nuveen
A TIAA Company

Nuveen Investment Management International Limited

2025 TCFD Entity Report

Contents

1. Introduction and context

1.1 Purpose

Nuveen Investment Management International Limited (NIMIL) forms part of the wider Nuveen International Holdings 2 Limited group and is a MiFID Investment Firm authorised and regulated by the Financial Conduct Authority (FCA) in the United Kingdom.

This NIMIL TCFD Entity Report (the Report) is produced pursuant to the requirements of the FCA's Environmental, Social and Governance (Sustainability) Sourcebook (the Sustainability Sourcebook). The Sustainability Sourcebook sets out rules and guidance concerning a firm's approach to Sustainability matters. Chapter 2 of the Sourcebook (Sustainability 2) contains rules and guidance regarding the disclosure of climate-related financial information consistent with the Task Force on Climate-related Financial Disclosures (TCFD) Recommendations and Recommended Disclosures.

The TCFD-related disclosures contained in the Report are intended to help clients understand the climate-related financial impacts, risks and opportunities of NIMIL's TCFD in-scope business.

The Report contains disclosures relating to NIMIL at an entity-level. The Report is not specific to any individual fund or portfolio managed by NIMIL, which is instead covered by separate TCFD product reporting where required under the FCA's rules.

1.2 NIMIL Structure and Business Activities

Nuveen LLC and the Nuveen group are a global investment leader, managing an array of public and private assets for clients around the world and on behalf of our parent company TIAA, one of the world's largest institutional investors [1], a highly-rated [2] insurance company and a retirement provider. With diverse expertise across income and alternatives, we invest in the growth of businesses, real estate, infrastructure, farmland and forests to help make an enduring impact on our world.

NIMIL was incorporated on 4 June 1987 and is a wholly owned U.K. subsidiary of Nuveen FCACO Limited which in turn is a subsidiary of Nuveen Investment Management Holdings Limited ("NIMHL"). NIMHL is ultimately controlled by Nuveen International Holdings 2 Limited (the Group) for U.K. accounting consolidation purposes, which is itself indirectly wholly owned by both Delaware-registered Nuveen LLC and ultimately TIAA in the United States. The Group is run on an integrated basis rather than the legal construct of its subsidiaries. NIMIL's strategy and business model is governed by and reflects that of the Group.

NIMIL provides discretionary portfolio management and investment advisory services, along with asset management services to other Nuveen affiliates and a number of external clients. NIMIL's regulated activities primarily relate to investment management of real estate assets on behalf of NIMIL's professional clients.

The real estate business of the Nuveen group is one of the largest real estate investment managers in the world. Managing a suite of funds and mandates, across both public and private investments, and spanning both debt and equity across diverse geographies and investment styles, the real estate business provides access to a broad array of real estate investment strategies managed by specialist investment teams. With over 85 years of real estate investing experience and more than 600 employees [3] located across over 40 cities throughout the U.S., Europe and Asia Pacific (APAC), the platform offers unparalleled geographic reach, which is married with deep sector expertise.

On 12 February 2026, it was announced that Nuveen, LLC had agreed a £9.9bn takeover (the Takeover) of Schroders PLC, subject to shareholder and regulator approval. It is anticipated that the Takeover will enhance the Group's investment capabilities, broaden diversification across asset classes and geographies, increase operational scale and efficiency, and create expanded opportunities for long-term value creation through enhanced product offerings and market reach.

[1] Pensions & Investments Real Estate Managers Special Report, October 2025. Ranking included 72 real estate managers and ranked them by total worldwide real estate assets as of 30 Jun 2025. Real estate assets are reported net of leverage, including contributions committed or received but not yet invested; REOCs are included with equity; REIT securities are excluded.

[2] For its stability, claims-paying ability and overall financial strength, Teachers Insurance and Annuity Association of America (TIAA) is a member of one of only three insurance groups in the United States to currently hold the highest rating available to U.S. insurers from all four leading insurance company rating agencies: A.M. Best (A++ rating affirmed as of July 23, 2025), Fitch (AAA rating affirmed as of August 5, 2025), Standard & Poor's (AA+ rating affirmed as of August 27, 2025), and Moody's Investors Service (Aa1 rating affirmed as of May 21, 2025). There is no guarantee that current ratings will be maintained. The financial strength ratings represent a company's ability to meet policyholders' obligations and do not apply to variable annuities or any other product or service not fully backed by TIAA's claims-paying ability. The ratings also do not apply to the safety or the performance of the variable accounts, which will fluctuate in value.

[3] As of 31 Dec 2025. Nuveen Real Estate has over 600 professionals, including 360 investment team members, and is supported by over 1,000 shared services employees across the broader Nuveen organization.

