

# WHITE PAPER Sovereign sustainability: The two lenses applied by Robeco



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\* Robeco has actively integrated sustainability analyses in its investment decisions for sovereign bonds for more than a decade. The Country SDG Framework has recently been developed to cater to the growing interest in SDG-aligned investing. The new framework helps us to identify countries with the highest potential for promoting further sustainable development. The SDG scores complement the existing country ESG analysis which is more focused on identifying risk and opportunities from the perspective of a sovereign bond investor.

WHITE PAPER SEPTEMBER 2023

Marketing material for professional investors, not for onward distribution

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### Introduction

Robeco has been actively incorporating sustainability analysis in its investment decisions for sovereign bonds since 2010. Over this period, the RobecoSAM Country Sustainability Ranking (CSR) has been our main sustainability analysis tool for sovereigns. The CSR helps us to avoid sustainability risks and seize opportunities. Recently we have complemented this sovereign analysis with a new instrument: the Robeco Country SDG Framework. This aims to identify which countries should be prioritized in government bond portfolios in order to further support sustainable development, along the lines of the UN Sustainable Development Goals (SDG). In this paper we briefly discuss both frameworks, show their purposes, common elements and differences.

The CSR score paints a picture of a country's current level of development and governance capacity, whereby yearon-year differences reveal changes to environmental, social and governance performance. The SDG score does not assess how countries currently are doing on sustainable development, but gauges if countries are likely to make contributions to attaining the SDGs in the future.

	Country Sustainability Ranking	Country SDG Framework						
Purpose	Identifying sustainability risks and opportunities for sovereign bonds, in order to make better informed investment decisions	Identifying which countries should be in/excluded in government bond portfolios, in order to support sustainable development						
Model	The model consists of three pillars, Environment (30%), Social (30%) and Governance (40%), that comprise 51 indicators related to 15 criteria	The framework consists of three steps that gauge if: (1) countries have good policies for the SDGs; (2) there is potential for investors to support a country gaining better access to capital; and (3) a country is involved in controversies that deteriorate the SDGs.						
Output	Score on a 1-10 scale (two decimals)	Score on a -3 to + 3 scale (integers)						
Similarities	Countries that have high levels of corruption and are invol will receive poor scores in both assessments.	ved in environmental, social, or governance controversies						

 Table 1 – Main characteristics for the two frameworks for sovereign sustainability analysis

Source: Robeco

#### Practical use

The Country SDG Framework is applied for portfolios that aim to be aligned with the SDGs. The scores are used at the beginning of the investment process to define the eligible universe. This can for instance consist of only countries with a neutral or positive score. Such a universe would exclude (among others) Turkey or Poland, while including India and Indonesia.

The CSR score is used for a broader set of portfolios and, at a later stage, in the investment process. After the investment universe has been identified, the CSR score is used in the fundamental analysis process. Changes in the score versus peers with a similar credit rating feed into the F-score of a country (together with Financial Health and Marco Economy). These F-scores are used to formulate an assessment on the relative attractiveness of the sovereign bonds versus peers. The CSR scores are also used in our sovereign engagement activities and as a binding element in our SFDR reporting.

### RobecoSAM Country Sustainability Ranking

A sovereign nation's ability and willingness to honor its financial obligations is not only affected by financial and macroeconomic variables, but also by aspects such as: a country's political situation, social climate, quality of governance, and environmental factors. The CSR framework is a method for prioritizing, assessing and unlocking a country's performance on those ESG factors.

Environmental metrics are important for evaluating a country's ability to minimize waste and protect its natural resources including water, biodiversity, and climate – all factors that support sustainable economic and population development.

Social metrics are important for assessing a country's overall well-being as measured in terms of citizens' access to education, healthcare, jobs and social services as well as equality of income, opportunity and overall human rights.

The governance sphere analyzes the capacity of a nation's political, judicial and network of policymaking institutions to protect, nurture and strengthen the foundations and conditions needed for economies to innovate and grow. That means controlling corruption, protecting free speech and civil liberties, constructing supportive regulations, and facilitating R&D.

