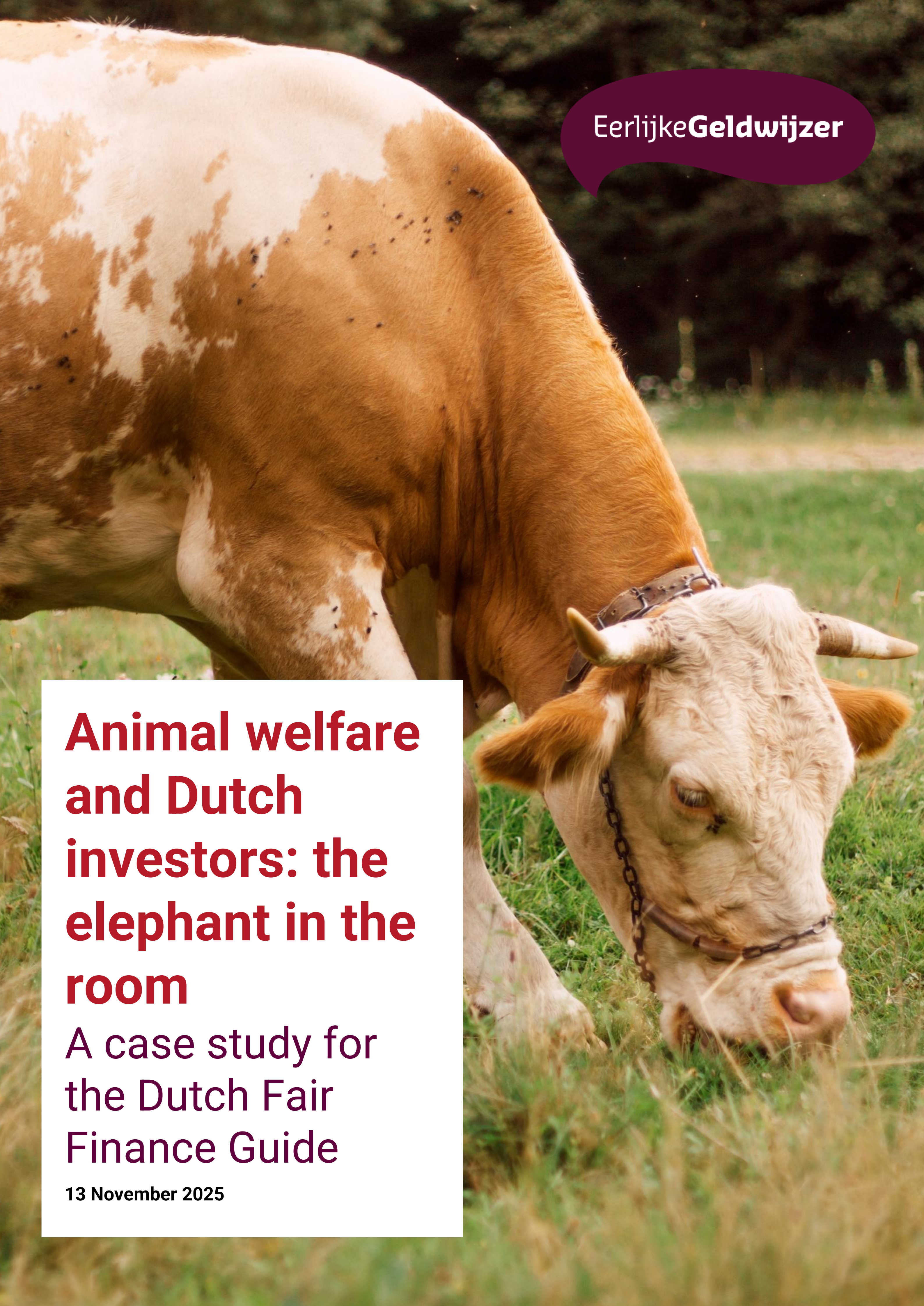

EerlijkeGeldwijzer

Animal welfare and Dutch investors: the elephant in the room

A case study for the Dutch Fair Finance Guide

13 November 2025

About the Dutch Fair Finance Guide

This report has been commissioned by the Dutch Fair Finance Guide (Eerlijke Geldwijzer). The Dutch Fair Finance Guide is a coalition of the following organisations: Amnesty International, Milieudefensie, Oxfam Novib, PAX and World Animal Protection. The aim of the Dutch Fair Finance Guide is to encourage corporate social responsibility by financial institutions.

Fair Finance Guide Netherlands is part of Fair Finance International (FFI), an international civil society network with over 100 CSO partners and allies in twenty-four countries, that seeks to strengthen the commitment of banks and other financial institutions to social, environmental and human rights standards.

About this report

This report aims to assess how Dutch pension and insurance investors address the animal welfare risks in relation to their investment activities in animal agriculture companies.

Authorship

This report was researched and written by Debbie Schepers and Jim Sanchez, with contributions from Mara Werkman and Juliette Laplane. Correct citation of this document: Schepers, D. and J. Sanchez (2025, November), *Animal welfare and Dutch investors: the elephant in the room*, Amsterdam, The Netherlands: Profundo.

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About Profundo

With profound research and advice, Profundo aims to make a practical contribution to a sustainable world and social justice. Quality comes first, aiming at the needs of our clients. Thematically we focus on commodity chains, the financial sector and corporate social responsibility. More information on Profundo can be found at www.profundo.nl.

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Summary

Industrial animal agriculture companies - commonly referred to as factory farming companies - pose significant risks to animal welfare. Animals are kept in high concentrations and lack the opportunity to behave naturally through grazing, nest building, free ranging or grubbing. Intensively confined animals suffer as they are forced to live in cramped, barren conditions often with poor air quality or lack of day light. Moreover, they are bred for high yields, which increases health and locomotion problems. Animal transports often cause severe mental and physical suffering due to a combination of stressors, such as exposure to heat, dehydration, prolonged hunger, motion stress, restriction of movement, sensory overstimulation and resting problems. Ineffective or non-existent pain relief during surgery (cutting tails, clipping of beaks, teeth filing and/or dehorning) or at the time of slaughter may induce severe pain and suffering.

As institutional investors invest substantial amounts on behalf of clients and other stakeholders, they exert significant influence in financial and economic markets. As such, international standards like the *Guidelines for Multinational Enterprises (MNE) on Responsible Business Conduct* (RBC) of the Organisation for Economic Cooperation and Development (OECD) prescribe that institutional investors have a responsibility to prevent or address adverse impacts on society and the environment, including animal welfare, related to their investment portfolios. Since 2023, the OECD guidelines include elements related to animal welfare. Therefore, this study assesses whether and how Dutch institutional investors try to influence industrial animal agriculture companies to address animal welfare-related risks and avoid animal suffering.

Methodology

To this end, the Dutch Fair Finance Guide (*Eerlijke Geldwijzer*) selected ten high-risk animal agriculture companies, specifically beef, pork and poultry companies. The selection is based on the companies' (low) scores in the annual *Business Benchmark on Farm Animal Welfare 2024,*[1] the scale and scope of their operations, and the geographical location of their activities. The selected companies are:

- JBS
- Marfrig
- Minerva Foods
- Muyuan Foodstuff
- New Hope Liuhe
- WH Group
- BRF
- Industrias Bachoco
- Wens Foodstuff Group
- Tyson Foods

The research comprises two components. First, a financial analysis was conducted to identify which Dutch pension funds and insurance companies hold investments in these ten companies. This part of the study covers the ten pension funds monitored by the Dutch Fair Pension Guide and sixteen insurance companies monitored by the Dutch Fair Insurance Guide. Based on the findings, four of the largest investors in the ten companies were selected for further research into their due diligence procedures on animal welfare-related risks. The four selected institutions are: Allianz (US$ 321 million), Algemeen Burgerlijk Pensioenfonds (ABP) (US$ 96 million), Pensioenfonds Zorg en Welzijn (PfZW) (US$ 27 million), and Pensioenfonds van de Metalektro (PME) (US$ 9 million).

This research assesses how the four investors address the animal welfare risks within their portfolios. Information analysed includes public policies and reports. To gain more detailed insights into their processes and engagement activities with selected companies that may not have been disclosed in public reports, the researchers also distributed a questionnaire among the

financial institutions. Three out of the four institutions answered the questionnaire: ABP, PfZW and PME. Allianz did not respond to the survey.

To assess the animal welfare due diligence processes and engagement activities of investors, Profundo and World Animal Protection (WAP) developed a methodology based on the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence guidance documents for Responsible Business Conduct in the financial sector and the Fair Finance Guide International (FFGI) Methodology. The information from public documents and the questionnaire was scored and normalised on a 10-point scale for four relevant steps of the due diligence process, namely: identification of risks, using leverage to influence companies, tracking and disclosing progress, and providing and/or enabling access to remedy.

Outcomes

As portrayed in Table 1, the assessment reveals that all four financial institutions score poorly on their animal welfare due diligence, with none of the institutions achieving a score higher than 3 out of 10.

Table 1 Insurance and pension investors' scores on animal welfare due diligence (/10)

Section	Allianz	ABP	PfZW	PME	Average score
A: Identification of animal welfare risks	4.0	2.0	2.0	2.0	2.5
B: Using leverage to influence companies	1.1	5.6	0.0	0.0	1.7
C: Tracking progress and communicating results	2.2	4.4	4.4	5.6	4.2
D: Providing for or cooperating in remediation	3.3	0.0	0.0	0.0	0.8
Average score	**2.7**	**3.0**	**1.6**	**1.9**	**2.3**

These low scores highlight a failure by investors to adequately integrate and report on the management of animal welfare risks within their investment activities. In terms of screening, the majority of institutions (3/4) mainly rely on the OECD Guidelines. However, these guidelines do not address the full range and depth of animal welfare concerns, such as ensuring adequate environmental enrichments, banning restrictive housing methods or the avoidance of mutilations. Allianz claims to have more detailed screening criteria on animal welfare. In spite of this, it has not publicly identified animal welfare risks in any of the selected high-risk companies. As such, Allianz's screening criteria may look good on paper, but the financial institution falls short in accounting for how these policies are implemented.

Notably, the results show that OECD screenings are not consistently applied across the four financial institutions. PfZW indicates that JBS and Marfrig do not pass the OECD screening and are therefore not eligible for investment. In contrast, ABP and Allianz continue to invest in these companies, despite both institutions stating that OECD screening is a core component of their ESG due diligence. This discrepancy raises questions about the credibility and consistency of ESG implementation across institutions that claim to follow the same international standards.

The case of ABP's investment in JBS, a company with well-documented environmental, social and governance (ESG) concerns, highlights further inconsistencies. While JBS would not meet the ESG criteria for ABP's developed markets, ABP continued its investment on the grounds that JBS was headquartered in Brazil and listed solely on the Brazilian stock exchange, thus subject to the fund's less stringent ESG standards for developing markets. This inconsistency stems from ABP applying different ESG standards to developed and developing markets. Now that JBS has moved its holding company to the Netherlands and is listed on the New York Stock Exchange, it should fall under ABP's developed markets ESG policy and be excluded from its portfolio. ABP has not yet responded to this issue. More broadly, applying different ESG policies to developed and developing markets is problematic and not in line with the OECD-guidelines. It implies lower standards for developing economies, reinforces global inequities, and oversimplifies complex differences among countries. Large multinationals like JBS render such distinctions increasingly irrelevant.

None of the financial institutions structurally report on animal welfare-related engagements with the selected animal agriculture companies. The absence of effective grievance mechanisms remains a major gap: only one of the four institutions assessed - Allianz - has a mechanism open to external stakeholders that covers ESG-related issues linked to investments. Such mechanisms are essential for accountability, transparency, and risk mitigation.

Recommendations

Based on the main findings, the following recommendations can be made to financial institutions:

1. **Integrate animal welfare into broader ESG risk frameworks**

   Given the links between animal welfare, biodiversity loss, climate change, and public health such as zoonotic diseases and antimicrobial resistance, financial institutions should systematically integrate animal welfare into biodiversity, climate, and human rights engagement programs. This would reflect the interconnected nature of these challenges and create greater leverage in dialogue with companies. The policy should explain what the financial institution will do to engage with companies on animal welfare issues.

2. **Set measurable, timebound engagement objectives**

   Institutions should introduce structured timelines for engagement objectives with companies, similar to approaches observed in climate or deforestation-related engagements. These objectives could include milestones such as:

   - Implementation of comprehensive, adequate animal welfare policies by a set date;
   - Timebound targets for reducing harmful practices in supply chains; and
   - Progress in certification or audit schemes related to animal welfare.

