	-225
<b>Total</b>	<b>-225</b>

## 5. Issued participation capital, unappropriated result, other reserves and revaluation reserve

Multi-year overview ASR Renewable Infrastructure Debt Fund

Net Asset Value	31-12-2023
Fund Net Assets (x € 1.000)	232,290
Number of participations	224,550
Net Asset Value in euros per participation	1,034.47

The development of the subscribed participation (Unit) capital during the reporting period is as follows (x €1,000):

Issued participation capital	26-04-2023 to 31-12-2023
Balance at the start of the reporting period	-
Issued during the reporting period	235,292
Repaid to participants during the reporting period	-8,907
Balance at the end of the reporting period	226,385

The movement in the number of participations during the reporting period was as follows:

Movement schedule of number of Participations	Number 26-04-2023	Issue	Redemption	Number 31-12-2023
ASR Renewable Infrastructure Debt Fund	-	233,378	-8,828	224,550

The movement in other reserves during the reporting period was as follows (x €1,000):

Other reserves	26-04-2023 to 31-12-2023
Balance at the start of the reporting period	-
Addition in the reporting period from unappropriated result	-
Dividend payment	-
Transfer to / from the revaluation reserve	-3,194
Balance at the end of the reporting period	-3,194

For investments for which no frequent market quotation is available, a revaluation reserve must be formed for unrealized changes in fair value – insofar as the fair value exceeds the historic cost price. The movement in the revaluation reserve during the reporting period was as follows (x €1,000):

Revaluation reserve	26-04-2023 to 31-12-2023
Balance at the start of the reporting period	-
Transfer from / to the other reserves	3,194
Balance at the end of the reporting period	3,194

The movement in unappropriated result during the reporting period was as follows (x €1,000):

Unappropriated result	26-04-2023 to 31-12-2023
Balance at the start of the reporting period	-
Profit distribution in the previous financial year	-
Result of the current financial year	7,984
Dividend paid with regard to current reporting period	-2,079
<b>Balance at the end of the reporting period</b>	<b>5,905</b>

## 6. Contingent assets and liabilities

There are no contingent assets and liabilities

As at 31 December 2023, the total commitment of the Participants of the Fund amounts to EUR 305 million, of which EUR 78 million is uncalled.

As at 31 December 2023, the commitments of the Fund in respect of private loans amounts to EUR 0 million.

## 7. Investment income

The investment income can be specified as follows (x €1,000):

Investment income	26-04-2023 to 31-12-2023
Interest from loans	5,716
Other interest income	119
Other income	60
<b>Total</b>	<b>5,895</b>

Other income from loans relate mostly to fees received regarding loans (such as commitment fees)

## 8. Changes in the fair value of investments

The realized changes in the fair value of the investments are the results from sales, including any selling costs.

The unrealized changes in the fair value of investments held include any purchasing costs.

The realized changes in the fair value of investments can be specified as follows (x €1,000):

Realized changes in the fair value of investments	26-04-2023 to 31-12-2023 (positive)	26-04-2023 to 31-12-2023 (negative)
Private loans	295	-
<b>Total</b>	<b>295</b>	<b>-</b>

The unrealized changes in the fair value of investments can be broken down as follows (x €1,000):

Unrealized changes in the fair value of investments	26-04-2023 to 31-12-2023 (positive)	26-04-2023 to 31-12-2023 (negative)
Private Loans	3,194	-905
<b>Total</b>	<b>3,194</b>	<b>-905</b>

## 9. Operating expenses

The operating expenses can be broken down as follows (x €1,000):

Operating expenses	26-04-2023 to 31-12-2023
Management fee	-416
Servicing fee	-59
Interest fee	-20
<b>Total</b>	<b>-495</b>

Other expenses mainly relate to fees paid to sourcing partners.

### Ongoing Charges Figure (OCF)

	Information Memorandum	01-01-2023 to 31-12-2023
ASR Renewable Infrastructure Debt Fund	0.40%	0.40%

\* exclusive of VAT, if applicable

The Ongoing Charges Figure (OCF) includes all costs charged to the Fund in the reporting period including the management and service fee of the underlying funds and pools, excluding the interest charges, any taxes and transaction costs as a result of the acquisitions and disposals of investments which the Fund carries out. The OCF is calculated by dividing the total costs in the reporting period by the average net asset value of the Fund.

