

Aegon Group Responsible Investment Policy

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1. Definitions

Active ownership	An approach to mitigating or managing sustainability risks and adverse impacts (as defined below) associated with our investment decisions, where we attempt to use our influence as a large investor to encourage the companies in which we invest to make positive changes to their business for the benefit of investors, society, and the planet. This approach includes engaging with companies, as well as exercising any voting rights we hold, per Aegon Asset Management's Active Ownership Policy (see section 4.1).
Adverse impacts	Potential or actual negative impacts of investment decisions on sustainability factors, such as environmental, social and employee matters, respect for human rights, anti-corruption, and anti-bribery matters.
Aegon	Aegon Group
Biodiversity	The variability among living organisms from all sources, including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species, and of ecosystems.
Business units	The operational subsidiaries of Aegon Group to which the policy applies: Transamerica, Aegon UK, Aegon Asset Management, Aegon Spain, and Transamerica Life Bermuda (TLB).
Carbon intensity	A measure of the amount of carbon dioxide (CO ₂) and other greenhouse gases (CO ₂ e) emitted per unit of activity.
Climate change	The long-term change in the average weather patterns that have come to define the earth's local, regional, and global climates. Climate change includes both the global warming driven by greenhouse gas emissions as a result of human activity, and the resulting large-scale changes in the earth's weather patterns.
Engagement	Interactions between Aegon and current or potential investees on ESG topics. Engagements are undertaken to influence (or identify the need to influence) ESG practices and/or improve ESG disclosure.
ESG factors	Financial and non-financial information and data related to environmental, social, or governance (ESG) activities.
ESG integration	Aegon's approach to systematically considering material ESG factors in the investment analysis process, with the aim of identifying sustainability risks.
Exclusion	The removal of securities from an investment universe (the scope of current and/or potential investments), or the set of securities in which an investment fund is allowed to invest.
Exclusion List	A list of companies and sovereign issuers in which Aegon does not permit any new investments to be made. By default, Aegon will aim to sell any existing listed equity investments in a newly-excluded company within a three-month period; for fixed income investments in a newly-excluded company or country, Aegon may continue to hold the investment until maturity.

General Account assets (GA assets)	General Account (GA) assets of Aegon business units where Aegon has management control and can take the investment decisions (for example, assets of joint venture companies where Aegon does not have management control, as well as assets managed by Aegon business units such as Aegon Asset Management on behalf of third parties, are out of scope).
Global Sustainability Board (GSB)	The Global Sustainability Board (GSB) is a senior management committee, chaired by an Executive Committee member, tasked with supporting the overall governance and oversight of our company-wide approach to sustainability. The GSB is responsible for monitoring, discussing, and advising the Executive Committee on all subjects and issues deemed relevant for the proper execution of the policy
Greenhouse gas (GHG) emissions	Greenhouse gas (GHG) emissions are gases that trap heat in the earth's atmosphere. They are produced by human and natural activities. Common GHGs include Carbon Dioxide (CO ₂), Methane (CH ₄), Nitrous Oxide (NO ₂), and fluorinated gases.
Human rights	For the purpose of this policy, Aegon considers all types of human rights, including (but not limited to): civil rights, political rights, social and economic rights, cultural rights, the rights of minorities, the rights of women, and the rights of vulnerable groups, such as children and indigenous peoples.
Investment decisions	Decisions based on investment objectives, risk appetites, and the nature of the investor.
Net-zero	A state where the amount of GHGs released into the earth's atmosphere is balanced by the amount of GHGs removed.
(Proxy) voting	Exercising of the right of a shareholder to vote on matters of policy and certain actions. Not all assets have associated voting rights and, as a result, voting is limited to certain asset classes.
Responsible investment	An umbrella term that covers various tools and approaches to incorporating ESG considerations into investment decision-making processes. It may include Aegon's approach to ESG integration and active ownership.
Scope 1 emissions	Direct GHG emissions that occur from sources that are controlled or owned by an organization.
Scope 2 emissions	Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling.
Screening	Identifying issuers in an investment universe or portfolio that meet or fail to meet certain criteria, such as deriving revenues from certain activities, being involved in the manufacturing of certain products, or being considered in breach of certain norms or standards.
Sustainability risks	An ESG-related event or condition that, if it occurs, could result in an actual or potential material, negative impact on the value of the investment.