3. **Expand the use of diverse engagement tools and escalation strategies**

   Institutions should broaden the toolkit for engaging on animal welfare, moving beyond dialogue to include:

   - Filing or supporting shareholder resolutions on animal welfare issues;
   - Voting against directors or specific resolutions at company AGMs where there is insufficient progress;
   - Publicly communicating concerns where private engagement has not yielded satisfactory outcomes; and
   - Considering divestment or exclusion in cases where engagement fails and risks remain inadequately managed.

   To ensure transparency and accountability, a clear escalation pathway should be disclosed in public stewardship reports.

4. **Improve transparency of engagement reporting**

   Institutions should significantly improve disclosure on animal welfare engagements by:

   - Identifying the companies targeted for engagement on animal welfare in public reports;
   - Describing the specific topics discussed and progress achieved; and
   - Reporting on the use of engagement tools and any escalation steps taken.

Such transparency would align with best practices seen in other ESG topics (e.g., climate change, human rights) and enable external stakeholders to assess the effectiveness of engagement strategies.

5. **Establish monitoring and evaluation frameworks for animal welfare engagement**

   Institutions should design internal scorecards or evaluation tools to assess the effectiveness of their animal welfare engagements. Metrics could include:

   - Number of companies engaged on animal welfare;
   - Percentage of engaged companies making policy or practice improvements; and
   - Alignment of company practices with international animal welfare standards.

   Regular internal reviews and external audits of engagement effectiveness could further strengthen credibility.

6. **Set up an effective grievance mechanism that covers investment activities and is open and accessible to external stakeholders**

   Financial institutions should ensure that accessible, effective grievance mechanisms are in place to address concerns linked to animal welfare risks in their investment activities. As per the UNGPs, in order to be effective, a non-judicial grievance mechanism should be:

   - Legitimate: ensuring trust by stakeholders and accountability in their operation;
   - Accessible: being known and reachable by all relevant groups, with support for those facing access barriers;
   - Predictable: providing a clear, timely, and transparent process with defined outcomes;
   - Equitable: seeking to ensure fair access to information and support so all parties can participate on equal terms;
   - Transparent: keeping parties informed and provide public information to build trust;
   - Rights-compatible: ensuring that outcomes align with international standards;
   - Enable continuous learning: incorporate feedback to improve and prevent future issues; and
   - Be based on engagement and dialogue: involve stakeholders in design and resolution through ongoing consultation[2].

7. **Apply responsible investment principles universally across asset classes and regions**

   Institutions should ensure that responsible investment policies and ESG standards are applied consistently across all asset classes and regions to avoid double standards and promote fairness and accountability.

Abbreviations

ABP	Algemeen Burgerlijk Pensioenfonds
BpfBOUW	Bedrijfstakpensioenfonds voor de Bouwnijverheid
ESG	Environmental, Social and Governance
FFGI	Fair Finance Guide International
MNE	Multinational Enterprises
OECD	Organisation for Economic Cooperation and Development
PfZW	Pensioenfonds Zorg en Welzijn
PH&C	Pensioenfonds Horeca & Catering
PME	Pensioenfonds van de Metalektro
PMT	Pensioenfonds Metaal en Techniek
RBC	Responsible Business Conduct
StiPP	Stichting Pensioenfonds voor Personeelsdiensten
UNGPs	United Nations Guiding Principles on Business and Human Rights
WAP	World Animal Protection

Introduction

Industrial animal agriculture companies - commonly referred to as factory farming companies - pose significant risks to animal welfare. Animals are kept in high concentrations and lack the opportunity to behave naturally through grazing, nest building, free ranging or grubbing. Intensively confined animals suffer as they are forced to live in cramped, barren conditions often with poor air quality or lack of day light. Moreover, they are bred for high yields, which increases health and locomotion problems.[3] Animal transports often cause severe mental and physical suffering due to a combination of stressors, such as exposure to heat, dehydration, prolonged hunger, motion stress, restriction of movement, sensory overstimulation and resting problems.[4] Ineffective or non-existent pain relief during surgery (cutting tails, clipping of beaks, teeth filing and/or dehorning) or at the time of slaughter may induce severe pain and suffering.[5]

As institutional investors invest substantial amounts on behalf of clients and other stakeholders, they exert significant influence in financial and economic markets. As such, international standards like the *Guidelines for Multinational Enterprises (MNE) on Responsible Business Conduct* (RBC) of the Organisation for Economic Cooperation and Development (OECD) prescribe that institutional investors have a responsibility to prevent or address adverse impacts on society and the environment, including animal welfare, related to their investment portfolios.[6] Therefore, this study assesses whether and how Dutch institutional investors try to influence industrial animal agriculture companies to address animal welfare-related risks and avoid animal suffering.

To this end, the Dutch Fair Finance Guide (*Dutch Fair Finance Guide*) has selected ten high-risk animal agriculture companies for this analysis:

- BRF
- Industrias Bachoco
- JBS
- Marfrig
- Minerva Foods
- Muyuan Foodstuff Co.
- New Hope Liuhe
- Tyson Foods
- Wens Foodstuff Group
- WH Group

The research comprises of two components. First, a financial analysis was conducted to select four of the largest investors in the selected companies. These institutions are:

- Allianz
- Algemeen Burgerlijk Pensioenfonds (ABP)
- Pensioenfonds Zorg en Welzijn (PfZW)
- Pensioenfonds van de Metalelektro (PME)

To assesses how these financial institutions address the animal welfare risks within their portfolios, public policies and reports were analysed. In addition, answers to a questionnaire seeking more detailed insights into their processes and engagement activities with selected companies that may not have been disclosed in public reports.

The structure of this report is as follows: Chapter 1 outlines the research methodology, including the background of this study, the research design and the indicators used for the assessment and scoring. Chapter 2 presents the financial analysis results for four of the largest investors in the selected companies, with results of the full financial research available in Appendix 1. Chapter 3 describes how these institutions address animal welfare-related risks. Chapter 4 presents conclusions, highlighting the key takeaways of the study.

A summary of the reports' main findings can be found on the first pages of this report.

1

Methodology

This chapter outlines the methodology employed in this study, which examines how Dutch financial institutions respond to animal welfare risks within their investment portfolios. It describes the approach used to identify financial flows between these institutions and selected animal agriculture companies. In addition, it presents the indicators and scoring framework applied in the assessment of institutional practices.

1.1 Financial research methodology

1.1.1 Selected financial institutions

The scope of the financial research covers twenty-six pension funds, insurance companies and health insurance companies operating in the Netherlands. Table 2 presents the names of the selected financial institutions.

Table 2 Selected financial institutions

Pension funds	Insurance companies	Health insurance companies
ABP	Achmea	CZ
BpfBOUW	Allianz	DSW
BPL	ANWB	Menzis
Detailhandel	ASR (includes Aegon)	ONVZ
Horeca en Catering	Cardano (includes Athora)	Unive
Vervoer	De Goudse	VGZ
PfZW	Klaverblad	ZLM
PME	NN Group	Zorg en Zekerheid
PMT		
StiPP		

1.1.2 Company selection

Ten animal agriculture companies were selected for this case study by De Dutch Fair Finance Guide. The selection was based on the companies' (low) scores in the annual *Business Benchmark on Farm Animal Welfare 2024,*[7] the scale and scope of their operations, and the geographical location of their activities. To ensure a broad and globally relevant analysis, we selected companies based in diverse regions - including Latin America, North America, and Asia - that operate across multiple continents. This international scope enables us to trace financial ties with Dutch institutions beyond regional investment trends, providing a more balanced view of global financial involvement in the meat industry. The following are the selected companies:

- BRF
- Industrias Bachoco

- JBS
- Marfrig
- Minerva Foods
- Muyuan Foodstuff Co.
- New Hope Liuhe
- Tyson Foods
- Wens Foodstuff Group
- WH Group

In addition to the companies, the scope of this research also covers relevant subsidiaries—specifically, those involved in food processing—as well as financing vehicles (i.e., subsidiaries established primarily to issue debt or attract financing, such as through bonds or loans, and which do not conduct production activities). These entities are included under the name of their respective parent companies throughout the analysis.

1.1.3 Data sources and processing

The research is based on three data sources. For the pension funds' investments, this research uses Profundo's pension fund portfolio disclosures database. This contains the investments in shares and bonds of ninety-five pension funds in the world's top 300 pension funds by assets managed.[i] For the insurance companies, this research looks for the insurers' portfolio disclosures in their annual reports, company registry filings and their websites. For the insurance companies with no portfolio disclosures, this research uses the databases Refinitiv Eikon and Refinitiv EMAXX to retrieve information about the investments in shares and bonds issued by the selected companies. In all three cases, the data is retrieved on 31 December 2024 or the latest filing date available.

The market value of the shares and bonds held by the financial institutions is reported in the financial databases and sources used in the research. Often, the number of shares and proportion of bonds is reported. Nonetheless, some insurance companies report holding shares and bonds of a specific company, but not the amount invested. When this is the case, this information is also reflected in the analysis of the specific financial institution. No estimations are performed to determine the contributions of the financial institutions.

1.1.4 Types of financing

All companies require capital, also referred to as *finance*, to operate. This capital is used to fund day-to-day activities such as paying and training employees, purchasing or maintaining machinery and equipment, and managing operational costs. It also supports longer-term strategic investments. For example, in the meat processing sector, this could include expanding slaughterhouse facilities or investing in cold chain logistics infrastructure.

Financial institutions can finance companies through two main means. They can either provide loans and underwriting services to companies or acquire the shares and bonds issued by such companies. In the first scenario, financial institutions, especially commercial banks, can provide credit to a company by providing them with loans and the services of underwriting shares and bond issuances. In the second scenario, financial institutions, especially investment banks and pension funds, can invest in the equity and debt of a company by holding their shares and bonds.

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[i] Profundo's pension fund portfolio database aims to include the top 100 pension funds by assets managed out of the top 300. Unfortunately, the database cannot include all top 100 because not all pension funds disclose their investment portfolios.

As this research focuses on Dutch insurance companies and pension funds, the report concentrates on their role as investors in corporate shares and bonds. This section outlines these different types of financing, how they are researched and the implications for the study.

- **Share issuances**

  Issuing shares on the stock exchange allows a company to increase its equity by attracting new capital from a large number of new and existing shareholders. When a company offers its shares on the stock exchange for the first time, it is called an Initial Public Offering (IPO). When a company's shares are already traded on the stock exchange, this is called a secondary offering of additional shares. To arrange an IPO or a secondary offering, a company needs the assistance of one or more banks, which will promote the shares and find buyers who will become shareholders. Therefore, the investment bank's role in this process is very important, though temporary. The investment bank initially purchases the shares and then promotes the shares and finds shareholders. When all the issued shares the financial institution has underwritten are sold, they are no longer included in the balance sheet or the financial institution's portfolio. However, the assistance provided by financial institutions to companies in their share issuances is crucial. They provide the company with access to capital markets and guarantee that the shares will be bought at a pre-determined minimum price.

- **Bond issuances**

  In a certain way, bonds are a mix between loans and share issuances. On the one hand, bonds can best be described as cutting a large loan into small pieces to sell each piece separately to a lender. The different pieces of the bond are sold by using underwriting services, as in the case of the share issuances. Bonds are issued on a large scale by governments and, to a lesser extent, by corporations. Also, like shares, bonds are traded on the stock exchange. To issue bonds, a company needs the assistance of one or more banks which act as underwriters of a certain amount of the bonds. Underwriting is, in effect, buying a piece of the bond with the intention of selling it to investors. The role of the underwriters is very important because if they fail to sell the bonds they have underwritten, the underwriters will end up owning the bonds.

- **Holding and managing shares**

  Financial institutions can acquire shares of a certain company through the funds they manage or through their own funds, making the financial institutions part-owners of the company that issued the shares. Share ownership, especially if it is a considerable percentage, gives the financial institution a direct influence on the company's strategy and operations. The magnitude of the influence depends on the amount of shares the bank holds.

  As financial institutions actively decide in which sectors and companies to invest and, as just described, are able to influence the company's business strategy, this research investigates the shareholdings of financial institutions of the selected companies. Shareholdings are only relevant for stock-listed companies. Not all companies in the study are listed on a stock exchange.

  Researching a company's shareholdings has a number of peculiarities that have implications for the research strategy: Firstly, shares can be bought and sold on the stock exchange from one moment to the next. Financial databases keep track of shareholdings through snapshots or filings. This means that when a particular shareholding is recorded in the financial database, the actual holding, or a portion of it, might have already been sold, or more shares might have been purchased. The other main implication for the research is that share prices are constantly fluctuating. As a consequence, the shareholding amounts identified in the research will not probably reflect the actual level of shareholdings by a given financial institution; it will reflect the level the financial institution had at the time of the research.

