

Operating Principles for Impact Management Nuveen Disclosure Statement¹ 2025

Nuveen is a founding signatory of the Operating Principles for Impact Management. The Impact Principles have proven an important step forward in promoting transparency in the impact investing industry, and we are encouraged to see the number of signatories to grow to more than 180 practitioners since the launch in 2019.

This is Nuveen’s **sixth** disclosure statement since 2019. Our most recent verification statement from BlueMark, a leading provider of independent impact verification and intelligence for the impact and sustainable investing market, is provided separately in full. BlueMark independently verifies the alignment of our impact management practices with the Operating Principles for Impact Management.

Nuveen implements impact investing strategies across four asset classes: fixed income, private equity, real estate, and private credit. Our approach to impact is rooted in industry best practices, such as the Operating Principles for Impact Management, and we have developed firm-level standards that apply to all impact investing products. These standards and processes are adapted to each strategy in a way that is most appropriate for the asset class, the related investment process, and the scale of the strategy. For each Principle in the disclosure statement, we have provided insight, where appropriate, to the differences of each strategy.

About Nuveen

Nuveen is the investment management arm of TIAA, a leading provider of retirement and other financial services to people in academic, government, medical, cultural and other nonprofit fields. Nuveen has been making impact investments for more than 30 years. The firm currently manages several impact investing vehicles, including capital from the TIAA General Account, funds, and institutional separately managed accounts.

Disclosure Statement

Nuveen (the “Signatory”) hereby affirms its status as a Signatory to the Operating Principles for Impact Management (“the Impact Principles”). This Disclosure Statement applies to the following assets (the “Covered Assets”):

- Nuveen Private Equity Impact Strategy (100% of the Portfolio)
- Nuveen Real Estate’s (NRE) Affordable Housing Strategy (100% of the Portfolio)
- Nuveen German Impact Living Fund (100% of the Fund)
- Arcmont Asset Management’s (“Arcmont”) Impact Lending Strategy (100% of the Strategy)

¹ The information contained in this Disclosure Statement has not been verified or endorsed by the Global Impact Investing Network (“the GIIN”) or the Secretariat or Advisory Board. All statements and/or opinions expressed in these materials are solely the responsibility of the person or entity providing such materials and do not reflect the opinion of the GIIN. The GIIN shall not be responsible for any loss, claim or liability that the person or entity publishing this Disclosure Statement or its investors, Affiliates (as defined below), advisers, employees or agents, or any other third party, may suffer or incur in relation to this Disclosure Statement or the impact investing principles to which it relates. For purposes hereof, “Affiliate” shall mean any individual, entity or other enterprise or organization controlling, controlled by, or under common control with the Signatory.

- Impact investments in Nuveen’s Core Impact Bond Fund (39% of the Fund)
- Impact investments in Nuveen’s Green Bond Fund (99% of the Fund)
- Impact investments within Nuveen’s Short Duration Impact Bond fund (60% of the fund)
- Impact investments in Nuveen’s Global Core Impact Bond Fund (40% of the fund)
- Impact investments in Nuveen’s US Core Impact Bond Fund (37% of the fund)
- Impact investments in Nuveen’s Emerging Markets Impact Bond Fund (30% of the fund)
- Impact investments in Nuveen’s Core Plus Impact Fund (64% of the fund)
- Impact investments in Nuveen’s Global Credit Impact Bond Fund (95% of the fund)
- Institutional separately managed accounts based on the above strategies (22%-99% of each account)
- Impact investments within a mixed assets account (16% of the account)

The total Assets under Management in alignment with the Impact Principles is **US\$19.4 billion as of December 31, 2024.**

Signed:

A handwritten signature in black ink that reads "Bill".

Name of Institution: Nuveen, a TIAA Company

Authorized Representative: Bill Huffman

Title: CEO

Principle 1: Define strategic impact objective(s), consistent with the investment strategy.

The Manager shall define strategic impact objectives² for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.