#### The methodology in brief

The CSR framework is broad, encompassing a comprehensive range of in-depth ESG metrics for 150 of the world's most significant countries around the globe, including 23 developed and 127 emerging markets and developing economies. At present the CSR framework includes 51 indicators aggregated into 15 criteria across the three primary ESG dimensions – four are environmental with a weight of 30%, five are social with a weight of 30% and six are governmental with a weight of 40%.

## "Robeco has been actively incorporating sustainability analysis in its investment decisions for sovereign bonds since 2010

The final country score is the weighted sum of all standardized indicator scores. The weighting of the individual indicators, criteria and dimensions that determine the final country score are based on expert judgment, evidence from external research, statistical analysis and peer comparisons. The end result is a score on a 1-10 scale, unrounded, which makes it possible to detect any changes in a country's ESG performance relative to peers.

ESG data is sourced from the world's foremost institutions for researching, financing, monitoring and advocating sustainable change in developed and emerging markets around the world. These include development banks, private institutions, NGOs, think tanks, rating agencies and universities.

More information can be found in our paper "The RobecoSAM Country Sustainability Framework" <u>docu-brochure-</u> <u>csr-framework.pdf (robeco.com)</u><sup>1</sup>

1 https://www.robeco.com/files/docm/docu-brochure-csr-framework.pdf

### Figure 1 - Robeco Country Sustainability Ranking: Score components

Indicators		Criteria V	Veight	Dimensions	Weight	Country		
For each country, numerous data series on a variety of ESG features are collected and summarized in $>50$ indicators. Each indicator gets a predefined weight and a relative score ranging from 1 to 10.		The indicators are ag ed to 15 criteria, whereby each criteric also assigned a prede weight.	n is	Each dimension w is the sum of the of weights within the tive dimension.	criteria	The Country Score is the weighted sum of all stand ardized indicator scores.		
Biodiversity Intactness Index 2030 Projection Forest Cover Net Change Natural Resources Rent Red List Index	Ecological Deficit/Reserve Marine Protected Area Ocean Health Index Terrestrial Protected Area	Biodiversity	7.5%					
Consumption CO2 per Capita GHG Emissions per GDP Consumption CO2 5-Yr p/C Change GHG Emissions 5-Yr p/GDP Change GHG p/C Reduction 2015-30	GHG Emissions per Capita Share of Renewables GHG Emissions 5-Yr p/C Change Share of Renewables 5-Yr Change GHG Emissions p/C Target 2030	Climate & energy						
Integrated Water Management Water Stress Level Water Use Efficiency Waste Management	Wastewater Treatment Water Stress 2030 Projection	Water & waste						
Climate Risk Index ND-GAIN Index	Natural Hazard Index	Environmental risk						
Labor Force Participation Rate 55-64	Old-age dependency ratio 25Y Projection	Aging	7.5%					
Education Human Development Index	Health	Human development				Country Sustainability Sco		
Global Rights Index	Human rights	Human & labor rights	7.5%	Social				
Gender Inequality Index	GINI Coefficient	Inequality	5%					
Fragile States Index	Socio-economic vulnerability	Social unrest						
		O	0					
Control of Corruption	Corruption Perception Index	Corruption						
Globalization Index	Global Innovation Index	Globalization&innova						
Government Effectiveness Rule of Law	Regulatory quality	Institutions						
Freedom in the World	Voice & accountability	Personal freedom						
Political Risk Rating ECR	Political Risk Rating PRS	Political risk						

Source: Robeco

### Robeco's Country SDG Framework

Robeco's Country SDG Framework applies three steps to determine which countries should be prioritized in SDG-aligned government bond strategies. First, it assesses if a country's policies advance, or detract from, attaining the SDGs. Second, it determines if a country lacks access to capital markets, and thereby offers potential for investors to help advance countries in overcoming this barrier. Third, countries are screened for controversial behavior that conflicts with key principles for the SDGs.

