

Robeco SDG Low Carbon Equities Indices

Key elements of the methodology

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1. Introduction

The Robeco SDG Low Carbon Equities Indices are a family of indices that seek efficient exposure to high impact stocks that have a positive societal contribution to SDGs, significantly reduce carbon footprint, while retaining the transition. The objective of the Robeco SDG Low Carbon Equities Indices is to reflect the returns of each geographical market, subject to screening of the investable universe for stocks that do not significant harm, reduce carbon footprint and contribute positively to a low carbon economy.

This document describes the key elements of the methodology. In addition, a document describing the index policies, practices and benchmark statement are available for all index families on the Robeco Indices website, [Indices \(robeco.com\)](https://www.robeco.com/indices).

Version history (as of January 2022)

#6	December, 2025	Update for Revised Benchmark Regulation
#5	September, 2025	Update of index methodology (incorporate Scope 3 upstream in GHG emission, exclude SDG 11 from the Climate SDG & transition leader definition) Change underlying benchmark for Robeco Developed SDG Low Carbon Equities Index
#4	March, 2025	Annual update
#3	October, 2023	Update of index methodology (carbon footprint reduction, transition leaders & Climate Beta)
#2	March, 2022	Annual update
#1	January, 2022	Publication including ESG methodology appendix

2. Constructing the Robeco SDG Low Carbon Equities Indices

2.1 Defining the universe

The universe of the Robeco SDG Low Carbon Equities Indices are based on underlying S&P indices. All stocks of the indices in this family are also constituent of these underlying S&P indices.

<i>Robeco SDG Low Carbon Equities Index</i>	<i>Universe / Underlying market-cap weighted index</i>
Robeco Global SDG Low Carbon Equities Index	S&P Global Large Mid Cap index
Robeco Developed SDG Low Carbon Equities Index	S&P World Index
Robeco Emerging Markets SDG Low Carbon Equities Index	S&P Emerging Plus Large Mid Cap index
Robeco European SDG Low Carbon Equities Index	S&P Europe Large Mid Cap index (ex Luxembourg)
Robeco US SDG Low Carbon Equities Index	S&P 500
Robeco Asia-Pacific SDG Low Carbon Equities Index	S&P Asia Pac Large Mid Cap index
Robeco Japan SDG Low Carbon Equities Index	S&P Japan Large Mid Cap index

For more information on the construction of the underlying universe or market-cap weighted indices, please refer to the methodology of the indices which is published on the S&P DJI website, [Index Finder | S&P Dow Jones Indices \(spglobal.com\)](#)

2.2 Applying weights to the constituents

The Robeco SDG Low Carbon Equities Indices provide exposure to high impact stocks that have a positive societal contribution to SDGs and significantly reduce carbon footprint, while retaining the transition leaders. The underlying benchmark universe is screened and adjusted based on the following characteristics:

Do no harm:

Stocks will only be selected if classified to not do harm to the UN Sustainable Development Goals. The Robeco SDG Framework rigorously measures and scores companies based on their SDG contributions. It is a systematic approach to capturing SDG impact of equity and credit issuers that is objective, disciplined and replicable. It consists of a **three-step sequence that starts with an assessment of the impact of a company's products and services. Step two** consists of an in-depth analysis of the impact of its operations, internal policies and structures. The process ends with a screening and review of corporate controversies that could negatively influence SDG progress, and hence a **company's SDG impact. The final results of this three-step analysis** are quantified in an SDG score (from -3, -2, ..., to +3). All stocks with a negative SDG scores are excluded from the universe.

Carbon footprint reduction:

The index has as objective to significantly reduce its carbon footprint relative to the universe. The carbon footprint of company is measured by normalizing the greenhouse gas (GHG) emissions¹, Scope 1, 2 and 3 upstream, by Enterprise Value Including Cash (EVIC). As part of the index construction algorithm, a restriction is included that the index' carbon footprint is 50% lower than the universe's.

Transition leaders:

The index overweighs stocks that are considered to be a transition leader if it is considered to have a positive contribution to the low carbon economy. To classify as transition leader, a stock must have a combined positive SDG

¹ GHG emission data is sourced from Trucost Environmental Data.

score on SDG 7 'Affordable and Clean Energy' and SDG 13 'Climate Action'. As part of the index construction algorithm, a restriction is included that the index' average combined SDG score on SDG 7, 11 & 13 is higher than the universe's.