For each Nuveen impact fund, strategy, or portfolio we define a set of impact themes and follow established criteria and guidelines to ensure that investments align with those themes. The themes and guidelines are based on in-house expertise and available third-party research linking the activities financed to the overall impact objectives.

Asset Class	Impact Themes	Aligned UN Sustainable Development Goals
Fixed income	<ul style="list-style-type: none"> Affordable housing Community and economic development Renewable energy and climate change² Natural resources 	
Private Equity	<p>Climate Inclusion:</p> <ul style="list-style-type: none"> Resource efficiency Inclusive growth 	
Real Estate	<ul style="list-style-type: none"> Preserving and increasing the supply of affordable housing Improving the quality of affordable housing and adding green retrofits to increase sustainability Enhancing resident well-being through resident services and programs 	
Private Credit	<ul style="list-style-type: none"> Climate Health Education Sustainable Economic Growth 	

² Impact objectives can be defined as the intended impact that contributes to financial, institutional, social, environmental, or other benefits to a society, community, or group of people via one or more investment. Adapted from OECD-DAC (www.oecd.org/dac/).

² Renewable energy and climate change & Natural resources are the two environmental impact themes that apply to Nuveen’s Green Bond Fund.

Fixed Income: The fixed income impact themes are based on broadly recognized social and environmental challenges. The FI impact framework pre-dates the creation of the SDGs in 2015, however, since then we have incorporated the SDGs into our model. Now each impact theme has defined expected outputs and outcomes, which are linked to specific SDG targets. In many cases individual impact themes to correspond to more than one Global Goal.

Private Equity: The Private Equity Impact Investing Strategy seeks to invest in transformative companies that are disrupting value chains to reduce waste, mitigate climate change, and provide valuable products and services to low-income consumers. Within these themes, the Nuveen Climate Inclusion strategy has defined impact objectives and related impact KPIs. Additionally, at deal closing an impact thesis is developed for each company, which includes specific expected outcomes and outputs, along with relevant SDG alignment.

Real Estate: The US real estate impact strategy aims to generate positive community outcomes through preserving and increasing the supply of affordable housing and by incorporating social impact and sustainability initiatives in every investment. The team implements resident services focused on housing stability, health and well-being, financial education, transportation, community building, and digital access. To achieve environmental objectives, RE Impact typically adapts older building stock to be more climate resilient, supports sustainable buildings through new developments, and optimizes energy and water usage to effectively manage costs.

The German Living Impact fund (GERILF) focuses on developing new affordable housing in Germany, creating projects with sustainable, modular wood construction, and supporting resident communities through a partnership with a local foundation.

Private Credit: The Impact Lending Strategy aims to generate positive measurable environmental and social impact across four impact themes: Climate, Health, Education and Sustainable Economic Growth. Under each theme, Arcmont has defined specific sustainable objectives³ the strategy is seeking to contribute to (the “Arcmont Sustainable Objectives”). The Impact Lending Strategy aims to provide capital to companies with products, services and projects that make a substantial and credible contribution⁴ to at least one of the Arcmont Sustainable Objectives.

Principle 2: Manage strategic impact on a portfolio basis.

The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part

³ Reference to a “sustainable objective” is not intended to imply that any investment made as part of the strategy will be a “sustainable investment” or have a “sustainable investment objective” as set out in the SFDR, unless otherwise specified in the relevant fund documentation and/or disclosures made pursuant to the SFDR.

⁴ Given the breadth of potential investment opportunities, Arcmont will determine what constitutes “substantial” and “credible” on an individual investment basis together with the impact consultant. Further, Arcmont will document its analysis and basis for decisions at each step.

of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

Nuveen's portfolio managers set portfolio-level impact objectives and, where possible, aggregate metrics to monitor impact beyond the individual deal level. Subject matter experts on the Responsible Investing and investment teams review all impact investments to ensure alignment with the fund or portfolio's defined themes.

Fixed Income: Potential investments are reviewed prior to inclusion in the strategy based on their use of proceeds and alignment with the strategy's impact objectives. The GFI Impact team takes a direct, aligned to at least one of the four impact themes, and measurable, impact reporting based on relevant KPIs, approach. Annually, the GFI Impact team and the RI team compare impact data against prior years to determine if there is any material divergence that may need reconciliation.