- **Holding and managing bonds**

  Similarly to shareholdings, financial institutions can acquire bonds issued by a certain company. The main difference between owning shares and owning bonds is that the latter does not give the bondholder influence over the company's strategy and operations, i.e., holding bonds does not make the holder a co-owner of the company issuing the bonds; it makes it its creditor. That is, the bondholder is entitled to repayment after a certain number of years, at the bond's maturity, and to a predefined interest rate during the years.

1.1.5 Feedback round

The selected financial institutions were invited to review and either confirm or suggest corrections to the financial research. Most of the financial institutions' comments relate to their inability to provide statements about their investments in the selected companies, citing privacy and confidentiality policies. Others point to their policies on animal welfare and investment exit lists. The comments by each financial institution is presented in Appendix 1.

1.2 Methodology to evaluate responses to animal welfare-risks

This section describes the methodological framework for evaluating how financial institutions address animal welfare risks linked to their investments. It describes the data gathering procedure and introduces the indicators used in the analysis, including an explanation of their foundation in internationally recognised standards.

1.2.1 Selection of financial institutions for animal welfare due diligence assessment

The results of the financial research showed that the top four investors in bonds and shares of the selected companies were Allianz (with investments for US$ 320.8 million), ABP (US$ 95.8 million), PfZW (US$ 80.4 million) and PME (US$ 16.1 million). These four investors were then selected for assessment of their animal welfare due diligence assessment.

1.2.2 Procedure for data collection

To evaluate how the four selected financial institutions address the animal welfare risks within their portfolios, the researchers analysed public policies and reports published in the three years preceding this study (covering financial years 2022-2024). This analysis focused on their screening processes, the extent and transparency of their reporting on engagement activities, and the existence of grievance mechanisms that are accessible to external stakeholders and applicable to their investment activities.

In addition to reviewing publicly available information, the researchers distributed a questionnaire to the four institutions, seeking more detailed insights into their internal screening procedures and any engagement activities with selected companies that may not have been disclosed in public reports. The institutions were also invited to provide feedback on both the financial research findings and the draft assessments of their survey responses and public reporting. During this feedback round, PME, Pensioenfonds Vervoer and PfZW provided updated investment amounts, which resulted in a slight change in the ranking of the top investors. Specifically, PME was no longer in the top four investors in the selected companies, but the sixth-largest investor.

Three of the four institutions - ABP, PfZW, and PME - responded to the questionnaire and provided feedback on the findings. Allianz, citing limited capacity, declined to participate and referred researchers solely to its publicly available documents. Consequently, Allianz's assessment is based exclusively on public reporting, while for the three pension funds, both public reports and survey responses were considered in the evaluation.

1.2.3 Indicators

The indicators used to assess how the selected institutional investors address the animal welfare risks in their portfolios, are based on the normative framework set out in the *OECD Guidelines for MNEs on RBC* and the *OECD sectoral guidelines for the financial sector*.[8] The OECD Guidelines for Multinational Enterprises define six key steps for responsible business conduct (RBC) due diligence, which apply to a wide range of environmental and social risks, including, by extension, animal welfare risks. While the Guidelines do not address animal welfare into details as a standalone issue, the 2023 edition explicitly introduces the issue for the first time, and the overall due diligence framework is applicable to animal welfare concerns where they represent a salient risk.

This study therefore uses the OECD due diligence framework as the basis for evaluating how Dutch financial institutions identify, manage, and address animal welfare risks in their investment practices.

More specifically, the OECD Guidelines outline six key steps to conduct effective due diligence:

1. Embedding RBC into relevant policies and management systems for investors
2. Identifying actual and potential adverse impacts within investment portfolios and potential investments
3. As appropriate, using leverage to influence investee companies causing an adverse impact to prevent or mitigate that impact
4. Tracking performance of the investor's own performance in managing RBC risks and impacts in its portfolio
5. Communicating results
6. Providing for or cooperating in remediation where appropriate

Since the Dutch Fair Finance Guide already conducts a comprehensive biennial assessment of institutional policies (step 1), this research focuses specifically on implementation, namely the due diligence steps 2 to 6.

The indicators are grouped into four sections that correspond to the OECD due diligence process, tailored for financial institutions with investments in companies exposed to significant animal welfare risks. Step 4 (tracking performance) and step 5 (communicating results) are combined into one section (Section C). The structure is as follows:

A. Identification, qualification and prioritisation of animal welfare issues and risks

B. Using leverage to influence investee companies to prevent and mitigate adverse animal welfare impacts

C. Tracking progress and outcome and communicating about the results

D. Providing for or cooperating in remediation

The OECD guidelines cover a broad range of responsible business topics. Since 2023, the OECD guidelines include elements related to animal welfare.[9] However, there is still room for improvement in terms of the scope and depth of topics covered to ensure genuinely fair and effective animal welfare practices. This report therefore aligns its assessment of specific animal welfare issues with the criteria for farm animals set out in the Fair Finance Guide International Methodology[10]. In particular, it evaluates whether the following risks are taken into account:

- Severely restricted housing methods for farm animals, including calves in crates, hens in battery cages and sows in feeding cubicles;
- Lack of species-specific adequate environmental enrichment;
- Mutilations without pain relief;
- Inhumane slaughter methods; and
- Poor welfare conditions during animal transports.

Table 3 presents an overview of the sections, indicators and maximum scores that were used to evaluate whether and how the financial institutions address the animal welfare risks in their portfolios.

Table 3 Overview of sections and indicators

Section		Indicator		Max. score
A	Identification, qualification and prioritisation of animal welfare issues and risk(s)	A1	The financial institution has processes to identify actual and potential adverse animal welfare impacts	2
		A2	The financial institution has identified animal welfare risks for the selected companies	3
B	Using leverage to influence companies	B1	The financial institution engages on animal welfare topics with the selected companies	3
		B2	The financial institution sets timebound goal(s) for engagement	3
		B3	The financial institution reports on the various engagement tools and escalation steps it has used to engage with the selected companies	3
C	Tracking progress and outcomes and communicating about the results	C1	The financial institution monitors the engagement progress for the selected companies	3
		C2	The financial institution is transparent and accountable on its efforts to engage (on animal welfare)	4
		C3	The financial institution discloses an exclusion list which includes animal welfare criteria and the names of companies excluded	2
D	Providing for or enabling remediation	D1	The financial institution has set up a grievance mechanism that is accessible to (potentially) affected stakeholders to raise social and/or environmental concerns, related to the financial institution’s investments	3
Total maximum score				**26**

A detailed description of the scoring methodology for each indicator is provided in Appendix 2.

1.2.4 Calculation of final scores

As outlined in section 1.2.3 and summarised below, financial institutions can achieve a maximum total score of 26. Scores for each section are weighted equally and normalised to a 10-point scale using the weights shown in Table 4.

Table 4 Calculation of final score

Section		Max. score	Weight
A	Identification, qualification and prioritisation of animal welfare issue(s) and risk(s)	5	25%
B	Using leverage to influence companies	9	25%
C	Tracking progress and outcomes and communicating about the results	9	25%
D	Providing for or enabling remediation	3	25%
Maximum total score		**26**	**100%**

1.3 Disclaimer

Not all coalition members of the Dutch Fair Finance Guide work on all themes and/or sectors on which the research of the Dutch Fair Finance Guide focuses. Positions on specific themes therefore do not necessarily reflect the opinion of all coalition members of the Dutch Fair Finance Guide.

2

Results of the financial research

This chapter outlines the investments made by four selected financial institutions in animal agriculture companies. These investments include both shares and bonds issued by the selected companies. The institutions examined are the insurance company Allianz, and the pension funds: ABP, PfZW, and PME.

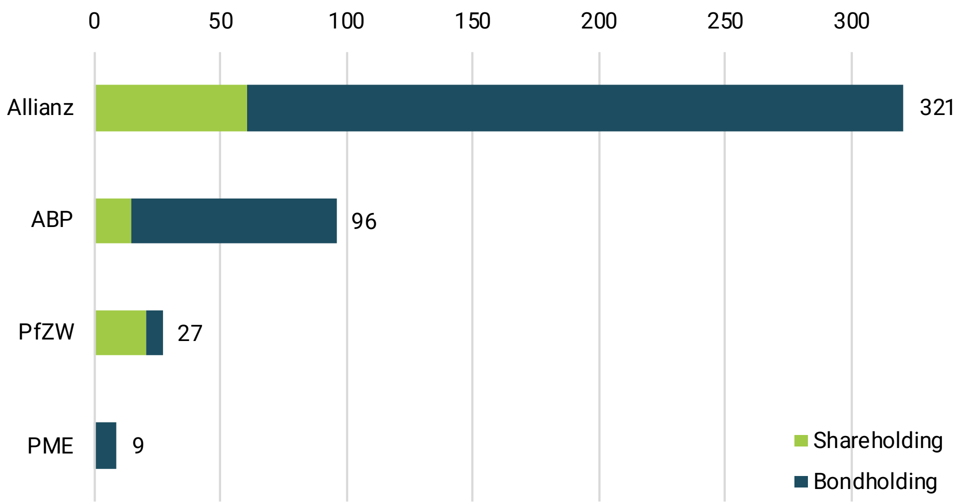
2.1 General findings

At the end of December 2024, or the latest filing available, the four selected financial institutions had investments in the animal agriculture companies for a total of US$ 452.6 million. Specifically, Allianz, ABP, PfZW and PME had investments for US$ 95.7 million in shares and US$ 356.9 million in bonds issued by the companies.

As can be seen in Figure 1, this research found that the main investor was the insurance company Allianz, with investments totalling US$ 321 million. Followed by pension funds ABP, with investments for US$ 96 million, PfZW, with US$ 27 million and PME, with US$ 9 million.

This research shows that the primary investment vehicle used by most financial institutions was bond holdings. However, there was one exception. Unlike the others, PfZW primarily invested in the selected companies through shareholdings.

Figure 1 Share and bond holdings per financial institution (Dec 2024 or latest filing date, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section 1.1.3.

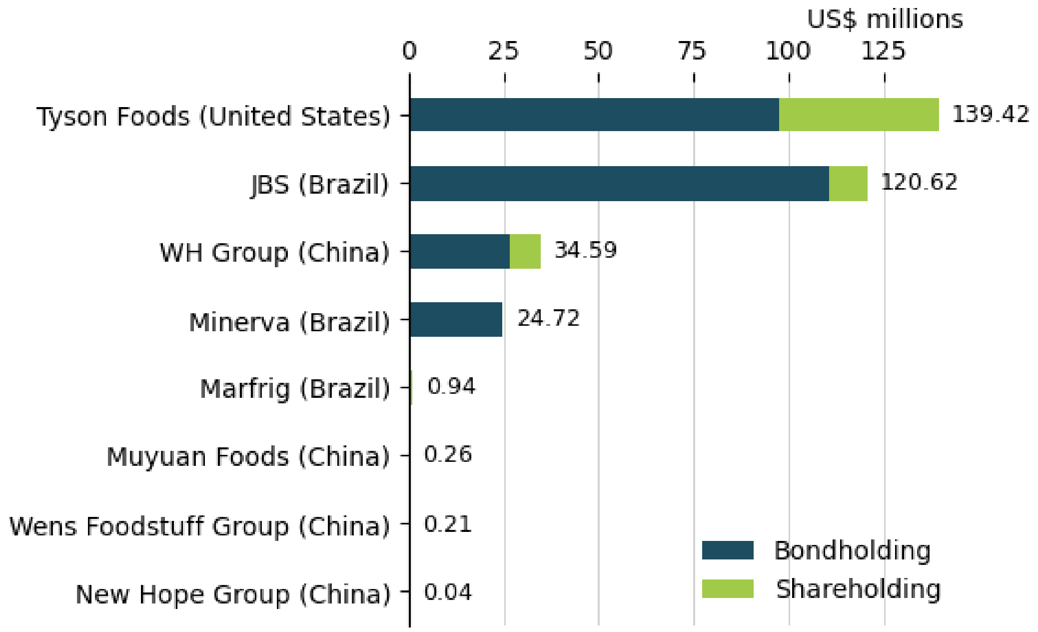
2.2 Allianz

In 2024, Allianz invested a total of US$ 320.8 million in eight of the selected animal agriculture companies. As can be seen in Figure 2, by the end of 2024, Allianz invested US$ 97.8 million in bond holdings and US$ 41.6 million in shareholdings of Tyson Foods, for a total of US$ 139.4

million. The second company in terms of investments was JBS, which received US$ 120.6 of financing, US$ 110.4 million of which was in bond holdings, and US$ 10.2 million in shareholdings. Third comes WH Group in which Allianz invested a total of US$ 34.6 of which, US$ 26.7 of this financing was in bond holdings and US$ 7.9 million in shareholdings. Finally, Allianz also had considerable investments in Minerva, US$ 24.7 million in bond holdings.

