

# Green Bond Impact Reporting

NN Group N.V.  
2024



# Introduction

Under the NN Sustainability Bond Framework, NN Group may issue Green, Social or Sustainability Bonds ("Sustainable Finance Instruments"). NN Group believes that Sustainable Finance Instruments are an effective tool to channel financing to projects that have demonstrated clear environmental, climate or social benefits and contribute to the achievement of the UN Sustainable Development Goals (SDGs). By issuing Sustainable Finance Instruments, NN Group intends to align its funding strategy with its mission, sustainability strategy and objectives. In addition, NN Group aims to contribute to the development of the sustainable finance market and to the growth of sustainable and impact investing.

NN Group reports on the positive impact associated with the Eligible Asset Portfolio annually.

For residential and commercial green buildings, we report:

- estimated annual energy consumption in MWh
- estimated annual avoided/reduced emissions in tons of CO<sub>2</sub> equivalent

For renewable energy projects, we report:

- installed capacity in MW
- estimated annual avoided emissions in tons of CO<sub>2</sub> equivalent

Impact measurement on residential green buildings was performed by CFP, an external consultant. Further information about the methodology behind impact measurement on residential green buildings together with the results can be found in the last part of this impact report. Impact figures for residential green buildings refer to financial year 2024.

Impact measurement on commercial green buildings and renewable energy was performed internally. In 2023, we developed a **'Climate Solutions Investments and Impact Measurement Framework'** to calculate avoided emissions of the climate solutions portfolio. The impact measurement framework is internally developed but draws on several market standards and guidance, such as PCAF Financed Emissions Standard, ICMA Harmonised Framework for Impact Reporting and Nordic Public Sector Issuers Position Paper on Green Bonds Impact Reporting. The impact measurement framework can be found on **NN Group website**.

Commercial green buildings and renewable energy assets in the NN Green Bond eligible portfolio are a subset of our climate solutions portfolio. As a result, the impact measurement framework is used as the basis for this impact reporting.

Impact reporting on commercial green buildings and renewable energy projects includes assets that were in the NN Green Bond eligible asset portfolio at the end of 2024 and for which 2023 data on impacts was available. Impact figures for these two categories become available in the second half of the following year. Therefore, impact figures for commercial green buildings and renewable energy projects refer to financial year 2023. For the same reason, impact figures for assets acquired in 2024 were not collected. A summary of the methodology and an overview of the portfolio for renewable energy is included on page 4 and for commercial green buildings on page 5.

Table 1. NN Green Bond Impact Report 2024

Eligible ICMA Project Category	Number of Eligible Projects/ Buildings – YE2024 <sup>1</sup>	Eligible Portfolio (EUR mln) - value YE2024 <sup>1,2</sup>	Eligible Portfolio (EUR mln) - value YE2023 <sup>1,2</sup>	Estimated Annual Avoided Emissions (tCo <sub>2</sub> ) <sup>3</sup>	Total Installed Capacity (MW)	Estimated Annual Energy Consumption (MWh) <sup>3</sup>
Residential Green Buildings	37,877	€ 11,485		65,706		400,873
Commercial Green Buildings	7	€ 463	€ 456	6,546		20,232
Renewable Energy	26	€ 381	€ 433	290,610	314	
<b>Total</b>	<b>37,910</b>	<b>€ 12,329</b>	<b>€ 889</b>	<b>362,862</b>	<b>314</b>	<b>421,105</b>

<sup>1</sup> The amount represents the share of the total eligible portfolio for which impact metrics could be calculated. Therefore, this amount can be either the same or lower than the one reported in the allocation report.

<sup>2</sup> For ease of calculating the economic intensity of impact figures for Commercial Green Buildings and Renewable energy, we provide the value of eligible assets for both financial year 2023 and 2024. The eligible portfolio value for Residential Green Buildings in December 2023 is not reported as impact figures for this category refer to the financial year 2024.

<sup>3</sup> For Residential Green Buildings Annual Energy Consumption has been estimated for financial year 2024 and for Commercial Green Buildings for financial year 2023.

# Renewable energy

### Methodology

For renewable energy investments, we follow the PCAF guidance and define estimated emissions avoided as emissions that would have happened if investments had been directed in the same attribution to the electricity generated by the least economically efficient energy generation facility in a country where the asset operates (the so-called operating margin). We only report impact for assets in operation as assets in development or construction have not started generating electricity yet. For generated electricity, we use actual or P90 10-year estimated electricity production figures which is a more conservative measure than the P50 value recommended by PCAF. Emissions avoided are obtained as follows:

$$\text{Avoided emissions}_p = \sum_a \text{Attribution factor}_a \times \text{Electricity production}_a \times \text{operating margin}_c$$