Climate Beta:

The index underweights stocks that are considered to be more susceptible to climate risk. Climate risk is measured through the Climate Beta of a company which estimates **the correlation of a company's stock returns with an observable proxy**² for the financial risk of climate change. As such, the Climate Beta of a company tells us whether the company is positively or negatively exposed to climate risks and the global transition to a low carbon economy. Companies with a high Climate beta are expected lose value from this transition, while companies with a low Climate Beta are expected to gain value. As part of the index construction algorithm, a restriction is included that **the index' average Climate Beta is lower than the universe's**.

The efficient index construction algorithm tilts the index towards stocks that positively contributes towards the UN Sustainable Development Goals, while keeping turnover low. The algorithm also ensures appropriate diversification and prevents unintended geographic or sector biases, as well as undue concentration to individual stocks or segments of the equity markets.

2.3 ESG methodology statement

Regulation (EU) 2016/1011 requires benchmark administrators to explain how environmental, social and governance factors ('ESG') are reflected in the benchmark methodology. Appendix I describes how ESG factors are reflected in the benchmark methodology.

2.4 Discretion in constructing the indices

Applying weights to the constituents is fully based on the Robeco SDG Low Carbon Equities Indices' rules-based methodology, which eliminates the exercise of discretion by an individual in this process.

² The proxy for the financial risk of climate change is a factor portfolio that is constructed in a similar fashion as the Fama and French (2015) factors. The proxy is a portfolio that goes long in the 30% companies that are considered transition laggards and shorts the 30% companies that are considered transition leaders, based on the Climate SDG score (the combined SDG score on SDG 7 and 13).

3. Maintaining the Robeco SDG Low Carbon Equities Indices

Robeco Indices B.V. (“Robeco”) has outsourced the calculation and maintenance of the Robeco SDG Low Carbon Equities Indices to S&P DJI acting as the calculation agent.

3.1 Rebalancing

Rebalancing of the Robeco SDG Low Carbon Equities Indices is performed quarterly. Constituent changes are typically communicated to clients two days before they are scheduled to be implemented. Constituent changes are communicated to all clients at the same time and are not made publicly available.

3.2 Index calculation

The Robeco SDG Low Carbon Equities Indices are calculated end-of-day by S&P DJI. Index calculations include price-, total- and net- return series:

- Price return indices reflect the market price performance for all securities in the index, which do not take into account dividends payouts.
- Gross total return (Total Return) indices reflect the return to an investor where dividends are reinvested without deduction of a withholding tax. Cash dividends are in general applied on the ex-date of the dividend.
- Net total return (Net Return) indices reflect the return to an investor where dividends are reinvested after the deduction of a withholding tax. The tax rate applied is the rate to non-resident institutions that do not benefit from double taxation treaties.

The Robeco SDG Low Carbon Equities Indices are calculated in U.S. dollars and euros.

For more information on the index calculation methodology, please refer to S&P DJI’s Index Mathematics Methodology, which is available on the S&P DJI website, [Methodologies - Governance | S&P Dow Jones Indices \(spglobal.com\)](#).

3.3 Input data

Data used by S&P DJI for determination of the Robeco SDG Low Carbon Equities Indices include (in order of priority):

- a. Completed transaction data (closing prices) from stock exchanges;
- b. For certain corporate actions, theoretical prices may be derived using the existing security price and the specifics of the corporate action.

In addition, WM/Refinitiv foreign exchange rates are taken daily at 04:00 PM London time and used in the calculation of the indices. These mid-market fixings are calculated by the WM Company based on Reuter’s data and appear on Refinitiv pages WMRA.

The Robeco SDG Low Carbon Equities Indices are calculated based on the values of the underlying equities, which are determined by its last closing price on the primary exchange where it is listed. The closing prices are received from S&P DJI’s third party vendors, who receive the closing prices from the primary exchanges. Closing prices received by S&P DJI from one of its third party vendors are verified by comparing them with prices from an alternative vendor.

3.4 Exceptional circumstances

The Robeco SDG Low Carbon Equities Indices rely on the continued availability of closing prices from stock exchanges. The potential limitations of the indices include circumstances where a significant portion of the closing prices of constituents of the indices are unavailable, for example due to unexpected market or exchange closures.