Furthermore, Allianz had investments in Marfrig, with US$0.9 million, Muyuan Foods, with US$ 0.3 million, Wens Foodstuff Group, with US$ 0.2 million and New Hope Group, with US$ 0.04 million, all in shareholdings.

Figure 2 Allianz's share and bond holdings (Dec 2024 or latest, US$ millions)

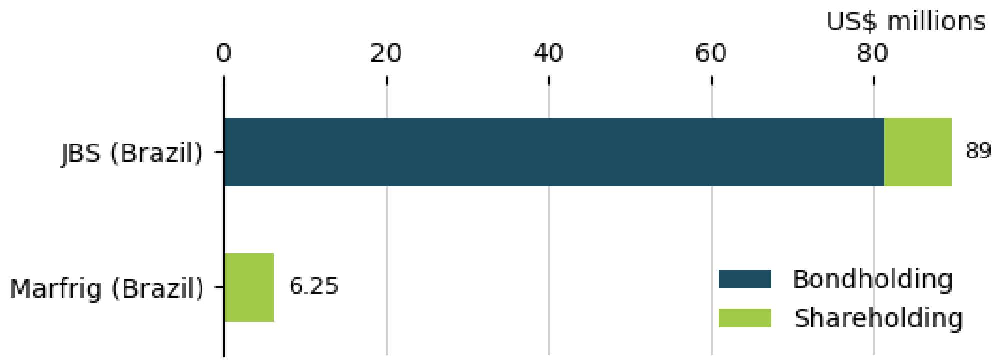


Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

2.3 Algemeen Burgerlijk Pensioenfonds (ABP)

ABP financed two Brazilian companies, JBS and Marfrig. In terms of bond holdings, ABP invested US$ 81.25 million in JBS. Further, ABP invested US$ 8.33 million in shares issued by JBS and US$ 6.25 million in shares issued by Marfrig. Altogether ABP financed the selected two companies with US$ 96 million. ABP did not invest in the other companies selected for this study.

Figure 3 ABP's share and bond holdings (Dec 2024, US$ millions)



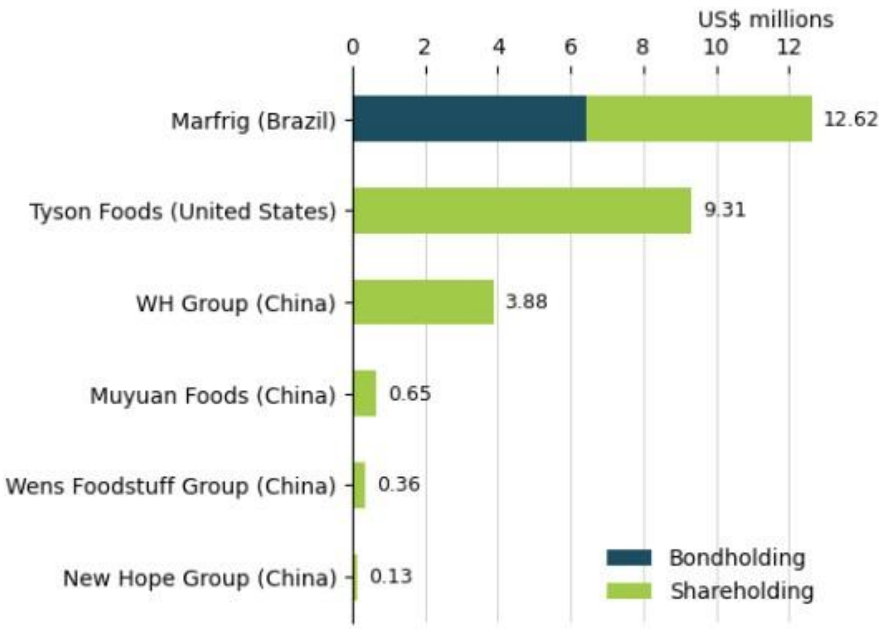
Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

2.4 Pensioenfonds Zorg en Welzijn (PfZW)

As can be seen in Figure 4, PfZW invested in six out of the ten companies considered in the study. By the end of December 2024, PfZW had investments for a total amount of US$ 27 million in shares and bonds. Figure 4PfZW held investments in BRF, a Marfrig subsidiary, for a total of US$ 12.6 million divided into US$ 6.2 million in shares and US$ 6.4 million in bonds. Next to this, PfZW had investments in shares issued by Tyson Foods (US$ 9.3 million), WH Group (US$ 3.9 million), Muyuan Foods (US$ 0.7 million), Wens Foodstuff (US$ 0.4 million) and New Hope Liuhe (US$ 0.1 million).

Summarised by type of investment, this research finds that PfZW invested mainly through shareholdings with US$ 20.5 million, whereas the total of amount in bond holdings of the selected companies was US$ 6.4 million.

Figure 4 PFZW's share and bond holdings (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

2.5 Pensioenfonds van de Metalektro (PME)

At the end of the first quarter of 2025, PME had investments, through bond holdings in Tyson Foods, for a total of US$ 9.02 million. None of the other selected companies were found in their portfolio disclosures.

3

Addressing animal welfare risks

This chapter examines whether and how Allianz, ABP, PfZW, and PME address animal welfare risks linked to their investments. It explores how these financial institutions identify, prioritise, and act on animal welfare risks, use their financial leverage to drive improvements, track engagement progress, and report outcomes. Finally, it considers whether they provide for or cooperate in remediating actual or potential animal welfare controversies.

3.1 Identification, qualification and prioritisation of animal welfare issue(s) and risk(s)

This section examines the extent to which selected investors have processes to identify actual and potential adverse impacts on animal welfare. It also assesses whether they identify specific animal welfare risks in the companies they invest in. As showcased in Table 5, Allianz receives a score of 4.0 out of 10, and ABP, PfZW, and PME each receive 2.0, resulting in an average score of 2.5. The findings show significant gaps in how these investors integrate animal welfare into their investment frameworks.

Table 5 Insurance and pension investors' scores on identification of animal welfare risks (/10)

Section	Allianz	ABP	PfZW	PME	Average
A: Identification of animal welfare risks	4.0	2.0	2.0	2.0	2.5

Among the institutions assessed, Allianz stands out as having relatively more structured processes in place to identify potential animal welfare impacts. First, Allianz's identification of animal welfare risks is guided by consideration of violations of the OECD Guidelines, which since 2023 include elements related to animal welfare.[11] In addition, Allianz's 2024 Sustainability Integration Framework sets out detailed screening and assessment criteria for animal welfare-related transactions, including:

- (The absence of) animal welfare certifications;
- Animal transport (including loading and unloading) exceeding eight hours;
- Inappropriate use of antibiotics, hormones or other growth-promoting substances,
- Inhumane practices such as routine mutilations without anesthetic, slaughter without pre-stunning; and
- Animal living conditions that fall below the sector average.[12]

With respect to the latter, it remains unclear how Allianz defines or benchmarks this "sector average" for farm animal living conditions. Given the wide variation in standards across regions and production systems, it is not evident which baseline Allianz deems minimally acceptable or how it ensures consistent application of its criteria across different geographies. Moreover, it is not clear from Allianz's policy what Allianz will do if some of these criteria are not met by an investee company.

ABP, PfZW, and PME each received only 2.0 points, mainly due to their reliance on the OECD Guidelines as the primary framework for addressing animal welfare concerns. Since the 2023 revision, these guidelines also cover animal welfare.[13] However, there is no evidence that any of the financial institutions apply species-specific animal welfare criteria, such as providing appropriate environmental enrichment, ensuring suitable housing conditions, or administering pain relief.

ABP does apply additional criteria beyond the OECD Guidelines, such as requiring companies involved in animal agriculture and animal protein production to have a "strong policy to guarantee animal welfare" and excluding companies linked to severe nature-related controversies.[14] However, these standards are applied only to ABP's listed equity portfolio for developed markets. This is not in line with international standards and creates significant gaps. It allows high-risk companies - such as Brazilian animal agriculture processors JBS and Marfrig - to remain eligible for investment, despite failing to meet the Environmental, Social, and Governance (ESG)-criteria ABP applies for developed markets. This is especially striking in the case of JBS, since most animals that are slaughtered by this multinational, are not 'produced' in Brazil, but in countries like the US, Australia and the UK.[15] ABP's documentation indicates an intention to extend these minimum ESG-criteria, including animal welfare standards, to emerging market equities and corporate bonds in the future.[16]

A noteworthy development in this context is JBS's recent initial public offering on the New York Stock Exchange, alongside the relocation of its international holding company to Amstelveen, the Netherlands.[17] This move brings JBS under ABP's developed markets portfolio, meaning that JBS should now be excluded from ABP's listed equity portfolio according to ABP's own ESG-criteria. Researchers sought clarification from ABP regarding the implications of JBS's move to Amstelveen, but ABP did not respond.

PME and PfZW similarly refer to adherence to OECD Guidelines and UN Guiding Principles as the basis of their ESG-risk identification process, with specific exclusions for fur-related activities.[18]

A critical shortfall is that none of the investors show public evidence of identifying company-level animal welfare risks. Allianz's relatively more advanced criteria have yet to translate into demonstrable identification of risks in specific holdings. ABP's investments in companies like JBS and Marfrig - despite their poor performance in the Business Benchmark on Farm Animal Welfare (2024)[19] - underscore a disconnect between policy intent and investment practice. For PME and PfZW, the focus on screening companies against OECD controversies appears to result in ad hoc risk identification, which undermines the proactive, company-level risk assessment needed to prevent serious animal welfare issues.

3.2 Using leverage to influence companies

This section examines how insurance and pension investors engaged with the selected companies after identifying actual or potential adverse animal welfare impacts. It evaluates how these financial institutions use their leverage to influence animal agriculture companies to improve animal welfare standards. The focus is on three key aspects: (1) whether the investors engage with the selected companies on animal welfare, (2) whether they set timebound goals for such engagement, and (3) whether they report on engagement tools and escalation steps used in this context. As illustrated in Table 6, the data reveal significant variations in approach, ambition, and transparency across the investors.

Table 6 Insurance and pension investors' scores on using leverage to influence companies (/10)

Section	Allianz	ABP	PfZW	PME	Average
B: Using leverage to influence companies	1.1	5.6	0.0	0.0	1.7

Across the board, direct engagement with the selected animal agriculture companies on animal welfare is limited. Allianz, despite participating in collaborative initiatives, provides no evidence of direct engagement with the selected companies on this issue. Allianz's public reporting refers to collaborative engagement initiatives like FAIRR, a collaborative investor network that raises awareness of the material risks and opportunities in the global food sector, including on animal welfare.[20] However, topics of engagement reported by Allianz focus on biodiversity and food sustainability without specifically mentioning welfare-related dialogues.[21] Allianz's low score of 1.1 out of 10 reflects this gap.

ABP demonstrates a somewhat more comprehensive approach. ABP sets expectations for supermarkets in its portfolio to establish an animal welfare policy by 2025 and to audit animal welfare in their supply chains annually.[22] However, ABP does not disclose whether it has engaged individual companies on these points. In its response to Profundo's questionnaire, ABP explicitly refrains from commenting on individual engagement efforts.[23] While ABP's engagement policy suggests an awareness of animal welfare issues within its engagement efforts, the lack of company-specific engagement reporting limits the assessment of its practical impact.

PfZW receives a score of 0.0 for its engagement on animal welfare, reflecting the absence of targeted activity in this domain. Its engagement efforts centre on climate change, human rights, and access to healthcare.[24] While PfZW reports having engaged with Minerva Foods and Tyson Foods, these dialogues were focused on controversies related to deforestation, social incidents, and client incidents (not further specified), rather than animal welfare.[25] Additionally, PfZW's asset manager, PGGM, reportedly engaged with Marfrig in 2021, but not on animal welfare. Engagement topics covered SDG 6: Clean water and sanitation, SDG 12: Responsible consumption and production, and SDG 13: Climate action.[26] None of the SDG sub-targets under SDG 12 specify animal welfare-related topics.[27]

PME's also receives a score of 0.0 as the pension fund does not directly address animal welfare. The institution reports raising antimicrobial resistance with Tyson Foods, a topic tangentially related to animal health but primarily a public health issue.[28] While PME mentioned it closely aligns with the FAIRR Initiative, PME is not an actual member of this collaborative investors' initiative.[29] That PME monitors FAIRR's engagement efforts and attempts to closely align with FAIRR approaches suggests some interest in broader food system risks. Nevertheless, no direct engagement on animal welfare was identified.[30]

Regarding the establishment of timebound goals, the institutions show limited practice in the context of animal welfare. For Allianz, PfZW and PME, no animal welfare-related engagements were identified and thus no timebound goals for animal welfare engagements were identified either.