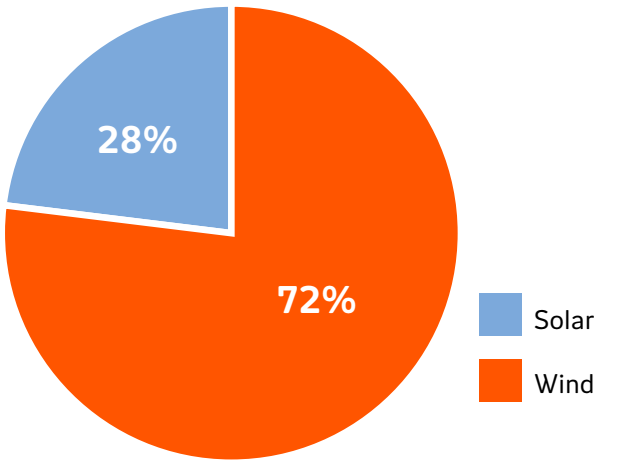
where attribution factor is calculated according to the following formula:

$$\text{Attribution factor}_a = \frac{\text{Debt} - \text{repayments}_a}{\text{Total equity} + \text{debt}_a}$$

and country-level operating margin is retrieved from the **UNFCCC International Financial Institution (IFI)**.

Since we receive production and generation data from external asset managers and we know the outstanding amount of our investment in the project or investee as well as its total equity plus debt, we assign the PCAF data quality score of 3<sup>1</sup> to this category.

Figure 1. Breakdown of YE2023 investment value by technology



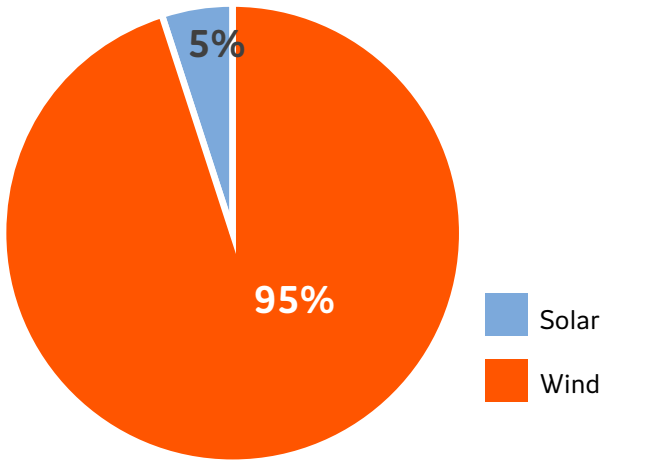
### Portfolio

As of year-end 2024, renewable energy assets in the eligible portfolio spread across wind and solar projects and across the EU and the UK. Table 2 provides an overview of assets in the portfolio, while Figures 1 and 2 provide further details in the portfolio by technology. The average avoided emissions per EUR invested amount to 0.67kgCO<sub>2</sub>/€.

Table 2. Breakdown of renewable energy investments

	Number of assets	Amount (EURm, YE2024)	Amount (EURm, YE2023)
Total assets in portfolio (YE2024)	39	574	
Assets for which impact is calculated	26	381	433
New assets in 2024	5	104	
Assets in development	8	89	

Figure 2. Breakdown of 2023 avoided emissions by technology



<sup>1</sup> As defined in PCAF, 2022, p83, **The Global GHG Accounting and Reporting Standard for the Financial Industry (carbonaccountingfinancials.com)**

# Commercial green buildings

## Methodology

Estimated emissions avoided for investments in green buildings are defined as the difference between estimated emissions from investments in commercial green buildings and estimated emissions from equally sized properties with the average emission intensity from the same country and sector. This relies on the definition provided in the Position Paper on Green Bonds Impact Reporting by Nordic Public Sector Issuers. In the current portfolio, we define commercial green buildings as buildings built before 31 December 2020 with at least an Energy Performance Certificate (EPC) class A or at least LEED 'Gold', BREEAM 'Excellent', DGNB 'Gold', HQE 'Excellent' level of certification.

In order to calculate emissions avoided and energy saved for our commercial green buildings portfolio, we rely on data from the Global Real Estate Sustainability Benchmark (GRESB). This data becomes available only in the latter part of the year following the year for which asset data is reported. The emission and energy intensity data from GRESB is compared with the average CO<sub>2</sub> emission and energy intensity of buildings in the corresponding sector and country. The difference between the two gives energy saved per m<sup>2</sup> and emissions avoided per m<sup>2</sup>. The source of country- and sector-specific emissions and energy intensity data is PCAF European building emission factor database created by Guidehouse Netherlands B.V. on behalf of PCAF.

Energy saved per m<sup>2</sup> = Energy intensity<sub>a</sub>  
– energy intensity<sub>c,s</sub>

Emissions avoided per m<sup>2</sup> = emission intensity<sub>a</sub>  
– emission factor<sub>c,s</sub>

where a stands for asset, c for country and s for sector.

