

European SRI Transparency Code

Robeco Quantitative Investment - Equities

September 2019

Rotterdam, the Netherlands



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Sustainable and Responsible Investing is an essential part of the strategic positioning and behavior of Robeco. We have been involved in SRI since 1999 and welcome the European SRI Transparency Code. This is our first statement of commitment and covers the period September 2019 to September 2020. Our full response to the European SRI Transparency Code can be accessed below and is available on our website.

Compliance with the Transparency Code

Robeco is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. Robeco meets the full recommendations of the European SRI Transparency Code.

Rotterdam, September 2019

Peter Ferket
CIO and member of the Executive Committee

1. List of funds covered by the Code

Name of the fund(s):

- Robeco QI Emerging Markets Sustainable Active Equities (EMSA)
- Robeco QI Global Developed Sustainable Enhanced Index Equities (GDSEI)
- Robeco QI Global Sustainable Conservative Equities (GSC)

Hereafter Robeco QI Sustainable strategies.

Dominant / preferred SRI strategy (please choose a maximum of 2 strategies)

- Best-in-Class Investment section
- Engagement & Voting
- ESG Integration
- Exclusions
- Impact Investing
- Norms-Based Screening
 - Leading to exclusions
 - Leading to risk management analysis/engagement
- Sustainability Themed

Asset Class

- Shares in a euro area country
- Shares in an EU country
- International shares
- Bonds and other debt securities denominated in euro
- International bonds and other debt securities
- Monetary assets
- Short-term monetary assets
- Structured funds

Exclusions standards and norms

- Controversial weapons
- Alcohol
- Tobacco
- Arms
- Nuclear power

- x Human rights
- x Labour rights
- x Gambling
- x Pornography
- Animal testing
- Conflict minerals
- Biodiversity
- Deforestation
- x CO2 intensive (including coal)
- Genetic engineering
- x Other (*thermal coal exclusion: mining companies with more than 10% revenues, and from power producers with more than 20 % related revenues, palm oil companies with <20% RSPO certified palm oil*)
- x Global Compact
- x OECD Guidelines for MNCs

GDSEI does not apply exclusion for alcohol, gambling and pornography

Fund capital as at 30 June 2018

- | | |
|--|-------------|
| ▪ Robeco QI Emerging Markets Sustainable Active Equities | EUR 62 mln |
| ▪ Robeco QI Global Developed Sustainable Enhanced Index Equities | EUR 256 mln |
| ▪ Robeco QI Global Sustainable Conservative Equities | EUR 63 mln |

Links to relevant documents

Robeco's exclusion policy and exclusion list can be found here: <https://www.robeco.com/images/exclusion-policy-and-list.pdf>

2. General information company

2.1. Name of the fund management company that manages the applicant fund(s)

Robeco Institutional Asset Management B.V.

2.2. What are the company's track record and principles when it comes to integrating SRI into its processes?

Robeco's track record:

Robeco has been a pioneer in sustainable investing, with twenty years of experience in this field. We have been on the forefront of the development in this area since 1999, when we launched the Dutch mutual fund Robeco Sustainable Equity. In 2004, Robeco introduced Robeco Sustainable Private Equity, the world's first sustainable private-equity fund of funds. In the same year, we started voting actively on behalf of institutional clients and one year later, in 2005, we introduced our engagement services and established a dedicated competence center for Active Ownership.

In 2006, Robeco acquired a majority stake in the Swiss based Sustainability specialist SAM (Sustainable Asset Management), which led to the creation of RobecoSAM as a leading sustainable asset manager. Both Robeco and the newly established firm RobecoSAM signed the UN PRI in 2006, among the first parties to do so.

In 2010, we reached two milestones in our firm-wide ambition on sustainable investing: the integration of environmental, social and governance ('ESG') factors into all (equity and credit) investment processes and the implementation of a firm-wide exclusion policy.

In the same year, we launched our first sustainable credit fund: European Sustainable Credits. This fund followed a best-in-class universe selection approach, until January 2019. From January 2019 onwards, we enhanced the universe screening process to bring it in line with our next generation sustainable investment strategies, based on the UN Sustainable Development Goals:

In 2018, and together with RobecoSAM, a pioneering methodology was developed to identify, and more importantly evaluate, the impact a specific credit would have on the 17 UN Sustainable Development Goals, SDGs. This methodology was used to implement a framework that would score all the issuers under coverage of the analysts' team. These scores categorize credits as having either a Positive, Neutral, or Negative impact on the SDGs. The scores are then used in a screening process, to define the investable universe that exclude credits with a Negative impact on the SDGs. This enabled us to launch 3 sustainable funds that utilize this screening process: RobecoSAM Global SDG Credits, RobecoSAM Euro SDG Credits and RobecoSAM SDG Credit Income.. As at end of April, assets under management in these three funds stood at ~EUR 1 bn.

As a leader and pioneer within the domain of sustainable investing, Robeco will continue to monitor and refine our sustainable investing processes and will always look at launching innovative sustainable funds by offering investors a solution driven approach to sustainable investing.