ABP stands out for setting timebound expectations. For supermarkets there are three expectations:

- To formulate animal welfare policies by 2025;
- To conduct an annual supply chain auditing on animal welfare compliance; and
- To publish a protein strategy by 2030 aimed at achieving a 50-50% division between animal- and plant-based proteins.[31]

While ABP does not link these objectives to individual animal agriculture company engagements, multiple meat-producing companies are indirectly targeted through ABP's engagement approach with supermarkets' supply chain. However, ABP does not stipulate the ambition and quality of the animal welfare policies, which raises concerns that the commitment may remain largely a tick-the-box exercise.

Finally, the degree of reporting on the use of engagement tools and progress toward animal welfare milestones is limited across all assessed entities. ABP does not report on any escalation processes employed in the case of non-compliance with its animal welfare expectations, citing in its questionnaire answer that ABP does not report on individual company engagements.[32] For Allianz, PME, and PfZW, no animal welfare-related engagements were found. Consequently, no concomitant reporting on engagement tools and achieved milestones could be identified.

3.3 Tracking progress and outcomes and communicating about the results

This section explores how insurance and pension investors monitor the progress and outcomes of their engagement efforts, as well as how they communicate these results publicly. For this section, public disclosures on engagement efforts across all ESG topics were taken into consideration. This is because financial institutions cannot report against engagements that have not taken place, and the main focus of this section is on transparency. Whether or not a financial institution engages on animal welfare, is already assessed and scored under Section B of this research (see 3.2).

Table 7 shows the scores per financial institution on Section C of the research.

Table 7 Insurance and pension investors' scores on tracking progress and communicating results (/10)

Section	Allianz	ABP	PfZW	PME	Average
C: Tracking progress and communicating results	2.2	4.4	4.4	5.6	4.2

The scores indicate varying levels of transparency on engagement efforts across the four financial institutions. Allianz only reports aggregated information about its engagement efforts, accompanied by a few case studies serving as illustrations. No case studies on the topic of animal welfare were reported. Comprehensive reporting is missing, including a list of all engaged companies, the topics of engagement, and milestones achieved.[33]

ABP annually publishes a list of its engagements, including the names of companies engaged and the broad topic of engagements (i.e., climate change, biodiversity, human rights and good governance). ABP provides some examples of individual cases in its annual report.[34] No reporting was found on the progress and outcomes of its engagements with supermarkets on animal welfare. This might be due to the fact that the programme comprises a relatively new engagement policy. Hopefully, structural reporting will follow in the future.

PfZW engages companies such as Minerva and Tyson, but not on animal welfare-related topics. Where the pension fund does engage (on ESG topics other than animal welfare), PfZW provides aggregate reporting and case-based highlights but lacks systematic, public reporting of progress against specific commitments.[35]

PME, by contrast, reports relatively transparently on the implementation of concrete steps companies have committed to. Though no engagements on animal welfare were identified, PME discloses the names of companies engaged, describes what milestones were achieved over the past year for each company engaged with, in addition to providing more aggregated information about its engagement efforts. For example, PME reports on engaging with Carrefour on protein transition, including clear follow-up actions and timelines, such as setting a clear target for the ratio of animal versus plant-based proteins by 2025.[36] While PME's engagement with Carrefour does not directly address animal welfare, its support for a transition away from animal-based proteins remains relevant to the issue.

An ultimate escalation tool is divestment and exclusion of companies that do not uphold minimal animal welfare standards. For this reason, the analysis scrutinised whether the financial institutions' exclusion policies covers animal welfare criteria. Allianz's exclusion policy is narrowly focused, covering controversial weapons and coal. Furthermore, Allianz does not disclose the names of excluded companies, citing client confidentiality as a reason for this lack of transparency.[37]

PME applies an exclusion criterion related to fur, avoiding investments in companies that exploit or produce fur products.[38] PME adopts an inclusion approach, meaning companies must meet ESG standards to enter its portfolio, effectively excluding non-compliant firms.[39] It no longer publishes a comprehensive exclusion list, making it impossible for external stakeholders to identify excluded companies.

For its developed markets listed equity portfolio, ABP excludes companies producing fur. For this asset class, the pension fund also has a policy specifying that companies with high animal welfare risks are not eligible for investments if they do not have "a strong policy to ensure animal welfare".[40] It is not further specified what such a strong policy should entail precisely. ABP discloses an exclusion list which lists the names of companies, but without mentioning animal welfare-related issues.[41] As such, it is not clear whether and what companies were excluded based on the exclusion clause of ABP's developed markets listed equity portfolio.

PfZW excludes companies involved in fur and leather production above a threshold (5% of revenue), reflecting some animal welfare consideration.[42] However, it no longer publishes an exclusion list, opting instead to disclose companies in its investable universe and the minimum standards required for inclusion. While this shift promotes positive screening, it reduces clarity on which companies are excluded for animal welfare or other ESG reasons. Notably, in its response to the questionnaire, PfZW indicated that JBS and Marfrig do not pass the OECD screening and are therefore not eligible for investment.[43] This discrepancy raises questions about the consistency of OECD screening practices across financial institutions, particularly why companies such as JBS and Marfrig are considered ineligible by PfZW but included in the investment universe of ABP and Allianz, despite all claiming to conduct a OECD-screening as a first step of their ESG due diligence (see section 3.1).

3.4 Providing for and cooperating in remediation

This section assesses whether and how the financial institutions provide for or cooperate in remediation of animal welfare risks.

Table 8 shows the scores per financial institution on Section D of the research.

Table 8 Insurance and pension investors' scores on providing for and cooperating in remediation (/10)

Section	Allianz	ABP	PfZW	PME	Average
D: Providing for or cooperating in remediation	3.3	0.0	0.0	0.0	0.8

Among the four financial institutions, Allianz is the only investor with a complaints mechanism that is explicitly accessible to external parties and covers its investment activities. The other three institutions do have complaints mechanisms, but these either do not cover investment activities (as in the case of PME) or their scope is unclear (ABP and PfZW).[44]

Notably, the complaints mechanisms of both PME and PfZW are specifically designed for pension participants and do not appear to accommodate complaints from external parties, such as affected stakeholders or NGOs. For ABP, it is not explicitly mentioned whether the complaints mechanism is open to external stakeholder.[45]

In the case of Allianz, although its complaints mechanism does not explicitly reference animal welfare-related incidents, the list of reportable issues appears illustrative rather than exhaustive. Concerns related to animal welfare could, in principle, be submitted under the existing mechanism.[46] Allianz reports that ''in 2024, no severe human rights violations of value chain workers were reported'' through its complaints mechanism. [47] However, no filings of animal welfare-related incidents were publicly reported by the insurer.

4

Conclusion

4.1 Conclusions

Investments by Dutch insurance companies and pension funds in the ten selected meat companies are generally limited. For most financial institutions (15/26), no investments in the selected companies were found. Notably, none of the Dutch health insurers invests in any of these companies. Consequently, PME, with investments of less than EUR 10 million in one of these companies, was among the largest Dutch investors in this group. Overall, these findings indicate minimal sector-wide exposure to these high-risk companies. The main exceptions are Allianz, ABP, and PfZW, which stand out with respective investments of US$ 321 million, US$ 96 million, and US$ 27 million.

The research illustrates that the four financial institutions have much to improve with respect to their animal welfare-related due diligence procedures. The low average scores on animal welfare-related due diligence, as presented in Table 9, are emblematic of the limited priority that investors assign to animal welfare risks. Despite some awareness of the ESG implications of poor animal welfare practices, meaningful engagement in this area is underdeveloped. The low scores suggest that animal welfare considerations have yet to be meaningfully integrated into stewardship strategies and active ownership practices.

Table 9 Insurance and pension investors' scores on animal welfare due diligence (/10)

Section	Allianz	ABP	PfZW	PME	Average score
A: Identification of animal welfare risks	4.0	2.0	2.0	2.0	2.5
B: Using leverage to influence companies	1.1	5.6	0.0	0.0	1.7
C: Tracking progress and communicating results	2.2	4.4	4.4	5.6	4.2
D: Providing for or cooperating in remediation	3.3	0.0	0.0	0.0	0.8
Average score	**2.7**	**3.0**	**1.6**	**1.9**	**2.3**

The assessment highlights that while Allianz, ABP, PfZW, and PME have integrated some animal welfare considerations into their responsible investment processes, significant gaps remain in the practical identification and management of animal welfare risks at the company level. Allianz demonstrates the most advanced processes through its detailed screening criteria, yet it has not translated these processes into publicly reported identification of risks in specific companies. Moreover, given that Allianz is by far the largest investor in the ten meat companies, the extent to which its animal welfare-related screening criteria are applied in practice remains questionable. ABP, PfZW, and PME largely rely on the OECD Guidelines, which address some animal welfare issues but do not cover the kind of species-specific requirements to guarantee the welfare of animals kept in industrial livestock industries. None of the financial institutions provided evidence of company-level risk identification in relation to animal welfare. Notably, the fact that PfZW has indicated that JBS and Marfrig do not pass the OECD screening, and are therefore not eligible investment, puts into question how it is possible that these two companies have slipped through the OECD screening of other financial institutions, like ABP and Allianz.

The assessment has revealed that ABP applies different screening criteria to ''developed'' and ''developing'' markets, which explains why ABP still invests in a company like JBS. The practice of maintaining separate responsible investment policies for developing and developed markets is problematic for several reasons. First, the implicit assumption that market actors in developing economies should not be held to the same social and environmental standards as those in developed countries allows for harms in the Global South. It implies lower expectations for accountability and responsibility, contradicting international sustainability standards and risking the reinforcement of global inequities. Second, the very conceptualisation of the world economy as divided into two distinct categories - developed and developing markets - is increasingly difficult to defend. This binary oversimplifies the wide political, economic, and institutional differences among countries labelled as developing economies. For example, middle-income countries such as Brazil differ substantially from low-income countries in parts of Africa, particularly when the market actor in question is a large multinational corporation like JBS, whose scale and global reach render such categorical distinctions largely irrelevant. In fact, JBS slaughters more animals in countries like the United States, Australia and the United Kingdom, than in Brazil.

The findings imply that for these financial institutions to meaningfully address animal welfare risks, further development of targeted risk identification processes is required. This would involve not only the expansion of existing frameworks beyond OECD compliance to cover adequate, species-appropriate housing, including environmental enrichments, good transport conditions and humane slaughtering methods, but also proactive assessment and disclosure of animal welfare risks in their investment portfolios. Strengthening data collection, applying consistent standards across asset classes and regions, and increasing transparency in reporting would be critical steps toward achieving more comprehensive integration of animal welfare considerations in financial decision-making.

Finally, the widespread absence of effective grievance mechanisms remains a critical case in point. Only one out of the four financial institutions assessed has a complaints mechanism that is explicitly open to external stakeholders and covers ESG-related issues linked to investment activities. The existence of an accessible and effective grievance mechanism is particularly important in the context of animal welfare. Since the primary affected stakeholders - animals - cannot raise concerns themselves, it is crucial that external parties, such as NGOs and other civil society actors, have a clear avenue to report and seek remedy for potential harms linked to investment activities. Such mechanisms not only enhance accountability and transparency but also provide an early-warning system that can help institutions identify and address risks before they escalate into reputational or financial harm.

4.2 Recommendations

Based on the main findings, the following recommendations can be made to financial institutions:

1. **Integrate animal welfare into broader ESG risk frameworks**

   Given the links between animal welfare, biodiversity loss, climate change, and public health such as zoonotic diseases and antimicrobial resistance, financial institutions should systematically integrate animal welfare into biodiversity, climate, and human rights engagement programs. This would reflect the interconnected nature of these challenges and create greater leverage in dialogue with companies. The policy should explain what the financial institution will do to engage with companies on animal welfare issues.

2. **Set measurable, timebound engagement objectives**

   Institutions should introduce structured timelines for engagement objectives with companies, similar to approaches observed in climate or deforestation-related engagements. These objectives could include milestones such as:

   - Implementation of comprehensive, adequate animal welfare policies by a set date;
   - Timebound targets for reducing harmful practices in supply chains; and
   - Progress in certification or audit schemes related to animal welfare.