It follows that emissions avoided and energy saved at the portfolio level are calculated as:

Energy saved<sub>p</sub> = Σ<sub>a</sub> Attribution factor<sub>a</sub> × Area<sub>a</sub>  
× energy saved per m<sup>2</sup><sub>a</sub>

Emissions avoided<sub>p</sub> = Σ<sub>a</sub> Attribution factor<sub>a</sub> × Area<sub>a</sub>  
× emissions avoided per m<sup>2</sup><sub>a</sub>

where attribution factor is calculated as:

$$\frac{\text{NN Gross Asset Value}_a}{\text{Asset level property value}_a}$$

We used the latest available emission factors. These emission factors are taken directly from the PCAF European building emission factor database. Country- and sector-specific energy intensities and emission factors used as benchmarks are derived directly from the CRREM Global Pathways.

For both asset classes, we needed to make further adjustment to the data because PCAF database provides more granular data on building types than available for our portfolio. Table below matches building types from our portfolio to building types taken from PCAF.

Table 3. Matching between NN property types and PCAF building types

NN building type	PCAF building type	NN-adjusted PCAF building type
Logistics	Distribution warehouse cold	Non-residential total
Logistics	Distribution warehouse warm	Non-residential total
Office	Office	Office
Retail	Retail – high street	Non-residential total
Retail	Retail – shopping centre	Non-residential total
Retail	Retail – warehouse	Non-residential total

<sup>1</sup> Nordic Public Sector Issuers, 2020, [NPSI\\_Position\\_paper\\_2020\\_final.pdf \(kuntarahoitus.fi\)](#)

If we apply the PCAF Data Quality Score based on the benchmark, we would assign the asset class a Score 4. We can also assign the score based on the data about the underlying properties. GRESB provides asset-level energy and emission data as reported to it by asset managers. But, since various asset managers use different emission factors, we take a precautionary approach and apply score 2.

**Portfolio**

As of year-end 2024 investments in commercial green buildings span across the EU and three sectors: logistics, office and retail. Table 4 provides an overview of assets in the portfolio, while Figures 3 and 4 provide further details in the portfolio by energy rating (energy performance certificate and green building certificate). The average avoided emissions per EUR invested amount to 0.01kgCO2/€.

Table 4. Breakdown of commercial green buildings

	Number of assets	Amount (EURm, YE2024)	Amount (EURm, YE2023)
Total assets in portfolio (YE2024)	8	477	
Assets for which impact is calculated	7	463	456
New assets in 2024			
Assets with missing data	1	14	

Figure 3. Breakdown of YE'23 investment value by energy rating

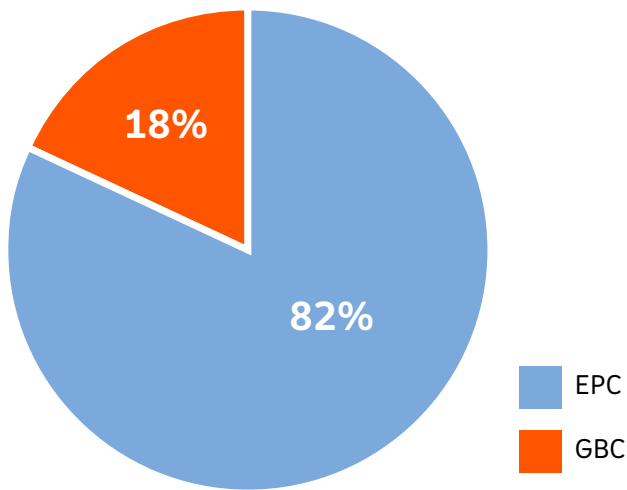
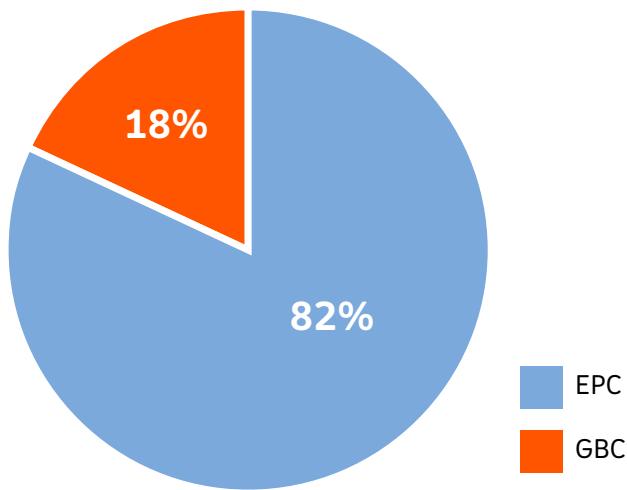


Figure 4. Breakdown of 2023 avoided emissions by energy rating







# Residential Green Buildings

**Project:** Impact Assessment Eligible Green Asset Portfolio NN Group

**Subject:** Reduced CO<sub>2</sub>-emission calculation

**Date:** April 2025

CFP Green Buildings has been asked to compare the greenhouse gas emissions<sup>1</sup> of a specific, energy-efficient group of residential real estate (in this document indicated as Eligible Green Asset Portfolio<sup>2,3</sup>) to that of a comparable group of residential real estate with an average energy efficiency (indicated as “Reference” or “Reference Group”<sup>4</sup>). The objective of this analysis is to report the positive impact of the sustainable residential real estate portfolio of NN Group. The sustainable residential real estate of NN Group complies with the criteria of the EU Taxonomy Delegated Regulation from June 2021. This document outlines the results of this analysis.