In general, all constituents (underlying equities) of the index will receive a daily closing price. Based on these closing prices the indices are calculated daily throughout the calendar year. The only days an index is not calculated are on days when all exchanges where the index constituents are listed are officially closed. In certain circumstances, for example unexpected market or exchange closures, not all securities in the index will receive a closing price on a particular day. Unexpected market/exchange closures are usually due to unforeseen circumstances, such as natural disasters, inclement weather, outages, or other events. Generally, if all exchanges are closed due to these unforeseen circumstances, the day will be treated as an unscheduled market holiday and no index will be calculated. Indices containing multiple markets will be calculated as normal, provided that at least one market is open that day.

For information on the policies in case of unexpected exchange closures, please refer to S&P DJI's Equity Indices Policies & Practices document located on the S&P DJI website, [Methodologies - Governance | S&P Dow Jones Indices \(spglobal.com\)](https://www.spglobal.com/indices/methodologies-governance).

3.5 Discretion in constructing and maintaining the indices

The Robeco SDG Low Carbon Equities Indices are constructed and calculated following the methodology as described in this benchmark statement and the standard policies and practices of S&P DJI. Certain events beyond the control of Robeco and S&P DJI, and which are not addressed by the methodology and standard policies and practices, may affect the construction and calculation of the indices, including, but not limited to:

- Possible market disruption
- New or complex corporate actions
- Excessive index changes or adjustments
- Country specific regulations
- Unnecessary turnover
- Unavailability of necessary input data

In such circumstances discretion may be used in the construction and calculation of the indices. In addition, as part of the rebalance process, expert judgement can be exercised to improve the investability, or lower the risk, of the indices; as long as it is immaterial and meeting the objectives of the methodology. The exercise of expert judgement and impact on the index are reviewed and signed off by a senior portfolio manager of Robeco Indices.

In case the calculation agent S&P DJI encounters any event where discretion is required in the calculation of the indices, S&P DJI consults with Robeco to decide on the appropriate action to be taken.

Any exercise of discretion in special circumstances which could have a material effect on the benchmark will be escalated to the Oversight Committee.

3.6 Error correction policy

In the event of an error in the construction or calculation of the Robeco SDG Low Carbon Equities Indices, the following procedures apply.

Input data errors

Where an error in the calculation of the indices is due to incorrect input data, S&P DJI shall follow the procedures described in its standard Equity Indices Policies & Practices document located on the S&P DJI website, [Methodologies - Governance | S&P Dow Jones Indices \(spglobal.com\)](#).

Recalculation Events	Treatment
Closing Price	Incorrect constituent closing prices are generally corrected and reposted.
Missed or Misapplied Corporate Action	Missed corporate action events are corrected & reposted.
Late Announcement of a Corporate Action	<p><u>Divisor Impact:</u> Divisor-impacting information is corrected and reposted.</p> <p><u>No Divisor Impact:</u> Late information, including regular cash dividends, that does not impact the index divisor are applied at the earliest opportunity when S&P DJI becomes aware of the event. For late announced or canceled dividends, S&P DJI may elect to use a Post Ex-date Dividend Adjustment in certain instances. Stock splits, bonus issues or stock dividends and reverse stock splits are applied on the correct ex-date. If these are announced on the same day (either that this is taking place or that a previously announced event is being postponed or cancelled), they are applied on the correct ex-date and files are not reposted. Same day corporate actions are included in the current day files, so previous day files are not reposted. If these are announced after the ex-date, then it is applied on the correct ex-date and files are regenerated and reposted.</p>
Incorrect Calculation or Data Entry Error	Incorrect calculations or data entry mistakes caused by S&P DJI are corrected and impacted indices are recalculated.

In the event one of these recalculation events is discovered within two trading days of its occurrence, in general the index will be recalculated. In the event any such recalculation event is discovered beyond such two trading day period, Robeco and S&P DJI will decide on the appropriate action to be taken.