3. **Expand the use of diverse engagement tools and escalation strategies**

   Institutions should broaden the toolkit for engaging on animal welfare, moving beyond dialogue to include:

   - Filing or supporting shareholder resolutions on animal welfare issues;
   - Voting against directors or specific resolutions at company AGMs where there is insufficient progress;
   - Publicly communicating concerns where private engagement has not yielded satisfactory outcomes; and
   - Considering divestment or exclusion in cases where engagement fails and risks remain inadequately managed.

   To ensure transparency and accountability, a clear escalation pathway should be disclosed in public stewardship reports.

4. **Improve transparency of engagement reporting**

   Institutions should significantly improve disclosure on animal welfare engagements by:

   - Identifying the companies targeted for engagement on animal welfare in public reports;
   - Describing the specific topics discussed and progress achieved; and
   - Reporting on the use of engagement tools and any escalation steps taken.

   Such transparency would align with best practices seen in other ESG topics (e.g., climate change, human rights) and enable external stakeholders to assess the effectiveness of engagement strategies.

5. **Establish monitoring and evaluation frameworks for animal welfare engagement**

   Institutions should design internal scorecards or evaluation tools to assess the effectiveness of their animal welfare engagements. Metrics could include:

   - Number of companies engaged on animal welfare;
   - Percentage of engaged companies making policy or practice improvements; and
   - Alignment of company practices with international animal welfare standards.

   Regular internal reviews and external audits of engagement effectiveness could further strengthen credibility.

6. **Set up an effective grievance mechanism that covers investment activities and is open and accessible to external stakeholders**

   Financial institutions should ensure that accessible, effective grievance mechanisms are in place to address concerns linked to animal welfare risks in their investment activities. As per the UNGPs, in order to be effective, a non-judicial grievance mechanism should be:

   - Legitimate: ensuring trust by stakeholders and accountability in their operation;
   - Accessible: being known and reachable by all relevant groups, with support for those facing access barriers;
   - Predictable: providing a clear, timely, and transparent process with defined outcomes;

- Equitable: seeking to ensure fair access to information and support so all parties can participate on equal terms;
- Transparent: keeping parties informed and provide public information to build trust;
- Rights-compatible: ensuring that outcomes align with international standards;
- Enable continuous learning: incorporate feedback to improve and prevent future issues; and
- Be based on engagement and dialogue: involve stakeholders in design and resolution through ongoing consultation[48].

7. Apply responsible investment principles universally across asset classes and regions

Institutions should ensure that responsible investment policies and ESG standards are applied consistently across all asset classes and regions to avoid double standards and promote fairness and accountability.

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Appendix 1 Financial results for all selected financial institutions

Pension funds

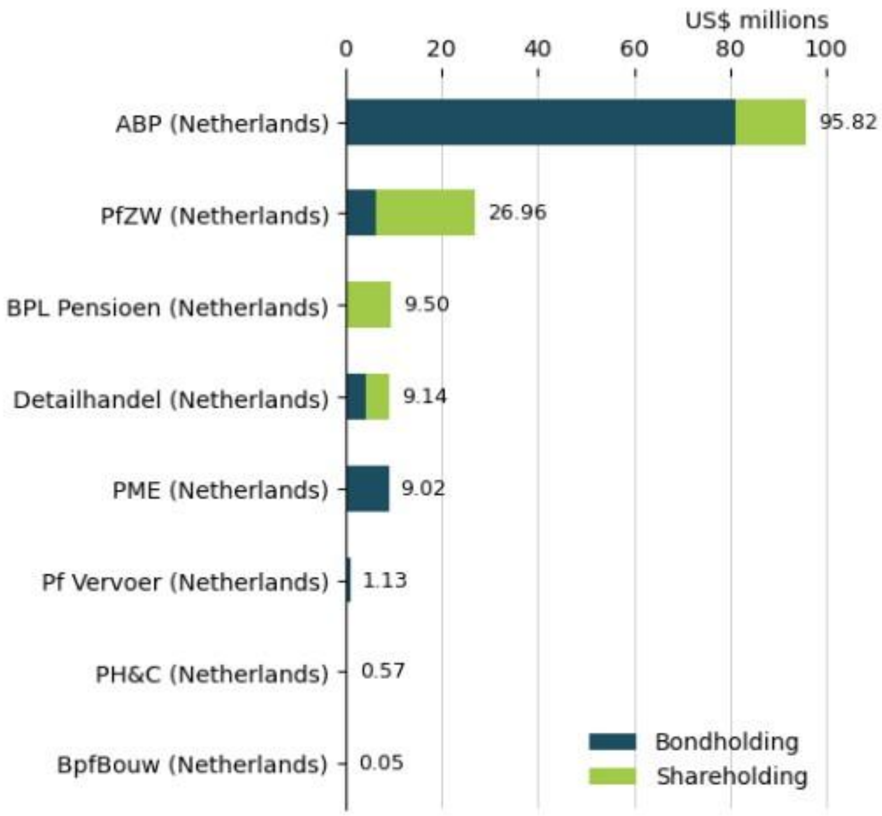
This chapter presents the identified pension funds' investments in shares and bonds issued by the selected animal agriculture companies. First, the general findings are presented adding up the investments of all the pension funds. Then, the investments of each pension fund are considered individually.

General findings

In December 2024, the latest filing date available, Dutch pension funds held US$ 152 million in shares and bonds issued by the selected companies. Specifically, Dutch pension funds have investments for US$ 49 million in shares and US$ 103 million in bonds issued by eight out of the ten animal agriculture companies considered in the research.

As can be seen in Figure 5, the main investors in the selected companies are ABP with investments for US$ 96 million, PfZW with US$ 27 million and BPL, Detailhandel, and PME with investments of around US$ 9 million each.

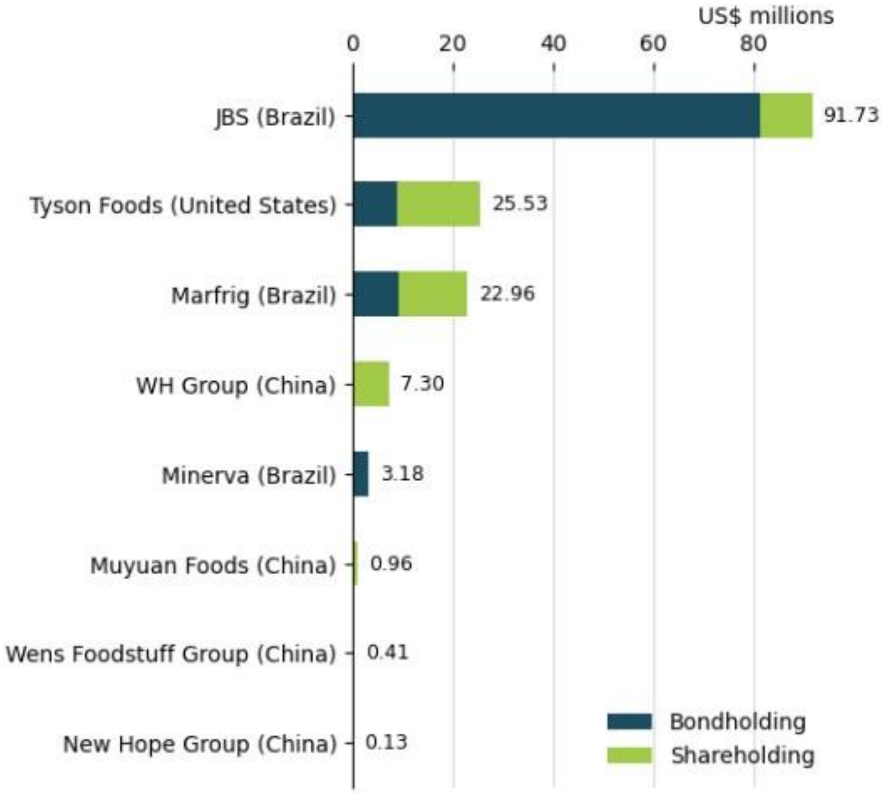
Figure 5 Pension funds' share and bond holdings (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section 1.1.3.

From the other perspective, as can be seen in Figure 6, the main recipients of the Dutch pension funds' investments are JBS which received investments for US$ 92 million, Tyson Foods with US$ 26 million and Marfrig with US$ 23 million. The remaining recipients for the top five are WH Group and Minerva, which received investments for US$ 7 million and US$ 3 million, respectively.

Figure 6 Pension funds' share and bond holdings per company (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

Considering only the investments via shareholdings, this research finds that by the end 2024, Dutch pension funds held US$ 49 million in shares issued by the selected companies. Specifically, US$ 21 million held by PfZW, US$ 15 million by ABP and US$ 10 million by BPL.

In terms of bond holdings, the Dutch pension funds held, by the end of 2024, US$ 103 million in bonds issued by the companies in scope. Specifically, the main investors in bonds of the selected animal agriculture companies were ABP with US$ 81 million, PME with US$ 9 million and PfZW with US$ 6 million.

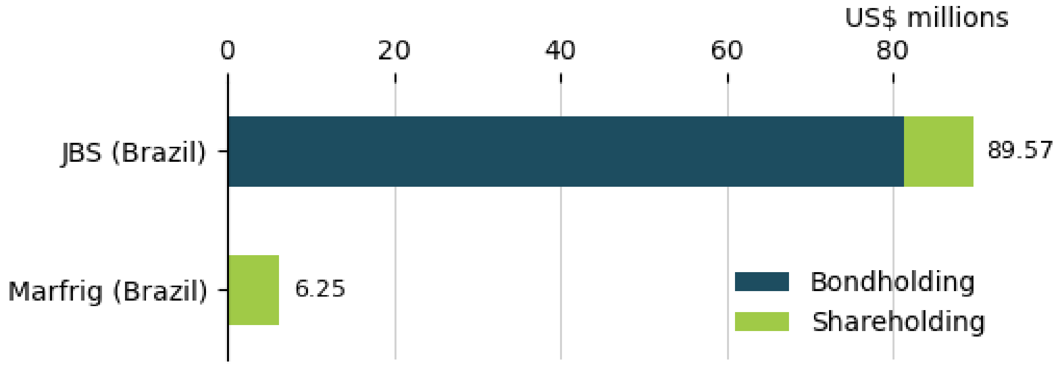
Findings per pension fund

The rest of this chapter presents the results for each of the pension funds considered in the research.

Algemeen Burgerlijk Pensioenfonds (ABP)

Algemeen Burgerlijk Pensioenfonds (ABP) financed two Brazilian companies: JBS and Marfrig. In terms of bond holdings, ABP invested US$ 81.25 million in JBS. On the other hand, ABP invested US$ 8.33 million in shares issued by JBS and US$ 6.25 million in shares issued by Marfrig. Altogether, ABP financed the selected two companies with US$ 96 million. These figures were confirmed by the pension fund.

Figure 7 ABP's share and bond holdings (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

Bedrijfstakpensioenfonds voor de Bouwnijverheid (BpfBOUW)

Bedrijfstakpensioenfonds voor de Bouwnijverheid (BpfBOUW) has shareholdings for US$ 0.05 million in the Chinese company Wens Foodstuff Group at the end of 2024. The pension fund refrained from commenting on the identified investment amounts.

BPL Pensioen

At the end of December 2023, BPL has shareholdings in two of the companies considered in the study for US$ 9.5 million. Specifically, BPL has US$ 6.1 million in shares issued by Tyson Foods and US$ 3.4 million in shares issued by WH Group.

Table 10 BPL Pensioen's share and bond holdings (Dec 2023, US$ millions)

Group	Group country	Shareholdings	Bond holdings	Total
Tyson Foods	United States	6.08	0.00	6.08
WH Group	China	3.42	0.00	3.42
Total		9.50	0.00	9.50

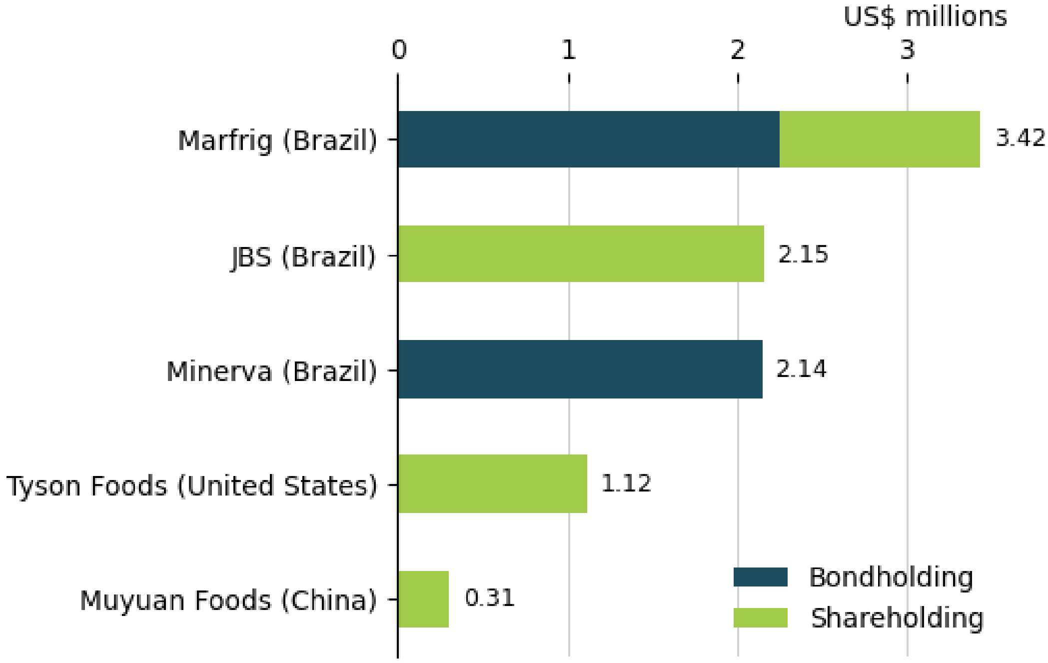
Source: Profundo calculations based on information retrieved as described in 1.1.3.