1.3 Basis of Preparation

NIMIL carries out portfolio management activities in the U.K. (the TCFD in-scope business) and has assets under management in relation to its TCFD in-scope business of greater than £5 billion calculated as a three-year rolling average on an annual assessment.

The Report covers a reporting period of 12 months starting 1 January 2025 and ending 31 December 2025, and is produced in accordance with the TCFD Recommendations and Recommended Disclosures. Further, NIMIL has taken reasonable steps to ensure that the relevant disclosures reflect Section C and D of the TCFD Annex (Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures).

The disclosures contained in the Report relate to NIMIL's TCFD in-scope business only (portfolio management activities) and do not reflect NIMIL's entire operation.

As an important part of both the Nuveen real estate business globally and the Group's regulated operations in the U.K., and with wider responsibility for delegated portfolio management activities spanning the EMEA and APAC regions on behalf of clients, NIMIL's approach to the assessment and management of climate-related risks and opportunities leverages business line and group-wide resources wherever appropriate. NIMIL is also firmly integrated within the Group's governance and risk management frameworks, providing effective risk management and controls oversight of relevant business lines, with emphasis on Nuveen's real estate business.

The disclosures in this Report reflect the policies, processes and governance of the Nuveen Group and its real estate business where relevant. They represent the activities formally undertaken by NIMIL in its TCFD-relevant investment management capacities. NIMIL also provides investment management functions to other business lines within the Group; those activities are not covered by this Report. As such, the disclosures in this Report are also (1) not necessarily automatically applicable across all Nuveen affiliates, (2) are not exhaustive of the approaches adopted by Nuveen more broadly with respect to climate-related risks and opportunities, (3) nor are they intended to represent practices that are applicable to or encompass the entire diversified portfolio of Nuveen globally.

Clients should also refer to their on-demand TCFD product reporting for more detailed and product specific information related to themes including governance, strategy, risk management, targets and metrics, which NIMIL produces where required to do so under the FCA's rules.

In 2023 NIMIL started to provide limited execution-only Fixed Income dealing services for only Nuveen U.S. affiliates. All fixed income portfolio management continued to reside in the United States. In 2024 limited public-side real estate equity portfolio management activities commenced pursuant to arrangements entered into with Nuveen U.S. affiliates, conducted on a limited basis, with principal portfolio management responsibilities and oversight continuing to reside in the U.S. Neither of these activities are reflected in the Report.

During the reporting period, NIMIL notified the FCA of its intention to expand its regulated activities across three areas. First, NIMIL will broaden its existing Fixed Income execution-only dealing service — currently provided to its U.S. affiliates in connection with their managed portfolios — to include an expanded range of derivative instruments for hedging purposes. Second, NIMIL intends to develop the capability to contract directly with clients for portfolio management services, spanning Fixed Income, Private Capital, and Real Assets strategies. Third, as part of a broader rationalisation of Nuveen's U.K. entity structure anticipated to complete during 2026 to 2027, Renewable Energy Infrastructure portfolio management activities will be transitioned into NIMIL.

It is anticipated that NIMIL's approach to TCFD entity reporting will continue to evolve, particularly as climate-related data and quantification methodologies develop further. The quantitative methodologies adopted for the current report, together with the known limitations of those methodologies, are referenced in section 5 of the report.

1.4 Compliance Statement

Pursuant to Sustainability 2.2.7, NIMIL confirms that the disclosures contained in this report comply with the requirements under Chapter 2 of the Sustainability Sourcebook.

NIMIL confirms that the disclosures contained within this report comply with the requirements under Chapter 2 of the Sustainability Sourcebook. The compliance statement is supported by NIMIL's internal controls, governance, policies and procedures as detailed in the relevant sections below and confirms compliance with the Sustainability Sourcebook and TCFD reporting requirements as set out in the Sustainability Sourcebook.

Duncan Morton
Nuveen Investment Management International Limited, Chief Financial Officer

2. Governance

2.1 Climate Governance

The NIMIL Board, as a U.K.-regulated internal governance body, sub-delegates responsibility for the review and approval of climate-related risk management at the fund, investment and portfolio levels to the relevant U.K. Real Estate Investment Committees (equity) or Real Estate Debt Investment Committees (debt).

The Board benefits from a governance structure that provides clear responsibility for monitoring climate-related risks across the business. Oversight begins with the regulated Boards of the relevant investment entities and is supported by senior leadership and dedicated committees that include climate and sustainability specialists. This structure ensures that material climate-related issues – such as regulatory change, operational exposure or market-wide risks – are escalated and reviewed through established decision-making channels. Reporting into the broader enterprise risk function further strengthens accountability by ensuring that climate-related considerations are treated as part of the wider risk framework rather than as a standalone initiative.