ROBECO													
Founding of Robeco	Launch Robeco Sustainable equity fund	World's first Sustainable Private Equity FoF	Voting & Engagement service initiated	Among the first to sign the UN PRI	ESG integration in all capabilities	Highest scores on all UN PRI categories	Robeco signs Dutch SDG investing agenda	Launch first global SDG Credit fund					
1929	1995	1999	2001	2004	2005	2006	2010	2014	2015	2016	2017	2018	
Founding of RobecoSAM	Cooperation with Dow Jones	World's first Sustainable water fund	World's first Clean Tech Private Equity FoF	RobecoSAM member of Robeco Group	Among the first to sign the UN PRI				Impact Investing platform launched			Launch of Sustainable Global Impact Equities fund	
ROBECOSAM													

Some Robeco milestones in the field of sustainability include:

- **1999** First mover in sustainable investing with the Dutch mutual fund Robeco Duurzaam Aandelen.
- **2004** Introduction of Robeco Sustainable Private Equity, the world's first sustainable private-equity fund of funds, later followed by Clean Tech Private Equity and Responsible Private Equity.
- **2004** Start of our voting services.
- **2005** Engagement with companies in which we invest to improve their sustainability practices.
- **2006** Acquisition of majority stake in SAM, later renamed RobecoSAM.
- **2006** Signatory UN PRI
- **2010** Integration of environmental, social and governance factors into our investment processes for equity and fixed income.
- **2010** Launch Euro Sustainable Credit strategy
- **2010** Implementation of a company-wide exclusion policy.
- **2014** Robeco consistently achieves high scores in the UNPRI assessment since 2014
- **2016** Signing of Dutch SDG investing agenda
- **2017** Launch Sustainable Global Impact Equities strategy
- **2018** Launch SDG Global Credits strategy

Our sister company RobecoSAM based in Zürich, Switzerland, is our key supplier of sustainability data. RobecoSAM is focused exclusively on sustainable investing. Accordingly, certain information presented relates to RobecoSAM. RobecoSAM is focused exclusively on sustainable investing.

Our investment beliefs

- As an active asset manager with a long-term investment view, we create added value for our clients
 - Our investment strategies are research-driven and executed in a disciplined, risk-controlled way
 - Our key research pillars are fundamental research, quantitative research and sustainability research
 - We can create socioeconomic benefits in addition to competitive financial returns
- ESG integration leads to better-informed investment decisions and better risk-adjusted returns throughout an economic cycle
 - Sustainability is a driver of structural change in countries, companies and markets

- Companies with sustainable business practices are more successful
- Active ownership contributes to both investment results and society

Please provide a hyperlink to any of the company's sustainable investment webpages.

<https://www.robeco.com/en/key-strengths/sustainability-investing/>

2.3. How does the company formalise its sustainable investment process?

At Robeco, sustainable investing has been identified as one of the key capabilities the firm focuses on. The Sustainability and Impact strategy committee (SISC) oversees the strategic developments on Sustainability investing at Robeco. The SISC, consisting of ExCo members and sustainability experts from both RobecoSAM and Robeco, combines the strengths of everyone involved by driving the vision of sustainability, enhancing the Sustainability Investing policy framework and creating an innovation platform for SI.

Robeco adopts a holistic approach to integrating sustainability into investment decisions and is fully integrated in all of the investment processes. This holistic approach to sustainable investing is formalized through our companywide mission, vision and investment beliefs.

Our vision

Safeguarding economic, environmental and social assets is a prerequisite for a healthy economy and the generation of attractive returns in the future. The focus in the investment industry is, therefore, shifting from creating wealth to creating wealth and well-being. We are the leading sustainable asset manager and will continue to improve and innovate.

Our mission

To enable our clients to achieve their financial and sustainability goals by providing superior investment returns and solutions.

We will accomplish our mission with employees who respect and embrace diversity and who are truly engaged and empowered to reach their full potential, working together to obtain the best possible results for our clients and our company.

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 - Sustainability is a driver of structural change in countries, companies and markets
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 - Active ownership contributes to both investment results and society

Please provide a link to the sustainable investment policy.

<https://www.robeco.com/docm/docu-robecos-sustainability-policy.pdf>

Please provide a link to the voting rights policy.

<https://www.robeco.com/docm/docu-robeco-voting-policy.pdf>

Please provide a link to the engagement policy.

<https://www.robeco.com/docm/docu-robeco-engagement-policy.pdf>

2.4. How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by company?

Robeco is truly committed to sustainability and it forms an explicit part of company strategy. We believe that:

- Sustainability is a significant driver of corporate value.
- Sustainability issues are a source of downside risk as well as upside potential, and as such should be evaluated by all investors who seek superior performance.
- Systematically assessing ESG factors and integrating them into investment processes leads to better informed investment decisions.
- Voting and engagement with the companies in which we invest is an integral part of our investment process and contributes positively to both investment results and to society.

Climate Change risk

Robeco acknowledges the responsibility of the asset management industry towards climate change risks through the investment decisions that we make and the contact we have with investee companies and other institutions. As signatories of the Paris Agreement, we aim to contribute to its ambition: to keep temperature rise well below 2 degrees Celsius above pre-industrial levels. We also want to meet the commitment we made to the Task Force on Climate-related Financial Disclosures. Our climate change strategy will play a significant role in helping us do that.

