

Sustainability-related disclosure

RobecoSAM US Green Bonds

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.

(b) No significant harm to the sustainable investment objective
How are the indicators for adverse impacts in Table 1 of Annex I, and any relevant indicators in Tables 2 and 3 of that Annex I, taken into account?
<p>For sustainable investments that are either Green, Social or Sustainable Bonds, significant harm is avoided by the application of Green Bonds Principles.</p> <p>For a large share of Green, Social and Sustainable bonds, Robeco adds an extra assessment on sustainability factors by applying Robeco's Green Bonds Framework or Social Bond Framework.</p> <p>Via these frameworks, the following adverse impacts are directly considered:</p> <ul style="list-style-type: none">- Table 1, PAI 10 (Violations of the UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises)- Table 1, PAI 14 (Exposure to controversial weapons) <p>For Green bonds, there is no disclosures on GHG emissions. Yet, avoided emissions (scope 4 emissions) are considered. For Social bonds, Robeco considers board gender diversity (Table 1, PAI 13) depending on whether the use of proceeds of the social bond will tackle gender diversity issues.</p> <p>Lastly, Robeco's SDG Framework is considered for the analysis of green, social or sustainable bonds. Robeco's SDG Framework assesses the contribution of companies to the Sustainable Development Goals (SDGs). Many PAI indicators are either directly or indirectly included in the SDG Framework to determine whether a company has significant impacts on the SDGs related to the PAI indicators. A detailed description of the incorporation of Principal Adverse Impact is available via Robeco's Principal Adverse Impact Statement.</p>
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 sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights via Robeco's Exclusion Policy, Robeco's SDG Framework, and the methodology of the benchmark provider.

(c) Sustainable investment objective of the financial product
What is the sustainable investment objective of the financial product?
<p>The Fund invests predominantly in green bonds, as well as in social and sustainable bonds. With these investments, The Fund finances investments that contribute to environmental goals like:</p> <ul style="list-style-type: none">• Climate change mitigation and adaptation• Sustainable use and protection of water and marine resources• Transition to a circular economy• Waste prevention and recycling• Pollution prevention• Protection of healthy ecosystems. <p>There is a reference benchmark designated for the purpose of attaining the sustainable objectives promoted by the Fund.</p> <p>The Fund has the following sustainability indicators:</p> <ol style="list-style-type: none">1. The % of the Fund invested in green bonds.2. The % of investments in securities that are on the Exclusion list as result of the application of Robeco's Exclusion policy.

3. The % of holdings that are in violation of the ILO standards, UNGPs, UNGC or OECD Guidelines for Multinational Enterprises.

(d) Investment strategy

What is the investment strategy used to meet the sustainable investment objective of the financial product?

RobecoSAM US Green Bonds is an actively managed fund that invests in USD-denominated green bonds issued by governments, government-related agencies and corporates. Other bonds invested in are either social bonds, sustainable bonds, or sustainability-linked bonds. The selection of these bonds is based on fundamental analysis. The strategy integrates sustainability indicators on a continuous basis as part of the stock selection process. Amongst others, the Fund applies norms-based and activity-based exclusions, Robeco’s good governance policy and considers Principal Adverse Impacts in the investment process.

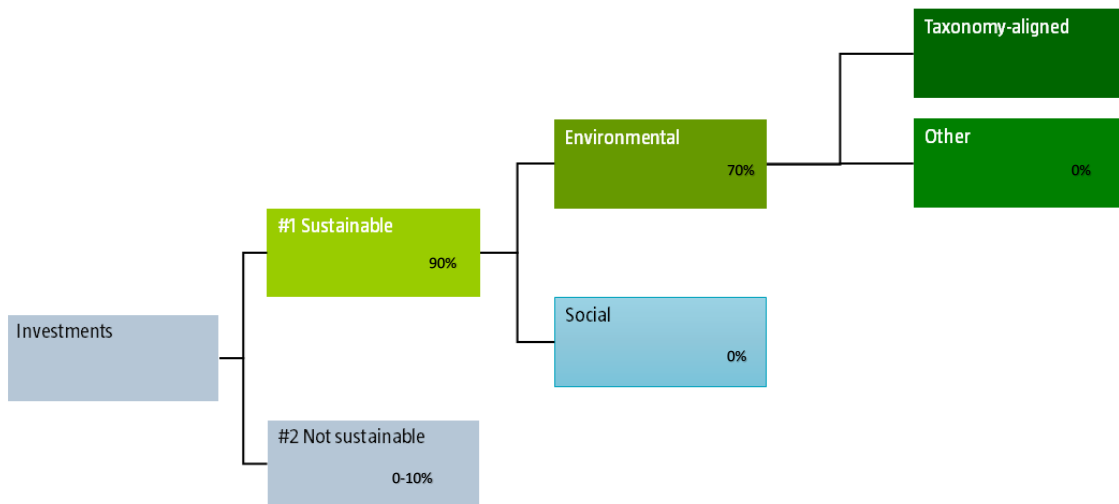
What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

Robeco has a Good Governance policy to assess governance practices of companies. Robeco’s Good Governance policy applies to the Fund. For more information, refer to <https://www.robeco.com/docm/docu-robeco-good-governancepolicy.pdf>.