#### Figure 2 - Robeco's Country SDG Framework: A three step process



#### Do policies support the SDGs? Does a country implement policies that

promote or limit each of the SDGs?

#### Assessing policies for the SDGs:

- Progress on SDG targets over time
- Average performance in recent years
- · Absolute performance in the last year

Source: Robeco

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Is there potential to improve financing? Is there potential for an investor to improve a country's access to capital?

#### Considerations:

- Country income-status
- Corruption
- Policy (step 1)



Are controversies known? Does the country comply with key principles for the SDGs?

#### Examples of controversies:

- Poor governance
- Hard-line autocracies
- · Violation of rights and civil liberties

#### Step 1 Policies: Do countries have good policies for the SDGs?

Achieving the SDGs requires governments to create policies that advance the goals while phasing out legislation that deteriorates progress. In aligning portfolios with the SDGs we must determine if a country indeed implements policies that support the SDGs. Ideally, we would generate such insights by analyzing governmental policy documents. Unfortunately, data on governmental policies for sustainable development is not available, at least not in standardized and comparable formats. In the first step of our framework, we tackle this challenge by assessing countries' policies for the SDGs. We use around 100 indicators that directly link to SDG targets. For each indicator we develop an assessment method.

Three types of methods are applied. First, policies for various SDG targets are indirectly scored by assessing how countries perform on an indicator in recent years. If countries show progress, they will receive a positive score in this phase. Reverse trends can lead to negative scores. For example, one indicator for SDG 3 (Good Health and Wellbeing) is a country's maternal mortality ratio. A reduction in maternal mortality will lead to positive scores, while increases lead to negative scores. Second, some indicators are screened by looking at a country's average performance in recent years. For example, a country's most recent performance on an indicator. For SDG 8 (Decent Work and Economic Growth), for instance, we assess children's rights in the workplace in the most recent year available. Combinations of these methods may apply, whereby both absolute levels and trends are assessed for a particular indicator. Together, these methods enable us to approximate the degree to which countries' policies are consistent with the SDGs.

### "Our Country ESG scores and SDG framework helps us deepen our knowledge on the countries in which we invest

Michiel de Bruin, portfolio manager with Robeco's Global Macro team

#### Step 2 Potential: Do countries require additional capital to realize the SDGs?

The second step evaluates whether investors can help countries get better access to the financing needed to progress on the SDGs. This assessment consists of two dimensions: (1) a country's income classification according to the World Bank, and (2) country corruption. Countries that are rated as low, lower-middle, and upper-middle income (following dimension one) and have low levels of corruption (following dimensions two) get a +1 score in step 2 of the framework. These low- and middle-income countries can be considered in need of additional capital (Gaspar et al., 2019). Since they do not exhibit high levels of corruption, the risk that funds are misallocated is considered low or moderate.

#### Step 3 Controversies: Are countries involved in controversies that conflict with the SDGs?

Attaining the SDGs require countries to follow key principles for the SDGs. Governments that show controversial behavior that conflicts with the 'integrated and indivisible' nature of the SDGs (cf. UN, 2015) are unlikely to attain all SDGs. The third step of our framework screens for controversies. First, countries with very very poor governance are given a -1 score, whereby we use the RobecoSAM Country Sustainability Ranking's composite governance metric to survey the quality of governance in countries. Second, we assess whether countries are dictatorships. Using the BTI Transformation Index, countries that are classified as 'hard-line autocracies' are given a -2 score. Finally, countries on our exclusion list, for which we look amongst others at civil liberties and failed states, receive a -3 score.

#### The scoring process: Creating country SDG scores

Through this framework, countries are assigned a score in each of the three steps. Next, these are converted into an overall SDG score. To do this, we first check if a country has a negative score in any of the individual steps. If so, the lowest score will become the country's total SDG score. This is because we recognize that countries with poor policies for the SDGs (step 1) or those displaying behavior that strongly conflicts with the SDGs (step 3) cannot be considered to have a neutral or positive alignment with the SDGs. Countries that have a neutral score in step 1 (and no negative score in step 3), will receive a total score of 0. For those with a positive score in step 1, we add the country's scores in step 2. This is to reward countries with good policies for the SDGs that are in need of additional financing.