In 2018, the Financial Risk Management department (FRM) started investigating and monitoring environmental risks, and climate risks in particular. This approach focuses on transition risk by visualizing carbon emissions and designing climate change scenarios in order to monitor the impact on client portfolios, both in equities and fixed income. Furthermore, the department focused on the set-up of a climate risk framework by starting a dialogue with sustainability experts within Robeco and by attending relevant seminars. This has resulted in the integration of carbon emission data supplied by RobecoSAM into the risk system and the design of climate change scenarios. This carbon emission takes into account scope 1 and scope 2 emissions and is normalized by enterprise value. In 2019 scope 3 data will be included as well. The outcomes of these scenarios for certain portfolios have already been discussed with Portfolio Management. The feedback obtained will be used to further optimize the scenarios, and to create awareness across the organization on client portfolio risks as a result of climate change. The end goal of FRM would be to set up a climate risk framework by providing follow up to the CO₂ exposure – and climate risk stress test

monitoring activity, by creating internal awareness and potentially support this by setting risk thresholds, in line with an organizational decarbonization trajectory.

Please also find the link to our climate change policy:

<https://www.robeco.com/docm/docu-climate-change-policy.pdf>

2.5. How many employees are directly involved in the company's sustainable investment activity?

As Sustainability is integrated in the investment process of our mainstream products, all of Robeco's 229 investment professionals are directly involved in sustainable investment activities.

In addition to that 12 employees are fully dedicated to Active Ownership. And at RobecoSAM over 11 analysts are providing specific Sustainability research on companies and countries, aided by a team of over 40 people that collect the underlying data.

2.6. Is the company involved in any RI initiatives?

Please find below the list of RI initiatives that Robeco participates in or is signatory to.

Overview SI memberships & working groups

General

- Principles for Responsible Investment
- NVP (Dutch Private Equity Association) Sustainability Committee
- DNB Sustainable Finance initiative
- GIIN (Global impact investing network)
- SDG Investment initiative NL

Environment and Climate Change

- IIGCC (Institutional investors Group on climate change)
- CDP (Carbon disclosure project)
- Portfolio Carbon Accounting Financials (PCAF)
- UNEP FI

Governance

- International Corporate Governance network (ICGN)
- Eumedion Dutch governance platform
- ACGA (Asian Corporate Governance association)
- AMEC

Social

- Human rights investor alliance

- Access to Medicine Index
- FAIRR (Farm Animal Investment Risk & Return)
- Business Benchmark on Farm Animal Welfare
- ZSL-SPOTT Palm Oil benchmark
- Plastic Solutions Investor Alliance

Overview SI statements

- PRI Fiduciary duty statement
- TCFD Statement of support
- Climate action 100+ statement
- 2018 Global Investor Statement on Climate Change
- Investor Support for Alignment Sustainability Requirements in the textile, apparel and footwear industry
- Workforce Disclosure Initiative
- The Tobacco-Free Finance Pledge

Overview stewardship codes

- ICGN Global Stewardship Principles
- UK Stewardship Code
- Dutch Stewardship Code
- Japanese Stewardship Code
- Taiwan Stewardship Principles
- Hong Kong Principles for Responsible Ownership
- Korean Stewardship Code
- Singapore Stewardship Principles
- Brazilian Amec Stewardship Code
- US Stewardship Principles

2.7. What is the total number of SRI assets under the company's management?

As of June 2019 Robeco had EUR 117 bln in ESG-integrated assets.

3. General information funds

3.1. What is (are) the fund(s) aiming to achieve by integrating ESG factors?

The funds aim to achieve better informed investment decisions and benefits to society by integrating ESG factors into the investment process. See also 2.3 & 2.4

3.2. What internal or external resources are used for ESG evaluation of the issuers who make up the investment universe of the fund(s)?

RobecoSAM, Sustainalytics, Glass Lewis, GRESB, Bloomberg

3.3. What ESG criteria are taken into account by the fund(s)?

Research and ESG criteria that are taken into account by the funds are delivered by RobecoSAM. RobecoSAM's Sustainability research is generated internally, and is based on RobecoSAM's annual Corporate Sustainability Assessment (CSA) and the annual reports published by the companies covered by RobecoSAM's Research. Over the last 18 years, RobecoSAM has identified and developed an extensive set of economic, environmental, and social assessment criteria in order to measure a company's sustainability performance. These criteria are built into the questionnaire, which quantifies the sustainability performance of a company by assigning a corporate sustainability score based on predefined weights for each of the criteria. The data is stored in RobecoSAM's proprietary Sustainability Information Management System (SIMS), where it is converted into investment relevant insights.

Information used as inputs for the RobecoSAM CSA includes, among others, environmental, social and economic (raw) data provided by the companies, supporting documentation such as internal corporate strategies and policies, position papers, publicly available sustainability, environmental, or occupational health and safety reports.