The average net asset value of the Fund is the sum of the net asset values divided by the number of times at which the net asset value is calculated during the reporting year. The net asset value is calculated once a month for the Fund. The number of measurement points is considered as the weighted average.

The OCF included in the table is the annualized OCF. The OCF for the period from starting date of the Fund amounts to 0.26%.

### Portfolio Turnover Rate (PTR)

	26-04-2023 to 31-12-2023
ASR Renewable Infrastructure Debt Fund	3.83%

The Portfolio Turnover Ratio (PTR) provides an indication of the turnover rate of the investments relative to the average fund capital and is a benchmark for the degree to which an investment policy is active. For example, a turnover ratio of 200% indicates that purchase and sales transactions amounting to twice the value of the average fund capital have been executed in addition to purchase and sales transactions resulting from subscriptions and redemptions.

In the calculation used, the turnover is equal to the sum of purchases and sales of investments in the reporting period less the sum of issues and redemptions of participations. This includes all investment categories except deposits with an original term of less than one month. The PTR is determined by the turnover expressed as a percentage of the average Net Asset Value of the Fund, calculated in the same way as when determining the OCF for the reporting period.

#### **Related party transactions**

The Fund has the following relations with related parties:

- a.s.r. vermogensbeheer is the Manager of the Fund and charges a management fee and servicing fee;
- At the Initial Closing Date, the Fund has acquired a portfolio of Renewable Infrastructure Loans (amounting to € 161.3 million) from Group companies of ASR Nederland in exchange for Participations;
- Within the investment portfolio, two loans (amounting to € 96.8 million) were provided to an subsidiary of ASR Real Estate B.V.;
- Group companies of ASR Nederland participate for an amount of € 231 million in the Fund (224,550 participations).

Transactions with related parties are performed at rates in line with the market.

#### **Profit appropriation**

Following the adoption of the annual report, the unappropriated result is added to the other reserves as part of the fund assets.

#### **Proposed dividend**

At the beginning of each quarter, the amount available for distribution generated in the preceding quarter is distributed to the Participants (after settling fees and costs payable). Participations will receive an equal share of the interest income of the preceding quarter. The amount available for distribution is determined at the discretion of the Manager.

#### **Events subsequent to the balance sheet date**

No events occurred in the period up to the preparation of this annual report that require any changes or explanatory notes to the financial statements. On 10 January 2024, the Q4 2023 dividend is paid out to the participants, amounting to EUR 2.8 million (EUR 12.68 per participation).

#### **SIGNING OF THE FINANCIAL STATEMENTS**

Utrecht, 28 March 2024

ASR Vermogensbeheer N.V.

On behalf of ASR Renewable Infrastructure Debt Fund

The management,

Mr. P. Klijnsmit (director)

Mr. M.R. Lavooi (director)

Mrs. J.H.L. de Jong-Kortman (CFRO)

## Other information

### Independent auditor's report

To: the General Meeting and the Supervisory Board of ASR Renewable Infrastructure Debt Fund

### Report on the audit of the accompanying financial statements

#### Our opinion

We have audited the financial statements 2023 of ASR Renewable Infrastructure Debt Fund ('the Fund'), based in Utrecht.

In our opinion the accompanying financial statements give a true and fair view of the financial position of ASR Renewable Infrastructure Debt Fund as at 31 December 2023, and of its result for the period 26 April 2023 up to and including 31 December 2023 in accordance with Part 9 of Book 2 of the Dutch Civil Code.

The financial statements comprise:

- 1 the balance sheet as at 31 December 2023;
- 2 the profit and loss account for the period 26 April 2023 up to and including 31 December 2023; and
- 3 the notes comprising a summary of the accounting policies and other explanatory information.

#### Basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing. Our responsibilities under those standards are further described in the 'Our responsibilities for the audit of the financial statements' section of our report.

We are independent of ASR Renewable Infrastructure Debt Fund in accordance with the 'Wet toezicht accountantsorganisaties' (Wta, Audit firms supervision act), the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics).

We designed our audit procedures in the context of our audit of the financial statements as a whole and in forming our opinion thereon. The information in respect of fraud and non-compliance with laws and regulations and going concern was addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Information in support of our opinion

#### Audit response to the risk of fraud and non-compliance with laws and regulations

In chapter Risk Management of the management board report, the management board describes its procedures in respect of the risk of fraud and non-compliance with laws and regulations and the supervisory board reflects on this.

