

## Sustainability-related disclosures for

# Robeco All Strategies Funds - Robeco Life Cycle Fund 2040

This document provides you with information about this product 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 product. You are advised to read it in conjunction with other relevant documentation on this product so you can make an informed decision about whether to invest.

### (b) No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

#### Where product aims to make one or more sustainable investments explain how the indicators for adverse impacts in Table 1 of Annex I, and any relevant indicators in Tables 2 and 3 of that Annex I, are taken into account?

The Sub-fund considers principal adverse impacts on sustainability factors of the invested fund via the fund due diligence process.

The invested funds consider principal adverse impacts on sustainability factors as referred to in Annex I of the SFDR Delegated Act.

Pre-investment, the following principal adverse impacts on sustainability factors are considered:

Via the applied normative and activity-based exclusions, the following PAIs are considered:

- Exposure to companies active in the fossil fuel sector (PAI 4, Table 1)
- Violations of the UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10, Table 1)
- Activities negatively affecting biodiversity-sensitive areas (PAI 7, Table 1). The consideration of this PAI is currently restricted to applying exclusions to palm oil producing companies and for any breaches to the UNGC, UNGP and OECD Guidelines for Multinational Enterprises in relation to biodiversity
- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons) (PAI 14, Table 1)

Via the ESG integration process, as part of the investment due diligence policies and procedures, the following PAIs are considered:

- All indicators related to GHG emissions, as part of the required Climate Risk analysis (PAI 1-6, Table 1, PAI 4, Table 2)
- Biodiversity, water and waste indicators (PAI 7-9, Table 1) when relevant for the sector
- Board gender diversity (PAI 13, Table 1)

More information is available via Robeco's Principal Adverse Impact Statement, published on Robeco's website. The Sub-fund will periodically report how it has considered the principal adverse impacts of its investments in the Company's annual report, which will be made available each year on or before 30 April at the Sub-fund page highlighted in final section of this document.

More information is available via [Robeco's Principal Adverse Impact Statement](#).

#### Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights?

The Sub-fund does not intend to make sustainable investments.

### (c) Environmental or social characteristics of the financial product

#### What are the environmental or social characteristics that the financial products promotes?

The Sub-fund invests mainly in investment funds or strategies with E/S promoting characteristics (Article 8) or a sustainable investment objective (Article 9). The Sub-fund considers investment funds promoting at least the same E/S characteristics which the Sub-fund promotes for the direct holdings, as depicted below.

For direct holdings in government bonds:

1. The Sub-fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that Robeco believes are detrimental to society, such as exposure to controversial behaviour, controversial weapons, and certain fossil fuel-related activities. Robeco deems investing in government bonds (federal or local) of countries where serious violations of human rights or a collapse of the governance structure take place as unsustainable. In addition, Robeco will follow applicable sanctions of the UN, EU or US to which it is subject and follows any mandatory (investment) restrictions deriving therefrom.
2. The Sub-fund promotes investment in countries that perform well on the Robeco Country Sustainability Ranking. The Robeco Country Sustainability Ranking incorporates a wide range of ESG factors such as aging, corruption, social unrest, political risks and environmental risks.

For direct holdings in corporate investments, i.e. equity or bonds:

1. The Sub-fund promotes certain minimum environmental and social safeguards through applying exclusion criteria and therefore applies exclusion criteria with regards to products and business practices that Robeco believes are detrimental to society, such as exposure to controversial behaviour, controversial weapons, and certain fossil fuel-related activities.
2. The Sub-fund promotes adherence to and conducting business activities in accordance with the United Nations Universal Declaration of Human Rights, the International Labor Organization's (ILO) labor standards, the United Nations Guiding Principles for Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC) and the OECD Guidelines for Multinational Enterprises, by scrutinizing companies that violate these principles.
3. The Sub-fund limits exposure to ESG risks by limiting of investing in companies with an elevated sustainability risk based on ESG risk scores whereas all such investments require approval from the Robeco's Sustainable Investment Center of Expertise that oversees that all investments are substantiated and eligible based on a fundamental review on the sustainability risk.

For fund investments, the Sub-fund promotes investments in funds that have a weighted average ESG score that is better than that of the general market index and/or funds that limit investing in companies with an elevated sustainability risk based on ESG risk scores.

#### (d) Investment strategy

**What is the investment strategy used to meet the environmental or social characteristics promoted by the financial product?**

Robeco Life Cycle Fund 2040 is an actively managed fund that invests in a global mix of asset classes like equity, bonds, deposits, money market instruments. The Sub-fund's objective is to achieve long term capital growth. As the maturity date of the Sub-fund approaches, the mix is adjusted in order to provide a gradual investment risk reduction. This eliminates the need for investors to switch to another fund with an appropriate short term risk profile. Via the due diligence performed on the funds invested in, the Sub-fund integrates sustainability indicators on a continuous basis. Amongst others, the Sub-fund considers norms-based and activity-based exclusions, Robeco's good governance policy and considers Principal Adverse Impacts in the due diligence process.