These governance arrangements give investors confidence that climate-related risks are assessed and managed through the same disciplined processes that apply to other investment risks. Portfolio management teams, investment teams and operating partners receive guidance and strategic insights to help them identify potential exposure early and incorporate appropriate mitigation measures into asset-level decisions. Roles and responsibilities are formally defined in the sustainability risk management framework, providing clarity on who is responsible for monitoring, evaluating and responding to risk. While this structure cannot remove uncertainty, it supports consistent, transparent oversight and helps ensure that climate-related risks are considered in a measured and financially grounded way throughout the investment lifecycle.

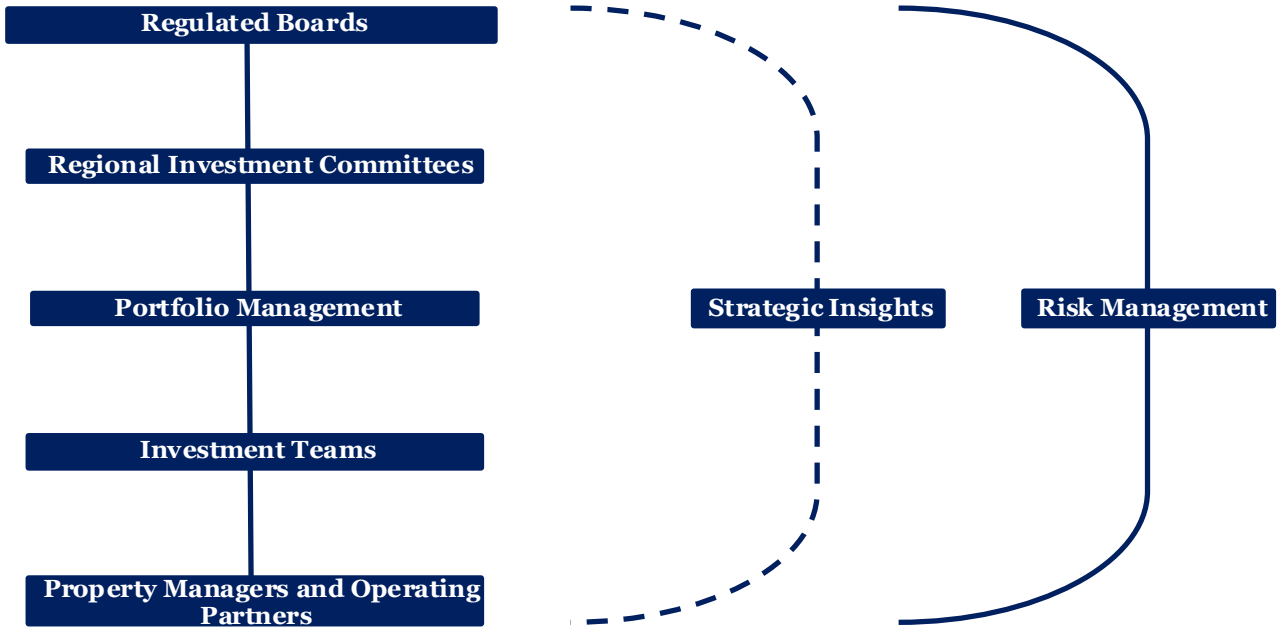

Figure 1 Real estate Climate Governance Framework

Table 1. NRE Organisational Structure

Guideline	Level of Adoption
Regulated Boards (NIMIL Board)	Provide oversight of climate related risk as part of their governance responsibilities, ensuring that relevant policies are reviewed and that material issues are escalated appropriately.
Regional Investment Committees	Oversee how climate related risks and obligations are addressed within investment strategies and underwriting decisions at the regional level.
Portfolio Management	Ensure that climate related risks and operational considerations are embedded into asset level plans, and that outcomes are transparently monitored over time.
Investment Teams	Develop and execute asset business plans that reflect climate related risks identified during underwriting, and work with operating partners to implement actions where appropriate.
Property Managers and Operating Partners	Support the delivery of asset level actions linked to climate related risk, including maintenance, operational improvements and compliance with local requirements.
Strategic Insights	Provide tools and training to help investment and asset teams identify material climate related risks earlier in the decision making process.
Risk Management	Independently evaluate climate related risk exposure across the investment portfolio and report findings to senior management and the Regulated Boards as required.

