

This document provides you with information about this Sub-Fund in relation to the Sustainable Finance Disclosure Regulation. It is not marketing material. The information is required by law to help you understand the sustainability characteristics and/or objectives and risks of this Sub-Fund. You are advised to read it in conjunction with other relevant documentation on this Sub-Fund so you can make an informed decision about whether to invest.

## Summary Sustainability-Related Disclosure

### Momentum GF Global Sustainable Equity Fund

*This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment. The Sub-Fund appoints Robeco Institutional Asset Management B.V. ("Robeco") as a Sub-Investment Manager and as such many of Robeco's processes are followed as described throughout this document.*

#### The Sub-Fund has the following E/S characteristics:

- The Sub-fund promotes good governance and sustainable corporate practices through proxy voting, which contributes to long-term shareholder value creation. This includes taking an active stance on social and environmental topics through Robeco's proxy voting policy.
- The Sub-Fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that the Sub-Fund believes are detrimental to society and incompatible with sustainable investment strategies.
- The Sub-Fund promotes having a 20% lower environmental footprint than the general market index.
- The Sub-Fund promotes adherence to and conducting business activities in accordance with the United Nations Universal Declaration of Human Rights, the International Labor Organization's (ILO) labor standards, the United Nations Guiding Principles for Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC) and the OECD Guidelines for Multinational Enterprises, by scrutinizing companies that violate these principles.
- The Sub-Fund promotes having a weighted average ESG score that is at least 10% better than that of the general market index.
- The Sub-Fund promotes investment in a portfolio that avoids significant harm to the Sustainable Development Goals (SDGs).

There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund. The ESG characteristics of the Sub-Fund are compared against general market indices.

#### Investment Strategy

The Sub-Fund aims for an improved environmental footprint and a better sustainability profile compared to the Benchmark by integrating ESG (i.e., Environmental, Social and corporate Governance) factors. The Sub-Fund is actively managed and invests in stocks of companies in developed markets. The selection of these stocks is based on a quantitative model.

The strategy integrates sustainability indicators on a continuous basis as part of the stock selection process. Amongst others, the Sub-Fund applies norms-based and activity-based exclusions, Robeco's good governance policy and considers Principal Adverse Impacts in the investment process.

### **Planned asset allocation**

The Sub-Fund plans to make a minimum amount of 60% sustainable investments. All investments are aligned with the E/S characteristics, except for investments in the category “other” which are mostly cash and cash equivalents.

### **Monitoring and due diligence**

The Sub-Fund has incorporated the sustainability aspects of the investment strategies by largely utilising Robeco’s investment due diligence processes and procedures for the selection and monitoring of investments. Robeco’s portfolio managers and analysts are primarily responsible for conducting investment due diligence on their strategies on a daily basis. They are supported by independent monitoring, performed by Robeco’s Financial Risk Management and Investment Restrictions departments.

Oversight and independent verification of the investment strategy results are performed by Momentum Global Investment Management Ltd (the Investment Manager).

### **Data sources, methodologies, and limitations**

The Sub-Fund uses several sources for gathering sustainability data. The data quality of each provider is reviewed during due diligence assessments, that includes reviewing the data model, performing statistical checks, and evaluating coverage. Data processing takes places in different forms, the preference is always to have data acquisition as automated as possible to avoid any operational risks or unnecessary human intervention. For some social and environmental characteristics, the Sub-Fund relies on externally sourced content and aims to select the best of breed vendor for each of its target characteristics. The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, we struggle to find adequate information on the principal adverse indicators. To overcome this issue, the Sub-Fund uses multiple data providers, since each has its own respective strengths and weaknesses.

### **Engagement strategy**

The holdings of the Sub-Fund are subject to the selection process of Robeco’s value engagement program, that consists of a constructive dialogue between investors and investee companies to discuss how they manage ESG risks and opportunities, as well as stakeholder impact. Although this type of engagement is not directly related to the environmental or social investment strategy of the Sub-Fund, it can be that adverse sustainability impacts are addressed via the value engagement program.