As part of our audit, we have gained insights into the Fund and its business environment, and assessed the design and implementation of the Fund's risk management in relation to fraud and non-compliance. Our procedures included, among other things, assessing the Fund's code of conduct, whistleblowing procedures, incidents register and its procedures to investigate indications of possible fraud and non-compliance. Furthermore, we performed relevant inquiries with management, those charged with governance and other relevant functions, such as Internal Audit, Risk Management and Compliance. As part of our audit procedures, we:

- obtained an understanding of how the Fund uses information technology (IT) and the impact of IT on the financial statements, including the potential for cybersecurity incidents to have a material impact on the financial statements;
- assessed other positions held by management board members and/or other employees and paid special attention to procedures and governance/compliance in view of possible conflicts of interest;



- evaluated investigation reports on indications of possible fraud and non-compliance, if any;
- evaluated correspondence with supervisory authorities and regulators.

In addition, we performed procedures to obtain an understanding of the legal and regulatory frameworks that are applicable to the Fund and identified the following areas as those most likely to have a material effect on the financial statements:

- the requirements by or pursuant to the Act on Financial Supervision (Wet op het financieel toezicht, Wft);
- the law on the prevention of money laundering and terrorist financing (Wwft).
- We evaluated the fraud and non-compliance risk factors to consider whether those factors indicate a risk of material misstatement in the financial statements.

We rebutted the presumed fraud risk on revenue recognition as the fund invests in loans that generate interest income based on contractual agreements. The calculation of interest income is considered non-complex and predictable.

Based on the above and on the auditing standards, we identified the following fraud risk that is relevant to our audit, including the relevant presumed risks laid down in the auditing standards, and responded as follows:

#### **Management override of controls (a presumed risk)**

##### **Risk:**

Management is in a unique position to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively such as estimates related to the valuation of loans.

##### **Responses:**

We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness of internal controls that mitigate fraud and non-compliance risks, such as processes related to journal entries and estimates.

We performed a data analysis of high-risk journal entries related to manual post-closing entries and evaluated key estimates and judgments for bias by the Fund's management, including retrospective reviews of prior years' estimates with respect to valuation of loans. Where we identified instances of unexpected journal entries or other risks through our data analytics, we performed additional audit procedures to address each identified risk, including testing of transactions back to source information.

We communicated our risk assessment, audit responses and results to the manager and the Supervisory Board.

Our audit procedures did not reveal indications and/or reasonable suspicion of fraud and non-compliance that are considered material for our audit.

#### **Audit response to going concern**

The management board has performed its going concern assessment and has not identified any going concern risks. To assess the management board's assessment, we have performed, inter alia, the following procedures:

- we considered whether the management board's assessment of the going concern risks includes all relevant information of which we are aware as a result of our audit;
- we analysed the company's financial position as at year-end and compared it to the previous financial year in terms of indicators that could identify going concern risks.

The outcome of our risk assessment procedures did not give reason to perform additional audit procedures on management's going concern assessment.

## Report on the other information included in the annual report

In addition to the financial statements and our auditor's report thereon, the annual report contains other information.

Based on the following procedures performed, we conclude that the other information:

- is consistent with the financial statements and does not contain material misstatements;
- contains the information as required by Part 9 of Book 2 of the Dutch Civil Code regarding the management report and the other information.

We have read the other information. Based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, we have considered whether the other information contains material misstatements.

By performing these procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720. The scope of the procedures performed is less than the scope of those performed in our audit of the financial statements.

The manager is responsible for the preparation of the other information, including the management report, in accordance with Part 9 of Book 2 of the Dutch Civil Code, and other information pursuant to Part 9 of Book 2 of the Dutch Civil Code.

## Description of the responsibilities for the financial statements

### Responsibilities of the manager and the Supervisory Board for the financial statements

The manager is responsible for the preparation and fair presentation of the financial statements in accordance with Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the manager is responsible for such internal control as the manager determines is necessary to enable the preparation of the financial statements that are free from material misstatement, whether due to errors or fraud.