Sustainability Analysis Criteria

Based on a global trend analysis, RobecoSAM has identified underlying economic, environmental and social megatrends such as aging infrastructure, access to capital, the scarcity of natural resources, and climate change, coupled with population growth, urbanization, and an aging population. Such trends represent opportunities and risks for companies to develop and market innovative products and services that address these long-term sustainability challenges. Those who can successfully anticipate to these trends are well-positioned to outperform in the long run.

Based on these trends, RobecoSAM has defined over 120 general and industry –specific criteria, across 60 different industries, which form the basis of the CSA. All criteria are based on widely accepted standards, best practices and audit procedures as well as extensive input from industry specialists and consultants. RobecoSAM's annual assessment is also used as the basis for the construction and annual review of the Dow Jones Sustainability Indices (DJSI).

General criteria include standard management practices and performance measures applicable to all industries, such as corporate governance, environmental management and performance, human rights, supply chain management, risk and crisis management and labour practices. The industry specific criteria account for the majority of the assessment.

Industry-specific criteria take into account the challenges and trends affecting specific industries. They reflect the economic, environmental and social forces driving the sustainability performance of a particular industry.

A full description of the methodology behind the Corporate Sustainability Assessment (CSA) in the following document : https://www.robecosam.com/media/e/3/0/e3094425bd9bcf0e56ccc31e32499055_measuring-intangibles-csa-methodology_tcm1011-15720.pdf

Because the CSA also forms the basis for the Dow Jones Sustainability Indices (DJSI), key criteria changes are published in the form of a Review Presentation, which can be downloaded.

Annual Review DJSI

<http://www.robecosam.com/en/sustainability-insights/about-sustainability/corporate-sustainability-assessment/review.jsp>

RobecoSAM also presents and discusses major methodology through publications and webcasts. These can be found in the Corporate Sustainability Resource Center:

CSA Resource Center

<http://www.robecosam.com/en/sustainability-insights/about-sustainability/corporate-sustainability-assessment/resource-center.jsp>

3.4. What principles and criteria linked to climate change are taken into account in the fund(s)?s

Robeco acknowledges the responsibility of the asset management industry towards climate change risks through the investment decisions that we make and the contact we have with investee companies and other institutions. We aim to make our contribution to the Paris Agreement ambition to keep temperature rise well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. We also recognize the part that climate change risks plays in contributing to the Sustainable Development Goals (SDGs) 7, 12 and 13.

Robeco's approach to deal with climate change risks in the funds under this code is based on five pillars:

1. Investment process
2. Active Ownership
3. Portfolio decarbonization
4. Divestment
5. Reducing our own footprint

1. Investment process

Robeco's investment teams adopt a holistic approach when integrating sustainability into their investment processes. We view sustainability factors as a long-term driver of change in markets, countries and

companies which impact future corporate performance. Based on this belief, sustainability is considered as one of the value drivers in our investment process, similar to the way we look at other drivers such as company financials or market momentum.

We believe that systematically considering material ESG factors such as climate change risks into our investment processes, strengthens our investment process and ultimately leads to a better-informed investment decision. We address climate change risks through considering business models, corporate climate change strategies, and products and services.

By including the analysis on climate change in the investment process our fundamental analysts have a better view on the risks (and opportunities) companies are exposed to. They can then direct the capital towards companies that are making the transition and value risks for companies that do not.

2. Active Ownership

Robeco has a long track record of engaging with companies on their environmental, social and governance practices.

Robeco's Engagement policy can be found here: <https://www.robeco.com/images/robecoengagement-policy.pdf>.

Robeco engages with companies in high impact sectors on their response to climate change risks. This includes engagements with greenhouse gas intensive industries where we encourage the oil and gas, utilities, automotive, extractive, cement and real estate industries to reduce their greenhouse gas emissions. We encourage the implementation of proactive and ambitious environmental strategies, the pursuit of operational excellence, the creation of asset portfolio resilience, the innovation of business models, and responsible participation in the public policy debate.

In line with our strong belief in active ownership, Robeco systematically supports reasonable shareholder proposals that ask companies to prepare and plan for climate change risks.

Robeco's Voting policy can be found here: <https://www.robeco.com/images/robeco-voting-policy.pdf>.

Robeco is also involved in policy engagement related to climate change, this is done in collaborative initiatives via our memberships of PRI, IIGCC and ICCR.

3. Portfolio decarbonization

Robeco is committed to measuring the carbon footprint of its investment products. RobecoSAM's Environmental Impact Monitoring tool measures the impact of investors' portfolios in terms of greenhouse gas emissions, energy and water consumption and waste production. Robeco and RobecoSAM have further developed tools for actively managing the reduction of the greenhouse gas emissions footprint associated with its portfolios while also controlling for other environmental impacts. Based on these tools Robeco has adopted a comprehensive approach to reducing emissions with respect to the relevant benchmark. We are also able to respond to specific client requirements in optimizing investment portfolios to meet absolute targets.

All Robeco QI Sustainable strategies optimize their carbon footprint. The funds to which this document relates have a target to substantially reduce the carbon footprint compared to the benchmark.

