

**Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:**  
ABN AMRO Funds Portfolio High quality Impact Bonds

**Legal entity identifier:**  
549300GBNQDBDYPB9S98

## Sustainable investment objective

### Does this financial product have a sustainable investment objective?

● ● ✕ Yes

It will make a minimum of **sustainable investments with an environmental objective: 40%**

- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective: 30%**

● ● □ No

It promotes **Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_% of sustainable investments

- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



### What is the sustainable investment objective of this financial product?

*ABN AMRO Funds Portfolio High Quality Impact Bonds ("the Sub-Fund") follows a multi-thematic sustainable investment strategy. The portfolio will be composed of companies exposed to the UN Sustainable Developments Goals (SDGs) and considering the SDG Solutions Assessment (SDGA) methodology of the external data provider ISS. As part of its sustainable investment objective, the Sub-Fund invests in companies contributing positively to environmental and social solutions. To define the sustainable investment universe, a "pass-fail" approach is used using a set of criteria. The DNSH principle is always applied on the entire investment universe.*

*No reference benchmark has been designated for the purpose of attaining the sustainable objectives followed by the Sub-Fund.*

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

● ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

*The analysis of certain sustainability indicators is systematically integrated into the investment decision making process. The attainment of the sustainable investment objectives is assessed by investing in securities financing economic activities that substantially contribute to the environmental and/or social objectives mentioned above. To define the sustainable investment universe, a “pass-fail” approach is used using a set of criteria. No other criteria than the one mentioned below are used to define the sustainable investment nature of an investment. The DNSH principle is always applied on the entire investment universe. To be eligible to the investment universe, issuers must meet at least one of the criteria mentioned below:*

- *Having net positive aggregated social solutions score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an issuer’s product portfolio on the achievement of social objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on social objectives. The SDGS is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*
- *Having net positive aggregated environmental solutions score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an issuer’s product portfolio on the achievement of Environmental objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on Environmental objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*
- *Having a net positive aggregated overall SDG. This criterion assesses the overall, aggregated impact of an issuer’s product portfolio on the achievement of sustainability objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objective scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on sustainability objectives. The SDG Solution Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*
- *Exposure to Green, Social, Sustainability or SDG bonds and related debts instruments*
- *Exposure to companies that do not meet the above criteria, but for which there is a trajectory of engagement with the company that could lead to meeting one or more of these criteria.*

● ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

*The "Do No Significant Harm" (DNSH) principle is compiled by taking into account adverse impacts indicators listed in the Delegated Regulation (EU) 2022/1288 of 6 April 2022. The Sub-Fund takes into consideration all the adverse impact indicators listed in Table 1 of Annex 1 that are applicable to investee companies, sovereigns and supranationals.*

*In addition, the Sub-Fund takes into consideration PAI No. 4 in Table 2 of Annex 2, applicable to investee companies, relating to investments in companies without carbon reduction initiatives. The Sub-Fund also takes into consideration PAI No. 15 of Table 3 of*

*Annex 1, applicable to investee companies, relating to the lack of anti-corruption and anti-bribery policies. The Sub-Fund takes into account PAI No.17 in Table 2, applicable to sovereigns and supranationals, relating to “Share of bonds not issued under Union legislation on environmentally sustainable bonds”. The Sub-Fund also takes into consideration PAI No.20 of Table 3, applicable to sovereigns and supranationals, relating to investments “Average human rights performance”.*

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*The Sub-Fund considers and mitigates adverse impacts of its investments on society and environment through a combination of portfolio management decisions, engagement, and the exclusion of issuers associated with controversial conduct or activities.*

*On the corporate side:*

*With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund takes into account the following principal adverse impacts (PAI) in portfolio management decisions and engagement activities:*

- *GHG emissions, biodiversity, water and waste indicators (i.e. PAI 1 to PAI 9)*
- *the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (i.e PAI 11)*
- *unadjusted gender pay gap (i.e. PAI 12)*
- *board diversity (i.e. PAI 13)*

*The further PAI are taken into account as per the Sub-Fund’s exclusion list:*

- *The violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises indicator (i.e. PAI 10)*
- *the exposure to controversial weapons (i.e. PAI 14).*

*With respect to Table 2, the Sub-Fund considers the indicator “investing in companies without carbon emission reduction initiatives” (i.e. PAI 4) in portfolio management decisions and engagement activities.*

*With respect to Table 3, the Sub-Fund considers the indicator “lack of anti-corruption and anti-bribery policies” as part of the exclusions (i.e. PAI 15).*

*On the sovereign ans supranational side:*

*With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund strives to minimize one PAI by excluding countries under international sanctions due to social violations (i.e. PAI 16).*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*The Sub-Fund also strives to minimize part of the GHG intensity PAI (i.e. PAI 15) by excluding countries that have not signed the Paris Agreement.*

*With respect to Table 2, the Sub-Fund will strive to minimize the “Share of bonds not issued under Union legislation on environmentally sustainable bonds” (i.e. PAI 17).*

*With respect to Table 3, the Sub-Fund will strive to minimize “Average human rights performance” (i.e PAI 20).*

*Further information on principal adverse impacts will be provided in an annex to the Sub-Fund’s annual report.*

**How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

*The Sub-Fund's sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set forth in the 8 “fundamental” conventions identified in the International Labor Organization's Declaration on Fundamental Principles (covering subjects that were considered to be fundamental principles and rights at work, e.g. freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation) and Rights at Work and the International Bill of Human Rights. Alignment is ensured through exclusions.*



**Does this financial product consider principal adverse impacts on sustainability factors?**

- ✗ Yes, the Sub-Fund considers and mitigates adverse impacts of its investments on society and environment through a combination of portfolio management decisions, engagement, and exclusion of issuers associated with controversial conduct or activities.