As part of the preparation of the financial statements, the manager is responsible for assessing the company's ability to continue as a going concern. Based on the financial reporting framework mentioned, the manager should prepare the financial statements using the going concern basis of accounting unless the manager either intends to liquidate the Fund or to cease operations, or has no realistic alternative but to do so. The manager should disclose events and circumstances that may cast significant doubt on the company's ability to continue as a going concern in the financial statements.

The Supervisory Board is responsible for overseeing the Fund's financial reporting process.

### Our responsibilities for the audit of the financial statements

Our objective is to plan and perform the audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence for our opinion. Our audit has been performed with a high, but not absolute, level of assurance, which means we may not have detected all material errors and fraud during our audit. Misstatements can arise from fraud or errors and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements. The materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.

We have exercised professional judgement and have maintained professional scepticism throughout the audit, in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. Our audit included among others:

- identifying and assessing the risks of material misstatement of the financial statements, whether due to errors or fraud, designing and performing audit procedures responsive to those risks, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from errors, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;

- obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control;
- evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the manager;
- concluding on the appropriateness of management's use of the going concern basis of accounting and based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the company ceasing to continue as a going concern;
- evaluating the overall presentation, structure and content of the financial statements, including the disclosures; and
- evaluating whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant findings in internal control that we identify during our audit.

Utrecht, 28 March 2024  
KPMG Accountants N.V.

G.J. Hoeve RA

## Appendix 1 Specification of investments

Loan ID	Instrument Name	Rating	Country	Currency	Energy Class	Nominal value 31-12-2023	Market value 31-12-2023
LF_124579	Purple	BB	NL	EUR	On-shore wind power	10,575	10,559
LF_124580	Green	BBB	NL	EUR	On-shore wind power	86,755	86,255
LF_1246	Yellow	BBB	FR	EUR	Off-shore wind power	50,000	49,095
LF_124732	Blue	BBB	NL	EUR	Off-shore wind power	75,460	76,063
<b>Total investments ASR Renewable Infrastructure Debt Fund</b>							<b>221,973</b>

## Appendix 2 Periodic disclosure SFDR

## SFDR Annex IV

Product name: ASR Renewable Infrastructure Debt Fund  
Legal entity identifier(LEI): 724500A93Z8V1MJK5349

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

### Sustainable investment objective

#### Did this financial product have a sustainable investment objective?



**X** Yes



No



It made **sustainable investments with an environmental objective**: 95.71%



It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_% of sustainable investments



In economic activities that qualify as environmentally sustainable under the EU Taxonomy



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



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



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



It promoted E/S characteristics, but **did not make any sustainable investments**



with a social objective

The interpretation of the definition of sustainable investments is subject to continuous development, both within the legislative framework and in the market. Based on these developments, ASR Vermogensbeheer N.V. ("ASR Vermogensbeheer", "AVB" or the "Manager") might update the definition of sustainable investments in 2024.

In calculating the percentage of sustainable investments, ASR Vermogensbeheer applies the methodology described under the heading *'What were the objectives of the sustainable investments partially made by the financial product, and how did the sustainable investments contribute to achieving those objectives?'*

The Manager has made an assessment regarding the taxonomy alignment based on public information and a due diligence procedure. The projects in which the Manager has invested didn't report on taxonomy alignment as of 1/1/2024. The Manager hasn't used an external auditor to validate the taxonomy alignment. There is still discussion regarding the interpretation of the DNSH test and the Minimum Safeguards. Therefore it is possible that the Manager will change the taxonomy alignment in the future.



## To what extent was the sustainable investment objective of this financial product met?

The Fund invested in Renewable Infrastructure Loans, thereby funding various renewable energy projects. Contributing to the sustainable energy transition remained at the core of the Fund's investment policy.

The Fund had, as its sustainable investment objective, aimed to contribute to the objectives of the Paris Climate Agreement. Specifically, the Fund endeavored to contribute to climate change mitigation. It strived to achieve this environmental objective by investing in loans extended for projects supporting the energy transition and the goals of the EU Green Deal. More specifically, the Fund aimed to invest in loans used to finance electricity generation projects that met the criteria and standards under the EU Taxonomy for Sustainable Activities. Examples included projects in offshore wind power, onshore wind power, solar power, hydrogen electricity storage, and/or battery storage. These projects were directed towards the transition from carbon-intensive energy sources to renewable and sustainable energy sources. Therefore, these projects did - in the view of the Manager - contribute to climate change mitigation.