## Preface

NN Group N.V. (“NN Group” or “the Group”) is an international financial services company, operating in 10 countries with a strong presence in Europe and Japan. NN Group has approximately 19 million customers, is listed on Euronext Amsterdam and employs approximately 16,000 people.

In the context of climate change, in 2024 we entered uncharted territory. According to the World Meteorological Organisation

(WMO), last year the global average surface temperature exceeded 1.5 °C above pre-industrial levels for the first time, threatening the Paris Agreement’s goal of keeping temperatures below this threshold. Furthermore, the UN Environment Programme (UNEP) reports that we are on course for a 2.6-3.1°C temperature increase over the course of this century. The physical effects of climate change are becoming more evident too; with wildfires, storms, droughts and floods posing an increasing threat to communities and ecosystems. According to the Intergovernmental Panel on Climate Change (IPCC), these impacts disproportionately affect the marginalised and most vulnerable. Against this backdrop, sentiment opposing the incorporation of sustainability considerations into investing has gained traction, particularly in the US, as evidenced by a number of high-profile withdrawals from global climate initiatives.

We acknowledge NN Group’s role and responsibility to help establish a sustainable economy through our investments, insurance and banking activities, and through our own operations, while supporting our stakeholders, particularly those who most need our help. As impacts of climate change become ever more evident, the associated risks and challenges for our business increase. However, there are also opportunities for innovation; to create positive impact and help accelerate the transition to a low-carbon economy. We are committed to reducing our greenhouse gas (GHG) emissions, while investing in and

<sup>1</sup> Greenhouse gas emissions are calculated in CO<sub>2</sub>-equivalent, which will be referred to as CO<sub>2</sub> throughout this document.

<sup>2</sup> When referring to the Eligible Green Asset Portfolio in this part of the document, we refer to Dutch Residential Green Buildings only.

<sup>3</sup> The Eligible Green Asset Portfolio consists of 37,877 objects. The Eligible Green Asset Portfolio represents 38% as per 31-12-2024 of the total outstanding amount of the total amount of the NN Group N.V. mortgage portfolio.

<sup>4</sup> The Reference Group represents the average CO<sub>2</sub>-emissions of residential buildings in the Netherlands, taking the floor area of the eligible assets into account.

insuring climate solutions, and collaborating with others to create momentum for change.

## The Eligible Green Asset Portfolio

A total of 37,877 assets have been selected as eligible for the NN Group Eligible Green Asset Portfolio. Assets in the NN Group Eligible Green Asset Portfolio either have a registered energy label A, belong to the top 15% of the national or regional building stock expressed as operational Primary Energy Demand, as required by the EU taxonomy, or meet the requirements for a PED lower than 10% threshold set for a Nearly Zero Energy Building (NZEB).

For the selection of the top 15%, the year a new building code was introduced was used as a criterion, as described in the Green Residential Buildings Methodology Assessment Document of March 2024<sup>5</sup>. This is because the Dutch Building Regulation sets out energy efficiency requirements for different building types. For example, the Dutch Building Code 2000 requires an EPC score of at least 1.0. Over time the Dutch Building Regulation becomes more stringent regarding energy-efficiency and sustainability requirements for new buildings. The year a new building code was introduced and therefore used as a selection criterion for the top 15% is 2006. Approximately 12.28% of the Dutch housing stock are residential buildings built between 2006 and year-end 2020. This way, the buildings in NN Group's Eligible Green Asset Portfolio belong to the top 15% of most energy-efficient buildings of the Dutch residential real estate market.

For buildings built after 31 December 2020 in the portfolio, they are 10% more energy efficient than the local Dutch NZEB requirements as they comply to the following values:

- Ground based houses (such as houses and (semi)-detached houses): Equal to or lower than 27 kWh/m<sup>2</sup>/year.
- Non-ground based buildings (such as flats and apartments): Equal to or lower than 45 kWh/m<sup>2</sup>/year.

## Methodology

The CO<sub>2</sub>-emissions of the 37,877 eligible objects, as selected by NN Group are determined by using the calculated energy consumption of these objects.

The energy usage is based on algorithms and benchmarks from the expert system of CFP Green Buildings. CFP's Expert system is a database consisting of actual energy data of buildings. A section of this anonymized data provides live energy data derived from CFP's Energy Monitoring projects. Moreover, public big data, for example yearly updated average energy usage of homes in the Netherlands provided by Statistics Netherlands (CBS), is used to improve and check the benchmarking model. CFP green buildings continuously improves its calculation methods and algorithms when new data or insights become available. In this study, the calculated energy consumption of the Reference Group was determined based on data from CBS, RVO, Kadaster and CFP<sup>6</sup>. The Netherlands' average CO<sub>2</sub> emissions per square meter per building type are calculated based on these sources. These averages are regularly updated as the public sources are also updated regularly. The numbers used for the calculations in this report are given in the table below<sup>7</sup>.