Private Equity: The Nuveen Global Impact team integrates impact considerations into screening, due diligence, execution, and monitoring phases of the investment process. An impact assessment is incorporated in every deal memo, as is material ESG information. This information is reviewed by the investment committee to ensure the investment aligns with the impact themes of the strategy and meets the minimum thresholds for inclusion. This process is managed primarily by an embedded specialist on the Nuveen Global Impact team. All NGI team members set ESG and impact related goals as part of their standard goal-setting process. The NGI team has taken further steps to align staff incentives by explicitly including ESG and impact management into individual-level performance goals.

Real Estate: Nuveen Real Estate (NRE) Impact team has developed and implemented an Impact Framework, which enables the sector to manage impact at a portfolio-level, as well as throughout the lifecycle of an investment. The sector does this by leveraging several tools, which include an Asset Scorecard, Impact Plan, and Digital Asset Plan for each investment. The use of a Net Impact Score, generated from the Asset Scorecard, allows for comparison of impact across investments and supports the investment decision making process. The Impact team has linked impact performance to its staff incentive systems by requiring specific goals related to impact competency, impact delivery, and impact performance. The successful completion of these goals influences the variable compensation of individuals on the team.

GERLIF reviews impact from due diligence through Responsible Exit and incorporates several tools and checklists to inform the investment decision making process and monitor impact over the hold period. The team has created an Asset Scorecard, implemented a quarterly reporting process, and developed a robust Responsible Exit checklist.

Private Credit: At the pre-investment stage, a critical set of impact KPIs (including at least one outcome KPI) are identified and implemented into the loan documents. Arcmont selects these KPIs in conjunction with Arcmont's impact consultant and endeavors to select these from the IRIS+ catalogue of metrics.

Borrowers have contractual obligations to provide Arcmont with annual impact KPI performance data which is reported to investors via an annual impact report. The Impact Investment Committee will review and assess Impact KPI performance, with progress reported to limited partners in the annual Impact report. Where impact performance differs from expectations at the time of underwriting, Arcmont will seek to utilise the tools available as a private credit lender to address such instances – including engagement with management and private equity sponsors/owners. Note that carried interest is linked to certain impact-aligned criteria.

Principle 3: Establish the Manager’s contribution to the achievement of impact.

The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels.⁵ The narrative should be stated in clear terms and supported, as much as possible, by evidence.

At a minimum, all of Nuveen’s impact investments must contribute to impact through the project, business, or other entity financed (i.e., “enterprise-level contribution”). As an investor, Nuveen contributes to the achievement of impact through various mechanisms, which necessarily differ depending on the asset class of the investment. The investor contribution is documented in the fund- and sector-level theories of change, assessed during due diligence, and gauged throughout the holding period in quantitative and qualitative ways (e.g., case studies and investee feedback).

Fixed Income: Nuveen’s GFI Impact team has developed an overarching engagement process, which includes working with issuers to develop innovative deal structures, encouraging issuers to improve and expand their impact reporting efforts, and helping shape asset class specific guidance for impact reporting, through mechanisms like the Green Bond Principles. The team tracks issuer engagements within a dedicated engagement tracker to assess and document engagement characteristics including financial and non-financial, expected influence, and engagement type. To further align with Principle 3, the team will work to explore ways to track, document, and report on outcomes of targeted issuer engagement.

Private Equity: There are three primary ways that the Nuveen Private Equity Impact team provides additional contribution to our companies’ ability to achieve impact. The first is capital. Nuveen Private Equity Impact Investing is very often the first institutional investors in our portfolio companies, providing scaled growth capital to support our companies’ inflection. Nuveen also regularly brings in co-investors via relationships with other managers and limited partners. The second is governance. In most cases, Nuveen takes board seats on portfolio companies, providing strategic support to companies and counsel

⁵ For example, this may include: improving the cost of capital, active shareholder engagement, specific financial structuring, offering innovative financing instruments, assisting with further resource mobilization, creating long-term trusted partnerships, providing technical/market advice or capacity building to the investee, and/or helping the investee to meet higher operational standards.

on how to best grow businesses and impact. The third is via strategic engagements with companies. These could take the form of short-term research projects, longer term engagements to support building out processes or systems, or more ad-hoc support. In all cases, the team works with companies to set up policies and processes to support ESG and impact performance management.