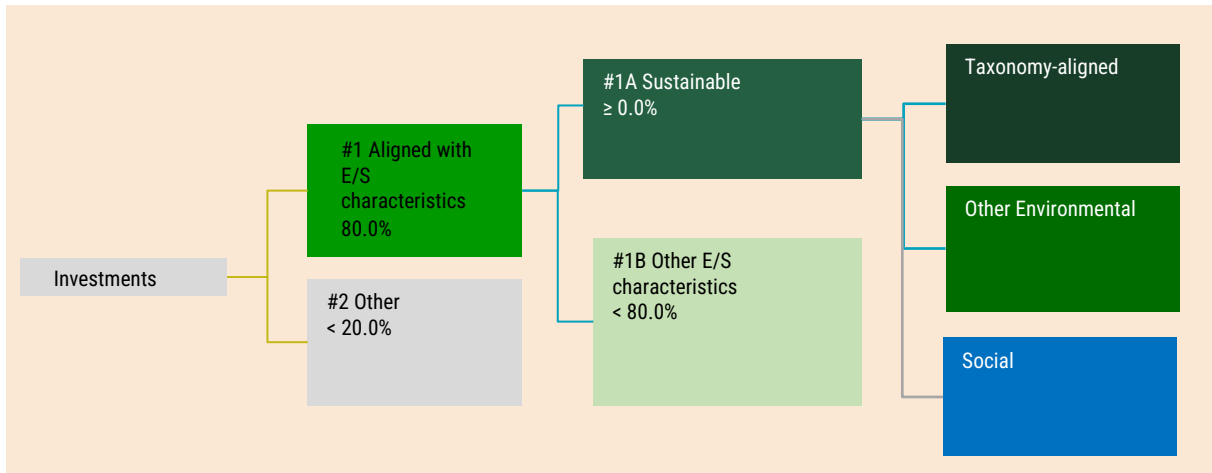
**What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?**

Robeco has a Good Governance policy to assess governance practices of companies. The policy describes how Robeco determines if and when a company does not follow good governance practices and is therefore excluded from the initial investment universe for the Sub-fund. Robeco's Good Governance policy applies tests on a set of governance criteria that reflect widely recognized industry established norms and include topics as employee relations, management structure, tax compliance and remuneration.

The Good Governance test consists of criteria on such topics that are examined for investee companies and further explained in Robeco's Good Governance policy <https://www.robeco.com/files/docm/docu-robeco-good-governance-policy.pdf>. Additionally, the companies that do not pass the good governance test are reflected in the exclusion list that can be accessed here - <https://www.robeco.com/files/docm/docu-exclusion-list.pdf>.

#### (e) Proportion of investments

Minimum Sustainable Investment:



## (f) Monitoring of environmental or social characteristics

**How are the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product monitored throughout the lifecycle of the financial product and what are the related internal or external control mechanisms?**

The second line of defense (Risk Management) monitors compliance with the binding element.

For direct holdings in government and government-related bonds (excluding government-owned but not guaranteed):

1. All exclusions are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
2. The second line of defense (Risk Management) monitors the weighted average CSR score of the portfolio on a daily basis and facilitates pre-trade compliance.

For direct holdings in corporate investments, i.e. equity or bonds (including government-owned but not guaranteed):

1. All exclusions are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
2. Engagement results are periodically assessed by an internal and external audit. Unsuccessful engagement might lead to exclusion. All exclusions are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
3. Financial Risk Management will monitor that all holdings with an elevated sustainability risk rating are substantiated. Every quarter, all holdings with elevated sustainability risk will be reviewed by the Controversy Committee and the committee can ask the portfolio manager for an update of the valuation case.

## (g) Methodologies

**What are the methodologies to measure how the social or environmental characteristics promoted by the financial product are met?**

Robeco maintains comprehensive methodology documents of our proprietary analytical frameworks on our website. These whitepapers go into greater depth, provide further insight into data sources and processes applied within their respective domains. More information in relation to these methodologies can be found at [Robeco's Sustainability Reports Policies](#).

In addition, for some social and environmental characteristics, Robeco relies on externally sourced content for which we aim to select the best of breed vendor for each of our target characteristics. Each vendor will have its own approach and set of internal processes, over which we have only limited influence as an end consumer. More information with regards to these methodologies can be found at [SFDR Data Disclosures document](#).

## (h) Data sources and processing

- **How are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?**
- **What measures are taken to ensure data quality?**
- **How is data processed?**
- **What is the proportion of data that are estimated?**

The following data sources are used:

1. Data provided via other Robeco funds
2. Data provided via external funds.

Robeco scrutinises the data quality of each provider during due diligence assessments, that includes reviewing the data model, performing statistical checks and evaluating coverage. Data processing takes places in different forms, the preference is always to have data acquisition as automated as possible to avoid any operational risks or unnecessary human intervention.