### CO<sub>2</sub> emissions of the Reference Group per m<sup>2</sup>

Residential	28.7	kg CO <sub>2</sub> e per year
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Table 1: Emission of the Reference Group

<sup>5</sup> Source: <https://www.nn-group.com/article-display-on-page-no-index/methodology-report-nn-group-cfp.htm>

<sup>6</sup> The Reference Group has the same floor area as the eligible objects. The CO<sub>2</sub>-emissions are calculated by CFP algorithms taking into account the energy usage of all residential buildings in the Netherlands.

<sup>7</sup> The emission factors of table 2 are used.



The Reference Group is a dynamic portfolio that is becoming more sustainable over time, as it represents the Dutch (residential) building stock, which is also becoming more sustainable.

The total energy consumption can be converted to CO<sub>2</sub>-emissions by using standard conversion factors. The Dutch government created a widely accepted and uniform list of grid emission factors:

<http://www.co2emissiefactoren.nl>. The grid emissions related to the direct emissions are used, also known as Tank-To-Wheel (TTW<sup>8</sup>). This is in accordance with the generally accepted PCAF<sup>9</sup> methodology. Whenever the electricity's origin is unknown, the emission factor for electricity from an undefined energy source should be used. The factor for electricity is updated regularly to reflect changes in the Dutch electricity mix. This leads to the following emission factors:

#### Applied GHG emission factors<sup>10</sup>

Natural gas	1.779	kg CO <sub>2</sub> e /m <sup>3</sup>
Electricity	0.270	kg CO <sub>2</sub> e /kWh

Table 2: Dutch CO<sub>2</sub>-emission factors

In addition, table 3 shows the distribution of the assets in the NN Group green residential building portfolio among eligibility criteria:

1. Residential buildings with an A-label.
2. Buildings in the top 15% of the national stock, as described in the Green Residential Buildings Methodology Assessment Document of March 2024.
3. Buildings built since 2021 that meet a PED that is 10% lower than the NZEB requirements.

Criteria	Objects
Buildings with an A-label <sup>11</sup>	29,231
Buildings built between 2006-2020 (Top 15%) <sup>12</sup>	5,539
Buildings built since 2021 with PED of NZEB -10%	3,107

Table 3: Assets in the Green Building Portfolio

CFP green buildings continuously improves its calculation methods and algorithms when new data or insights become available. Over the last years, the algorithms have been improved so that energy labels play a more critical role in determining the energy usage. However, other input fields for example floor area, building year, and building type also influence the calculated energy usage. In May 2024, the Green Buildings Tool was updated to provide a more accurate estimation of electricity consumption from (hybrid / full electric) heat pumps, particularly in newer or highly energy-efficient buildings. As a result, electricity consumption appears slightly higher than previous years, while gas consumption has decreased in some cases especially in buildings with higher energy labels, and/or constructed after 2020.

## Energy consumption

Table 4 shows the calculated energy consumption of the Eligible Green Asset Portfolio. The calculated annual energy consumption is approximately 173.0 million kWh of electricity and 28.5 million m<sup>3</sup> of natural gas. To calculate the total energy consumption in kWh, the natural gas consumption in m<sup>3</sup> needs to be converted to kWh. One m<sup>3</sup> of natural gas is equal to 9.769 kWh. So to convert the natural gas consumption to kWh, the consumption in m<sup>3</sup> (28.5 million) must be multiplied by 9.769 giving a consumption of 277.9 million kWh. The total calculated energy consumption is 79.4 kWh per m<sup>2</sup> (30.5 + 48.9 kWh per m<sup>2</sup>)<sup>13</sup>.

<sup>8</sup> Tank to Wheels (TTW) are the direct emissions of an activity. In this case, the direct emissions of the energy usage.

<sup>9</sup> PCAF is a global partnership of financial institutions that work together to develop and implement a harmonized approach to assess and disclose the greenhouse gas (GHG) emissions associated with their loans and investments.

<sup>10</sup> Source: <https://www.co2emissiefactoren.nl> using TTW emissions, retrieved 28-03-2025.

<sup>11</sup> This category includes buildings with building year after 2020. However, these have a building permit before the first of January 2021.

<sup>12</sup> This category has no registered energy labels.

<sup>13</sup> The total electricity consumption (173.0 million kWh) and gas consumption (277.9 million kWh) is divided by the total amount of square meters of the portfolio (5.7 million m<sup>2</sup>), to calculate the electricity consumption (30.5 kWh/m<sup>2</sup>) and gas consumption (48.9 kWh/m<sup>2</sup>) per square meter.