2. Introduction

2.1 Purpose

Aegon is an integrated, diversified, international financial services group. We offer investment, protection, and retirement solutions, always with a clear purpose: helping people live their best lives. This requires a sustainable, future-oriented business that actively considers the interests of all stakeholders, including our customers, employees, investors, business partners, as well as the environment and the society at large.

Through our investment analysis and decision process, we systematically consider financially material factors, including environmental, social, and governance (ESG) factors, with the aim of identifying risks and opportunities and maximizing risk-adjusted returns for our clients. By taking an active approach to responsible investment, we seek to reduce the risks to our business and explore ways to serve the interests of our customers and wider society in which we operate. Moreover, we believe that actively engaging with companies to improve their ESG performance is generally more effective as a tool to achieve sustainability outcomes than exclusion from our investment universe. By spearheading engagement efforts and exercising shareholder voting rights, we use our voice and actions to try to effect positive change in line with our responsible investment priorities.

The Responsible Investment Policy (“policy”) acts as the basis for how our general account (GA) assets should be managed, consistent with our responsible investment objectives, relevant laws, and governance standards (a non-exhaustive list of applicable frameworks, laws, and guidelines are listed in Appendix A: references).

2.2 Scope

The policy only applies to the GA assets of Aegon business units, where Aegon has management control and can take the investment decisions. Aegon expects all asset managers (internal or external) managing GA assets of Aegon’s business units to apply this policy.

3. Our responsible investment focus areas

We selected four responsible investment focus areas for the purpose of this policy, concentrated on topics that have material impact for both people and the planet and that are also addressable via responsible investment.¹ To continually advance on our responsible investment objectives, Aegon will update its policy, as it deems necessary in its sole discretion, to cover additional topics, or to amend the terms of this policy. We will build on the current focus areas, adapting to evolving stakeholder expectations regarding material responsible investment topics, sustainability-related regulations, and industry-aligned best practices. Our focus area scope will also be informed through stakeholder consultations as part of our regular Double Materiality Assessment process.

3.1 Climate change

Climate change is a sustainability topic that has increasing importance for Aegon and its stakeholders. We realize that our influence as an investor is significant, and we must aim to make a positive contribution to mitigating climate change and adapting to its associated impacts. As a diversified financial services business, Aegon is well-positioned to support society's transition to a climate-resilient economy and a net-zero world. As an important step in strengthening our group-wide approach towards reaching net-zero objectives by 2050, Aegon signed the Paris Pledge for Action in 2015 and joined the Net-Zero Asset Owner Alliance (NZAOA) in 2021. To steer progress towards 2050, we have committed to:

- Transition our GA investment portfolio to net-zero greenhouse gas (GHG) emissions by 2050.
- Reduce the weighted average carbon intensity of our corporate fixed income and listed equity GA assets by 50% by 2030, against a 2019 baseline.
- Reduce the scope 1 and 2 carbon intensity of our directly held real estate investments by 42% by 2030, against a 2019 baseline.
- Invest an additional USD 1 billion, on top of our existing USD 2.5 billion commitment, in activities to help mitigate climate change or adapt to the associated impacts by 2030.
- Continue our engagements with at least the top 20 corporate carbon emitters in our portfolio by 2030.

Supporting our commitment and targets, Aegon excludes issuers, including majority-owned subsidiaries of such issuers, from its investment universe if they are involved in certain activities considered to have significant adverse impacts on climate change:

Thermal coal

- Companies that derive 10% or more of their revenue from the exploration, mining, or refining of thermal coal. This threshold will be adjusted to near zero percent by 2030.²

¹ Apart from the Exclusion List, which is binding for all investments in scope of the Responsible Investment Policy, under certain circumstances we may not be able to adhere to all positions for all RI topics noted.

² "Near Zero" is defined as between 0 and 5%. The phase-out strategy described will occur through a run-off of existing investments and opting to not reinvest when they mature.