More details on our sovereign SDG methodology can be found in this report <u>How to integrate SDGs into</u> <u>government bond portfolios (robeco.com)</u><sup>2</sup>.

" Through the UN SDGs Robeco has a consistent, measurable and actionable framework to assess sustainability in all parts of a multi-asset portfolio. For so long, achieving sustainable outcomes meant excluding investible elements such as government bonds. We believe that our clients' capital can invest in government bonds, which will enable countries that are implementing a sustainable and credible policy framework to benefit from lower borrowing costs Colin Graham, Head of Multi Asset Strategies at Robeco

2 https://www.robeco.com/en-int/insights/2023/08/how-to-integrate-sdgs-into-government-bond-portfolios

## Comparing the results of both lenses

There is no overall clear positive or negative correlation between the scores from both analysis methods. This can can be seen in figure 3. The chart shows the scores on both the SDG and the CSR framework for 150 countries. What can be observed is a cluster of countries that score either a 0 or +1 in the SDG framework and have an above average CSR score. These are typically (relatively more) advanced economies with a smaller sustainability risk, but also less potential progress on the SDGs.

The red boxes in the chart include countries that score poorly on both the SDGs as well as sustainability risks measured via the CSR. Zooming in on these countries we can conclude that most of them combine SDG-related controversies with a poorer score on governance risk, such as Egypt and Turkey. The dark green boxes comprise countries with SDG promoting polices in place and potential for further progress, while sustainability-related risks in these countries are still relatively high (for example Ghana).

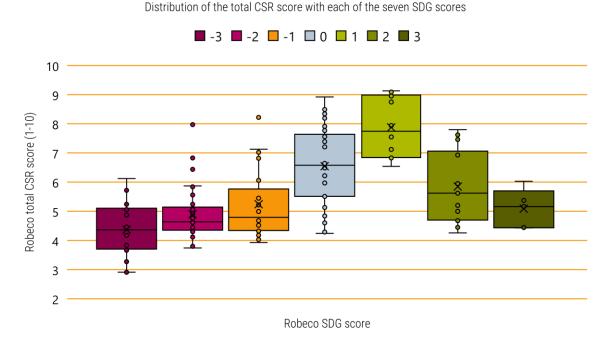
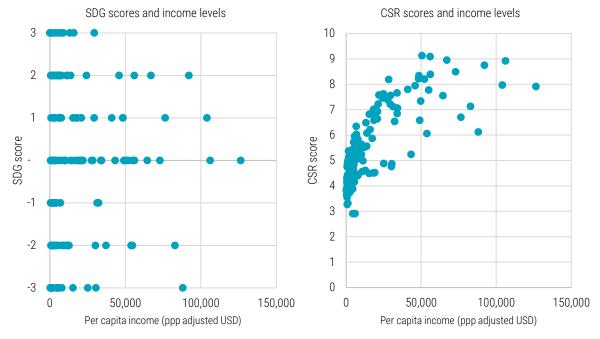


Figure 3 - Both scores compared per country

Source: Robeco

Sustainability-related risks tend to be lower for higher-income countries. That is one of our observations from working with the CSR framework. Wealthier countries have more opportunities to allocate capital to amongst others education, health care, or a social security system. In practice this correlation does not hamper working with the CSR tool, as we compare countries with their rating peers and look at score changes as well as levels. Still, we do appreciate that the SDG framework does not exhibit this correlation to income levels. High and low scoring counties can be found in any place of the per capita income spectrum. This is illustrated in Figure 4.