Real Estate: As an investor, the NRE Impact Sector provides investor contribution through the development and preservation of affordable housing, the improvement of housing quality and sustainability, and the enhancement of resident well-being through services and programs. The team has developed tools to complete robust screening and due diligence processes to ensure that investment decisions and plans for each asset are informed by Impact and ESG considerations. Investor contribution is documented through impact plans for each new investment and tracked with an asset scorecard that helps measure the added benefits of social and sustainability initiatives. This information, as well as other key performance indicators, are updated each year in the asset management business planning process and data is used to inform service delivery changes or enhancements.

GERILF's investor contribution strategy has three main pillars: developing affordable housing, where not required by law, constructing properties in a sustainable way that goes beyond what is customary, and providing community support. An asset scorecard is used to assess investor contribution compared with what otherwise would have happened if other investors were financing the asset and the fund collects evidence of the activities implemented using quarterly portfolio monitoring.

Private Credit: Arcmont's primary contribution to the achievement of impact is the provision of capital. Arcmont provides financing to (i) support the growth and reach of companies with impactful products, services and projects and (ii) enable companies to execute discrete impactful initiatives. At the time an investment is made, Arcmont leverages an independent impact consultant to test, develop and validate the impact assessment produced by the deal team, utilizing the Five Dimensions of Impact framework to do so – this is documented and disclosed to investors via the annual impact report. In addition, Arcmont intends to use all the tools available to lenders to facilitate and drive companies to achieve the relevant Arcmont Sustainable Objective including impact-linked margin ratchets.

Principle 4: Assess the expected impact of each investment, based on a systematic approach.

For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact⁶ potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact?⁷ The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations.

⁶ Impact is considered the material effect/s on people and the environment resulting from the investment, as outlined in Principle 1. Impacts assessed under Principle 4 may also include positive ESG effects derived from the investment.

⁷ Adapted from the Impact Management Project (www.impactmanagementproject.com).

In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards⁸ and follow best practice.⁹

Nuveen currently assesses the expected impact of each investment in qualitative terms against our impact themes and product guidelines. Nuveen impact investments target North America, South America, Europe, Asia, Africa, and Oceania. When the information is available, we leverage the five dimensions of impact from the Impact Management Project (IMP) and use metrics aligned with IRIS+ to capture and track quantitative impact. We have also integrated other standards into our processes such as the Green Bond Principles.

Fixed Income: Nuveen has a robust process for assessing the expected impact of an investment. The GFI Impact team engages with issuers, reviews issuer green, social, sustainability (gss) frameworks, impact and allocation reporting requirements, potential negative impacts, and evaluation of expected use of proceeds considering what the intended impact is, who experiences the impact, and how significant the impact is in line with the IMP's five dimensions of impact. In addition to the GFI Impact team's thorough due diligence pre-investment, the RI team reviews newly purchased securities on a quarterly basis and documents the expected use of proceeds to be later evaluated against impact and allocation reporting as part of the annual impact reporting process. Few issuers publish project or bond-level quantitative expected outcomes prior to investment, but where available the RI team documents and reconciles expected with reported impact.

Private Equity: The private equity impact investing portfolio, employs an impact measurement system that requires an ex-ante impact assessment for each investment, focusing on the *What, Who, How much* and *Enterprise Contribution* IMP dimensions. The dimensions are integrated into investment committee memos at multiple stages. Since 2019, the team has also developed a more standardized approach for assessing impact risk for each investment. This approach addresses evidence risk (the likelihood of achieving expected impact) as well as opportunities to mitigate impact risks or negative impact. Where possible, the team relies on standardized impact metrics, including IRIS+ and the Joint Impact Indicators (JII).