- Companies that produce more than 20 million tonnes of thermal coal annually and are actively expanding exploration, mining, or refining operations.
- Companies that derive 25% or more of their revenue from thermal coal-fired electricity generation. This threshold will be adjusted to 10% in 2027 and phased-out in accordance with 1.5°C pathways by 2030 for thermal coal assets in industrialized countries and a full phase-out globally by 2040.³
- Companies that own coal-fired electricity generation capacity greater than 10 gigawatts and are actively expanding coal-fired electricity production capacity.⁴

Aegon will also engage with select companies in its GA portfolio to call for an immediate cancellation of all new thermal coal projects, including thermal coal plants, coal mines, and related infrastructure that are in the pre-construction phase.⁵

Oil and gas

- Companies that derive 5% or more of their total oil equivalent production from oil sands.
- Companies that derive 5% or more of their revenue from oil and gas exploration and production in the Arctic.

As part of its commitment to addressing climate change, Aegon will also engage with select oil and gas companies in its GA portfolio to transition away from oil and gas.⁶ Additionally, Aegon will no longer provide finance to new oil and gas infrastructure assets whose purpose or emissions cannot be aligned with science-based 1.5°C pathways.⁷

3.2 Human rights

Aegon is committed to upholding human rights by actively seeking to avoid causing or contributing to adverse human rights impacts in areas under its direct influence through management control. As a matter of policy, Aegon applies European Union, United Kingdom, United Nations Security Council, and United States sanctions globally, including sanction regimes that specifically target human rights abuses (subject to permissibility under applicable local law), even where not directly legally required.⁸ In alignment with our approach, Aegon also deems the production and use of controversial weapons that have an indiscriminate and disproportional impact on civilian populations to be unacceptable. The effects of these controversial weapons can persist long after armed conflicts end. As a result, Aegon excludes issuers involved in the below activities from its investment universe:

³ 1.5°C pathways, as provided by the IPCC and referenced by the International Energy Agency (IEA) and Powering Past Coal Alliance (PPCA); please refer to the NZAOA's [Thermal Coal Position](#) for more information.

⁴ Actively expanding coal-fired electricity generation refers to activities aimed at increasing the capacity or number of coal-powered plants to generate electricity, either through building new coal plants or upgrading existing plants.

⁵ Per the NZAOA [Thermal Coal Position](#), pre-construction includes the following categories of projects: Announced: Projects that have appeared in corporate or governmental planning documents but have not yet moved actively forward by applying for permits or seeking land, coal, or financing. Pre-permit development: Projects that have actively moved forward in one or more of the following ways: applying for environmental permits, acquiring land, acquiring coal, acquiring water rights, acquiring transmission arrangements, or securing financing.

⁶ Per the NZAOA [Position on the Oil and Gas Sector](#) Section 2.3.3, in line with the described expectations (Section 2.1).

⁷ Per the NZAOA [Position on the Oil and Gas Sector](#), such investments cover direct private asset investment in oil and gas infrastructure (standalone, unlisted infrastructure assets). Science-based 1.5°C pathways are those that are aligned with the NZAOA's net-zero ambitions, guided by IPCC's no or limited overshoot scenarios, OECM, and the IEA's NZE2050.

⁸ Screening against the European Union, United Kingdom, United Nations Security Council, and United States (including the U.S. State Department's State Sponsors of Terrorism list (<https://www.state.gov/state-sponsors-of-terrorism/>)) sanctions lists is conducted by Aegon's Legal and Compliance departments as a matter of policy in order to meet all (local) laws and regulations. The included reference to sanctions lists in the Responsible Investment Policy does not supersede or run counter to Aegon's Financial Economic Crime Statement (<https://www.aegon.com/about/compliance/financial-economic-crime>) or Group Sanctions Policy.

- Companies involved in the development, production, maintenance, and trade of: anti-personnel mines; biological or chemical weapons; cluster munitions; ammunitions containing depleted uranium; incendiary weapons; laser-blinding weapons; and weapons that use non-detectable fragments.
- Companies involved in the production and maintenance of nuclear weapons for any countries not identified as nuclear-weapon states under the Treaty on the Non-Proliferation of Nuclear Weapons.
- Companies that produce or develop key and dedicated components for controversial weapons, as listed above, or offer essential services for their use.
- Companies that hold a stake of 20% or more in, or are currently 50% or more owned by, a company that is involved in controversial weapons based on the above criteria.