It is currently complex to report sufficiently accurate yet broad numbers on the proportion of data that is estimated. Robeco has calculated the weighted proportion of assets covered per PAI within our standard equity and fixed income benchmarks. These figures have been calculated per provider and, where relevant, we used this coverage figure as a determining factor in our choice of vendor for that PAI since, ceteris paribus, we prefer higher coverage for our investible universe.

Robeco intends to investigate a methodology for determining the proportion of data that has been internally enriched to support wider applications, e.g., by cascading to the broader corporate structure or using sector averages as proxies. Evaluating the proportion of vendor sourced data that is estimated remains a challenge due to insufficient metadata.

More information in relation to data quality and processing can be found in the SFDR data disclosures available at [Robeco's SFDR Data Disclosures](#).

## (i) Limitations to methodologies and data

- **What are potential limitations to the methodologies or data sources and how do such limitations not affect how the environmental or social characteristics promoted by the financial product are met?**

The main limitation in terms of methodologies and data relates to the relative immaturity of corporate sustainability disclosure. In recent years, we have seen a marked increase in the availability of environmental and social data, largely driven by regulations such as the EU Corporate Sustainability Reporting Directive (CSRD) and the Taxonomy Regulation. It remains to be seen whether this trend will continue at the pace previously anticipated given the highly politicized nature of the topic.

To address data gaps, we rely on a selection of external data providers. This introduces additional risks, as we must account for variations between providers. These include discrepancies in estimation methodologies, update frequency, and more foundational issues such as the treatment of corporate actions, security identifiers, and group structures.

From a methodological perspective, we consistently observe divergence in how vendors approach specific environmental topics. For example, regarding GHG emissions, some providers combine corporate-reported data with modelled estimates, while others use different methodological bases. It is common to find significant differences in 'reported' values across providers, stemming from varying policies, quality assurance processes, and case-by-case judgements. This is a widely acknowledged concern, as noted in publications by industry associations and regulators, including EuroSIF and IOSCO, regarding the quality and transparency of ESG data.

Carbon emissions are one of our primary environmental objectives, as this represents the most mature sustainability data theme, offering the most comprehensive coverage across our investment universe, despite the limitations noted above. To mitigate these data challenges, we conduct a thorough annual review of the Robeco-default carbon dataset, at the time of writing S&P Trucost, including a detailed impact assessment each time we transition to a new fiscal year's dataset. This rigorous verification process helps us identify and address anomalies, improving our confidence in the analyses we perform. Nonetheless, we acknowledge that significant data quality challenges persist even in this relatively more developed area of sustainability reporting.

Further information on data and methodologies is available in our [SFDR Data Disclosures document](#).

**(j) Due diligence**

**What due diligence is carried out on the underlying assets of the financial product (including the internal and external controls)?**

Robeco has incorporated the sustainability aspects of the investment strategies into adequate investment due diligence processes and procedures for the selection and monitoring of investments, amongst others taking into account Robeco's risk appetite and sustainability risk management policies.

Specific details on investment due diligence are available in Robeco's Investment Due Diligence Policy as described at [Robeco's Sustainability Risk Policy](#).

**(k) Engagement policies**

**What is the engagement policy applied, in the case that engagement is part of the environmental or social investment strategy (including any management procedures applicable to sustainability-related controversies in investee companies)?**

The holdings of the fund are subject indirectly, via the fund-of-fund investments, to Robeco's enhanced engagement program, that focuses on companies that severely breach minimum standards which Robeco has set out in terms of corporate behavior, climate and biodiversity. In evaluating corporate behavior, we expect companies to comply with internationally accepted codes of conduct for corporate governance, social responsibility, the environment and transparency such as the UN Global Compact and OECD Guidelines for Multinational Enterprises. In the areas of climate change and biodiversity, we expect companies to make sufficient progress against Robeco's climate traffic light score or against the RSPO certification, respectively. The process for enhanced engagement theme selection is a formal part of our exclusion policy. Enhanced Engagement program includes the themes 'Global controversy', 'Acceleration to Paris', and 'Palm oil'.

In addition, the holdings of the fund are subject indirectly, via the fund-of-fund investments to the selection process of Robeco's value engagement program, that consists of a constructive dialogue between investors and investee companies to discuss how they manage ESG risks and opportunities, as well as stakeholder impact. Although this type of engagement is not directly related to the environmental or social investment strategy of the fund, it can be that adverse sustainability impacts are addressed via the value engagement program.

More information can be found in [Robeco's Stewardship Policy](#).

**(l) Designated reference benchmark**

**Has an index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product? If yes, how that index is aligned with the environmental or social characteristics promoted by the financial product, and where can one find information with regards to input data, methodologies used to select those data, the rebalancing methodologies and index calculations?**

There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the product.