4. Divestment

Robeco believes that our responsibility as an investor requires us to make investment decisions and to engage for better corporate practice. To date, we have made selective choices to exclude companies from our investment decisions as a result of their inability to correct certain inappropriate or unsustainable practices in relation to environmental and climate change issues. For this reason we exclude companies that continue to severely and structurally breach the United Nations Global Compact principles related to environmental issues after an intensive but unsuccessful engagement dialogue.

Robeco's exclusion policy and exclusion list can be found here: <https://www.robeco.com/images/exclusion-policy-and-list.pdf>.

In addition to this, all Robeco QI Sustainable strategies are divested from mining companies with more than 10 percent of thermal coal revenues, and from power producers with more than 20 percent of thermal coal related revenues.

Thermal coal is a product that is predominantly used in power generation and is a more carbon intensive source of energy than any of the alternatives such as oil and natural gas. We focus on thermal coal because we consider that power generators have a choice of technologies and we expect them to move towards the lower carbon alternatives. We expect to see companies reducing their dependence on thermal coal in the future and aim to adjust our threshold lower in the coming years.

5. Reducing our own footprint

Robeco actively strives to reduce its own energy consumption and water use and promotes the use of sustainable energy. Various energy-saving measures are being implemented to achieve continuous reductions in energy consumption. Environmental considerations are an essential part of our important purchasing decisions. When building or renovating offices, Robeco applies strict environmental standards with regard to the buildings and the materials used. Sustainability is a prominent feature of Robeco's headquarter 'FIRST' in Rotterdam which has been awarded a BREEAM certificate at the scale of "Excellent" by the Dutch Green Building Council. Robeco compensates its carbon emissions on an annual basis and is certified CarbonNeutral® in accordance with The CarbonNeutral Protocol.

3.5. What is the ESG analysis and evaluation methodology of the fund manager/fund management company (how is the investment universe built, what rating scale is used etc.)?

Investment Universe

The starting point for the investment universes of the Robeco QI Sustainable Strategies are broad market indices. The investment universe is restricted by the exclusion and negative screening policy of the fund as we believe that some products and business practices are detrimental to society in a way that makes them incompatible with a sustainable investment strategy. With this in mind, we exclude from our investment universe companies whose practices breach the principles of the United Nations Global Compact and turn out to be unwilling or incapable of

changing these practices even after active engagement by our specialized team. In addition, our investment universe restricts firms with a significant exposure to damaging activities, such as the production of tobacco, firearms or thermal coal (see 1.)

Besides this there is a systematic integration of ESG factors in our investment process. We do not apply a best-in-class approach, but require the portfolio to have a significantly better Smart ESG score than the index and a significantly lower environmental footprint.

The Smart ESG score

We integrate ESG in the portfolio construction process by ensuring that the total Smart ESG score of the portfolio is significantly higher than the index. Moreover, the scores on the Environmental, Social and Governance dimension should all also be higher than the index to ensure that the ESG enhancement is reached across all of these three dimensions.

Robeco's Smart ESG score builds upon the existing sustainability data by eliminating known biases such as market cap, industry and regional biases. We improve the ESG data by following two steps:

- In the first step, we remove undesired exposures, for example to regions or industry, companies are compared only to those with similar characteristics. Biases induced by the heterogeneous and diverse nature of sustainability data are effectively removed. This means that we correct for the level and also for the variation in scores.
- In the second step, we improve question weights using a predictive model of expected investment success. Evidence from RobecoSAM's comprehensive sustainability database is incorporated into the scores, leading to more explanatory and predictive power for future returns. The weighting of all indicators that make up the sustainability score are thus based on both quantitative and qualitative information, by combining the expertise of sustainability analysts with quantitative empirical results.

For a full description of how we construct our Smart ESG score and the empirical evidence of the relation between Smart ESG and excess performance please refer to: Smart ESG integration, Factoring in Sustainability, September 2015, Bacon and Ossen, RobecoSAM.

http://www.robecosam.com/images/Smart_ESG_integration_factoring_in_sustainability.pdf

The environmental footprint

When constructing the portfolio we also impose an environmental footprint of the portfolio that is significantly better (i.e.lower) than the index. A growing number of investors expects their portfolios to restrict impacts. Using data from the RobecoSAM CSA, we measure the portfolio's footprint on four key quantitative environmental indicators:

- Greenhouse gas (GHG) emissions: measures direct GHG emissions generated by sources owned or controlled by the company (Scope 1 emissions) and indirect emissions associated with the generation of purchased electricity or heat (Scope 2 emissions).
- Energy consumption: measures total energy directly consumed by the company as well as indirect energy consumed outside the organization.

- Water use: measures company's total water withdrawal, excluding water discharged with an equivalent quality level than the water extracted.
- Waste generation: measures metric tons of dry waste generated by the company, consisting of by-products of the extraction or production process that can no longer be used for production or consumption and which the company intends to discard.

3.6. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

RobecoSAM continuously makes enhancements to its research methodology in order to identify and interpret corporate sustainability information that has a material impact on long-term shareholder value creation. Such enhancements are aligned with our mission to leverage our understanding of sustainability issues in making better-informed investment decisions. Each SI research analyst is responsible for reviewing the sector-specific portion of the questionnaire for his or her area of coverage, and amending or including new questions for inclusion in the questionnaire, based on industry-specific sustainability trends, risks, and challenges affecting his or her specific research sector.