During the past year, the Fund predominantly invested in EU-located projects.

## How did the sustainability indicators perform? .. and compared to previous periods?

The Fund invested exclusively in projects that were aligned with the climate change mitigation criteria and thresholds under the EU Taxonomy for Sustainable Activities. Examples of projects in which the Fund aimed to invest included those focusing on generating, transmitting, storing, distributing, or using renewable energy. As part of the Fund's investment selection process, the following criteria were applied:

- The Fund's investment policy was to make, hold, and manage investments in Renewable Infrastructure Loans that met criteria and standards under the Taxonomy Regulation.
- The Fund invested in Renewable Infrastructure Loans granted to companies operating in both onshore and offshore wind sectors.
- The Fund applied the ESG Policy to contribute to the objectives of the Paris Climate Agreement by exclusively investing in projects that supported the energy transition and the objectives of the EU Green Deal.

The Fund used two indicators to measure the attainment of the sustainable investment objectives during the past year:

- The annual energy production:
  - 270 Gwh of renewable energy production
- The annual emissions avoided:
  - 118.8kt CO2 emissions avoided

Looking back on the accomplishments of the previous year, the Fund successfully, in the view of the Manager, realized its intent by investing in projects that aligned with the climate change mitigation criteria and thresholds outlined in the EU Taxonomy for Sustainable Activities.

Since the Fund's first reporting year was in 2023, there are no prior periods for comparison.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

## **How did the sustainable investments not cause significant harm to any sustainable investment objective?**

The Manager has aligned the sustainability policy with international frameworks such as the OECD Guidelines, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the principles and rights under the Eight Fundamental Conventions of the International Labour Organisation. All investments are screened against these principles. Companies that do not adhere to these standards had been or were excluded during the reference period. More information on this subject can be found in the [list](#) of exclusions as at year-end 2023.

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

The following indicators have been taken into account as part of the investment and monitoring process:

**PAI for companies Table I #4.** Exposure to companies active in the fossil fuel sector.

**PAI for companies Table I #10.** Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. Companies with serious violations of the UN Global Compact or OECD guidelines are excluded. Indications of serious breach by a portfolio company may lead to a dialogue with the company. Unsatisfactory results will lead to exclusion from the company.

**PAI for companies Table I #14** Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons). Controversial weapons are excluded in line with the SRI Policy.

The PAI results for the year 2023 are reported in the next section.

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

The sustainable investments were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, according to the SRI policy of ASR Vermogensbeheer. All sustainable investments are screened against these principles. Companies that do not meet the OECD Guidelines or the UN Guiding Principles on Business and Human Rights had been or were excluded during the reference period. More information on this subject can be found in the [list](#) of exclusions as at year-end 2023.





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

As part of the sustainability policy, the Manager considered the following key adverse impacts on sustainability indicators:

- PAI for companies Table I #10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- PAI for companies Table I #11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

The Manager has incorporated a Principal Adverse Impact ("PAI") statement on its website. In this statement, the potential adverse impacts of investment decisions on sustainability factors are transparently explained. This page is consistently updated and can be accessed via [www.asrvermogensbeheer.nl](http://www.asrvermogensbeheer.nl).

**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 top investments of this financial product?

Largest investments	Sector	% assets	Country
Project Green	Utility	38.86%	NL
Project Blue	Utility	34.27%	NL
Project Yellow	Utility	22.12%	FR
Project Purple	Utility	4.76%	NL

