



Nature policy *Rabobank Group*

Introduction

As a cooperative bank we use our industry knowledge, networks and financial solutions to help customers transition to a sustainable future and help move 'the system' in a more sustainable and just direction. This is about increasing positive impact and reducing negative impact. Because we know: change is needed.

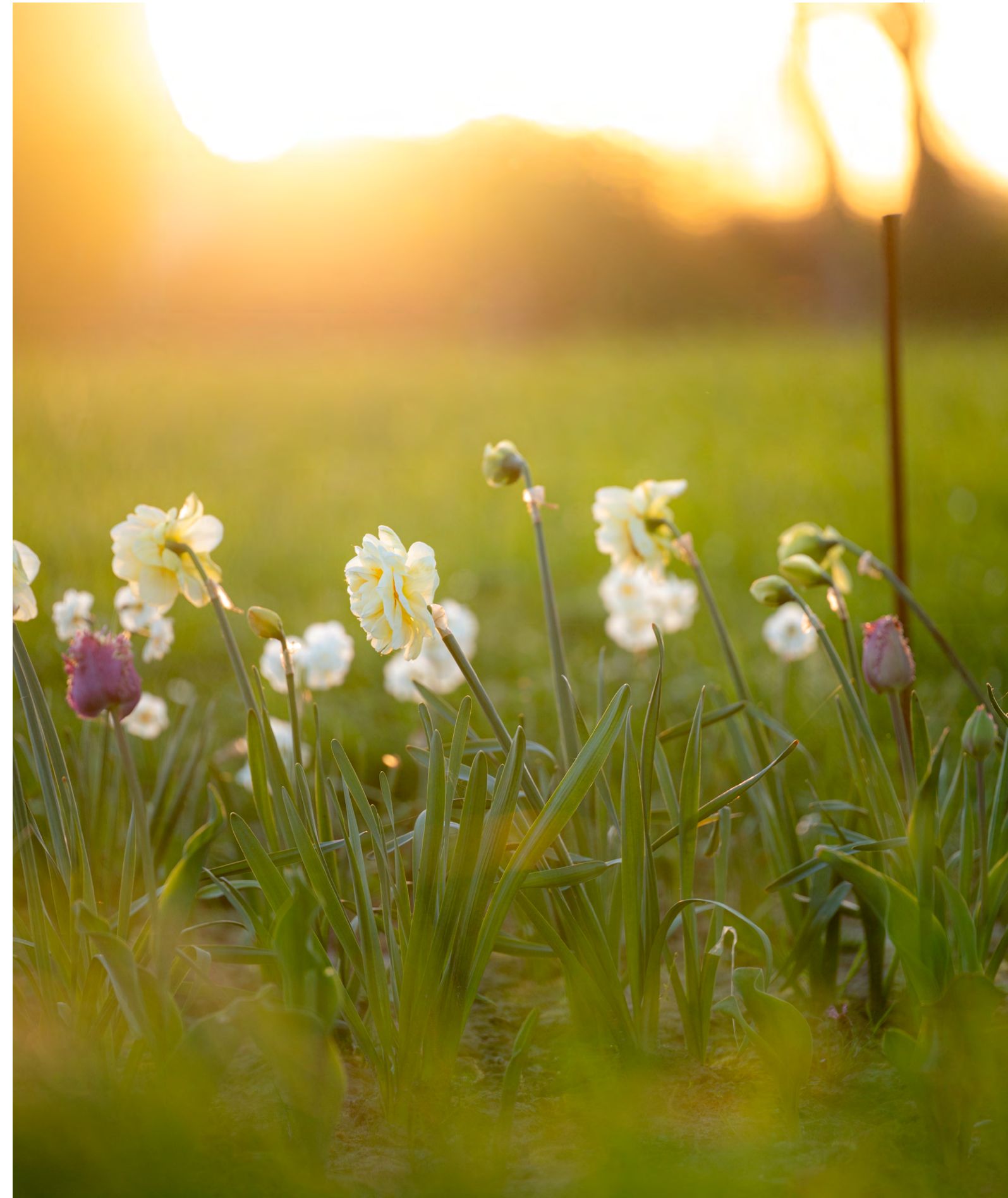
And we want to contribute to that as a cooperative bank. To us that means we act on climate, value nature and enable people. While the composition of our portfolio means that most of our focus is on helping our customers and their sectors transition to that sustainable future, we also make conscious choices in growing our portfolio in a more sustainable manner.

We use policies to set minimum requirements which clients and business partners are expected to meet. This also holds in relation to nature.

Healthy, biodiverse ecosystems sustain life by providing air, water, and other essential elements. From land to freshwater to oceans, the planet's ecosystems provide the natural resources to companies. Protecting and conserving nature, maintaining ecosystem services, and adequately managing natural resources are fundamental to sustainable development.

Rabobank recognizes that its own economic activities and that of its clients and business partners can create or contribute to impacts that could threaten nature. Businesses that do not effectively address their potential adverse impacts can cause serious long-term and possibly irreversible environmental damage and biodiversity loss. At the same time, this can create significant business risks and decrease economic vitality.