Real Estate: NRE Impact team applies an Impact Framework to assess the expected impact of each prospective acquisition or development. A qualitative assessment of the prospective investment is

⁸ Industry indicator standards include HIPSO (<https://indicators.ifipartnership.org/about/>); IRIS (<iris.thegiin.org>); GIIRS (<http://b-analytics.net/giirs-funds>); GRI (www.globalreporting.org/Pages/default.aspx); and SASB (www.sasb.org), among others.

⁹ International best practice indicators include SMART (Specific, Measurable, Attainable, Relevant, and Timely), and SPICED (Subjective, Participatory, Interpreted & communicable, Cross-checked, Empowering, and Diverse & disaggregated), among others.

completed and covers the Impact Management Project (IMP)'s Five Dimensions of Impact, which includes better understanding the scale of impact, beneficiaries of the investment, potential risks and opportunities, and responsible exit considerations. The firm has developed an Asset Scorecard which assigns a baseline impact score, expected impact score, and net impact score utilizing specific indicators under the IMP's five dimensions. Having a set criterion ensures there is standardization and consistency in the investment monitoring process. The Impact team also conducts property visits and gathers feedback from property managers and residents to inform impact planning and delivery. In partnership with its research team, the Impact sector conducts research on demographics and market trends to contextualize investment opportunities and inform the decision-making process.

GERLIF assesses each investment opportunity against six dimensions, including intentionality, additionality, measurability, negative unintended consequences, responsible exit, and external validation. Each opportunity that moves forward then undergoes more in-depth impact due diligence where the firm evaluates strategic alignment and intentionality and the expected social and environmental performance for each property. GERLIF has also developed an Asset Scorecard that assigns an expected and net impact score against the IMP's 5 dimensions of impact and lays out clear scoring criteria to ensure standardization and consistency.

Private Credit: To assess and monitor the expected impact of investments, Arcmont uses a structured approach that was designed with a specialist independent impact consultant and is anchored in the IMP's Five Dimensions of Impact. The impact consultant is embedded into the pre-investment process to test, develop and validate the impact thesis of every investment. This includes assessing the intended impact goals of an investment, alignment with the Arcmont Sustainable Objectives and the significance of the investment's contribution to the intended impact. The process also identifies risks to the intended impact not occurring and the potential for negative impacts and/or unintended harm to occur. The impact consultant conducts this assessment using empirical data, studies, reports and leveraging the consultant's impact investing expertise. As part of this assessment impact KPIs are identified, including at least one outcome KPI. These are selected from the IRIS+ Catalogue of Metrics to the extent possible.

Principle 5: Assess, address, monitor, and manage potential negative impacts of each investment.

For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG)¹⁰ risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry

¹⁰ The application of good ESG management will potentially have positive impacts that may or may not be the principal targeted impacts of the Manager. Positive impacts resulting from ESG matters shall be measured and managed alongside with, or directly embedded in, the impact management system referenced in Principles 4 and 6.

practice.¹¹ As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.

In Nuveen's experience, there is substantial overlap between negative impact and ESG risks. Therefore, we leverage our robust ESG risk identification and management tools built over several years and adapted to each sector and asset class as a starting point to identify potential negative impact. You can read more about Nuveen's approach to ESG risk identification and management in the [TIAA Policy Statement on Responsible Investing](#).

Fixed Income: We have identified types of projects and corporate behavior that may have a potentially negative impact or possibly cause harm to stakeholders. To avoid and/or mitigate harm related sensitive projects, we have developed a negative impact framework, which provides guidance on the factors and stakeholders that should be considered. Quarterly, the Responsible Investing team reviews new impact securities for alignment with a set of proprietary qualification factors designed to help mitigate ESG risks and reduce negative externalities of projects.