	#	m <sup>2</sup>	Electricity consumption		Natural gas consumption	
			(x1,000 kWh)	(kWh/m <sup>2</sup> )	(x1,000 m <sup>3</sup> )	(kWh/m <sup>2</sup> )
<i>Buildings with an A-label</i>	29,231	4,322,623	131,391	30.4	23,241	52.5
<i>Buildings built between 2006-2020 (Top 15%)</i>	5,539	917,121	25,098	27.4	5,206	55.5
<i>Buildings built since 2021 with PED of NZEB -10%</i>	3,107	440,263	16,484	37.4	0	0
<b>Total Eligible portfolio</b>	<b>37,877</b>	<b>5,680,007</b>	<b>172,973</b>	<b>30.5</b>	<b>28,447</b>	<b>48.9</b>

Table 4: Calculated energy consumption Eligible Green Asset Portfolio

## CO<sub>2</sub>-emission

Table 5 shows the CO<sub>2</sub>-emissions of the Eligible Green Asset Portfolio and the Reference Group, based on the calculated energy consumption. The total CO<sub>2</sub>-emissions of the Eligible Green Asset Portfolio is 97,310

tonnes CO<sub>2</sub> per year while the annual CO<sub>2</sub>-emission for the Reference Group is 163,016 tonnes. Thus, the buildings are estimated to emit 65,706 tonnes of CO<sub>2</sub> per year less than the Reference Group.

	GHG emission Eligible Green Asset Portfolio (tonnes CO <sub>2</sub> e)	GHG emission Reference (tonnes CO <sub>2</sub> e)	GHG emissions Reduced (tonnes CO <sub>2</sub> e)
<i>Buildings with an A-label</i>	76,821	124,059	47,239
<i>Buildings built between 2006-2020 (Top 15%)</i>	16,039	26,321	10,283
<i>Buildings built since 2021 with PED of NZEB -10%</i>	4,451	12,636	8,185
<b>Total Eligible portfolio</b>	<b>97,310</b>	<b>163,016</b>	<b>65,706</b>

Table 5: CO<sub>2</sub>-emission Eligible Green Asset Portfolio compared to the Reference Group

## Annual development of climate impact

CFP Green Buildings also gave insights into the energy consumption of the Eligible Green Asset Portfolio as per year-end 2023 and compared the CO<sub>2</sub>-emissions of the Eligible Green Asset Portfolio. Figure 1 shows the

energy consumption of the Eligible Green Asset Portfolio in 2023 and 2024. In order to compare the outcomes of both reports, the numbers are converted to consumption / CO<sub>2</sub>-emissions per m<sup>2</sup>.

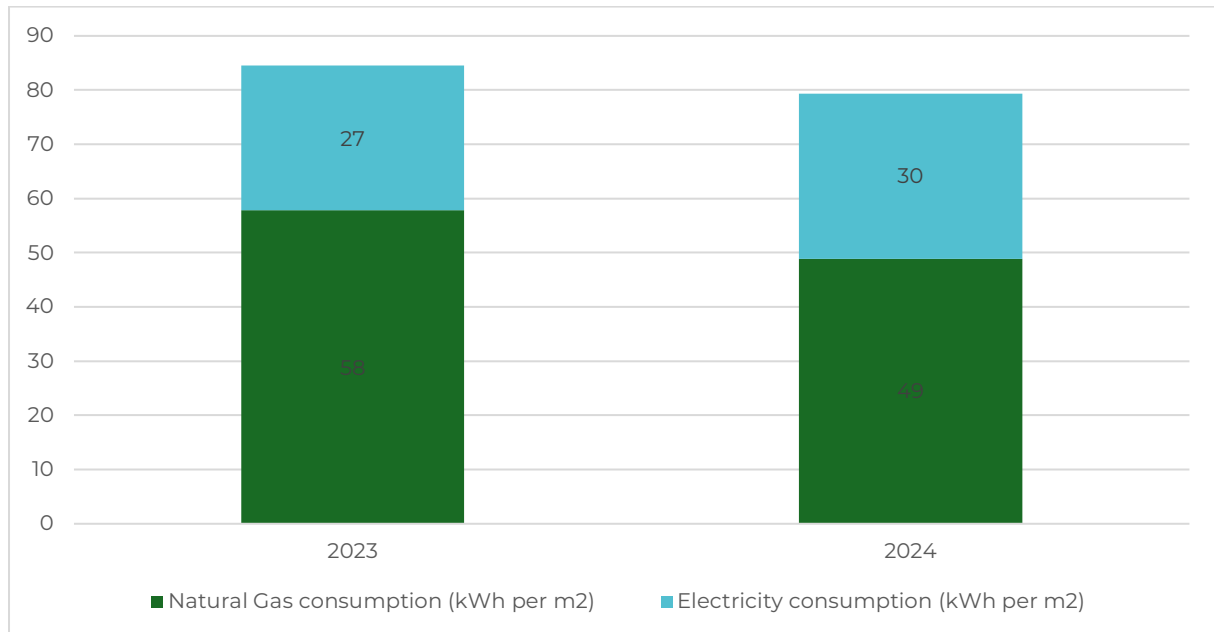


Figure 1: Calculated energy consumption comparison per m<sup>2</sup> Eligible Green Asset Portfolio