The questionnaire for the annual RobecoSAM CSA is reviewed by RobecoSAM Research each year. Approximately 15-20% of the questions are yearly renewed and optimized. In the 2017 assessment, for instance, new questions on Policy Influence and Impact Measurement were introduced and increased focus was put on companies' assessment of risks in their supply chains. The section on Corporate Governance was extended to cover additional questions about board tenure and board industry experience. By doing so, we hope to raise awareness and eventually improve corporate performance in these areas. In addition to this, many other criteria were reviewed to ensure consistency, clarity and materiality of the questions asked.

Other enhancements to our SI research process include a Materiality Analysis on the most relevant sustainability factors for the GICS industries that RobecoSAM analyses, and a new format for sharing companies' Sustainability Profiles with other investment professionals of the group.

Controversies: Media & Stakeholder Analysis

As part of its annual CSA, RobecoSAM conducts an ongoing monitoring of companies that have been selected as members of the eligible investment universe for its funds, or as components of the Dow Jones Sustainability Indices. This monitoring process consists of a Media & Stakeholder Analysis, which is based on screening provided by RepRisk, a leading ESG research and business intelligence provider, and frequent interactions with key stakeholders such as NGOs and consumer organizations. Companies are monitored on an ongoing basis to verify their involvement in, and the management of critical environmental, economic and social crisis situations that can have a damaging effect on their reputation and core business. In addition, the consistency and quality of a company's behaviour, response, and management of such situations is reviewed in line with its stated principles and policies. The Media & Stakeholder Analysis can lead to the downgrading of a company's sustainability score, which may affect its overall fair valuation score.

Examples of critical issues identified and reviewed through the monitoring process include:

- Commercial practices; e.g. tax fraud, money laundering, antitrust, balance sheet fraud, and corruption cases.
- Human rights abuses; e.g. cases involving discrimination, forced resettlements, child labour and discrimination of indigenous people.

- Layoffs or workforce conflicts; e.g. extensive layoffs and strikes.
- Catastrophic events or accidents: e.g., fatalities, workplace safety issues, technical failures, ecological disasters and product recalls.

The CSA is renewed yearly and the scores can be adjusted quarterly or ad hoc based on the Media & Stakeholder analysis.

Furthermore as part of our Enhanced Engagement program, we focus on companies that severely and structurally breach principles of the United Nations Global Compact in the areas of human rights, labor, environment and anti-corruption. In contrast with value engagement, enhanced engagement may ultimately result in excluding a company from the investment universe of Robeco or its clients.

The funds apply a direct link between the enhanced engagement program and the buy discipline. For companies that are placed under enhanced engagement, the target weight is halved (GSC) for the duration of the enhanced engagement process or no overweights are allowed (EMSA, GDSEI) for the duration of the enhanced engagement process.

In case the enhanced engagement is closed unsuccessfully, the company will be excluded from the investable universe and any remaining positions in the portfolio will be sold.

4. Investment process

4.1. How are the results of the ESG research integrated into portfolio construction?

ESG is integrated in the strategy in three ways:

- We restrict the investment universe to avoid investing in harmful practices.
- We integrate ESG in the portfolio construction process by ensuring that the total ESG score of the portfolio is at significantly higher than the index.
- We want to create environmental impact alongside returns. Therefore, we make sure that the portfolio has a better environmental footprint on four dimensions: Greenhouse Gas emissions, Waste generation, Water usage and Energy consumption.

Furthermore, the strategies participate in the engagement programs as conducted by the Robeco Active Ownership team.

Determining a sustainable investment universe

We start with the broad investment universe. We exclude stocks from our universe that may be seen as inappropriate from an ethical point of view. We believe that some products and business practices are detrimental to society in a way that makes them incompatible with a sustainable investment strategy. The criteria reflect a combination of broad ethical norms resulting amongst others in avoiding firms exposed to controversial sectors or business practices.

Better RobecoSAM Smart ESG score

We integrate ESG in the portfolio construction process by ensuring that the total ESG score of the portfolio is at least significantly higher than the index. Moreover, the scores on the Environmental, Social and Governance dimension should all be higher than the index to ensure that the ESG enhancement is reached across all of these three dimensions. The ranking model proposes a high ranking stock for inclusion when constructing the portfolio. It will propose another high-ranking stock if the portfolio would score below target on one or more of these dimensions. Companies with higher ESG scores have a greater chance of inclusion in the portfolio as a result of this positive screening.

The Global Developed Sustainable Enhanced Index Equities strategy also takes ESG factors explicitly into account when ranking the most attractive stocks. We determine the relative attractiveness of stocks based on Sustainability, Valuation and Momentum.

Smaller environmental footprint

When constructing the portfolio we also impose an environmental footprint of the portfolio that is significantly smaller than the index footprint. A growing number of investors expects their portfolios to restrict impacts. Using data from the CSA, we measure the portfolio's footprint on four key quantitative environmental indicators: greenhouse gas emissions, energy consumption, water usage and waste generation.

