

# Periodic Disclosure 2023

APG Infrastructure Pool 2016



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

**Product name:** APG Infrastructure Pool 2016

**Legal entity identifier:** 549300R0407JoSoSHQ34

**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.

Environmental and/or social characteristics	
<b>Did this financial product have a sustainable investment objective?</b>	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It made <b>sustainable investments with an environmental objective:</b> _____% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It made <b>sustainable investments with a social objective:</b> _____%	<input type="checkbox"/> It promoted <b>Environmental/Social (E/S) characteristics</b> and while it did not have a sustainable investment as its objective, it had a proportion of _____% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b>



#### Sustainability indicators

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

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

This product promotes the following environmental and/or social characteristics<sup>1</sup>:

### Exclusion Policy<sup>2</sup>

The Corporate Exclusion Policy applies to this product. The product does not invest in companies involved in the production, sale or distribution of:

- cluster munitions;
- anti-personnel mines;
- nuclear, chemical or biological weapons.

Furthermore, the product does not invest in companies involved in the production of:

- tobacco

The exclusion lists have been updated twice a year and communicated with the external Managers involved in this product.

### GRESB<sup>3</sup>

Participation in the Global Real Estate Sustainability Benchmark (GRESB) Infra and the GRESB Infra scores of the investments in the financial product. The Infrastructure Asset Assessment assesses ESG performance at the asset level for infrastructure asset operators, fund managers and investors that invest directly in infrastructure.

### Sustainable Development Investments<sup>4</sup>

An ambition applies to the Pool to invest in Sustainable Development Investments (SDIs) and to increase investments in SDIs as part of the total NAV (Net Asset Value) of the Pool.

Investing in SDIs is part of the Pool's investment strategy and decision-making process in the sense that the Pool actively seeks investments in SDIs and if an SDI has the same risk/return profile as an investment without the relevant SDI classification, then the SDI is preferred over the non-SDI investment. By means of this assessment per investment decision, the ambition is to achieve the highest possible percentage of SDIs as part of the total NAV of the Pool.

### Controversy screening

Investments in this product are structurally monitored on (severe) controversies through a dedicated application, RepRisk, where a watchlist has been set up for this financial product. Controversies, ESG incidents and other relevant news items with high headline risk are flagged and subsequently followed upon with the respective company. For those controversies that have been identified during the reporting period, a standard engagement framework applies and engagement process is followed.

<sup>1</sup> For more information about the Corporate Exclusion Policy, Corporate Inclusion Policy and the Sustainable Development Investments approach, please see: <https://apg.nl/en/about-apg/asset-management/responsible-investment/>.

<sup>2</sup> For more information about the Corporate Exclusion Policy and the Sustainable Development Investments approach, please see: [Responsible investment, good pension in a sustainable world | APG](#).

<sup>3</sup> For more information about the GRESB Infrastructure Asset Assessment, refer to [Infrastructure Asset Assessment | GRESB](#)

<sup>4</sup> Please note that Sustainable Development Investments do not constitute investments as defined by SFDR.

### Climate risk

We have in place structured monitoring and measurement of exposure to individual physical climate risk hazards for investments within this product. We make use of 427 and VeriskMaplecroft, through which we have set up an overview for this product. Risks are flagged and subsequently followed up on by our team.

### Responsible Investment Policy

Presence of an RI Policy in line with the Principles of the UN Global Compact and the relevant IFC Standards.

The following sustainability indicators are used to measure attainment of each of the environmental or social characteristics promoted by this financial product:

- The absence of excluded products/ companies in this financial product;
- The GRESB Infra score of investments in this product is being compared to the GRESB benchmark at both investment as well as aggregated across all APG Infrastructure products;
- The % of investments classified as SDIs versus the overall NAV of this product;
- Structured monitoring and quarterly reporting on (severe) controversies for investments within this product;
- Structured monitoring and measurement of exposure to individual physical climate risk hazards for investments within this product;
- The share of investments with an RI Policy in place.

### ● How did the sustainability indicators perform?

Sustainability Indicator	Measurement	Observations over reporting period	Observations over prior reporting period
The absence of excluded products/companies in this financial product;	Number of breaches of the exclusion policy.	There were no excluded products in the pool.	There were no excluded products in the pool.
The GRESB Infra score of investments in this product is being compared to the GRESB bench- mark at both investment as well as aggregated across all APG Infrastructure products;	Number of investments participating in GRESB, calculated based upon the NAV.	On NAV basis, 100% of investments in this product participated in GRESB <sup>5</sup> . Average GRESB Infra performance score for the investments in this product is 83.7 which compares to an average 83 score of all GRESB Infra participants.	On a NAV basis, 96% of investments in this product participated in GRESB. Average GRESB Infra performance score for the investments in this product is 87 which compares to an average 86 score of all GRESB Infra participants.
The % of investments classified as SDIs versus the overall NAV of this product	Percentage of SDI investments versus the overall NAV of the Pool.	~15% of NAV is considered an SDI.	15% of NAV is considered an SDI.
Structured monitoring and quarterly reporting on (severe) controversies for	Number of severe controversies	During the reference period, for one of the investments a	We make use of RepRisk, where we have set up a watchlist for this product. Controversies, ESG incidents, and other news items with high