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: **2023-12-31**

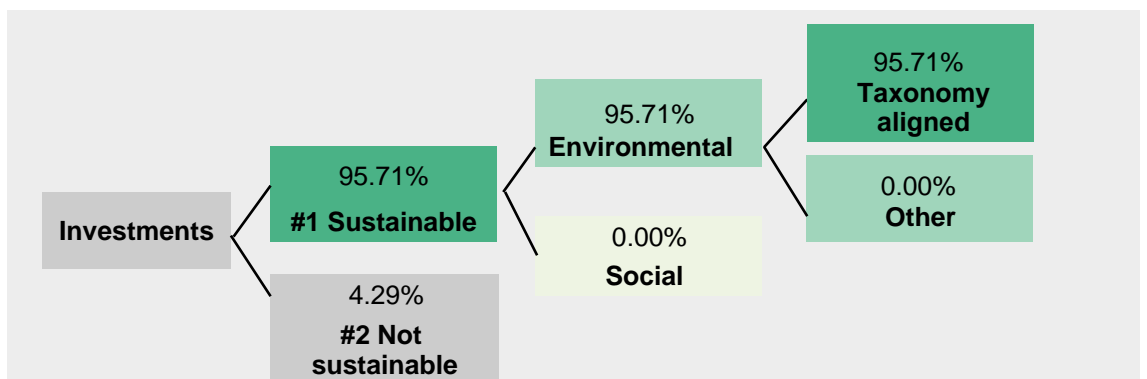


## What was the proportion of sustainability-related investments?

Of the investments, a specific percentage is invested in #1, "Sustainable", while another percentage is invested in "#2 Not Sustainable". Additionally, a specific percentage is invested in "Environmental", with the remaining percentage invested in "Social". See the diagram below for an overview.

### What was the asset allocation?

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



**#1 Sustainable** covers sustainable investments with environmental or social objectives.

**#2 Not sustainable** includes investments which do not qualify as sustainable investments.

## In which economic sectors were the investments made?

More information about the economic sectors can be found in the Management Board report of this financial product.



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

As at year end 2023, the percentage of investments that were aligned with the environmental objectives outlined in the EU Taxonomy was 95.71%.

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

Yes  In fossil gas  In nuclear energy

No

<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.

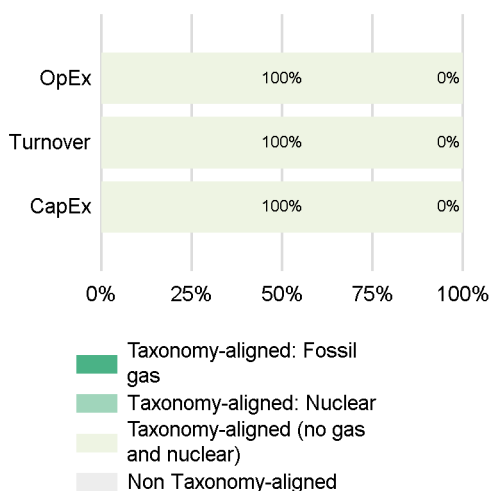
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Taxonomy-aligned activities are expressed as a share of:

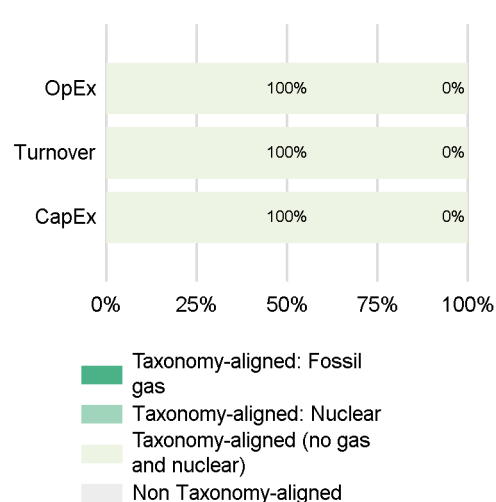
- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure (OpEx)** reflecting green operational activities of investee companies.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*




This graph represents 100,00% of the total investments.

\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**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 the EU Taxonomy.

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

As at year-end 2023, the percentage of investments that were made in transitional activities was 0%. The percentage of investments that were made in enabling activities was 0%.

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


As at year-end 2023, 95.71% of the investments were aligned with the EU Taxonomy.

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

As at year-end 2023, the percentage of investments with an environmental objective that were not aligned with the EU Taxonomy was 0%.

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

As at year-end 2023, the percentage of investments that were investments with a socially sustainable objective was 0%.

 **What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?**

4.29% of the investments was categorized under "not sustainable." Investments under "not sustainable" included cash or cash equivalents. These investments were used for diversification purposes, efficient portfolio management and risk management.



**What actions have been taken to attain the sustainable objective during the reference period?**

The renewable infrastructure debt team has monitored its investments and verified that energy production budgets have been met and that no issues have occurred during 2023 which might negatively impact the sustainable investment objectives.



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

This question is not applicable for this financial product because no comparison was made with a sustainable benchmark.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable objective.