At the time this research is conducted, BPL has not published its investment disclosures for 2024. The researchers contacted the pension fund requesting for the disclosures but BPL did not respond.

Pensioenfonds Detailhandel

In 2024, Pensioenfonds Detailhandel financed five of the selected animal agriculture companies, with a total amount of US$ 9.14 million. As can be seen in Figure 8, most financing was directed to Marfrig, with US$ 1.17 million in shareholdings and US$ 2.25 million in bond holdings, which makes a total of US$ 3.42 million. Further, Pensioenfonds Detailhandel invested in JBS with US$ 2.15 million in shareholdings, Minerva with US$ 2.14 million in bond holdings, Tyson Foods with US$ 1.12 million in shareholdings and finally Muyuan Foods with US$ 0.31 million in shareholdings. In terms of portfolio balance, this research finds that Pensioenfonds Detailhandel is equally invested in the shares and bonds of the selected companies. As can be seen in Figure 8, the pension fund's shareholdings are US$ 4.75 million, whereas the total of bond holdings is US$ 4.39 million. These figures were confirmed by the pension fund.

Figure 8 **Pensioenfonds Detailhandel's share and bond holdings (Dec 2024, US$ millions).**



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

Pensioenfonds Horeca en Catering (PH&C)

This research finds that by the end of 2024, Pensioenfonds Horeca en Catering invested US$ 0.57 million, through bond holdings, in Minerva Luxembourg. No other investments in any of the selected companies were identified. The pension fund refrained from commenting on the identified investment amounts.

Pensioenfonds Metaal en Techniek (PMT)

Based on PMT's portfolio disclosures, this research finds that PMT does not invest in any of the companies consider in the study. This information was confirmed by the pension fund.

Pensioenfonds van de Metalektro (PME)

At the end of the first quarter of 2025, Pensioenfonds van de Metalektro has investments, through bond holdings in Tyson Foods, for a total of US$ 9.02 million. None of the other selected companies were found in their portfolio disclosures. This information was confirmed by the pension fund.

Pensioenfonds Vervoer

At the end of 2024, Pensioenfonds Vervoer has investments in bond holdings issued by the selected companies for a total of US$ 1.13 million. Specifically, the pension fund has investments for US$ 0.7 million in Marfrig and US$ 0.5 million in Minerva. These figures were confirmed by the pension fund.

Table 11 Pensioenfonds Vervoer's share and bond holdings (Dec 2024, US$ millions)

Group	Group country	Shareholdings	Bond holdings	Total
Marfrig	Brazil	0.00	0.67	0.67
Minerva	Brazil	0.00	0.46	0.46
Total		0.00	1.13	1.13

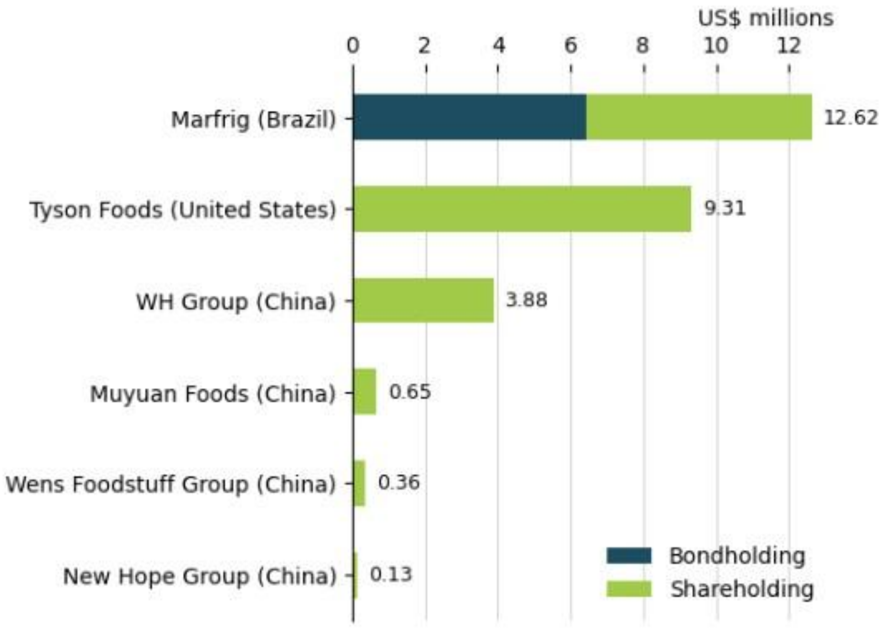
Source: Profundo calculations based on information retrieved as described in Section1.1.3

Pensioenfonds Zorg en Welzijn (PfZW)

As can be seen in Figure 9, Pensioenfonds Zorg en Welzijn (PfZW) invested in six out of the ten companies considered in the study. Specifically, by the end of December 2024, PfZW has investments for a total amount of US$ 27 million in shares and bonds issued by the selected companies. Per companies, as Figure 9 shows, PfZW held investments in BRF, a Marfrig subsidiary, for a total of US$ 12.6 million divided as US$ 6.2 million in shares and US$ 6.4 million in bonds. Furthermore, PfZW had investments in shares issued by Tyson Foods (US$ 9.3 million), WH Group (US$ 3.9 million), Muyuan Foods (US$ 0.7 million), Wens Foodstuff (US$ 0.4 million) and New Hope Liuhe (US$ 0.1 million).

Summarising by type of investment, this research finds that PfZW invested mainly through shareholdings with US$ 20.5 million, whereas the total amount in bond holdings of the selected companies was US$ 6.4 million. These figures were confirmed by the pension fund.

Figure 9 PFZW's share and bond holdings (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section 1.1.3.

Stichting Pensioenfonds voor Personeelsdiensten (StiPP)

By the end of December 2023, StiPP did not have investments in the companies considered in the study.

At the time this research is conducted, StiPP has not published its investment disclosures for 2024. This research contacted the pension fund requesting for the disclosures but StiPP responded informing that the disclosures were not available yet.

Insurance companies

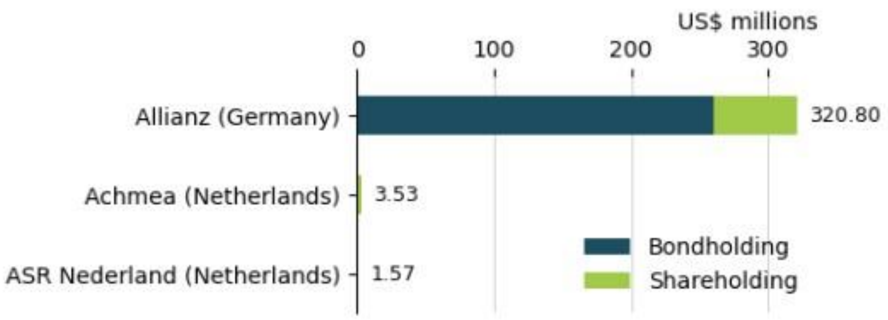
This section presents the identified insurance companies' investments in shares and bonds issued by the selected animal agriculture companies. First, the general findings are presented adding up the investments of all the insurance companies. Then, the investments of each insurance company are considered individually.

General findings

By the end of December 2024, or the latest filing date available, Dutch insurance companies held US$ 326 million in shares and bonds issue by the selected companies. Specifically, the selected insurance companies had investments for US$ 65.7 million in shares and US$ 260.3 million in bonds issued by the ten animal agriculture companies considered in this research.

As can be seen in Figure 10, the main investor in the selected companies was Allianz with investments for a total of US$ 320.8 million, followed by Achmea with US$ 3.5 million and ASR Nederland with US$ 1.6 million.

Figure 10 Insurers' share and bond holdings (Dec 2024, US$ millions)



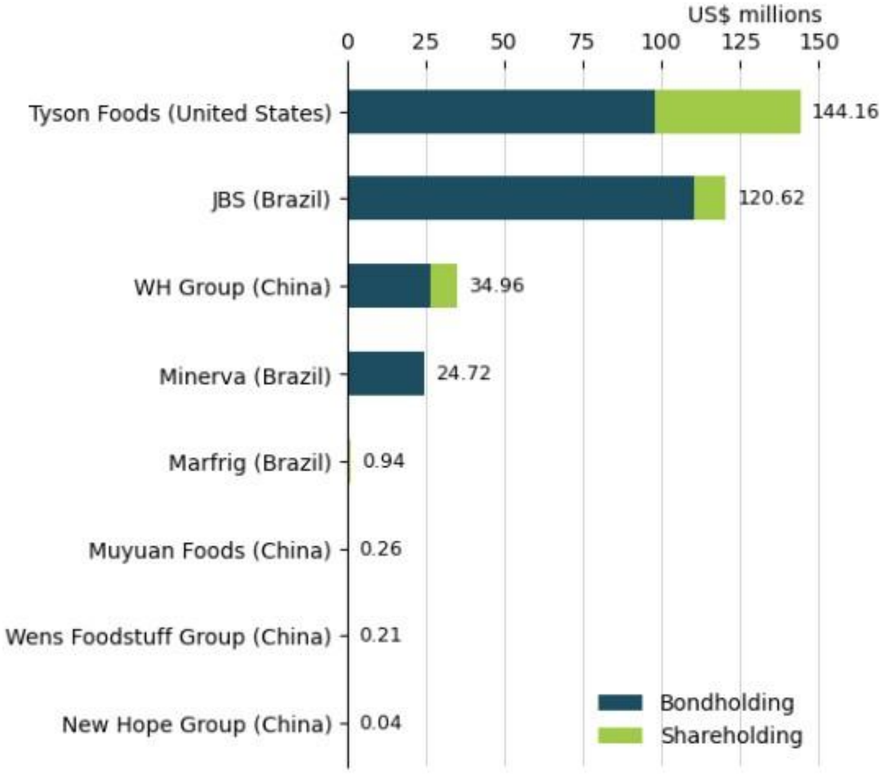
Source: Profundo calculations based on information retrieved as described in Section 1.1.3

From the other perspective, as can be seen in Figure 11, the main recipients of the Dutch insurance companies' investments were Tyson Foods, which received investments for US$ 144.2 million, JBS with US$ 120.6 million, WH Group with US$ 35.0 million and Minerva with US$ 24.7 million. The remaining companies—Marfrig, Muyuan Foods, Wens Foodstuff and New Hope Liuhe—received between US$ 0.9 million and US$ 0.04 million.

Considering only the investments via shareholdings, this research finds that by the end 2024, Dutch insurance companies held US$ 65.7 million in shares issued by the selected companies. Specifically, the Dutch insurance companies held US$ 46.4 million in Tyson Foods, US$ 10.2 million in JBS and US$ 8.3 million in WH Group.

In terms of bond holdings, the Dutch insurance companies held by the end of 2024, US$ 260.3 million in bonds issued by the companies in scope. Specifically, the main recipients of the investments in bonds were JBS with US$ 110.4 million, Tyson Foods with US$ 97.8 million and WH Group with US$ 26.7 million.

Figure 11 Insurers' share and bond holdings per company (Dec 2024, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

Findings per insurance company

The rest of this chapter presents the results for each of the insurance companies considered in the research.

Achmea

By December 2024, Achmea had investments for US$ 3.5 million in Tyson Foods' shares. This research did not identify investments by Achmea in any of the other of the companies considered in the study. The insurance company refrained from commenting on the identified investment amounts.