<sup>5</sup> Throughout this document, all GRESB data references a period lagged by one year, based on information reported for 2022 and collected through the survey completed in 2023.

investments within this product	reported.	controversy was identified. This was related to a criminal probe for unauthorized waste operations, involving the management of the investee company. The investee company disputes the charges and initial hearings will take place. APG will continue to monitor the outcomes of this process.	headline risk are flagged and subsequently followed up on by our team. For those controversies that have been identified during the reporting periods, follows the standard engagement framework.
The share of investments with an RI Policy in place	Share of investments based upon NAV, with a RI policy in place.	100% of investments have a RI policy in place.	100% of investments have a RI policy in place.

● **... and compared to previous periods?**

The rise in "The share of investments with a Responsible Investment (RI) Policy in place" to 100% can be attributed to the adoption of a new definition/methodology, which utilizes GRESB variables. Specifically, if an asset reported to GRESB has a policy related to environmental, social, or governance factors, it is considered to have an RI policy in place. This determination is further weighted by the Net Asset Value (NAV) of assets reporting to GRESB.

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

Not applicable.

**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.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

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

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



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

Sustainability Indicators <sup>6</sup>				
Indicator	Metric		Explanation	Observations/data over the reporting period
PAI # 1	GHG emissions	Scope 1 GHG emissions	Scope 1 and 2 GHG emissions of the investments in this product are measured and monitored.	Scope 1: <b>18,127,494.78 CO<sub>2</sub>e</b> Scope 2: <b>775,161.76 CO<sub>2</sub>e</b>  Scope 3: <b>225,542,649.50 CO<sub>2</sub>e</b>  Total <b>244,445,306.04 CO<sub>2</sub>e</b>
		Scope 2 GHG emissions		
PAI # 2	Carbon footprint	Carbon footprint	Carbon footprint of the investments in this product are measured, monitored and quantified to determine how much is attributable to this product. GHG intensity in this product is multiplied by NAV, where measured data is available.	<b>0.18 CO<sub>2</sub>e/EUR</b>
PAI # 3	GHG intensity of investee companies	GHG intensity of investee companies	GHG intensity of the investments in this product is measured in terms of GHG by NAV.	<b>3.55 CO<sub>2</sub>e/EUR</b>
PAI # 4	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	This product is not allowed to invest in companies active in the fossil fuel sector.	47.4%
PAI # 5	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and production of investee companies from non-renewable energy sources compared to renewable	Share of non-renewable energy consumption is generally available to the extent that entities report to GRESB.	Consumed: 80.8% Sold: 96.12%

<sup>6</sup> Reported data for PAI #1, #2, #3, and #5 has been assessed Based on GREBS, GRESB Benchmarks, and APG Benchmarks.

		energy sources, expressed as a percentage of total energy sources		
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The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: **2023**.

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

#	Largest investments	Sector	Country	% Assets
1	3i Managed Infrastructure Acquisitions LP	Public Utility Companies	United Kingdom	54.8%

The top investments are calculated based on a quarterly average as a percentage of Net Asset Value. The country is the country of domicile.



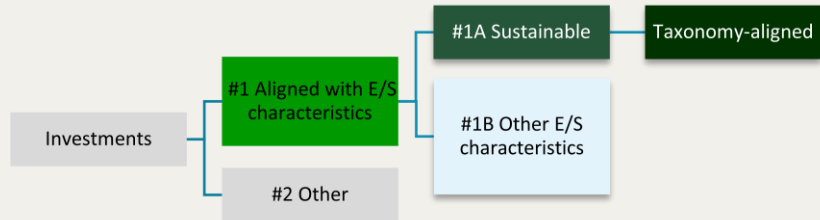
**Asset allocation** describes the share of investments in specific assets.

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

#### ● *What was the asset allocation?*

The investments in this financial product meet the environmental or social characteristics promoted by the financial product.

The asset allocation of this product is split between investments “aligned with E&S characteristics” (100% based on GRESB participation) and “other” (0%).



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Sector	Subsector	% Assets
Energy	Oil, Gas & Consumable Fuels	46.4%
Information Technology		0.0%
Public Utility Companies		3.5%
Real Estate		0.0%
Telecommunication		16.6%
Transport		33.5%

The sectors are calculated based on a quarterly average as a percentage of Net Asset Value. As required by the SFDR regulation, the subsectors related to fossil fuel are provided.

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.

**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.



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

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.