Construction and calculation errors

Where an error is detected in the construction or calculation of the indices, which is not an input data error, but that was caused by the incorrect application of the index methodology and results in the incorrect composition and/or weighting of index constituents, Robeco and S&P DJI will discuss the appropriate action to be taken in order to resolve the error. In case the error is discovered before the new index composition is sent to clients, Robeco and S&P DJI will recalculate the index within the original rebalance timelines, if deemed feasible by S&P DJI. In the event an error is discovered beyond the rebalance period, after the new index composition has been sent out to clients, Robeco and S&P DJI will decide on the appropriate action to be taken. In the event Robeco chooses to recalculate an index, that shall be done within a reasonable timeframe following the detection and review of the issue. If it is determined that an index will be recalculated, the following steps will be taken upon completion of the recalculation:

- All impacted files are regenerated and reposted.
- All clients are notified of the recalculation and alerted when files have been successfully reposted.

3.7 Holiday Schedule

The Robeco SDG Low Carbon Equities Indices are calculated on all business days of the year. S&P DJI publishes a calendar of holidays annually during the fourth quarter on their website, [Methodologies - Governance | S&P Dow Jones Indices \(spglobal.com\)](#).

3.8 Corporate Actions

Corporate actions (such as stock splits, stock dividends, spin-offs and rights offerings) are applied after the close of trading on the day prior to the ex-date. The Robeco SDG Low Carbon Equities Indices follow the standard S&P DJI policy for Corporate Actions. For the main corporate actions, the treatment is described in the table.

<i>Corporate Action</i>	<i>Standard SPDJI Treatment</i>	<i>Divisor Change</i>
Company Addition/Deletion	<u>Addition</u> : The indices do not add companies between rebalancings. <u>Deletion</u> : The weights of all stocks in the index will proportionately change but relative weights will stay the same. The index divisor will change due to the net change in the index market capitalization.	Yes
Change in shares outstanding	Shares outstanding changes are offset by an adjustment factor (AWF). There is no change to the index market capitalization.	No
Split/Reverse Split	Shares outstanding are adjusted by split ratio. Stock price is adjusted by split ratio. There is no change to the index market capitalization.	No
Spin-off	The spin-off is added to the index on the ex-date at a price of zero. The spin-off index shares are based on the spin-off ratio. On the ex-date the spin-off will have the same attributes and capping adjustment factor (AWF) as its parent company, and will remain in the index for at least one trading day. As a result, there will be no change to the index divisor on the ex-date. If the spin-off is ineligible for continued inclusion, it will be removed after the ex-date. The weight of the spin-off being deleted is reinvested across all the index components proportionately such that the relative weights of all index components are unchanged. The net change in index market capitalization will cause a divisor change.	Depending on type of spin-off
Change in IWF	IWF changes are offset by an adjustment factor (AWF). There is no change to the index market capitalization.	No
Ordinary dividend	When a company pays an ordinary cash dividend, also referred to as a regular cash dividend, the index does not make any adjustments to the price or shares of the stock.	No
Special dividend	The stock price is adjusted by the amount of the dividend.	Yes
Rights offering	All rights offerings that are in the money on the ex-date are applied under the assumption the rights are fully subscribed. The stock price is adjusted by the value of the rights and the shares outstanding are increased by the rights ratio. The change in price and shares is offset by an adjustment factor (AWF) to keep the index market capitalization (stock weight) unchanged.	No

For more information on corporate actions treatment, please refer to S&P DJI's Equity Indices Policies & Practices document located on the S&P DJI website, [Methodologies - Governance | S&P Dow Jones Indices \(spglobal.com\)](https://www.spglobal.com/dji/methodologies/governance).

4. Internal approval and review process

4.1 Design and validation of new methodologies

Our dedicated team of experienced specialists in the field of index construction and sustainability research is responsible for the design of new methodologies. When designing new methodologies, the team runs index simulations to verify the results of proposed methodologies. Survivorship bias and look-ahead biases can normally arise from back testing. In order to ensure the prevention of these biases, the historical databases, which are used for running back tests, are free from survivorship biases. In addition, look-ahead biases are prevented in the back tests by lagging accounting data.

New methodologies are internally reviewed and are presented to and reviewed by the Oversight Committee as part of its responsibility to supervise the design, development and approval of index methodologies.

