

PRE-CONTRACTUAL DISCLOSURE OF A FUND THAT HAS A SUSTAINABLE INVESTMENT OBJECTIVE

This document provides you with information about this fund in relation to the Sustainable Finance Disclosure Regulation. It is not marketing material. The information is required by law to help you understand the sustainability characteristics and/or objectives and risks of this fund. You are advised to read it in conjunction with other relevant documentation on this fund so you can make an informed decision about whether to invest.

RobecoSAM Euro SDG Credits

SFDR Classification	<p>This fund has sustainable investment as its objective within the meaning of article 9 of the Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial sector.</p>
1. SUSTAINABLE INVESTMENT OBJECTIVE	<p>What is the <u>sustainable investment objective</u> of the fund? Does the fund have a <u>low carbon objective</u>? How is the sustainable investment objective to be <u>attained</u>?</p> <p>The fund has the following sustainable investment objective: the fund advances the United Nations Sustainable Development Goals (SDGs).</p> <p>The sustainable investment objective is attained by investing in companies whose business models and operational practices are aligned with the targets defined by the 17 SDGs to create a positive social and environmental impact. The fund solely invests in bonds of companies with a positive or neutral SDG score and will not invest in bonds of companies with a negative SDG score. The SDG score is based on the Robeco SDG Framework and its proprietary SDG rating methodology, as further described in Section 4 below.</p> <p>In addition, the fund excludes companies on the basis of controversial behaviour and controversial products (including controversial weapons, tobacco, palm oil, fossil fuel, military contracting, firearms, nuclear power, alcohol, gambling and adult entertainment).</p> <p>The reference index used for asset allocation, Bloomberg Barclays Euro Aggregate Corporates Index, is a general market index, representing the investment universe, and is not consistent with the sustainable objective of the fund. The index methodology can be found on the relevant webpages by the index provider: https://www.bloomberg.com/professional/product/indices/bloomberg-barclays-indices/#/ucits.</p>

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<p>2. SUSTAINABILITY INDICATORS</p>	<p>What are the relevant <u>sustainability indicators</u> used to measure the attainment of each of the fund's sustainable investment objective ?</p> <p>The fund has the following sustainability indicators:</p> <ol style="list-style-type: none"> 1. The fund is solely invested in companies that hold a positive or neutral SDG score. 2. 100% of the fund's portfolio is invested in line with Robeco's Exclusion Policy https://www.robeco.com/en/key-strengths/sustainable-investing/sustainability-reports-policies.html, excluding investments in companies that are exposed to controversial behavior and controversial products (including controversial weapons, tobacco, palm oil, fossil fuel, military contracting, firearms, nuclear power, alcohol, gambling and adult entertainment). <p>The sustainable objective and the sustainability indicators are coded and monitored on a regular basis as part of the investment process of the investment strategy and by applying strict restrictions on the Exclusion Policy, and by independent risk management functions, regularly measuring restrictions and controls. In this way the fund uses the sustainability indicators to measure if the sustainable investment objective is achieved.</p> <p>Adherence to the Exclusion Policy as well as investing in line with the SDG scores is monitored with strict pre-trade restrictions by the risk management function, with only holdings that are in line with the sustainability indicators allowed in the portfolio.</p>
<p>3. SUSTAINABILITY RISK</p>	<p>How are sustainability risks <u>mitigated</u> in this fund? What are the likely <u>impacts of sustainability risks on the return of the fund</u>?</p> <p>Sustainability risks are environmental, social or governance events or conditions that, if occurring, could cause an actual or a potential material negative impact on the value of the investment. Examples are climate-related and environmental risks, poor governance practices and/ or significant social issues.</p> <p>Sustainability risks can be identified across asset classes, sectors and geographies or on the basis of length and maturity. Robeco uses various tooling to identify and evaluate sustainability factors and related risks. Once identified and evaluated as impactful for an individual investment portfolio, sustainability risks are directly integrated in the related investment and risk management process.</p> <p>In order to mitigate sustainability risks, the fund takes the following actions:</p>