Through its investments, the product contributes to the following environmental objectives as set out in article 9 of the EU Taxonomy:

- climate change mitigation: 0.0%
- climate change adaptation: 0.0%

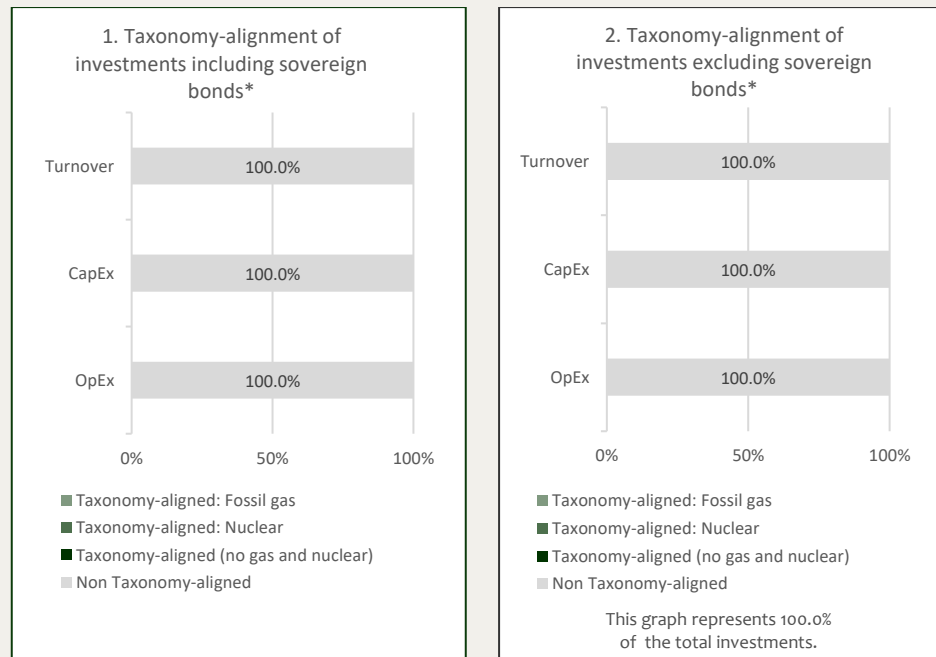
The figures provide the share of taxonomy aligned activities as a share of turnover. The taxonomy-alignment percentages are calculated based on a quarterly average. In limited cases in which the company did not publicly report on their taxonomy-alignment, equivalent information where obtained from a third party data provider. The requirements laid down in Article 3 of Regulation (EU) 2020/852 were neither subject to an assurance provided by an auditor nor reviewed by a third party.

- **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>7</sup>?**

- Yes:
- In fossil gas       In nuclear energy
- No

<sup>7</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

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\*\*.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.  
 \*\* For the purpose of readability, the shaded areas in the graph are zoomed in. The size of these areas therefore no longer matches their relative proportion compared to the total.

The taxonomy-alignment percentages are calculated based on a quarterly average. In limited cases in which the companies did not publicly report on their taxonomy-alignment, equivalent information were obtained from a third party data provider. The requirements laid down in Article 3 of Regulation (EU) 2020/852 were neither subject to an assurance provided by an auditor nor reviewed by a third party.

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

The product invested 0.0% of its investments in enabling activities and 0.0% in transitional activities.

The figures provide the share of taxonomy aligned transitional and enabling activities as a share of turnover. The taxonomy-alignment percentages are calculated based on a quarterly average. In limited cases in which the companies did not publicly report on their taxonomy-alignment, equivalent information were obtained from a third party data provider. The requirements laid down in Article 3 of Regulation (EU) 2020/852 were neither subject to an assurance provided by an auditor nor reviewed by a third party.



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

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

Not applicable.



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

Not applicable.



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

Not applicable.



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

Investments included under "#2 Other" are derivatives and investments that are not participating in GRSB, as they do not meet the environmental and/or social characteristics promoted by this financial product. In this pool, 0% of committed capital falls under “#2 Other.” Therefore, minimum environmental and/or social safeguards are not relevant for this financial product.



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

**Due diligence** (including ESG due diligence questionnaire completed at each underwriting). We mandate GRESB Infra reporting (an annual private markets survey) as a condition and use this to track ESG integration and key ESG metrics in our portfolio. Periodic monitoring of investments for identification of severe ESG incidents (RepRisk) as well as monitoring of Physical Climate Risk (427/Verisk Maplecroft).

Actions taken in 2023:

- APG Infrastructure joined the GRESB Net Zero Working Group
- Encourage portfolio companies to participate in the GRESB Infra SFDR survey, alongside the annual GRESB Infra survey.
- Finalized APG Infra Net Zero Strategy in line with IIGCC Guidance for Infrastructure Assets
- Launched an internal audit for SDI calculation verification to ensure accurate classification.
- Enhanced sustainability goal-setting, engagement prioritization, and progress tracking systems at APG Infrastructure.

- Finalized gathering scope 1, 2, and 3 greenhouse gas emissions across the infrastructure portfolio, developing a strategy to align with APG clients' climate goals and enhance our portfolio's Climate Transition Plans



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

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

- ***How does the reference benchmark differ from a broad market index?***

Not applicable.

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

Not applicable.

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

Not applicable.

- ***How did this financial product perform compared with the broad market index?***

Not applicable.