4.2. How are criteria specific to climate change integrated into portfolio construction?

We recognize three approaches for managing climate change related risk in our quantitative portfolios:

- Exclusions: using an climate change focused exclusion list based on companies that score poorly on certain climate change related parameters. The strategies exclude thermal coal companies (see details above).
- Climate change constraints: forcing the portfolios to have a certain level of improvement over the benchmark on climate change related parameters, by setting a constraint in the portfolio construction phase. The strategies target a significant reduction of the environmental footprint.
- ESG integration: integrating ESG criteria by ensuring an improved ESG score over that of the index. This forward-looking score complements the firm's current environmental rating, and allows one to gauge the readiness of a company to master future environmental challenges and opportunities. This solution integrates reliable historical environmental data and forward looking sustainability criteria.

While the exclusions mostly provide risk avoidance, the other two approaches also provide additional opportunities to the strategies and leave more room for the investment strategies to efficiently create factor exposures.

4.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?

- Please specify how much the funds can hold.

We aim for all portfolio holdings to be covered by the ESG analysis.

4.4. Has the ESG evaluation or investment process changed in the last 12 months?

Yes.

We integrate ESG in the portfolio construction process by ensuring that the total ESG score of the portfolio is significantly higher than the index. In 2018, we have added the requirement that the scores on the Environmental, Social and Governance dimensions should all be higher than the index to ensure that the ESG enhancement is reached across all of these three dimensions.

4.5. Is a part of the fund(s) invested in entities pursuing strong social goals/social enterprises?

No

4.6. Does (do) the fund(s) engage in securities lending activities? If so, (i) is there a policy in place to recall the securities so as to exercise the voting rights? (ii) does the process for selecting the counterparty(ies) integrate ESG criteria?

The fund does not engage in securities lending currently.

4.7. Does (do) the fund(s) use derivative instruments? If so, please describe (i) their nature;

(ii) their objectives;

(iii) the potential limits in terms of exposure;

Derivatives do not constitute a structural part of our quantitative equity portfolios, but are used as substitutes for a position in the more fundamental underlying instruments.

The derivatives we use are:

- Index futures to efficiently handle cash-flows between rebalancing dates or proceeds from corporate actions. On average we expect the economic exposure of the index futures to be less than 5% of the net asset value of the portfolio.
- Currency forwards to hedge currency back to benchmark (for GDSEI only).

The exposure towards derivatives is fully integrated in our overall risk management framework and is overseen and monitored by our independent Risk Management department.

(iv) if appropriate, their impact on the SRI nature of the fund(s).

Not applicable

4.8. Does (do) the fund(s) invest in mutual funds?

No

If so, how do you ensure compatibility between the policy for selecting mutual funds and the SRI policy of the fund(s)? How many funds can be held?

Not applicable

5. ESG controls

5.1. What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?

The rules for Sustainability funds are determined and validated by the Sustainability and Impact Strategy committee (SISC). This committee guides sustainability developments. The committee consists of members of the Executive Committees of Robeco and RobecoSAM and internal specialists. These rules are evaluated yearly.

The portfolio management team bears the responsibility to implement the rules in the portfolio. Outcomes are measured and monitored via an automated system. The eligible universe is coded by the compliance team as such that any ticker not being eligible will be flagged and results into a pre-trade compliance alert that needs to be addressed by the pre-trade restriction team and the portfolio manager responsible for the respective fund. In addition, the eligible tickers enables the daily Compliance post-trade check, ensuring the portfolios being monitored are compliant on an ongoing basis. Results are reported to clients on a monthly basis. Please see the monthly portfolio managers update on our website for an example of this reporting.

6. Impact measures and ESG reporting

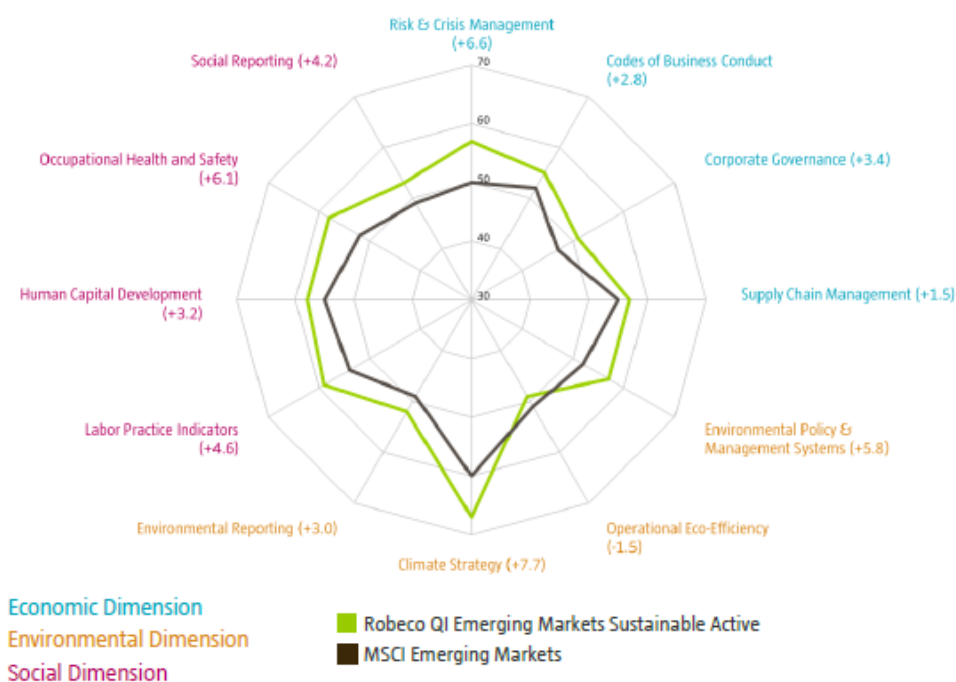
6.1. How is the ESG quality of the fund(s) assessed?