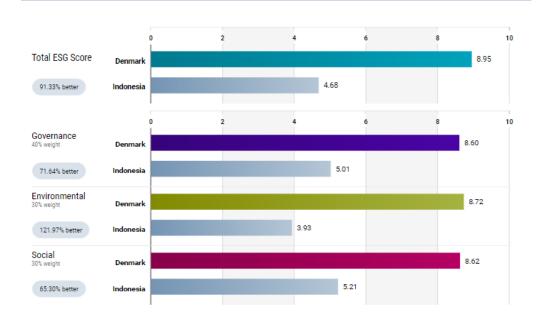


Source: Robeco

#### Example: Denmark and Indonesia seen through two lenses

To illustrate how the two methodologies work in practice we look into more detail at Denmark and Indonesia. The Country Sustainability Ranking gives Denmark a score of 8.95, while Indonesia scores 4.78. Denmark's sustainability risk profile gets higher marks on all three ESG dimensions. Notable differences can be found in categories such as political stability, water and waste, and human and labor rights.





**Country ESG Scorecard** 

Source: Robeco

In the Country SDG Framework, both Indonesia and Denmark score a +1 for their policies for the SDGs in step 1 of the framework. Denmark's total score is a +1 while Indonesia ends up with a +2 final score. What explains these scores?

Both countries score positively on policies for the SDGs. Despite its high level of economic development, Denmark has continued to make progress on among others: affordable and clean energy (SDG 7), industry, innovation, and infrastructure (SDG 9), climate action (SDG 13), life below water (SDG 14), peace, justice and strong institutions (SDG 16) and partnerships for the goals (SDG 17). However, on sustainable cities and communities (SDG 11) and responsible consumption and production (SDG 12) the country is demonstrating poorer policies.

Indonesia shows progress on: no poverty (SDG 1), good health and well-being (SDG 3), quality of education (SDG 4) and life below water (SDG 14), suggesting that the country has good policies for advancing these SDGs. While the country also scores negatively on SDGs, mainly related to water (SDG 6), clean energy (SDG 7), life on land (SDG 15) and institutions (SDG 16), its total rating in step 1 is positive-low (+1).

High per capita income does mean that Denmark will not receive an additional point for its sustainable development potential. Indonesia is entitled to such an additional point, because of its low level of income per capita. Its score on corruption is sufficient, and therefore it gets a +1 score in step 2, where we look at the potential for investors to support countries in gaining better access to capital. Neither of the two countries is subject of severe controversies, which leads Denmark to score +1 and Indonesia to receive a +2 score.

Country	Total SDG score	Scores per step of the framework			Scores per SDG in Step 1 - Policies																
		Step 1 Policies	Step 2 Potential	1.22 C 1.2 C 1.2 C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Ghana	3	2	1	275	2		2	2	1	1	1	-	-	-	1	-1		-		1	-
Indonesia	2	1	1	-	3	-	3	2	-	-1	-1	-	-	-	-	-	-	1	-3	-1	-
Denmark	1	1	-	-		-	-	-		-	2	-	1	-	-2	-1	1	1	-	1	1
Netherlands	-	-			-	-	-	2	-	1	-	-	1	-	-	÷.	-1	1	-1	1	-1
Poland	-1	-1	-	-	2	-		-	-	1	-1	-	-	-2	-1	1	-1	1	-1	-1	-
Israel	-2	-	-	-2	-	-	-	2	-	1	-1	-	3	-1	-	-1	-		-2	-1	
Russia	-3	-1	-	-3	2	2	-1	-	-	-	-1	-	1	2	-	-1	-2	1	-1	-3	-

Figure 6 - Robeco's Country SDG Framework: Selected scores

Source: Robeco

Both analysis frameworks will be used alongside each other in a different phase of the investment process. With the help of both instruments we feel well equipped to manage sustainable investments in sovereign bonds, taking account of both opportunities for development, as well as investment risks and opportunities.