2.2 Climate Risk Internal Engagement

Climate-related risks are regularly monitored and discussed across real estate investments for which NIMIL is appointed as asset manager. These groups receive updates on issues such as portfolio alignment with Net Zero standards, changes in regulation and potential long-term physical risks. Investment teams are supported with training and practical guidance from the Sustainability team to help them apply this information in day-to-day decision-making.

NIMIL also tracks progress against fund climate strategies and risk-mitigation plans, with transparent reporting to the Real Estate Investment Committee, the Real Estate Debt Investment Committee, and the Regulated Boards (meaning, with respect to NIMIL in the U.K., the NIMIL Board). This creates a clear line of accountability and ensures that climate-related risks are considered alongside other financial and operational risks. The Strategic Insights team further contributes by presenting emerging risks and opportunities directly to leadership and participating in Investment Committees and strategy meetings, ensuring these factors are embedded within the broader investment risk framework.

3. Strategy

3.1 Approach to Climate Risk

Climate-related risks are integrated into NIMIL's asset management processes to inform financial performance and support long-term resilience. As part of The Board's regulated operations in the U.K., and with delegated portfolio management responsibilities across the EMEA and APAC regions, NIMIL leverages both business-line expertise and group-wide resources in the identification, assessment and management of climate-related risks and opportunities. NIMIL undertakes asset management for real estate investments across Europe and Asia Pacific, from which investment cash flows are generated.

During acquisitions, transaction teams review both physical risks (such as heat or flood exposure) and transition risks (such as tightening regulations or energy-efficiency requirements). These factors are assessed for their potential impact on cash flow, operating costs and hold-period assumptions. As part of Investment Committee review, each deal includes a structured sustainability assessment to ensure that these risks are recognised and discussed.

Physical risks are evaluated using Munich Re's Location Risk Intelligence Platform. Assets with higher exposure receive more detailed technical due-diligence and downside scenario analysis. Transition risks are assessed using a Net Zero Carbon tool aligned with CRREM benchmarks, supported by technical audits where appropriate. The findings are incorporated into investment business plans so that assumptions and capital plans reflect identified risks.

During ongoing asset and portfolio management, climate-related risks are re-evaluated as conditions change. This can lead to updates to business plans, capital expenditure, rental assumptions or hold/sell decisions. The aim is not to eliminate uncertainty but to ensure that investment decisions remain well-informed and responsive to evolving market and regulatory conditions, giving investors confidence that climate-related risks are managed with discipline and transparency.

3.2 Investment Lifecycle Strategy

The investment process for NIMIL's real estate assets incorporates climate-related risk assessment at an early stage, examining the potential impacts of climate factors on asset performance and long-term value.

Initial screening looks for exposure to issues such as energy-efficiency requirements, shifting market expectations and potential physical hazards. If an opportunity proceeds to detailed underwriting, the assessment becomes more specific and considers how these risks may influence operating costs, liquidity, demand and long-term resilience. The purpose of this analysis is not to claim that risks can be eliminated, but to understand their potential scale and whether they could materially affect expected returns.

Once an asset is acquired, the same risk considerations continue through financing, management, capital planning and the eventual sale. The focus is on identifying where costs, compliance pressures or market competitiveness could be affected over time, especially if regulations tighten or climate-related conditions change. Actions such as maintenance planning or efficiency upgrades are evaluated based on whether they may help reduce operational and financial vulnerability, rather than as guaranteed improvements. By regularly reassessing the asset against evolving risks, the process aims to support more informed decision-making and reduce the likelihood of unexpected financial impacts.

3.3 Board Strategy

NIMIL applies a defined Sustainability strategy that is centred on protecting long-term value by identifying and managing risks linked to energy performance, regulation and climate-related disruption. The approach uses established frameworks – such as Net Zero Carbon pathways, GRESB methodology and NRE's Smart Sustainable Building Blueprint – to highlight where operational, compliance or cost exposures may emerge over time. This gives investors a structured way to understand how Sustainability-related factors could influence asset performance and ensures that decisions are based on evidence rather than assumptions.

Once invested, this framework supports a consistent evaluation of each asset's condition and future resilience. It enables the team to prioritise actions that may help limit financial downside – such as reducing reliance on inefficient systems, addressing maintenance risks early or preparing for foreseeable regulatory changes. Importantly, the strategy does not promise guaranteed improvements or risk elimination. Instead, it provides investors with confidence that Sustainability considerations are assessed with the same rigour as any other financial variable, helping The Board make more informed decisions throughout the hold period.