## Sustainability-related disclosure

### Momentum GF Global Sustainable Equity Fund

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#### (b) No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment. . The Sub-Fund appoints Robeco Institutional Asset Management B.V. (“Robeco”) as a Sub-Investment Manager and as such many of Robeco’s processes are followed as described throughout this document.

Where fund aims to make one or more sustainable investments explain how the indicators for adverse impacts in Table 1 of Annex I, and any relevant indicators in Tables 2 and 3 of that Annex I, are taken into account?

The Sub-Fund considers PAI indicators in relation to the sustainable investments, as referred to in Annex I of the SFDR Delegated Act.

Pre-investment, the following principal adverse impacts on sustainability factors are considered:

- Via the applied normative and activity-based exclusions, the following PAIs are considered:
  - Exposure to companies active in the fossil fuel sector (PAI 4, Table 1)
  - Violations of the UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10, Table 1)
  - Activities negatively affecting biodiversity-sensitive areas (PAI 7, Table 1). The consideration of this PAI is currently restricted to applying exclusions to palm oil producing companies and for any breaches to the UNGC, UNGP and OECD Guidelines for Multinational Enterprises in relation to biodiversity.
  - Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons (PAI 14, Table 1)
- Via the environmental footprint performance targets of the Sub-Fund, the following PAIs are considered:
  - Carbon footprint (PAI 2, Table 1)
  - Water and waste indicators (PAI 7-9, Table 1). Robeco will use on water and waste footprint until data quality and coverage of the PAIs will improve.

Post-investment, the following principal adverse impacts on sustainability factors are taken into account:

- Via the application of the voting policy, the following PAIs are considered:
  - All indicators related to GHG emissions (PAI 1-6, Table 1)
  - Indicators related to social and employee matters (PAI 10-13, Table 1; PAI 5-8, Table 3)
- Via Robeco’s entity engagement program, the following PAIs are considered:
  - All indicators related to Climate and other environment-related indicators (PAI 1-9, Table 1)
  - Violations of the UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10, Table 1)

- In addition, based on a yearly review of Robeco's performance on all mandatory and selected voluntary indicators, holdings of the Sub-Fund that cause adverse impact might be selected for engagement.

More information on how the Sub-Fund considered its PAI Indicators may be found in the periodic reporting of the Fund.

Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights?

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights via both Robeco's Exclusion Policy and Robeco's SDG Framework.

### **(c) Environmental or social characteristics of the financial product**

What are the environmental or social characteristics that the financial products promotes?

- The Sub-fund promotes good governance and sustainable corporate practices through proxy voting, which contributes to long-term shareholder value creation. This includes taking an active stance on social and environmental topics through Robeco's proxy voting policy.
- The Sub-Fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that the Sub-Fund believes are detrimental to society and incompatible with sustainable investment strategies.
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- The Sub-Fund promotes having a weighted average ESG score that is at least 10% better than that of the general market index.
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There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund. The ESG characteristics of the Sub-Fund are compared against general market indices.

### **(d) Investment strategy**

What is the investment strategy used to meet the environmental or social characteristics promoted by the financial product?

The Sub-Fund aims for an improved environmental footprint and a better sustainability profile compared to the Benchmark by integrating ESG (i.e. Environmental, Social and corporate Governance) factors. The Sub-Fund is actively managed and invests in stocks of companies in developed markets. The selection of these stocks is based on a quantitative model.

The strategy integrates sustainability indicators on a continuous basis as part of the stock selection process. Amongst others, the Fund applies norms-based and activity-based exclusions, Robeco's good governance policy and considers Principal Adverse Impacts in the investment process.

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

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

#### **(e) Proportion of investments**

Minimum Sustainable Investment: 60%

At least 90% of the investments are aligned with the E/S characteristics of the Sub-Fund. The Sub-Fund plans to make a minimum of 60% sustainable investments, measured by positive scores in Robeco's SDG Framework.

The remaining investments, estimated between 0-10%, are mostly in cash, cash equivalents or derivatives. The planned asset allocation is monitored continuously and evaluated on a yearly basis.