The (estimated) electricity consumption has not visibly improved, which can be explained by several factors. As the Green Buildings Tool was updated in May 2024 to better estimate electricity use from heat pumps, particularly in newer or highly efficient buildings, it leads to slightly higher calculated electricity consumption and lower gas consumption. In the Eligible Green Asset portfolio the number of buildings with an energy label A and the

number of buildings built since 2021 with PED of NZEB -10% have increased substantially compared to 2023 leading to an increased use of heat pumps in the portfolio resulting in higher electricity demand and lower gas usage. Additionally, portfolio changes, with some buildings added or removed, have also influenced overall energy consumption due to different usage patterns across building types.

Figure 2 gives insights on the CO<sub>2</sub>-Emissions per m<sup>2</sup> of the Eligible Green Loan Portfolio in 2023 and 2024. The total energy consumption is converted to CO<sub>2</sub>-emission by using standard conversion factors. The CO<sub>2</sub>-emission is calculated over the entire portfolio, divided by the total amount of square meters. This graph shows that the GHG emissions per m<sup>2</sup> of the Eligible Green Asset Portfolio have decreased

over the last year, from 17.9 kg CO<sub>2</sub>/m<sup>2</sup> to 17.1 kg CO<sub>2</sub>/m<sup>2</sup> as the Eligible Green Asset Portfolio per year-end 2024 includes relatively more newly built buildings that have high energy efficiency as determined by latest building regulations. Therefore, the reduced emissions per m<sup>2</sup> have increased from 10.9 kg CO<sub>2</sub>/m<sup>2</sup> to 11.6 kg CO<sub>2</sub>/m<sup>2</sup>.

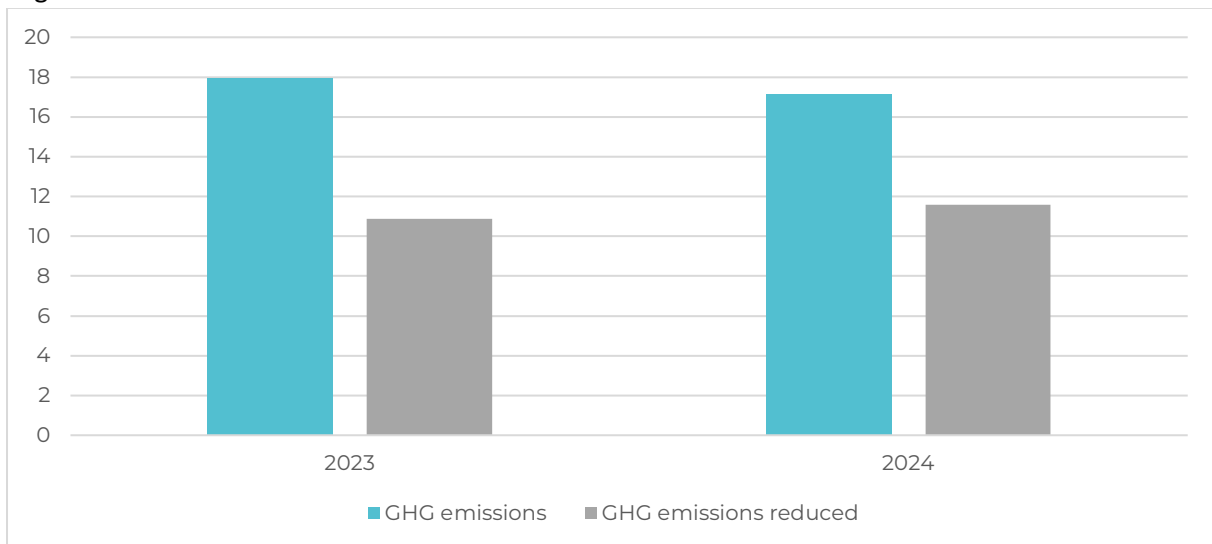


Figure 2: GHG emissions of the Eligible Green Loan Portfolio and GHG emissions reduced relative to the Reference Group.

## Conclusion

The following conclusions are drawn from this study:

- The buildings in the Eligible Green Asset Portfolio are estimated to emit 65,706 tonnes of CO<sub>2</sub> per year less than the Reference Group, which is a difference of 40.3%.
- The total energy consumption is calculated at 79.4 kWh/m<sup>2</sup>.
- The reduced emissions have increased from 37.8% for 2023 to 40.3% for the year 2024. An increase of 2.5% in reduced emission performance in relation to the Reference Group.
- All buildings in the Eligible Green Asset Portfolio align with the substantial contribution to climate change mitigation criteria following the EU Taxonomy definition, either by having an EPC class A rating, belonging to the top 15% of the national building stock expressed as operational PED, or meeting the requirements for a PED lower than 10% threshold set for a Nearly Zero Energy Building (NZEB).