(e) Proportion of investments

Minimum Sustainable Investment: 90%

Asset allocation table



(f) Monitoring of sustainable investment objective

How are the sustainable investment objective and the sustainability indicators used to measure the attainment of the sustainable investment objective monitored throughout the lifecycle of the financial product and what are the related internal or external control mechanisms?

1. The second line of defense (Risk Management) monitors the concentration towards green bonds, and facilitates pre-trade compliance.
2. 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. All exclusions in relation to Controversial behavior are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.

(g) Methodologies

What are the methodologies to measure the attainment of the sustainable investment objectives and how are the sustainability indicators used to measure the attainment of that sustainable investment objective?

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 <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

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 <https://www.robeco.com/docm/docu-robeco-sfdr-data-disclosures.pdf>.

(h) Data sources and processing

- (a) How are data sources used to attain the sustainable investment objective of the financial product?
- (b) What measures are taken to ensure data quality?
- (c) How is data processed?
- (d) What is the proportion of data that are estimated?

The Fund uses the following data sources:

1. The green bond selection uses Bloomberg in conjunction with data derived from internal processes.
2. The exclusion process uses several data sources such as Sustainalytics, RSPO (Roundtable on Sustainable Palm Oil), World Bank, and Freedom House, Fund for Peace and International Sanctions.
3. The controversial behavior process uses data derived from Sustainalytics and the internal process.

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 <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

(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 sustainable investment objective of the financial product is attained?

The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, we struggle to find adequate information on the principal adverse indicators. To overcome this issue, we have resorted to using multiple data providers, since each has its own respective strengths and weaknesses. We do not expect the corporate reporting landscape to change significantly until the anticipated introduction of CSRD in 2025.

In terms of methodology, we frequently see divergence in the way that data vendors deal with certain topics. For instance, for GHG emissions, some vendors blend corporate reporting with modelled data. It has been a common experience to note that 'reported' data can vary between providers due to conflicting policies, quality assurance and other case-by-case factors. We are not alone in this view as evidenced by the numerous reports from industry associations and trade bodies such as EuroSIF and IOSCO on the quality and transparency of ESG data products. Our environmental objectives are predominantly linked to more mature themes, specifically carbon, water and waste. Disclosure is far greater today within these areas and so we are able to evaluate a satisfactory proportion of our universe to be able to perform tasks such as exclusions and comparisons between portfolio and benchmark.

The primary limitation to the methodology or data source is the limited availability of accurate ESG data by countries. Additionally, data that is reported is delayed and not completely disclosed leading to coverage issues. Like many other financial market participants, we struggle to find adequate information on the principal adverse indicators. In terms of methodology, we frequently see divergence in the way that sovereigns report on environmental and social indicators such as GHG emissions and social violations given varying definitions and

interpretations. We are not alone in such issues and to overcome them, we have resorted to using multiple data sources as available, since each has its own respective strengths and weaknesses.

Information in relation to data and methodologies can be found in the SFDR data disclosures document available at: <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>

(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.

Information in relation to due diligence carried out can be found in the Robeco Investment Due Diligence Policy available at <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

(k) Engagement policies

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

The holdings of the fund are subject 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 sustainable investment objective 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) Attainment of the sustainable investment objective

For the financial product, has an index been designated as a reference benchmark? If yes, how is that index aligned with the sustainable investment objective of the financial product, and where can one find information with regards to input data, methodologies used to select those data, rebalancing methodologies and index calculations?

- Yes, the Fund uses the Bloomberg MSCI US Green Bond Index as a reference index to meet the sustainable investment objective of The Fund.
- Given that sustainable investment objective of The Fund is to finance investment in green bonds, the reference index is aligned with such objective of The Fund by applying clearly defined rules for evaluating green bonds composition in the index.
- Bloomberg MSCI evaluates green bonds to ensure adherence to established Green Bond Principles (GBP) and to examine bonds by their environmental use of proceeds. The index provider follows an eligibility criteria along four dimensions as per the GBP for assessing eligibility to index. In this way The Fund's investment objective is aligned with the reference index.
- The methodology of the reference index follows rebalancing rules which ensures alignment with the investment strategy of The Fund. The Bloomberg MSCI US Green Bond Index is rebalanced on the last business day of each month. New bond issues are not added to the Projected Universe until after the Green Bond Evaluation. On the 25th calendar day of each month, the list of green bonds that are evaluated is updated by MSCI ESG Research which are taken into consideration before rebalancing.
- The benchmark differs from a broad market index in that the latter does not take into account in its methodology any criteria for eligibility and inclusion of green bonds.
- The index methodology can be found on the relevant webpages by the index provider: <https://www.msci.com>