#### **(f) Monitoring of environmental or social characteristics**

How are the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product monitored throughout the lifecycle of the financial product and what are the related internal or external control mechanisms?

- Robeco reviews its proxy voting policy on an annual basis, including voting principles in relation to ESG topics. Changes to the policy are presented to its Sustainability and Impact Strategy Committee. Voting behavior on ESG topics are monitored. On an annual basis the implementation of the voting policy is tested as part of Robeco's ISAE framework.
- Robeco monitors the environmental footprint (Carbon, Water, and Waste Footprint) of the portfolio versus the reference index on a daily basis and facilitates pre-trade compliance.
- All exclusions are coded in Robeco's Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
- All exclusions in relation to Controversial behavior are coded in Robeco's Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
- Robeco monitors all SDG scores.
- Robeco monitors the weighted average ESG score of the portfolio versus the reference index on a daily basis.

#### **(g) Methodologies**

What are the methodologies to measure how the social or environmental characteristics promoted by the financial product are met?

Robeco maintains comprehensive methodology documents of its proprietary analytical frameworks on its website. These whitepapers go into greater depth, provide further insight into data sources and processes applied within their respective domains. More information in relation to these methodologies can be found at <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

In addition, for some social and environmental characteristics, the Sub-Fund relies on externally sourced content. Each vendor will have its own approach and set of internal processes. More information with regards to these methodologies can be found at <https://www.robeco.com/docm/docu-robecosfdr-data-disclosures.pdf>.

#### **(h) Data sources and processing**

- How are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?
- What measures are taken to ensure data quality?
- How is data processed?
- What is the proportion of data that are estimated?

The Fund uses the following data sources:

1. The proxy voting process uses data derived from internal processes, aided by content from Glass Lewis and ISS.
2. The Fund's environmental footprint is calculated based on Trucost environmental data.
3. The exclusion process uses several data sources such as Sustainalytics, RSPO (Roundtable on Sustainable Palm Oil), World Bank, and Freedom House, Fund for Peace and International Sanctions.
4. The controversial behavior process uses data derived from Sustainalytics and the internal process.
5. The SDG Framework uses data derived from the internal process.
6. The Fund's ESG scores are based on Sustainalytics data.

Robeco scrutinises the data quality of each provider during due diligence assessments, that includes reviewing the data model, performing statistical checks and evaluating coverage. Data processing takes places in different forms, the preference is always to have data acquisition as automated as possible to avoid any operational risks or unnecessary human intervention.

Evaluating the proportion of vendor sourced data that is estimated remains a challenge due to insufficient metadata. More information in relation to data quality and processing can be found in the SFDR data disclosures available at <https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

#### (i) Limitations to methodologies and data

What are potential limitations to the methodologies or data sources and how do such limitations not affect how the environmental or social characteristics promoted by the financial product are met?

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

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

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

#### (j) Due diligence

What due diligence is carried out on the underlying assets of the financial product (including the internal and external controls)?

Robeco has incorporated the sustainability aspects of the investment strategies into adequate investment due diligence processes and procedures for the selection and monitoring of investments, amongst others taking into account risk appetite and sustainability risk management policies.

Specific details on investment due diligence are available in Robeco's Investment Due Diligence Policy as described at <https://www.robeco.com/docm/docu-robeco-sustainability-risk-policy.pdf>.

#### (k) Engagement policies

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

The holdings of the fund are subject to the selection process of Robeco's value engagement program, that consists of a constructive dialogue between investors and investee companies to discuss how they manage ESG risks and opportunities, as well as stakeholder impact. Although this type of engagement is not directly related to the environmental or social investment strategy of the fund, it can be that adverse sustainability impacts are addressed via the value engagement program.

More information can be found in Robeco's Stewardship Policy. <https://www.robeco.com/docm/docu-robeco-stewardship-policy.pdf>

**(I) Designated reference benchmark**

Has an index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product? If yes, how that index is aligned with the environmental or social characteristics promoted by the financial product, and where can one find information with regards to input data, methodologies used to select those data, the rebalancing methodologies and index calculations?

There is no reference benchmark designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.