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This document is exclusively distributed to Liechtenstein-based, duly licensed financial intermediaries (such as banks, discretionary portfolio managers, insurance companies, fund of funds) which do not intend to invest on their own account into Fund(s) displayed in the document. This material is distributed by Robeco Switzerland Ltd, postal address: Josefstrasse 218, 8005 Zurich, Switzerland. LGT Bank Ltd., Herrengasse 12, FL-9490 Vaduz, Liechtenstein acts as the representative and paying agent in Liechtenstein. The prospectus, the Key Information Documents (PRIIP) the articles of association, the annual and semi-annual reports of the Fund(s) may be obtained from the representative or via the website. Additional information for investors with residence or seat in Malaysia

Generally, no offer or sale of the Shares is permitted in Malaysia unless where a Recognition Exemption or the Prospectus Exemption applies: NO ACTION HAS BEEN, OR WILL BE, TAKEN TO COMPLY WITH MALAYSIAN LAWS FOR MAKING AVAILABLE, OFFERING FOR SUBSCRIPTION OR PURCHASE, OR ISSUING ANY INVITATION TO SUBSCRIBE FOR OR PURCHASE OR SALE OF THE SHARES IN MALAYSIA OR TO PERSONS IN MALAYSIA AS THE SHARES ARE NOT INTENDED BY THE ISSUER TO BE MADE AVAILABLE, OR MADE THE SUBJECT OF ANY OFFER OR INVITATION TO SUBSCRIBE OR PURCHASE, IN MALAYSIA. NEITHER THIS DOCUMENT NOR ANY DOCUMENT OR OTHER MATERIAL IN CONNECTION WITH THE SHARES SHOULD BE DISTRIBUTED, CAUSED TO BE DISTRIBUTED OR CIRCULATED IN MALAYSIA. NO PERSON SHOULD MAKE AVAILABLE OR MAKE ANY INVITATION OR OFFER OR INVITATION TO SELL OR PURCHASE THE SHARES IN MALAYSIA UNLESS SUCH PERSON TAKES THE NECESSARY ACTION TO COMPLY WITH MALAYSIAN LAWS.

#### Additional information for investors with residence or seat in Mexico

The funds have not been and will not be registered with the National Registry of Securities or maintained by the Mexican National Banking and Securities Commission and, as a result, may not be offered or sold publicly in Mexico. Robeco and any underwriter or purchaser may offer and sell the funds in Mexico on a private placement basis to Institutional and Accredited Investors, pursuant to Article 8 of the Mexican Securities Market Law.

#### Additional information for investors with residence or seat in Peru

The Superintendencia del Mercado de Valores (SMV) does not exercise any supervision over this Fund and therefore the management of it. The information the Fund provides to its investors and the other services it provides to them are the sole responsibility of the Administrator. This Prospectus is not for public distribution.

#### Additional information for investors with residence or seat in Singapore

This document has not been registered with the Monetary Authority of Singapore ("MAS"). Accordingly, this document may not be circulated or distributed directly or indirectly to persons in Singapore other than (i) to an institutional investor under Section 304 of the SFA, (ii) to a relevant person pursuant to Section 305(1), or any person pursuant to Section 305(2), and in accordance with the conditions specified in Section 305, of the SFA, or (iii) otherwise pursuant to, and in accordance with the conditions of, any other applicable provision of the SFA. The considerations, conflicts of interest, risk factors and the relevant Singapore selling restrictions (as described in the section entitled "Important information for Singapore Investors") contained in the prospectus. Investors should consult their professional adviser if you are in doubt about the stringent restrictions applicable regulatory protection, associated risks and suitability of the Fund to your objectives. Investors should note that only the Sub-Funds listed in the appendix to the section entitled "Important information for Singapore Investors" of the prospectus ("Sub-Funds") are available to Singapore investors. The Sub-Funds are notified as restricted foreign exemptions under Section 304 and Section 305 of the SFA. The Sub-Funds are not authorized or recognized by the MAS and shares in the Sub-Funds are not allowed to be offered to the retail public in Singapore. The prospectus of the Fund is not a prospectus as defined in the SFA. Accordingly, statutory liability under the SFA in relation to the content of prospectuses does not apply. The Sub-Funds may only be promoted exclusively to persons who are sufficiently experienced and sophisticated to understand the risks involved in investing in such schemes, and who satisfy certain other criteria provided under Section 304, or any other applicable provision of the SFA. You should be that only be sub-funds may only be promoted exclusively to persons who are sufficiently experienced and sophisticated