Private Equity: The Nuveen Global Impact Strategy leverages a thorough approach to the identification and management of ESG risks, including identification of material ESG risks based on industry research, calls with investees, and annual updates to our proprietary ESG ratings. The investment team assigns ESG ratings to every company pre-investment. Nuveen also takes steps to formally define and document our investee engagement process in order to identify and manage unexpected risks or negative impact. As part of hold-period engagement, Nuveen supports portfolio companies to develop explicit policies to mitigate potential negative externalities, including ESG policies, environmental management policies, Diversity, Equity, and Inclusion (DEI) policies, etc. Finally, Nuveen requires all direct investments since 2021 to develop bottoms-up emissions estimates, in support of developing decarbonization pathways where possible.

Real Estate: NRE Impact has developed an overarching ESG risk identification and management framework for due diligence and monitoring investments throughout the hold period. As the first step, the NRE Impact team screens prospective investments for regulatory- and climate-related risks. Any risks are then outlined in Investment Committee memos and mitigation and downside scenario planning is included in underwriting and impact plans. Ongoing each year, the firm collects 600+ data points through its Smart Sustainable Building Blueprint (SSBB) process to assess environmental performance and the Impact team meets regularly to discuss performance. Asset Management Action Plans are developed by the team to support any underperforming properties.

¹¹ Examples of good international industry practice include: IFC's Performance Standards (www.ifc.org/performancestandards); IFC's Corporate Governance Methodology (www.ifc.org/cgmethodology), the United Nations Guiding Principles for Business and Human Rights (www.unglobalcompact.org/library/2); and the OECD Guidelines for Multinational Enterprises (<http://mneguidelines.oecd.org/themes/human-rights.htm>).

For each assessment GERLIF examines a holistic list of ESG factors and assigns a Red, Amber, Green (RAG) rating to indicate the likelihood and severity of specific risks. Key risks identified and the appropriate mitigation plans are documented in detail in the Investment Committee memo. GERLIF monitors ESG risks and underperformance through monitoring calls with the on-site team as well as within the quarterly impact reports.

Private Credit: Every investment made as part of Arcmont’s Impact Lending Strategy is subject to Arcmont’s existing responsible investment process and sign-off, in addition to more stringent impact requirements. In Arcmont’s existing responsible investment process, every investment is screened against an ESG exclusions policy and goes through a comprehensive ESG materiality assessment where material ESG risks are assessed in detail. Any material ESG risks identified are actively monitored through Arcmont’s holding period. In addition to these steps, every investment made as part of Arcmont’s Impact Lending Strategy is screened against the Paris-Aligned Benchmark Exclusions and undergoes a do no significant harm test.

Principle 6: Monitor the progress of each investment in achieving impact against expectations and respond appropriately.

The Manager shall use the results framework (referenced in Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action.¹² The Manager shall also seek to use the results framework to capture investment outcomes.¹³

Fixed Income: Nuveen collects impact data directly from issuers’ reports and disclosure statements on an annual basis and aggregates the results into an annual impact report. Nuveen compares the expected impact allocation detailed within issuer use of proceeds to the actual impact allocation (details provided in Principle 4 response). Moreover, Nuveen monitors impact at the investment, fund, and portfolio-levels to track, monitor, and assess progress towards achieving impact objectives. During this process, the investment team will share feedback with issuers on the quality of their reports and ask questions if or when impact reported is significantly different from expectations.

¹² Actions could include active engagement with the investee; early divestment; adjusting indicators/expectations due to significant, unforeseen, and changing circumstances; or other appropriate measures to improve the portfolio’s expected impact performance.

¹³ Outcomes are the short-term and medium-term effects of an investment’s outputs, while the outputs are the products, capital goods, and services resulting from the investment. Adopted from OECD-DAC (www.oecd.org/dac/).

Private Equity: The Nuveen Global Impact Strategy, collects and analyzes investee impact data on a regular basis. The team balances consistency with flexibility and facilitates portfolio-level assessment of impact performance through the mapping of diverse metrics reported by investees to a core set of predefined portfolio-level impact KPIs. The team has also established a robust process for engaging investees in the event that monitoring indicates impact underperformance. This includes a climate engagement framework, which outlines engagements with all portfolio companies on physical and transition climate risks and opportunities.