In light of its commitment to human rights, Aegon also excludes from its investment universe:

- Countries that we believe systematically breach human rights. These countries are identified through pre-defined thresholds from data derived from Freedom House's Freedom in the World index, Transparency International's Corruption Perceptions Index, the World Bank's World Governance Indicators, and Fund for Peace's Fragile States Index.⁹
- Countries being used to launder proceeds of crime, to finance terrorism and/or to be involved in transactions related to sanctioned persons, entities and/or countries as well as trade controlled exports and proliferation financing.¹⁰
- Investments in any Russia- or Belarus-based companies.

3.3 Health and well-being

Aegon believes that investing in the tobacco industry contradicts our purpose of helping people live their best lives. As such, Aegon is a signatory to the Tobacco-Free Finance Pledge. Aegon implements this commitment by excluding issuers involved in the below activities from its investment universe:

- Companies that generate 5% or more of their revenue from tobacco production, distribution, and retailing activities.

3.4 Biodiversity

The issue of nature and biodiversity loss has become increasingly central to the climate debate in recent years, as climate science highlights the importance of nature-related actions, such as protecting carbon sinks and transforming agriculture, to limit global temperature increases in line with the Paris Agreement goals. Recognizing that our investment activities can contribute to key drivers of biodiversity loss through the companies in which we invest, Aegon excludes issuers involved in the below activities from its investment universe:

- Companies that generate 5% or more of their revenue from palm oil production and/or distribution.

⁹ When a country exceeds the pre-defined threshold for at least three of the four outlined criteria, the country will be excluded from future investment. Final decisions for country exclusions will be subject to approval by Aegon's Global Sustainability Board.

¹⁰ In compliance with sanction regimes and in line with Aegon Group's Financial Economic Crime Statement (<https://www.aegon.com/about/compliance/financial-economic-crime>).

4. Addressing our responsible investment focus areas

To implement this policy, we use engagement and exclusion as our priority tools.

4.1 Engagement

Aegon's engagement efforts are conducted by Aegon Asset Management. Our engagement efforts focus primarily on public corporate fixed income investments. Consistent with its [Active Ownership Policy](#), Aegon Asset Management engages in a dialogue with companies identified as relevant according to our responsible investment focus areas. This dialogue provides us with an opportunity to highlight our findings, inform company management of our concerns, and advocate the changes we believe they should make to their business.

We recognize that it can take some time for a company to make the changes we ask of them. As such, we typically expect our engagement efforts to continue with a company for between three and five years. Participating in collaborative engagements with other like-minded investors can sometimes be the best course of action to maximize our influence. We seek to strengthen our investor voice in engagement by actively participating in collaborative engagement platforms when appropriate.

Our preference is for engagement with companies to be targeted and outcomes-driven, as well as private and confidential. This enables an open discussion that hopefully leads to the resolution of our concerns. Nevertheless, Aegon's Integrated Annual Report provides in-depth information on our financial and non-financial performance, including relevant references to Aegon's responsible investment activities as required under applicable laws and regulations.

Each engagement has a specific set of objectives stated at the outset, which vary depending on the company and stem from the priority theme identified. Aegon Asset Management then contacts the most appropriate person in the company with whom to discuss the issue. For this engagement process, a milestone system is used to track and communicate engagement efforts:

- Milestone 1 means that concerns have been flagged with the company.
- Milestone 2 means the company has responded, and the dialogue started.
- Milestone 3 is reached once concrete steps are taken to resolve our concerns, such as a public commitment made.
- Milestone 4 is reached only when the engagement goal has been achieved.

In some cases, Aegon Asset Management's assessment changes during the engagement and (after talks with the company) they may decide to no longer pursue the engagement due to a change in circumstances. The engagement is then categorized as "no further action required."

4.2 Voting

Aegon's business units have limited exposure to equities in their GA. However, they are expected to exercise any voting rights associated with their shareholdings in their general accounts where possible.