#### Additional information for investors with residence or seat in Spain

Robeco Institutional Asset Management B.V., Sucursal en España with identification number W0032687F and having its registered office in Madrid at Calle Serrano 47-14°, is registered with the Spanish Commercial Registry in Madrid, in volume 19.957, page 190, section 8, sheet M-351927 and with the National Securities Market Commission (CNMV) in the Official Register of branches of European investment services companies, under number 24. The investment funds or SICAV mentioned in this document are regulated by the corresponding authorities of their country of origin and are registered in the Special Registry of the CNMV of Foreign Collective Investment Institutions marketed in Spain.

#### Additional information for investors with residence or seat in South Africa

Robeco Institutional Asset Management B.V. is registered and regulated by the Financial Sector Conduct Authority in South Africa.

#### Additional information for investors with residence or seat in Switzerland

The Fund(s) are domiciled in Luxembourg. This document is exclusively distributed in Switzerland to qualified investors as defined in the Swiss Collective Investment Schemes Act (CISA). This material is distributed by Robeco Switzerland Ltd, postal address: Josefstrasse 218, 8005 Zurich. ACOLIN Fund Services AG, postal address: Leutschenbachstrasse 50, 8050 Zürich, acts as the Swiss representative of the Fund(s). UBS Switzerland AG, Bahnhofstrasse 45, 8001 Zurich, postal address: Europastrasse 2, P.O. Box, CH-8152 Opfikon, acts as the Swiss paying agent. The prospectus, the Key Information Documents (PRIIP), 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.

#### Additional information relating to RobecoSAM-branded funds/services

Robeco Switzerland Ltd, postal address Josefstrasse 218, 8005 Zurich, Switzerland has a license as asset manager of collective assets from the Swiss Financial Market Supervisory Authority FINMA. The RobecoSAM brand is a registered trademark of Robeco Holding B.V. The brand RobecoSAM is used to market services and products which entail Robeco's expertise on Sustainable Investing (SI). The brand RobecoSAM is not to be considered as a separate legal entity.

#### Additional information for investors with residence or seat in Taiwan

The contents of this document have not been reviewed by any regulatory authority in Hong Kong. If you are in any doubt about any of the contents of this document, you should obtain independent professional advice. This document has been distributed by Robeco Hong Kong Limited ("Robeco"). Robeco is regulated by the Securities and Futures Commission in Hong Kong.

#### Additional information for investors with residence or seat in Thailand

The Prospectus has not been approved by the Securities and Exchange Commission which takes no responsibility for its contents. No offer to the public to purchase the Shares will be made in Thailand and the Prospectus is intended to be read by the addressee only and must not be passed to, issued to, or shown to the public generally.

#### Additional information for investors with residence or seat in the United Arab Emirates

Some Funds referred to in this marketing material have been registered with the UAE Securities and Commodities Authority ("the Authority"). Details of all Registered Funds can be found on the Authority's website. The Authority assumes no liability for the accuracy of the information set out in this material/document, nor for the failure of any persons engaged in the investment Fund in performing their duties and responsibilities.

#### Additional information for investors with residence or seat in the United Kingdom

Robeco is deemed authorized and regulated by the Financial Conduct Authority.

Additional information for investors with residence or seat in Uruguay

The sale of the Fund qualifies as a private placement pursuant to section 2 of Uruguayan law 18,627. The Fund must not be offered or sold to the public in Uruguay, except under circumstances which do not constitute a public offering or distribution under Uruguayan laws and regulations. The Fund is not and will not be registered with the Financial Services Superintendency of the Central Bank of Uruguay. The Fund corresponds to investment funds that are not investment funds regulated by Uruguayan law 16,774 dated 27 September 1996, as amended.