4.2 Approval of new indices

Next to approving new methodologies, a separate procedure is in place for approval of new indices. The procedure for approval of a new index is as follows:

- A proposal to set up a new index is prepared.
- The Oversight Committee is informed, and in case required by the Oversight Committee, consulted about the set-up of the new index.
- The proposal to set up a new index is reviewed on appropriateness and impact, and approved by the relevant control functions, including Compliance and Risk Management.
- The Board of Directors of Robeco Indices B.V. reviews and approves the new index proposal.
- Robeco will launch the new index after approval of the Board of Directors of Robeco Indices B.V.

4.3 Review of methodology

The methodologies will be reviewed regularly, at least annually, internally, to ensure that the methodology still reflects its objective and complies with the Robeco standards. In addition, certain circumstances may trigger ad-hoc methodology reviews, including, but not limited to:

- Changes in underlying market structure
- Changes in the underlying S&P DJI indices
- Client feedback
- Market events

If a review of the methodology results in a revised composition of constituents, an interim rebalancing will take place in case Robeco establishes that the benchmark no longer represents the underlying market or economic reality it seeks to measure.

The Oversight Committee reviews the methodologies at least annually, to ensure the indices continue to achieve the stated objectives, taking into consideration feedback received from internal control functions, regulators, clients and other stakeholders.

5. Index changes and cessations

Robeco realizes to the fullest that changes to, or the cessation of a Benchmark may have a significant impact on financial contracts and financial instruments that reference to the Benchmark or use the Benchmark for the measurement of the performance of investment funds. To safeguard client interests and to provide transparency to the users of Benchmarks, the change and cessation procedure describes in detail what situations may cause a material change to or cessation of a Benchmark and what actions are to be taken as part of this procedure.

5.1 Material change

Several factors, including external factors beyond the control of the Robeco may necessitate changes to, or the cessation of, one or more Benchmarks or family of Benchmarks. These situations may include, *but are not limited to*:

- Methodology review outcomes;
- Changes in or cessation of the underlying Benchmark universe;
- Changes to the structure of the underlying market;
- Regulatory changes;
- Low usage.

A change is considered to be material in case the change:

- would lead to the insertion or deletion of any of the key elements of the methodology of the Benchmark;
- would have a potentially significant impact on the users of the benchmark, e.g., high turnover;
- would significantly impact the key ESG factors that are reflected in the index methodology.

Methodology updates that are not deemed as material change include minor adjustments to inclusion and/or exclusion criteria, parameter updates or other minor edits which do not lead to any of the aforementioned consequences that are affiliated with a material change.

5.2 Market consultation

In case of a material change, a market consultation will be part of the procedure in case of multiple Users of the benchmarks. Such market consultation, which includes the scope and rationale for the change or cessation, allows Robeco to get familiar with essential feedback from Benchmark users, while it also provides transparency.

The timeframe and duration of the consultation period will be determined by Robeco. The minimum time frame for the consultation period is at least 5 business days and must be concluded at least 2 weeks before the effective date of the change or cessation.

A summary of comments by the Users, external stakeholders and Robeco's response will be made accessible to all stakeholders after the consultation period, except where the commenter requested confidentiality.

5.3 Change & cessation procedure

Any proposed change to a Benchmark or proposed cessation of a Benchmark shall be submitted to the control functions of Robeco (amongst which in each case Compliance and Risk Management) for review on appropriateness and impact, and approval.

Following the review and approval by the control functions of Robeco, the proposed change or cessation, including whether a consultation will take place, will be submitted to the Board of Directors for approval.

Robeco's Oversight Committee has the responsibility of overseeing any changes to and/or cessation of a Benchmark. For each proposed change, the Oversight Committee has the ability to provide feedback on such changes.

Robeco shall announce the change or cessation of the Benchmark on the website of Robeco and/or via e-mail well in advance to the Users and at least 2 weeks before the effective date of the change or cessation. As per the effective date, Robeco will implement the change and adjust the applicable documentation (i.e. the benchmark statement and key elements of the methodology, which are published on the Robeco website).

Upon specific approval of the Board of Directors, a change in the methodology of a Benchmark may be implemented with a shorter notice and/or consultation period, e.g., in the event that urgent action is required, for example but without limitation, where the representativeness of the Benchmark and its appropriateness for its intended use are at risk.

5.4 Cessation of a benchmark

In case Robeco decides to terminate provision of a Benchmark, users will be informed as soon as possible of the cessation via an announcement on the website of Robeco and/or via e-mail. The process of the cessation and the expected timelines for the termination of the Benchmark will also be communicated in this announcement. Further, Robeco shall propose an appropriate alternative if such is available within the Robeco index range.

