

## Sustainability-related disclosure

### Robeco Life Cycle Fund 2040

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 sustainable investment objective

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

Where fund 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 fund considers principal adverse impacts on sustainability factors via the fund due diligence process.

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 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 and government-related bonds (excluding government-owned but not guaranteed):

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 and incompatible with sustainable investment strategies. 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 investments in countries that perform well on the RobecoSAM Country Sustainability Ranking. The RobecoSAM 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 (including government-owned but not guaranteed):

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 and incompatible with sustainable investment strategies.
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.

For the selection criteria for investment funds only, the Sub-fund may, instead of limiting the elevated sustainability risk, invest in funds that obtain at least a weighted average ESG score that is better than that of the general market index.

## (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. As the maturity date of the 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 fund integrates sustainability indicators on a continuous basis. Amongst others, the fund considers norms-based and activity-based exclusions, Robeco's good governance policy and considers Principal Adverse Impacts in the due diligence process.

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.

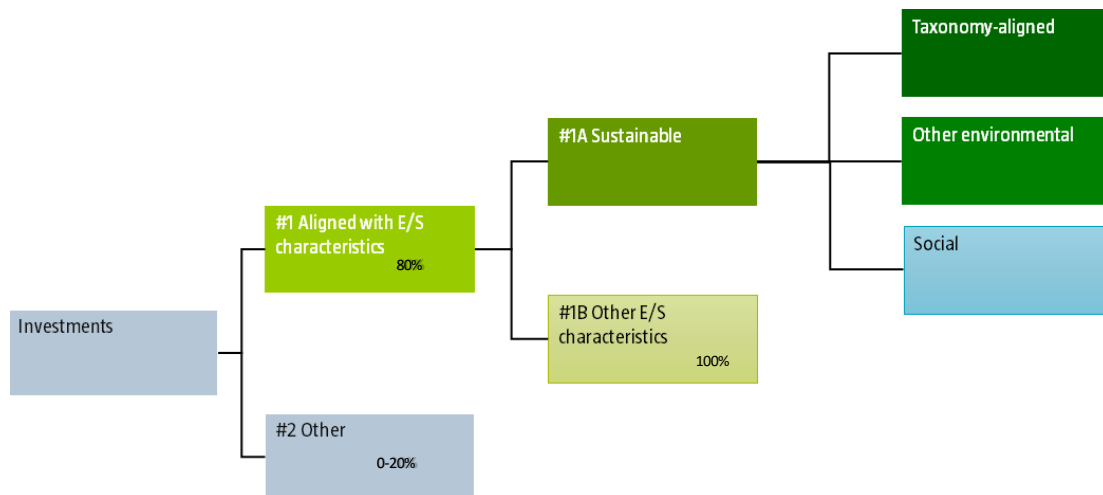
What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

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 [Robeco's Good Governance Policy](#).

## (e) Proportion of investments

Minimum Sustainable Investment: 0%

Asset allocation table



## (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 [Robeco's SFDR Data Disclosures](#).

## (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 fund uses the following data sources:

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 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.

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

#### (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 fund.