4.3 Approach to exclusions

Although we believe firmly in being active owners of our investments and using our influence to change the behavior of the companies in which we invest, there is never a guarantee that our engagement and voting efforts will be successful. Engagement efforts may fail to yield immediate results, and we understand some companies need time to adapt. On occasion, companies are not responsive to our calls, are unwilling to make the required changes, or have difficulties in addressing shortcomings in what we consider to be an acceptable timeframe. Under such circumstances, Aegon must decide on the most appropriate course of action, which can include the possibility of selling our holdings in the company and/or adding it to our Exclusion List.

We also choose not to invest in certain companies and countries by default because we deem them to be causing or contributing to significant harm to people and/or the planet. For companies, including majority-owned subsidiaries of such companies, these exclusions are generally driven by the products and services they offer. For countries, they are typically related to human rights abuses or similar violations of global norms.

The Exclusion List is compiled, at a minimum, annually¹¹ using the broadest available research universe offered by our specialist ESG data providers. Therefore, since it is subject to the availability of appropriate research data, it should not be considered as a fully comprehensive list of issuers involved in excluded activities. For the avoidance of doubt, we expect asset managers to exclude those issuers identified in the Exclusion List.

When an issuer is added to our Exclusion List, no further investments can be made in securities issued by that issuer. By default, we will aim to sell any existing listed equity investments in a newly-excluded company within a three-month period. For fixed income investments in a newly-excluded company or country, we may continue to hold the investments until maturity, but we will actively try to sell these investments on an ongoing basis.

Our Exclusion List is not applied to investments in which we lack direct control, such as in agricultural loans, index products and index replications (i.e., index-based derivatives, such as futures or options, or structured credit), and indirect exposures including but not limited to commercial mortgage loan tenant exposures (provided the tenant is not the borrower).

¹¹ Subject to changes to the Responsible Investment Policy outside of the (at least) annual review cycle, the Exclusion List may be reviewed on an ad-hoc basis.

5. Promoting global norms and standards

As an investor and UN Global Compact (UNGC) signatory, we expect companies in our portfolio to comply with relevant laws and internationally recognized norms and standards. Non-compliance with globally recognized norms can expose companies—and our broader portfolio—to significant legal, regulatory, operational, and reputational risk. Accordingly, we engage with companies identified by specialist research providers as breaching the global norms enshrined in the 10 principles of the UNGC.¹² Our objective is to better understand the nature of the breach, to verify third-party opinions and to encourage resolution, compensation (if relevant), and risk mitigation with respect to future occurrences. These principles cover areas such as human rights, labor, environment, and anti-corruption. Our commitment as a UNGC signatory extends beyond compliance—it reflects our dedication to promoting sustainable practices and reducing material business risks. We recognize the long-term benefit when companies actively engage in addressing economic, social, and environmental issues, leading to sustainable practices and reduced material business risks.

¹² In selecting companies to engage, we screen our investment universe to identify issuers flagged as (potentially) being at risk of breaching UNGC principles based on pre-defined criteria. The decision to engage a company is done in consultation with our asset manager on whether to include the issuer in our engagement program to arrive at a priority list, considering such factors as the materiality of the issue or weight and relevance of the issuer in the portfolio.

6. Asset manager expectations

As an asset owner, close collaboration with our asset managers is necessary in meeting our responsible investment ambitions, while simultaneously managing sustainability-related risks and opportunities across our GA portfolio. In implementing our policy, current and prospective managers are to demonstrate alignment with our minimum expectations across the following areas:¹³

Responsible investment governance	Manager is to have a responsible investment policy in place and to evidence responsible investment activities across different asset classes and strategies.
Responsible investment focus areas	<p>Manager is to consider the responsible investment focus areas outlined in the policy, support our responsible investment ambitions through respective policies and/or activities, and outline potential risks.</p> <p>With respect to climate change, manager is to support our public corporate commitment to net-zero by 2050.</p>
Stewardship	<p>Manager leading engagements on behalf of asset owner is to provide clear expectations of companies in relation to our responsible investment focus areas.</p> <p>Manager leading engagements on behalf of asset owner is to provide a summary of engagement activities and outcomes achieved against pre-defined objectives for companies in our portfolio, as applicable, on a periodic basis (to be mutually agreed-upon).</p>
Industry advocacy	Manager is supportive of, or able to demonstrate, cross-industry collaboration on responsible investment focus areas.