Real Estate: The Impact Sector's impact measurement system includes KPIs that are derived from GIIN's IRIS+ system, the Multifamily Impact Council, and the Sustainable Development Goals. NRE consistently monitors the impact performance of each investment through quarterly reporting as well as through the annual SSBB process. The Impact team is currently working to onboard assets onto one utility data benchmarking platform to make portfolio-level tracking simpler and to inform green retrofit opportunities. Each year, the Impact team revisits the Asset Scorecard and adjusts the net impact score based on monitoring data. To help understand the long-term impact of its investment and to gather feedback that informs service delivery, the Impact team sends out an annual resident satisfaction surveys. The Impact Sector is also working to develop several research studies to inform the delivery of resident services and sustainability objectives.

GERLIF leverages a standardized reporting template to collect quantitative impact data, which is monitored against the values from the previous quarter and year. GERLIF will begin an annual resident satisfaction survey to better understand resident experience and to further validate the long-term outcomes, which will inform service delivery.

Private Credit: In addition to having active and continuous dialogue with management teams over the holding period, Arcmont will track a critical set of impact KPIs for every investment to monitor progress towards each investment's intended Sustainable Objective. Arcmont will collect impact KPI performance data annually. The Impact Investment Committee will review and assess Impact KPI performance, with progress reported to limited partners in the annual Impact report. In cases where impact performance is below expectations, deal teams will aim to actively engage with management teams and/or sponsor/owners to understand any underlying reasons for such performance. The Arcmont Impact Investment Committee will consider where additional support is needed to help management teams reach their impact goals and offer resources. Note that impact performance will be specifically considered in follow-on transaction decisions. The Arcmont Impact Investment Committee will also regularly meet to review broader trends and learnings from impact performance across the strategy.

Principle 7: Conduct exits considering the effect on sustained impact.

When conducting an exit,¹⁴ the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.

Fixed Income: For our fixed income impact investments, we generally apply a “buy and hold” strategy, reflecting our commitment to impact over a long time horizon. When a security is being evaluated – for alignment with our impact and financial objectives – the team is considering the longevity of the assets and their ability to deliver the impact inherent in their function (i.e., delivery of water for a water infrastructure system or energy from a wind farm). Where appropriate, we incorporate third-party opinions and credentials into our impact review process to confirm and validate alignment. Additionally, the GFI Impact team developed a process for tracking and assessing impact at exit where appropriate.

Private Equity: The Nuveen Global Impact Strategy seeks investments where impact and financial returns are collinear. Therefore, we consider responsible exits to be part of our processes from the beginning of our investment. The team has a formalized approach to considering the effect of exits on the sustainability of impact and consider this issue very early on in the investment process (during screening and diligence). The team has also incorporated an “impact at exit” section in the exit memo template to ensure the team assesses the likelihood of preserving impact post-exit in the exit decision making processes.

Real Estate: NRE Impact has a strategic approach to managing Responsible Exit. The team’s strategy considers affordability restrictions at the time of investment that last beyond NRE’s expected hold period and screens potential buyers for mission alignment and ability to continue impact initiatives. The team has developed a Responsible Exit Due Diligence Questionnaire, which aids in rigorously assessing buyers and supporting a smooth transition of the asset.

GERLIF considers Responsible Exit at the time of the investment and developed an assessment to aid in selecting an aligned buyer. The four main considerations include identifying a desired hold period with co-investors and management, assessing a potential buyer’s commitment to the mission and expertise, utilizing any available mechanisms that can legally enshrine the mission, and screening buyers first on nonfinancial aspects and then on financials.

Private Credit: At exit, the Arcmont deal team will prepare an Impact at Exit Investment Memorandum summarizing a borrower’s impact performance over Arcmont’s holding period. This will then be reviewed by the Arcmont Impact Investment Committee and Arcmont ESG Committee who will identify learnings to inform the strategy going forward.

¹⁴ This may include debt, equity, or bond sales, and excludes self-liquidating or maturing instruments.

Principle 8: Review, document, and improve decisions and processes based on the achievement of impact and lessons learned.

The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.