## Appendix: Data Integrity and validation in CFP Green Buildings Services

### Third-Party Verified Reliability of Sources and Algorithms

At CFP Green Buildings, we ensure our tools and data are reliable and accurate by working with independent third-party experts to review and verify the accuracy of the Green Buildings Tool<sup>1</sup>. Zanders, respected in real estate and energy efficiency, confirm that our algorithms are robust, and our data sources are trustworthy. This gives confidence to stakeholders like auditors, investors, and regulators.

We perform third-party validations in each country where the tool is used. Zanders assess our data and methods, providing recommendations to further improve accuracy. This ensures the tool stays up to date with local market conditions and industry best practices.

The Green Buildings Tool is designed to provide accurate, location-specific insights by tailoring its calculations to the building type and location. This approach ensures relevant and reliable results for every property.

The key data used in the tool is sourced from respected organizations and government publications and backed by detailed country-specific research. By combining expert validations, tailored calculations, and reliable data, we deliver a tool that meets the highest standards of accuracy and reliability.

### Commitment to Data Confidentiality

We believe the importance of confidentiality cannot be taken lightly. Full care is taken to handle all information provided by our clients in conformity with relevant data protection regulations, including GDPR. Our systems are designed to maintain rigid security protocols that ensure sensitive information remains secure throughout processing.

Complementing our internal strict policies on security and confidentiality are internationally recognized certifications showing our commitment to data security and confidentiality, including:

- **ISO 27001:2022 Certification:** In line with this standard, we have implemented an Information Security Management System, ISMS, that strives to guarantee comprehensive protection of information for our clients.
- **SOC 2 Report:** Our SOC 2 attestation is proof that we meet all the rigid criteria regarding security, availability, processing integrity and confidentiality.

We also follow the following practices:

- **Limited Access:** Data access is restricted to authorized personnel. We also apply the Need-To-Know principle in that individuals will only be given access to data they absolutely need to know for their jobs. We periodically review the rights of access to data in order to keep it compliant and further minimize any possible risk.
- **Encryption Standards:** Data transferred and stored is protected with advanced methods of encryption.
- **Four-Eyes Principle:** All major acts involving sensitive data by key persons are always approved and reviewed by

at least two team members for better accountability and accuracy.

Maintaining these high standards gives our clients confidence in knowing that their data is secure and handled with integrity.

### **About CFP Green Buildings**

CFP Green Buildings is the industry leader in sustainability for the real estate industry. Sustainability is at the core of everything we do, guiding our mission to create a more sustainable built environment. This commitment is underscored by our

certifications, including **B Corp** and **EcoVadis**, which reflect our adherence to the highest standards of social and environmental performance, transparency, and accountability.

We empower our clients to make informed decisions that will positively impact the environment and their bottom line through innovative tools, data-driven insights, and expert guidance. As an extension of their team, we continuously improve our processes and outcomes to protect a greener future for all.



## Important legal information

Certain of the statements contained herein are not historical facts, including, without limitation, certain statements made of future expectations and other forward-looking statements that are based on management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to, without limitation: (1) changes in general economic conditions, in particular economic conditions in NN Group's core markets, (2) changes in performance of financial markets, including developing markets, (3) consequences of a potential (partial) break-up of the euro or European Union countries leaving the European Union, (4) changes in the availability of, and costs associated with, sources of liquidity as well as conditions in the credit markets generally, (5) the frequency and severity of insured loss events, (6) changes affecting mortality and morbidity levels and trends, (7) changes affecting persistency levels, (8) changes affecting interest rate levels, (9) changes affecting currency exchange rates, (10) changes in investor, customer and policyholder behaviour, (11) changes in general competitive factors, (12) changes in laws and regulations and the interpretation and application thereof, (13) changes in the policies and actions of governments and/or regulatory authorities, (14) conclusions with regard to accounting assumptions and methodologies, (15) changes in ownership that could affect the future availability to NN Group of net operating loss, net capital and built-in loss carry forwards, (16) changes in credit and financial strength ratings, (17) NN Group's ability to achieve projected operational synergies, (18) catastrophes and terrorist-related events, (19) operational and IT risks, such as system disruptions or failures, breaches of security, cyber-attacks, human error, changes in operational practices or inadequate controls including in respect of third parties with which we do business, (20) risks and challenges related to cybercrime including the effects of cyberattacks and changes in legislation and regulation related to cybersecurity and data privacy, (21) business, operational, regulatory, reputation and other risks and challenges in connection with Sustainability Matters (please see the link to our sustainability matters definition [www.nn-group.com/sustainability/policies-reports-and-memberships/policy-and-reportlibrary.htm](http://www.nn-group.com/sustainability/policies-reports-and-memberships/policy-and-reportlibrary.htm)) (22) the inability to retain key personnel, (23) adverse developments in legal and other proceedings and (24) the other risks and uncertainties contained in recent public disclosures made by NN Group.

Any forward-looking statements made by or on behalf of NN Group speak only as of the date they are made, and, NN Group assumes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information or for any other reason.

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