3.4 Identification of Climate Risks

NIMIL approaches climate risk in a structured and transparent way, assessing both asset-level and market-level exposure before and during ownership. This includes reviewing local energy regulations, understanding how demand for more efficient or net-zero-aligned assets may influence liquidity, and analysing sector-specific pressures that could affect future operating costs or compliance obligations. Physical climate risks are evaluated using an established external dataset from Munich Re, which helps identify potential hazards such as heat stress or flooding. These insights feed directly into underwriting and business-planning discussions, allowing investment teams to understand where risks may be material and how they could influence long-term asset performance.

In assessing climate-related impacts on the portfolio, NIMIL reviews the NGFS climate scenarios – orderly transition, disorderly transition, and hothouse world – each representing a different pathway depending on the global response to climate change.

- **Orderly** transition aims to limit warming to 1.5°C by steadily tightening global climate policies and fostering innovation to reach net-zero CO_2 emissions by 2050. It involves major behavioural shifts that lower energy demand, a rising (shadow) carbon price, and technological advances to ease economic pressures, providing a 67% chance of keeping warming below 2°C relative to pre-industrial averages.
- **Disorderly** transition assumes climate action is delayed until after 2030, requiring abrupt and costly policy measures to keep warming below 2°C relative to pre-industrial levels. With limited negative emissions available, emissions cuts must be sharper and more expensive, leading to greater physical and economic risks.
- **Hothouse world** transition assumes that only existing policies remain in place, pledged commitments are not met and emissions continue to rise. As a result, temperature increase is not limited, leading to long-term severe physical, social and economic risks. It reflects a world where nationally determined contributions (NDCs) include all current targets but lack effective policies to achieve them.

NIMIL uses the Munich RE physical risk database – built on the Intergovernmental Panel on Climate Change's (IPCC) Representative Concentration Pathway (RCP) framework – to align its analysis with NGFS climate scenarios. The orderly and disorderly transition scenarios correspond to RCP2.6, which projects 1.5–2°C of warming by 2100, while the hothouse world scenario aligns with the high-temperature RCP8.5 pathway. NIMIL also evaluates RCP8.5 for 2050 to assess nearer-term implications for real estate values. This alignment, supported by Munich RE's application of the IPCC Fifth Assessment Report (AR5) RCPs, establishes a robust foundation for NIMIL's early underwriting and detailed technical assessment processes.

3.4.1 Physical Climate Risk Assessment

Physical climate risk is assessed using Munich Re's Location Risk Intelligence Platform, drawing on forward-looking hazard projections across multiple climate scenarios (RCP2.6, RCP4.5, and RCP8.5) extending to 2100. The assessment considers a range of acute hazards, such as river flooding, wildfire, and tropical cyclones, as well as chronic hazards including sea level rise, heat stress, and drought.

The analysis is designed to identify relative levels of exposure across different geographies and asset types, and to distinguish between hazards that may present short-term operational risks and those that may affect long-term asset performance and resilience. Outputs from the assessment are used to flag assets that may warrant deeper technical review, enhanced due diligence or further scenario analysis.

The findings are not intended to provide definitive predictions of outcomes, but rather to inform investment and asset management decision-making by highlighting potential areas of vulnerability. Where higher relative exposure is identified, this informs consideration of adaptation measures, resilience planning, insurance strategy, and longer-term capital planning to support the protection of asset value and liquidity under a range of plausible climate pathways.

3.4.2 Transition Climate Risk Assessment

From a transition risk perspective, NIMIL looks at how each market is responding to low carbon targets and building performance regulations. This helps the Board understand whether assets may face cost pressures or compliance challenges as the economy moves toward lower carbon standards. Each asset in the real estate equity portfolio has been classified under the "Green-Brown" framework. This framework is based on measurable performance data and shows how prepared each asset is for a lower carbon future.

Under this system, assets fall into one of four categories:

- **Dark Green – Net Zero Carbon Ready:** Assets that already meet net zero carbon standards or have a cost-effective business plan to achieve net zero within the investment horizon.
- **Light Green – Transition Aligned:** Assets that demonstrate strong energy performance and a clear commitment to eliminating fossil-fuel use.

- **Grey – Insufficient Information:** Assets for which data gaps prevent a reliable assessment of transition readiness or risk.
- **Light Brown – Potential Transition Risk:** Assets with poor energy performance or those unlikely to meet evolving market efficiency expectations.
- **Dark Brown – Transition Risk:** Assets without a cost-effective pathway to reach net zero carbon or comply with market-driven performance requirements.

This classification helps investors understand where the portfolio is more exposed to transition risk and where action plans may be needed to protect asset value.

It is not yet reasonably practical to provide quantitative examples to demonstrate the approach to climate-related scenario analysis. However, this information is included within specific investor reports where this is a client request.