Table 12 Achmea's share and bond holdings (Dec 2024, US$ millions)

Group	Group country	Shareholdings	Bond holdings	Total
Tyson Foods	United States	3.53	0.00	3.53

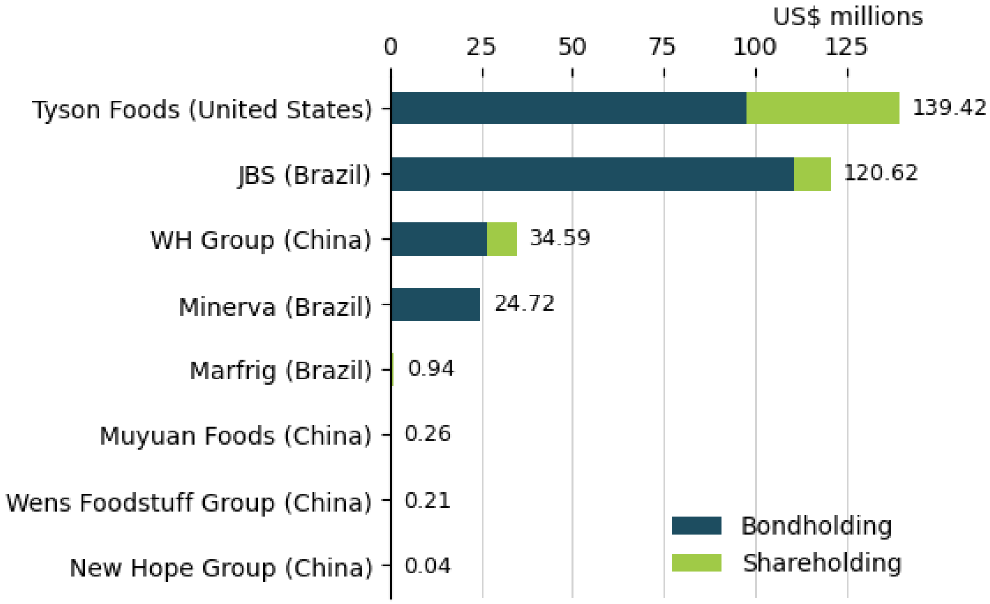
Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

Allianz

In 2024, Allianz invested a total of US$ 320.8 million in eight of the selected animal agriculture companies. As can be seen in Figure 12, by the end of 2024, Allianz had US$ 97.8 million invested in bond holdings and US$ 41.6 million in shareholdings of Tyson Foods, for a total of US$ 139.4 million. The second company in terms of investments was JBS, which received US$ 120.6 of financing, US$ 110.4 million of which was in bond holdings, and US$ 10.2 million in shareholdings. Third came WH Group in which Allianz invested a total of US$ 34.6 of which, US$ 26.7 of this financing was in bond holdings and US$ 7.9 million in shareholdings. Finally, Allianz also had considerable investments in Minerva, US$ 24.7 million in bond holdings.

Furthermore, Allianz had investments in Marfrig, with US$ 0.9 million, Muyuan Foods, with US$ 0.3 million, Wens Foodstuff Group, with US$ 0.2 million and New Hope Group, with US$ 0.04 million, all in shareholdings. The insurance company refrained from commenting on the identified investment amounts.

Figure 12 Allianz's share and bond holdings (Dec 2024 or latest, US$ millions)



Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

ANWB

This research did not identify investment data, share and bondholding, for ANWB. This is because ANWB is not covered by the financial databases used in this research. This does not imply that the insurance company is not investing in the animal agriculture companies considered in the research. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the identified investment amounts.

ASR

ASR invested US$ 1.6 million in two of the selected companies. By the end of 2024, ASR had investments for US$ 1.2 million of shareholdings in Tyson Foods and US$ 0.4 million of shareholdings in WH Group.

Table 13 ASR Nederland's share and bond holdings (Dec 2024, US$ millions)

Group	Group country	Shareholdings	Bond holdings	Total
Tyson Foods	United States	1.21	0.00	1.21
WH Group	China	0.36	0.00	0.36
Total		1.57	0.00	1.57

Source: Profundo calculations based on information retrieved as described in Section **1.1.3**.

This research did not identify investments by ASR in any other of the companies considered in the study. This does not imply that ASR does not invest in the other companies, but rather that this study could not identify further investments, if they exist. The insurance company refrained from commenting on the identified investment amounts.

Cardano

This research did not identify investment data, share and bondholding, for Cardano. This is because Cardano is not covered by the financial databases used in this research. This does not imply that the insurance company is not investing in the animal agriculture companies considered in the research. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the identified investment amounts.

De Goudse Verzekeringen

This research did not identify investment data, share and bondholding, for De Goudse Verzekeringen. This is because De Goudse Verzekeringen is not covered by the financial databases used in this research. This does not imply that the insurance company is not investing in the animal agriculture companies considered in the research. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the identified investment amounts.

Klaverblad Verzekeringen

This research did not identify investments by Klaverblad in any of the companies considered in the study. The insurance company refrained from commenting on the identified investment amounts.

NN Group

This research did not identify investment data, share and bondholding, for NN Group. This is because NN Group is not covered by the financial databases used in this research. This does not imply that the insurance company is not investing in the animal agriculture companies considered in the research. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the identified investment amounts.

Health insurance companies

This section presents the identified health insurance companies' investments in shares and bonds issued by the selected animal agriculture companies. First, the general findings are presented adding up the investments of all the health insurance companies. Then, the investments of each insurance company are considered individually.

General findings

This research did not identify investment data, share and bondholding, for any of the health insurance companies considered in the study. This is because health insurance companies are not covered by the financial databases used in this research. This does not imply that the health insurance companies do not invest in the animal agriculture companies considered in the research, unless they explicitly mention the companies in scope in an exclusion list. It means that such financing was not possible to be obtained during the course of the research.

Findings per health insurance company

The rest of this chapter presents the results for each of the health insurance companies considered in the research.

CZ Group

While CZ Group invested an undisclosed amount in WH Group in 2023, the 2024 portfolio disclosures shows that CZ Group no longer invest in any of the companies considered in the study. These figures were confirmed by the insurance company.

DSW Zorgverzekeraar

Based on the portfolio disclosures received from DSW, this research finds that, at the latest portfolio disclosures, the health insurance company does not invest in any of the companies considered in the research.

Menzis

Menzis publishes its investment portfolio.[49] This research did not identify investments by Menzis in any of the selected companies in the portfolio disclosures. This information was confirmed by the insurance company.

ONVZ Zorgverzekering

This research did not identify investment data, share and bondholding, for ONVZ Zorgverzekering. This is because ONVZ is not covered by the financial databases used in this research. This does not imply that the health insurance company is not investing in the animal agriculture companies considered in this study. It means that such financing was not possible to be obtained during the course of the research.

Univé

Univé publishes its investment portfolio[50]: this research finds that, at the latest portfolio disclosures, the health insurance company does not invest in any of the companies considered in the research. This information was confirmed by the insurance company..

VGZ

Based on the portfolio disclosures received from VGZ, this research finds that, at the latest portfolio disclosures, the health insurance company does not invest in any of the companies considered in the research. This information was confirmed by the insurance company.

ZLM Verzekeringen

This research did not identify investment data, share and bondholding, for ZLM Verzekeringen. This is because ZLM is not covered by the financial databases used in this research. This does not imply that the health insurance company is not investing in the animal agriculture companies considered in this study. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the findings of the research.

Zorg en Zekerheid

This research did not identify investment data, share and bondholding, for Zorg en Zekerheid. This is because Zorg en Zekerheid is not covered by the financial databases used in this research. This does not imply that the health insurance company is not investing in the animal agriculture companies considered in this study. It means that such financing was not possible to be obtained during the course of the research. The insurance company refrained from commenting on the findings of the research.

Appendix 2 Scoring approach to assess company engagement

Table 14 Scoring table for section A: Identification, qualification and prioritisation of animal welfare issue(s) and risk(s)

Indicator		Criteria	Scoring guidance	Points
A1	The financial institution has processes to identify actual and potential adverse impacts on animal welfare	The financial institution screens its portfolio on animal welfare issues	No ongoing screening / no information	0
			The financial institution screens its investment portfolio on general animal welfare issues	1
			The financial institution screens its investment portfolio on animal welfare issues specific to the animal agriculture industry (i.e., severely restricted housing methods, adequate environmental enrichments, animal breeding practices, avoiding painful procedures, duration of animal transport, humane slaughter practices).	2
A2	The financial institution has identified animal welfare risks for the selected companies		For none of the company/ no information	0
			For less than half of the selected companies	1
			For half or more than half of the selected companies	2
			For all the selected companies	3
Maximum score for Section A				**5**

Table 15 Scoring table for Section B: Using leverage to influence companies

Indicator		Criteria	Scoring guidance	Points
B1	The financial institution engages with the selected companies	The financial institution engages on animal welfare with the selected companies	For none of the companies/ no information	0
			For less than half of the selected companies	1
			For half or more than half of the selected companies	2
			For all the selected companies	3
B2	The financial institution sets timebound goal(s) for engagement	The financial institution sets timebound goal(s) for engagement on animal welfare	Never	0
			For less than half of the relevant selected companies	1

Indicator		Criteria	Scoring guidance	Points
			For half or more of the relevant selected companies	2
			For all of the relevant selected companies	3
B3	The financial institution reports on the various engagement tools and escalation steps it has used to engage with the selected companies	Engagement tools can be voting, participation to collaborative engagement initiatives, bilateral engagement with companies, engagement with policy makers/regulators. If the engagement goals are not met, the financial institution can try different options to increase its leverage to address the animal welfare abuse(s) or in case of persisting unsuccessful engagement, to suspend or end the business relationship	Never	0
			Incidentally: ad-hoc examples	1
			Frequently: shows sufficient evidence	2
			Systematically: evidence for all the relevant selected companies	3
Maximum score for Section B				**9**

Table 16 Scoring table for Section C: Tracking progress and outcomes and communicating about the results

Indicator		Criteria	Scoring guidance	Points
C1	The financial institution monitors the engagement progress for the selected companies	The financial institution monitors the company's progress on the implementation of the concrete steps the company has committed itself to and the achievement of engagement goals.	Never	0
			The financial institution provides examples for less than half of the selected companies	1
			The financial institution provides examples for half or more of the selected companies	2
			The financial institution provides examples for all of the selected companies	3
C2	The financial institution is transparent and accountable on its efforts to engage (on animal welfare)	The financial institution ensures transparency by disclosing regular reports of its engagement with the companies it has formally engaged.	No reporting	0
		NB: the scoring approach for this indicator is cumulative. For each level of disclosure, the financial institution will be given a score according to the scope of the disclosure. The scores	The financial institution discloses aggregated data/information about its	1

Indicator		Criteria	Scoring guidance	Points
		obtained for each level will be added together to obtain the total score for this criterion.	engagement on animal welfare (for instance in a stewardship report)	
			The financial institution discloses aggregated data/information about its engagement on animal welfare (for instance in a stewardship report) and some examples of animal welfare engagement cases	1
			The financial institution discloses aggregated data/information about its engagement on animal welfare (for instance in a stewardship report). In addition, it provides the list of all the companies engaged on animal welfare.	1
			The financial institution discloses aggregated data/information about its engagement on animal welfare (for instance in a stewardship report). In addition, it provides the list of all the companies engaged on animal welfare and related information about the status and milestone(s) achieved.	1
C3	The financial institution excludes companies that adversely affect animal welfare	The financial institution discloses an exclusion list which includes animal welfare criteria and the names of companies excluded	No information	0
			The financial institution discloses an exclusion list which includes animal welfare criteria OR the financial institution discloses an exclusion list and the names of companies but without mentioning animal welfare-related issues	1
			The financial institution discloses the names of companies excluded for animal welfare-related issues	2
Maximum score for Section C				**9**

Table 17 Scoring table for Section D: Providing for or enabling remediation

Indicator		Criteria	Scoring guidance	Points
D1	The financial institution has set up a grievance mechanism that is accessible to (potentially) affected stakeholders to raise ESG-related concerns related to the financial institution’s investments	The financial institution has set up a grievance mechanism that is accessible to (potentially) affected stakeholders to raise ESG-related concerns (including animal welfare) related to the financial institution’s investments NB: this criterion focuses exclusively on stakeholders which are external to the financial institutions, and non-clients such as local communities, NGOs or trade unions.	No/No information.	0
			The financial institution has set up channels through which affected stakeholders can raise animal welfare-related concerns related to the financial institution’s	1
			The financial institution has set up a grievance mechanism that is accessible (in various languages), and clearly explains its process for managing complaints	3
Maximum score for Section D				**3**

49 Menzis (2024, December 31), *Aandelen Q4 2024*;
Menzis (2024, December 31), *ObligatiesQ4 2024*
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