Managers that fail to meet our minimum expectations must be able to demonstrate how they intend to remedy these gaps. While our preference is to work constructively with our managers, we may consider suitable escalation approaches in cases where the manager remains consistently misaligned with our minimum expectations.

¹³ Demonstration of alignment with minimum expectations will be evidenced through a due diligence questionnaire sent to current and prospective internal and external managers.

7. Governance

7.1 Management and oversight

Aegon's Executive Committee oversees operational issues and the implementation of Aegon's strategy, as set by the Board of Directors. The Executive Committee has ultimate responsibility for the execution of this policy and for its integration into investment strategy and other relevant company processes and practices. The Executive Committee also has the responsibility to ensure that the policy is fit for purpose by accurately reflecting Aegon's corporate values and aligning with relevant frameworks and guidelines (Appendix A: references).

The Global Sustainability Board (GSB) is responsible for monitoring, discussing, and advising the Executive Committee on all subjects and issues deemed relevant for the proper execution of the policy. This includes deciding upon any changes to the policy's responsible investment topics and Exclusion List.

Day-to-day oversight and administration of the policy fall to the Corporate Sustainability department and its working group(s).

7.2 Conflict of interest

There may be a conflict of interest if we invest in a company that has a business relationship with us. In these circumstances, we put the interests of our clients first. When conflicts arise, we will identify where our fiduciary responsibility lies and act in accordance with Aegon's Code of Conduct and Speak Up Policy.

7.3 Update procedure

This policy is reviewed on at least an annual basis to ensure that it continues to reflect Aegon's sustainability strategy, Aegon's values, and current market practices. The policy is made available publicly on Aegon's website.

We value the opinion of our clients, regulators, business partners, and other stakeholders including civil society, and aim to remain in contact with our stakeholders. This exchange of ideas provides relevant input for our internal discussions and decisions on responsible investment topics.

8. Change log

Version	Date	Author/updated by	Comments	Approved by
1.0	October 2017	Responsible Investment Strategy Committee (RISC)	First publication October 10, 2017	Aegon Management Board
2.0	March 2018	RISC	Tobacco exclusion	Aegon Management Board
3.0	October 2018	RISC	Minor changes in country exclusion	RI Strategy Committee
4.0	February 2019	RISC	Oil sands and pipeline exclusion	Aegon Management Board
5.0	January 2020	Responsible Business Investment Committee (RBIC)	General update and coal exclusion revision	Aegon Management Board
5.1	January 2021	RBIC	General annual update and review	Aegon Management Board
5.2	January 2022	GSB	Addition of net-zero commitment; revision of governance and exclusion criteria	Aegon Management Board
5.3	March 2022	GSB	Addition of Russia- and Belarus-based exclusions	Aegon Management Board
6.0	October 2023	GSB	Revision and restructuring following completion of the combination of Aegon's Dutch pension, life and non-life insurance, banking, and mortgage origination activities with a.s.r.	Aegon Executive Committee
7.0	November 2024	GSB	Addition of norms-based engagement; coal and oil and gas exclusion revision; country exclusion revision; addition of biodiversity exclusion category; inclusion of asset manager minimum requirements	Aegon Executive Committee

Appendix A: references

The below serves as a non-exhaustive list of organizations, frameworks, and guidelines that have informed or served as a reference for the content of this policy:

- Aegon Group's Financial Economic Crime Statement
- Net-Zero Asset Owner Alliance
- OECD Guidelines for Multinational Enterprises
- Paris Pledge for Action
- Treaty on the Non-Proliferation of Nuclear Weapons
- The Tobacco-Free Finance Pledge
- UNEP FI Principles for Responsible Investment (PRI)
- UNEP FI Principles for Sustainable Insurance (PSI)
- UN Universal Declaration of Human Rights
- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- U.S. State Department's State Sponsors of Terrorism list

All of Aegon Group's sustainability commitments are available publicly at <https://www.aegon.com/sustainability/our-commitments>