3.4.3 Assessment of Material Financial Risks and Opportunities

Understanding how and when climate impacts become financially material is essential to managing investment performance. The transition to a low-carbon economy presents both risks and opportunities, and effectively navigating these factors is key to protecting and creating value across the portfolio. NIMIL is committed to identifying climate-driven opportunities that support long-term financial returns.

Physical Risks: The Board's assets face physical risks from both sudden climate events and long-term environmental changes. Sudden events such as flooding, wildfires and extreme wind can damage buildings, interrupt tenant operations and increase insurance costs. Long-term changes including rising temperatures, drought and sea-level rise can raise water costs, affect building structure and shorten equipment lifespan. These risks are expected to emerge over the medium to long term.

Physical Opportunities: Investing early in adaptation measures can make buildings more resilient, protect asset value and improve the experience of people using the space. Many of these measures can also reduce operational costs and enhance biodiversity on site.

Transition Risks: The shift to a low-carbon economy creates policy, technology, market and reputational risks. New climate policies may increase operating and compliance costs or lead to earlier-than-planned upgrades and retirements of building systems. Technology changes may require additional investment or risk underperformance if new solutions fail. Market expectations are shifting toward low-carbon buildings, and rising resource costs may put pressure on operations. Reputationally, lagging on climate performance can reduce occupier demand and investor interest.

Transition Opportunities: A proactive approach to decarbonisation supports regulatory preparedness and enhances the long-term competitiveness of NIMIL-managed real estate. Low-carbon and energy-efficient assets are generally associated with stronger occupier and investor demand, improved rental performance, lower operating costs, and enhanced marketability through sustainability certifications.

Where applicable, real estate investment products in scope for TCFD are managed under defined Sustainability strategies designed to improve climate resilience. For real estate equity portfolios, this includes a focus on net zero carbon objectives, targeted GRESB performance (where relevant), and application of the Smart Sustainable Building Blueprint (SSBB).

For real estate debt portfolios, the Sustainability approach is centred on a Green Loan Framework that incentivises improved environmental performance of financed assets. This includes lending to assets that exceed baseline sustainability standards and the use of performance-linked loan features, such as margin ratchets or preferential pricing, aligned with defined sustainability metrics.

Operational delivery is supported by external property managers and specialist consultants, who are responsible for monitoring energy and environmental data, implementing sustainability action plans, and supporting the identification and mitigation of climate-related risks.

At an entity level, climate-related opportunities are linked to protecting and enhancing cash flows from NIMIL's real estate asset management activities across Europe and Asia Pacific, and to the continued development of investment strategies that respond to growing investor demand for climate-aware, low-risk, and long-term value-preservation solutions.

4. Risk Management

4.1 How is Climate Risk integrated into overall Risk Management?

Nuveen employs a three lines of defence approach to managing risks, including climate-related risks, in client portfolios.

Nuveen's investment teams and business management are the primary risk owners, or first line of defence.

Nuveen's investment risk management team (IRM) is responsible for Nuveen's investment and enterprise risk management frameworks and serves as a key part of the second line of defence. IRM evaluates investment risks, including financially material climate-related risks, during regular reviews with portfolio managers. This helps to ensure that such risks are understood, deliberate and consistent with client objectives, complementing the first-line monitoring. IRM also has a dedicated climate risk oversight team that partners with portfolio managers, sustainability teams, risk managers and businesses to oversee climate-risks across the enterprise.

The third line of defence, Internal Audit Services, operates as an assurance function. The mandate of internal audit is to objectively assess the adequacy and effectiveness of Nuveen's internal control environment to improve risk management, control and governance processes, including those relevant to climate-related matters.

The identification of material transition and physical climate-related risks is a foundational step in NIMIL's risk management process for real estate investments. This step is crucial in the initial stages of sourcing and underwriting new investments. Investment teams, supported by the Strategic Insights team, use specific toolkits to determine if an investment is in a region susceptible to elevated climate risk.

Transition risk: NIMIL assesses how exposed each asset is to transition-related risks such as regulatory change or obsolescence. This is done using a transparent and rules-based review of Net Zero Carbon performance and independent market-stringency data. The results are translated into forward-looking liquidity-risk classifications. At the core of the method is the Green-Brown framework, which ranks each asset based on measurable operational performance, data quality and alignment with regulatory, occupier and capital-market expectations. This allows for a consistent view of an asset's resilience, marketability and potential exposure to liquidity risk.

Physical risk: To evaluate physical climate risks, NRE uses hazard, scenario and time-horizon data provided by Munich Re. This information helps identify each asset's exposure to climate-related events such as flooding, heat or storms. These insights support understanding of potential long-term impacts and help inform risk assessments for future investments.