Rabobank believes that the best approach to halt and reduce adverse impacts is to maintain an agenda of positive engagement with government, society, and companies, and to actively promote best practices in production and sourcing.



The policy

We distinguish between impacts in our direct control and those that are indirectly created through our relationships with clients and business partners. We therefore set requirements for our own activities ('Rabobank's own activities') and for our clients and business partners ('acceptance requirements' and 'performance monitoring'), to the extent applicable.



*Rabobank's
own activities*



*Acceptance
requirements*



*Performance
monitoring*

Scope

This policy applies to all clients and business partners whose activities have potential and actual material impacts on nature. Potential and actual material impacts include the responsibility and controls over their value chains.



Rabobank's own activities

Regarding nature, for activities in our direct control we will:

- identify and prevent contributing to adverse impacts on biodiversity and ecosystem services;
- promote sustainable agricultural practices (notably precision farming) and balanced land-based, climate smart and nature inclusive farming, supported with bottom up solutions such as the development of a biodiversity monitor and its planet impact loan (for Dutch farmers), Open Soil Index, organic transition loan (for US farmers);
- support the development of a bio-based and circular economy. Where biomass and notably the residual streams are used as feedstock for the green building blocks of bio-based applications;
- identify and engage with the clients in our portfolio that could create exposure to material adverse environmental impacts;
- use natural resources, such as energy and water, as efficiently and optimally as possible, and protect or enhance the environment (e.g. through sustainable procurement, sustainable real estate, and sustainable IT);
- actively follow the scientific and public debate on the pros and cons of scales of production;
- engage in a continuous dialogue with authorities and other relevant stakeholders to promote the United Nations Sustainable Development Goals;
- actively participate in the leading (global) networks and roundtables.



Acceptance requirements

Rabobank assesses clients and business partners and their activities against specific acceptance requirements, which are split into client and business partner-level and activity-level.



Client and business partner-level

We do not accept clients or business partners that:

- operate in legally Protected Areas, as designated by national regulations, and/or are internationally designated for protection by the International Union for the Conservation of Nature (IUCN I and II areas), UNESCO World Heritage sites and/or Ramsar wetlands¹;
- cause or intentionally contribute to a reduction in the population of endangered species (on the IUCN Red List of threatened species).

Activity-level

We do not accept activities related to:

- conversion or deforestation of high conservation value areas² (e.g. with valuable species, landscapes, ecosystems, environmental services, basic needs for local communities, cultural values for Indigenous peoples), even if legally permissible;
- intentional introduction of alien species into natural landscapes or marine environments that have not been designated as farming areas;
- trade in or unauthorized catching of wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) or species on the IUCN Red List of threatened species;
- production of, or trade in, products containing Polychlorinated Biphenyls (PCBs) or other Persistent Organic Pollutants (POPs) that are subject to international bans or phase outs as listed by the Stockholm Convention;
- production of, or trade in, Ozone Depleting Substances (ODS) that are subject to international bans or phase outs as listed with target reduction and phase out dates by the Montreal Protocol.

Performance monitoring

We can request supporting information on our accepted clients' and business partners' controls and progress that demonstrate they:

- are aware of the key environmental impacts at their production/operational sites, by having an environmental plan addressing these impacts e.g. land use change, water, soil, agrochemicals, pollution;
 - for midstream and downstream, they also have a purchasing policy that takes value chain responsibility into account and that pays attention to the material impacts and sustainability issues in their supply chain;
- have and maintain an environmental management system, which includes monitoring impacts and implementing control measures commensurate with their risks and controls;
- undertake an Environmental and Social Impact Assessment (ESIA) for projects that meet the Equator Principles criteria³, and include results into planning of operational management;
- if developing plans, of which the realization adversely impacts ecosystem services and other high conservation values with social dimensions (cultural and community values), obtain the Free, Prior and Informed Consent (FPIC) of impacted communities.



Implementation

Rabobank embeds these acceptance requirements and performance monitoring in its business operations taking into account the applicable and relevant finance practices, thresholds per client and business partner type, different impacts per sector and region, and risks and controls that are applicable in the specific business operations and subsidiaries. As a result, requirements may be implemented differently across business operations and subsidiaries. In light of ongoing regulatory and societal changes, our sustainability policies are regularly reviewed and updated as necessary. This means that implementation is a continuous process, and there may be instances where parts of our policies are not fully implemented at a given time.

Rabobank supports its clients and business partners on their journey to become more sustainable and acknowledges that they might need time to fully meet the requirements mentioned in this policy. A limited number of exceptions can be made, in line with internal governance.



Our commitments

Rabobank is involved in sector initiatives and has joined commitments that relate to nature:

- Finance for Biodiversity Pledge
- Taskforce on Nature-related Financial Disclosures (TNFD)
- Partnership for Biodiversity Accounting Financials (PBAF)
- Deltaplan Biodiversiteitsherstel

Endnotes

¹ For energy projects subject to the Equator Principles, an exception is made at activity-level. Please refer to the energy policy.

² Source: [HCV Approach](#) | [HCV Network](#)

³ For transactions subject to the Equator Principles, the requirement for an ESIA as per Equator Principle 2 prevails.



Rabobank