The rules for Sustainability funds are determined and validated by the Sustainability and Impact Strategy Committee (SISC). This committee guides sustainability developments. The committee consists of members of the Executive Committees of Robeco and RobecoSAM and internal specialists. These rules and the quality of the rules are evaluated yearly.

Furthermore the fund(s) reporting on ESG performance is extensive. The RobecoSAM Sustainability Report measures the sustainability exposure of an equity or credit portfolio based on a selected set of general ESG criteria applicable to a broad range of companies.

The report covers the three dimensions of RobecoSAM's CSA (economic, environmental and social factors) and provides a general overview – displayed as a spider chart – of a portfolio's sustainability performance versus the relevant portfolio benchmark. The report compares the weighted average scores of the portfolio holdings for these criteria with the average scores of all the companies in the benchmark. The results demonstrate whether the portfolio outperforms or underperforms the average company scores for each criterion and illustrates the areas of relative strength and weakness across key ESG criteria.

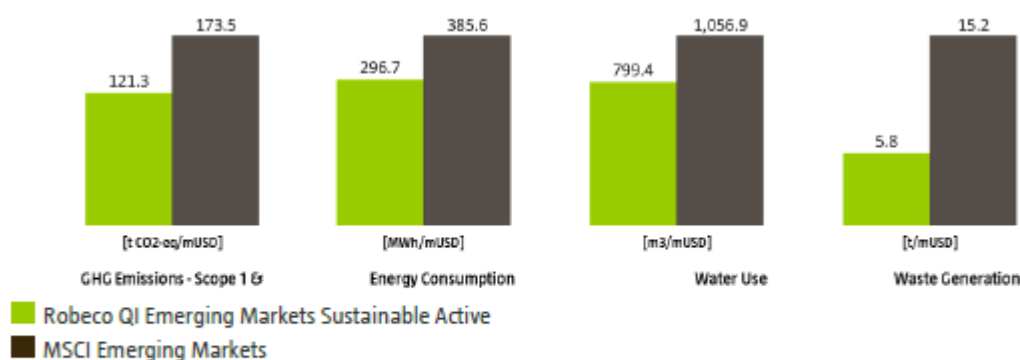
Example:



Source: RobecoSAM, Robeco. Data per end June 2018.

By measuring their portfolio's footprint against a series of tangible environmental indicators, investors can gain insight into the magnitude of the portfolio's environmental impact per invested dollar. The quantitative indicators measured at the company level include greenhouse gas emissions, energy consumption, water use and waste generation. The results can be compared with peer companies in the same industry to reveal which companies are leading in a particular field. Furthermore, the same analysis can be conducted on the respective benchmark companies, to reveal differences in environmental performance between the investor's portfolio and the benchmark. An attribution analysis relative to the selected benchmark helps the investor determine whether the portfolio's environmental impacts are driven by sector allocation or stock selection.

Example:



Source: RobecoSAM, Robeco. Data per end June 2018.

6.2. What ESG indicators are used by the fund(s)?

The RobecoSAM Smart ESG score, the environmental footprint and the exclusionary screening all explained in 3.5 are used by the fund.

6.3. What communication resources are used to provide investors with information about the SRI management of the fund(s)?

There are many communication resources that are used to provide investors information on the funds: our website, insights, quarterly reports and monthly portfolio manager updates.

We would specifically refer to our Sustainability insights: <https://www.robeco.com/en/insights/>
 And our Sustainability webpage: <https://www.robeco.com/en/key-strengths/sustainability-investing/>
 And to the fund documentation.

6.4. Does the fund management company publish the results of its voting and engagement policies? If so, please include links to the relevant activity reports.

Yes, please find the link to our voting policy here: <https://www.robeco.com/docm/docu-robeco-voting-policy.pdf>

And the link to our engagement policy here: <https://www.robeco.com/docm/docu-robeco-engagement-policy.pdf>

Each quarter a public report is published on our engagement activities:

<https://www.robeco.com/en/insights/?t=Active+Ownership+Report>

The voting results are also available per company: <https://www.robeco.com/en/about-us/voting-report/>

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(KIDs), the articles of association, the annual and semi-annual reports of the Fund(s), as well as the list of the purchases and sales which the Fund(s) has undertaken during the financial year, may be obtained, on simple request and free of charge, at the office of the Swiss representative ACOLIN Fund Services AG. The prospectuses are also available via the website www.robeco.ch.

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