After identifying potential risks, a detailed assessment is conducted to understand their implications for investment viability. Discussions between the Strategic Insights teams, investment and portfolio management teams, under the supervision of the investment committee, play a critical role in the investment decision. This stage involves evaluating the impact of risks on target returns, the alignment of risk levels with property prices and considerations for the investment's maximum hold period in light of increasing risks. Further assessments are carried out through due diligence and business planning activities, which include collecting sustainability-related technical assessments to evaluate the business plan's adequacy in meeting target returns.

4.2 Additional Risk Measures

NRE includes climate considerations within its Investment Risk Framework and Procedure, which guide how sustainability-related risks are assessed across investment decisions. This approach brings together top-down strategic review with practical, on-the-ground assessment. Additional supporting measures include:

- **Smart Sustainable Building Blueprint (SSBB):** Sector-specific guidance that highlights current and emerging Sustainability and technology indicators relevant to prime assets, helping shape asset-level planning.
- **Green Lease Policy:** Requirements for tenants and owners to agree on goals and strategies that support improved energy performance (only applicable to equity portfolios).
- **Green Loan Framework:** Includes a requirement for borrowers to agree targets and strategies to improve the energy performance of the assets and comply with regulations notified to enhance the environmental performance of the assets (only applicable to debt portfolios).
- **Industry Collaboration:** Active participation in industry groups such as BBP, GRESB and INREV Sustainability committees to help inform good practice and stay aligned with market developments.

5. Metrics and Targets

NIMIL aims to achieve Net Zero Carbon across its global real estate equity portfolio by 2040, allowing different portfolios to move at different speeds depending on market conditions. Assessing climate-related risk through to 2040 helps identify where changes in regulation, energy standards or market expectations could affect future valuations. NRE uses insights from its global footprint to understand how quickly markets are adopting lower-carbon requirements.

The Net Zero goal builds on NIMIL's commitment to improve energy efficiency by 30% by 2025 (from a 2015 baseline) which it has now achieved. Asset performance is monitored through the SSBB and utility data tracking, helping to identify and prioritise investment strategies and track progress. Achieving Net Zero Carbon requires ongoing environmental and operational improvements, including energy efficiency, lower-carbon principles, building systems upgrades and operational adjustments to manage emissions responsibly.

5.1 Target Objectives

NIMIL has set an ambition for its real estate assets under management to achieve net zero carbon by 2040. This objective is considered integral to protecting and enhancing long-term investment value and addressing the priorities of clients, while responding to evolving market expectations and regulatory requirements related to net zero carbon buildings. Accordingly, the net zero ambition is embedded within fund strategies and asset-level business planning where appropriate.

NIMIL manages a diverse range of real estate strategies with varying investment structures, levels of discretion, asset ownership models and investment horizons. These include open-ended vehicles with a long-term outlook, as well as closed-ended strategies where assets are expected to be disposed of well in advance of 2040. In addition, some mandates involve advisory roles or joint venture arrangements where decision-making authority rests partially or wholly with investors. In light of these factors, it has not been appropriate for all strategies to adopt detailed, strategy-specific pathways aligned to the 2040 target. Nevertheless, the integration of climate risk into investment decision-making, as described in Sections 3 and 4, is consistently applied across all real estate strategies.

At the asset level, the degree of influence over energy consumption varies significantly depending on asset type and leasing arrangements. For example, greater control can typically be exercised in multi-tenant buildings where building systems are landlord-controlled, compared with industrial assets where tenants own and operate energy-intensive plants and procure energy directly. To reflect these differing circumstances, NIMIL's real estate business has developed three net zero carbon personas, which are applied across investment strategies and asset business planning to support portfolio managers in managing the transition to a low-carbon economy.

Further information on the net zero carbon personas and interim targets is publicly available via the Net Zero Carbon Update: NRE Net Zero Carbon Pathway

Further details on progress toward the net zero target, metrics and KPIs are available in the Nuveen Real Estate Sustainability Report: 2024-2025 NRE Sustainability Report

5.2 Greenhouse Gas (GHG) Emissions

A third-party adviser, JLL, measures NIMIL's Scope 1, 2 and 3 greenhouse gas emissions across the Europe and Asia-Pacific portfolio. Where direct energy data is missing, industry benchmarks for the asset type and location are used, together with the correct regional carbon factors. All calculations follow the GHG Protocol and are based on actual utility bills and meter readings.

In line with the U.K. FCA disclosure requirements, the Weighted Average Carbon Intensity (WACI) of NIMIL's in-scope managed real estate portfolio is provided below, based on the annual rental income as of December 31, 2025. However, WACI is not a perfect measure for real estate, as it focuses on revenue rather than asset performance, and more appropriate floor-area-based metrics are provided within the wider disclosures.