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	<ul style="list-style-type: none"> - Climate risk: The fund applies ESG integration on material climate issues, fossil fuel exclusions and engagement with high carbon emitters on climate strategy. The climate risk is considered <i>low</i>. - Environmental, social and governance risks: The fund only invests in companies that have a positive or neutral SDG score, applies integration of material environmental, social and governance issues in investment decision making, exclusions based on UN Global Compact and OECD screening on environmental, social and governance issues, and engagement with companies on material environmental, social and governance issues. The environmental, social and governance risk is considered <i>low</i>. <p>The likely impacts sustainability risks will have on the return of the fund are considered <i>low</i>.</p> <p>For more information on the integration of sustainability risks see https://www.robeco.com/en/key-strengths/sustainable-investing/sustainability-reports-policies.html.</p>
<p>4. SUSTAINABILITY DATA</p>	<p>What sustainability <u>data</u> is used in managing this fund? Are there any <u>limitations</u> in the data sources used in this fund?</p> <p>The fund uses as its main data source the Robeco SDG Framework and its proprietary SDG rating methodology to assess a company's contribution to the achievement of the United Nations Sustainable Development Goals. Using a 3-step approach the framework investigates to what extent a company positively and/or negatively impacts each of the SDGs, whereby impacts may range from highly negative (-3) to highly positive (+3) impact. The outcome of this 3-step analysis is quantified with a proprietary SDG rating methodology. All companies obtain an SDG score based on their contribution to the SDGs (positive, neutral or negative) and the extent of this contribution (high, medium or low), through their products and services, their operations and (the absence of) any legal disputes or controversies. To conduct this analysis, research analysts use a variety of data sources, including corporate data as well as information from data providers such as Bloomberg or Sustainalytics. For more information on the SDG Framework and the proprietary SDG rating methodology, see https://www.robeco.com/en/key-strengths/sustainable-investing/sustainability-reports-policies.html.</p> <p>The fund uses Sustainalytics as primary data source for its exclusion screening process. The quality of this screening is enhanced with inhouse analysis. For the screening on Palm Oil</p>

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	<p>production from RSPO-certified plantations, data from RSPO.org is used.</p> <p>Different regions and asset classes have varying challenges with regards to data quality and coverage that need to be considered, especially emerging markets. Investors must consider that some datasets are based on modelled rather than reported data. Used indicators, like any other quantitative or qualitative model, are inherent to model risk and could fail to capture anticipated changes in the sustainability risk profile of the issuers.</p>
<p>5. STEWARDSHIP</p>	<p>What is the <u>voting & engagement</u> policy of this fund? What is the policy to assess <u>good governance</u> practices for the investments selected by this fund?</p> <p>As part of exercising our stewardship responsibilities, by means of proxy voting and engagement, Robeco actively encourages good governance and sustainable corporate practices, which contribute to long-term shareholder value creation (for more information regarding our policy see https://www.robeco.com/docm/docu-robeco-stewardship-policy.pdf).</p> <p>Corporate governance is a material issue for almost all sectors and therefore also taken into account in the investment analysis of this fund. In addition, as of 2022, the fund will integrate Principal Adverse Impact as another measure to mitigate (amongst others) governance risk in its portfolio.</p>
<p>6. DO NO SIGNIFICANT HARM</p>	<p>How do you ensure the underlying investments in the fund <u>do no significant harm</u> to the sustainable investment objective of the fund?</p> <p>We ensure that the underlying investments in the fund do no significant harm to the sustainable investment objective by actively monitoring companies that severely and structurally breach minimum behavioral norms. The primary objective of this screening is to detect reported shortfalls against internationally accepted codes of conduct for corporate governance, social responsibility, the environment and transparency and this screening is thus aligned with the UNGC and OECD Guidelines, as well as the United Nations Universal Declaration of Human Rights, the International Labor Organization's (ILO) labor standards and the United Nations Guiding Principles for Business and Human Rights (UNGPs). A review of the investment universe takes place on a quarterly basis, based on Sustainalytics data as well as an internal materiality analysis of three criteria: nature of breach, accountability and severity. Based on this analysis Robeco will</p>

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	<p>decide to exclude certain companies from its investment universe.</p> <p>In addition to this screening, and to determine whether a company is causing harm to the relevant sustainable investment objective, Robeco applies its SDG Framework (see above Section 4). Companies that get assigned a negative SDG score as an outcome of the analysis generally are considered to be in contradiction with the SDGs. The fund does not invest in companies with such negative scores.</p> <p>Moreover, the fund adheres to an extensive exclusions list, excluding investments in companies that are exposed to controversial behavior and controversial products (including controversial weapons, tobacco, palm oil, fossil fuel, military contracting, firearms, nuclear power, alcohol, gambling and adult entertainment).</p>
<p>Other relevant documents</p>	<p>Prospectus / KIID / Factsheet</p> <p>For other relevant documents see https://www.robeco.com/en/funds/#!/#documents</p>