Disclaimer

This document has been carefully prepared by Robeco Indices B.V. (Robeco). The information contained in this publication is based upon sources of information believed to be reliable. Robeco is not answerable for the accuracy or completeness of the information referred to therein. Whilst every care has been taken in the preparation of this document, we do not accept any responsibility for damage of any kind resulting from incorrect or incomplete information. This document is subject to change without notice.

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Appendix I: ESG methodology statement

Introduction

Regulation (EU) 2016/1011 requires benchmark administrators to explain how environmental, social and governance factors ('ESG') are reflected in the benchmark methodology.

ESG factors as reflected in the key elements of the benchmark methodology

Item 1	Name of the benchmark administrator	Robeco Indices B.V.
Item 2	Type of benchmark or family of benchmarks	Equity
Item 3	Name of the benchmark or family of benchmarks	Robeco SDG Low Carbon Equities Indices
Item 4	Does the benchmark methodology for the benchmark or family of benchmarks take into account ESG factors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Item 5	Reflection of ESG factors in benchmark methodology of the family of benchmarks	
	a) List of combined ESG factors:	<ul style="list-style-type: none"> Exclusions based on a company's contribution towards the UN Sustainable Development Goals. All stocks with a negative SDG scores are excluded from the universe. Weighting based on the index construction algorithm that tilts the index towards stocks that positively contributes towards the UN Sustainable Development Goals, while keeping turnover low.
	b) List of environmental factors:	<ul style="list-style-type: none"> Reduction of the index carbon footprint relative to the universe. The carbon footprint of company is measured by normalizing the greenhouse gas (GHG) emissions, Scope 1, 2 and 3 upstream, by Enterprise Value Including Cash (EVIC). A restriction is included that the index carbon footprint is 50% lower than the universe. Overweighing of stocks that are considered to be a transition leader. To classify as transition leader, a stock must have a combined positive SDG score on SDG 7 'Affordable and Clean Energy' and SDG 13 'Climate Action'. A restriction is in place that the index' average combined SDG score on SDG 7 & 13 is higher than the universe. Underweighting of stocks that are considered to be more susceptible to climate risk, based on the Climate Beta of a company. A restriction is in place that the average Climate Beta of the index is lower than the universe.
	c) List of social factors	<ul style="list-style-type: none"> N/A
	d) List of governance factors:	<ul style="list-style-type: none"> N/A
Item 6	Reflection of ESG factors in benchmark methodology of each benchmark:	<ul style="list-style-type: none"> See item 5, ESG factors are reflected in the methodology in the same way for all members of this benchmark family.
Item 7	Data and standards used:	
	a) Data input:	<ul style="list-style-type: none"> <u>SDG scores</u>: Sourced from Robeco Institutional Asset Management (Robeco) <u>Emissions Data</u>: Sourced from Trucost Environmental Data. <u>Climate Beta</u>: Proprietary research data of Robeco Indices B.V.
	b) Verification and quality of data:	<ul style="list-style-type: none"> <u>SDG scores</u>: The Robeco's SDG Committee is responsible for maintaining, updating, and improving Robeco's SDG framework. This involves overseeing the continuous development of the KPIs and thresholds, ensuring that the systems and processes through which the SDG assessment are undertaken are of the highest quality, assessing proposed amendments to the framework, and ensuring high quality governance. A data owner is responsible for oversight of content, methodology, process controls and, ultimately, quality. <u>Emissions Data</u>: Robeco scrutinizes the data quality of each external provider during due diligence assessments. At the initial stage, this involves activities such as reviewing the data model, including choice

	of identifier, inclusion of units where relevant and so on. As we proceed through the process, we perform deep-dive statistical checks to identify outliers patterns or other distortion in the data.
	<ul style="list-style-type: none">• <u>Climate Beta</u>: Calibration and verification of the proprietary research data is subject to the internal control framework of Robeco Indices B.V.
c) Reference standards:	<ul style="list-style-type: none">• <u>SDG scores</u>: N/A• <u>Emissions Data</u> : N/A• <u>Climate Beta</u>: N/A
Date on which information has been last updated and reason for the update:	September 2025, index methodology update