Table 2. Overview of key climate-related metrics[4]

Indicator	Unit of Measurement	2025
(a) Absolute Scope 1 greenhouse gas emissions	tCO_2e	1,574
(b) Absolute Scope 2 greenhouse gas emissions	tCO_2e	45,319
(c) Absolute Scope 3 greenhouse gas emissions	tCO_2e	124,009
(d) Total carbon emissions (Scope 1 + 2) adjusted by equity share of portfolio AUM (apportioned emissions)	tCO_2e	40,571
(e) Weighted average carbon intensity (WACI) – normalized by revenue (rental income)[5]	tCO_2e/ $m Revenue (rental income)	90.4
(f) Carbon footprint – normalized by market value[6]	tCO_2e / $m AUM	3.5

Table 3. Overview of key climate-related metrics and incorporation into NIMIL reporting

	Exposure to Emissions		
	Absolute Emissions	Carbon Footprint	Weighted average carbon intensity
Unit	tCO_2e	tCO_2e / $m AUM	tCO_2e/ $m Revenue (rental income)
What it measures	Exposure to the GHG emissions from assets	Scope 1 and 2 emissions intensity per unit of investment (apportioned to take account of equity share)	Scope 1 and 2 emissions normalized by revenue (rental income, in USD).
Pros	• Standard data inputs • Direct connection to transition to lower carbon economy • Industry standard	• Standard data inputs • Normalizes for size, allowing for comparability	
Cons	• Doesn't account for size • Incomplete data – gaps filled with estimation	• Standard data inputs • Normalizes for size, allowing for comparability	
Current NIMIL use of metric	Entity-level absolute emissions of AUM (buildings)	Entity-level carbon footprint of AUM, Scopes 1 and 2	Entity-level weighted average carbon intensity, Scopes 1 and 2

[4] UK Medical Research Council is included in the NIMIL funds but excluded from this instance of reporting due to no assets being within NRE's operational control as of 31st December 2025.
[5] The WACI covers Scope 1 and Scope 2 emissions and includes no apportioning of emissions to take account of equity share. The WACI expresses NIMIL's exposure to carbon intensive investments (regardless of its equity share).
[6] The carbon footprint normalised by market value covers all Scope 1 and 2 emissions, adjusted by equity share of portfolio AUM.

5.3 Methodology Alignment

Emissions Calculation: Scope 1, 2 and 3 greenhouse gas emissions have been calculated in line with guidance from INREV (European Association for Investors in Non-Listed Real Estate Vehicles) and the Global Reporting Initiative (GRI).

Energy Data: Energy data is collected from automatic meters, utility bills and property manager readings. Where data is incomplete, estimates are made using actual data already received for the relevant asset. Where no data is available at all, estimates are based on benchmark intensity values from the Building Energy Efficiency Survey (BEES). Where BEES does not provide a direct match for a given property type, a composite or custom benchmark is applied.

Emissions Scope Assignment for Estimated Data: Benchmark-based estimates are assigned to emissions scopes based on who controls the energy supply. Where a landlord-procured energy contract is in place, estimated consumption is counted within Scope 1 and 2 emissions. Where no such contract exists, consumption is assumed to be tenant-controlled and is counted within Scope 3. All emissions from debt investments are classified as Scope 3, as they relate to the borrower or sponsor rather than the fund manager.

Deviations from Standard Methodology: There are two deviations from the approach described above. For one fund, emissions figures were taken from the prior year's GRESB submission rather than calculated directly and therefore reflect 2023 data. Calculations for this fund follow the GHG Protocol rather than BEES. For debt fund assets, emissions were calculated using the most recently available EPC (Energy Performance Certificate) data rather than metered consumption.

Emissions Metrics: Two portfolio-level emissions metrics are reported. The Weighted Average Carbon Intensity (WACI) covers Scope 1 and 2 emissions and does not adjust for equity share. It expresses the portfolio's exposure to carbon-intensive assets relative to asset value. The carbon footprint normalised by market value also covers Scope 1 and 2 emissions but adjusts figures to reflect the fund's proportionate equity ownership of each asset.

Emission Factors: Electricity emission factors are sourced from the IEA (International Energy Agency). Emission factors for gas, district heating and district cooling are sourced from CRREM (Carbon Risk Real Estate Monitor), drawing on UK Government GHG Conversion Factors for Company Reporting (2021). For one fund, CRREM emission factors are used for all energy sources including electricity, with certain district heating and cooling factors specified by the fund's dedicated carbon reporting provider.

Valuation Date: All investment values are reported as at December 2025.

Risks and other important considerations

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