Nuveen is committed to continuously reviewing and improving our impact management systems. This is a joint effort that involves the portfolio management teams and impact experts on the Responsible Investing team.

Fixed Income: The impact performance of Global Fixed Income Impact Investments is documented in the annual platform-level [Global Fixed Income Impact Report](#) and fund-level impact reports. Additionally, the Responsible Investing team completes an annual assessment of the review and reporting processes. The team provides recommendations to the investment team on how internal processes, engagements with issuers, and reporting may be improved to further align with emerging best practices and industry standards.

Private Equity: In the Nuveen Global Impact Strategy, the NGI team reviews the impact performance of each investment and the portfolio on a quarterly and annual basis. These reviews include a comparison of expected and actual impact, and other findings derived from detailed analysis of impact performance over time. Asset-specific impact performance measurement along with investment-informed adjustments to our impact framework are provided in our [Private Equity Impact Annual Report](#). The team also meets monthly to discuss any material ESG events at any portfolio companies, and to identify areas for possible improvement of the impact management process. On an annual basis, the team meets to discuss larger scale improvements to the ESG/Impact system.

Real Estate: NRE Impact regularly reviews the efficacy of resident services and evaluates the effectiveness of sustainability upgrades. The team conducts on-going monthly meetings with operating partners and on-site teams to gather feedback and address concerns related to the delivery of impact initiatives. Internally the asset management team meets regularly to review operational KPIs, strategy improvements, and to discuss upcoming initiatives. Feedback memos are provided to support annual priorities and impact progress in reflected in the annual [Nuveen Real Estate Sustainability Report](#).

GERLIF reviews the impact performance of its properties on a quarterly basis leveraging the impact reporting process as well as quarterly review calls with the property management team to ensure that performance is on track and to address underperformance promptly. GERLIF has also partnered with Phineo to produce an annual impact report which includes a review of key impact performance data, a case study, and learnings from the past year.

Private Credit: The Impact Investment Committee will review and assess Impact KPI performance, with progress reported to limited partners in the annual Impact report. These reviews include a review of impact KPI performance data, comparison of expected and actual impact and other findings.

Principle 9: Publicly disclose alignment with the Operating Principles for Impact Management and provide regular independent verification¹⁵ of the alignment.

The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Impact Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.

This Disclosure Note re-affirms the alignment of Nuveen’s investment processes with the Impact Principles and will continue to be updated annually. Nuveen has committed to regular intervals to obtain an independent verification, with the last verification conducted in 2024. The next verification is scheduled for 2026.

Independent Verification Completed September 2024 by:

BlueMark

154 W 14th St,
2nd Floor,
New York, NY 10011

Nuveen engaged BlueMark to independently verify the alignment of the firm’s impact management practices with the Operating Principles for Impact Management, an industry standard for integrating impact throughout the investment lifecycle. BlueMark’s assessment findings cover both areas of strength and areas for improvement, as reflected in the Verifier Statement.

BlueMark’s full assessment methodology, based on its professional judgment, consisted of:

1. Assessment of the IM system in relation to the Impact Principles, using BlueMark’s proprietary rubric, and examining processes and policies against the following criteria:
 - a. Compliance of the IM system with a threshold level of practice;
 - b. Quality of the IM system’s design in terms of its consistency and robustness; and
 - c. Depth of sub-components of the system, focused on completeness
2. Interviews with Nuveen staff responsible for defining and implementing the IM system;
3. Testing of selected Nuveen transactions to check the application of the IM system; and
4. Delivery of detailed assessment findings to Nuveen, outlining areas of strong alignment and recommended improvement, as well as BlueMark’s proprietary benchmark ratings on the extent of alignment to each of the Impact Principles.

A copy of BlueMark’s verification statement can be found on [Nuveen’s website](#).

¹⁵ The independent verification may be conducted in different ways, i.e., as part of a financial audit, by an independent internal impact assessment committee, or through a portfolio/fund performance evaluation. The frequency and complexity of the verification process should consider its cost, relative to the size of the fund or institution concerned, and appropriate confidentiality.