*On the corporate side:*

*With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund takes into account the following principal adverse impacts (PAI) in portfolio management decisions and engagement activities:*

- GHG emissions, biodiversity, water and waste indicators (i.e. PAI 1 to PAI 9)
- the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (i.e PAI 11)
- unadjusted gender pay gap (i.e. PAI 12)
- board diversity (i.e. PAI 13)

*The further PAI are taken into account as per the Sub-Fund's exclusion list:*

- *The violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises indicator (i.e. PAI 10)*
- *the exposure to controversial weapons (i.e. PAI 14).*

*With respect to Table 2, the Sub-Fund considers the indicator "investing in companies without carbon emission reduction initiatives" (i.e. PAI 4) in portfolio management decisions and engagement activities.*

*With respect to Table 3, the Sub-Fund considers the indicator "lack of anti-corruption and anti-bribery policies" as part of the exclusions (i.e. PAI 15).*

*On the sovereign and supranational side:*

*With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund strives to minimize one PAI by excluding countries under international sanctions due to social violations (i.e. PAI 16).*

*The Sub-Fund also strives to minimize part of the GHG intensity PAI (i.e. PAI 15) by excluding countries that have not signed the Paris Agreement.*

*With respect to Table 2, the Sub-Fund will strive to minimize the "Share of bonds not issued under Union legislation on environmentally sustainable bonds" (i.e. PAI 17).*

*With respect to Table 3, the Sub-Fund will strive to minimize "Average human rights performance" (i.e PAI 20).*

*Further information on principal adverse impacts will be provided in an annex to the Sub-Fund's annual report.*

No



## **What investment strategy does this financial product follow?**

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

*The Sub-Fund will invest in Euro Investment Grade denominated (Sub)Sovereign, and Suprational bonds incorporating as well, corporate bonds to the portfolio. The selection process targeting impact solutions would give the preference to green/ social/ sustainability/SDG bonds. Nonetheless, the Sub-Fund aims to invest at least 50% of its securities in Green, social, sustainability or SDG Bonds that have been qualified as such by an external party. The 50% target is subject to the flow of upcoming emissions which pass the sustainability filters.*

*The Sub-Fund uses a combination of financial and non-financial indicators to identify securities. It aims to foster the growth of a sustainable global economy without compromising returns. The sustainability criteria are designed to identify companies with strong environmental and social thematic exposures and more globally, debts instruments financing projects that are in line with the sustainability indicators. The Sub-Fund is actively managed combining both quantitative and qualitative financial modelling and impact research. Investments will be made into companies and/or projects with growth driven by long term sustainable impact themes and with the intent to contribute to measurable*

*positive social, economic and environmental impact alongside financial returns. The Sub-Fund can invest in Companies, in Sovereign and in Supranational bonds.*

*Regarding corporate Investment : those are only aimed at companies that generate a net positive impact. These are companies with products or services that bring positive impact to the environment, climate and society. The process of selecting companies starts with applying quantitative screens on the global universe by using external ESG data providers. These screens consist of activity-based and norm-based exclusions, best-in-class ESG score (companies that are not scoring within the 50th percentile of each sector are not suitable for investing) and SDG' solutions impact score (overall SDG' negative scores are eliminated).*

*Regarding countries and public organisations investments : The analysis is carried out at the country level. The process of selecting countries starts with applying quantitative screens on the global universe of countries by using external ESG data providers. These screens consist of activity-based and norm-based exclusions, and ESG risk score threshold (High and severe ESG risk scores are not eligible).*

*Regarding Supranational investments : the Sub-Fund does not follow a best-in-class approach for Supranational entities as their existence is tied almost directly to impact objective of adding to the United Nations Sustainable Development goals. Nonetheless the Sub-Fund will verify that the entity objectives are in line with its sustainable objectives.*

*When investing in green, social, sustainability or SDG bonds, the Sub-Fund may not apply the above screening; Nonetheless, the Sub-Fund will make sure that the bond's use of proceeds is verified by a third-party and that the objective of the bond is in line with the objectives of the Sub-Fund.*

*After this initial quantitative screening, The last step consists of the qualitative assessment performed by the investment manager of the Sub-Fund. The portfolio manager will ascertain the positive impact the selected investment bring.*

● ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

*The binding elements of the investment strategy are:*

- *The Management Company's exclusions list as defined in the following table:*

Company Exclusions based on International Standards and Policies	Exclusion Criteria
Companies non-compliant with the UN Global Compact's Principles	No
Companies non-compliant with SFDR Sustainable Investments mandatory norms and conventions	No
Companies listed on ABN AMRO Investment Exclusion List (IEL)	No
Companies listed on AAIS Good Governance Blacklist	No
Company Exclusions based on Revenue Thresholds	
Adult Entertainment Production	>5%

Controversial Weapons direct ownership	No
Controversial Weapons indirect ownership Involvement	>10%
Military Contracting Weapons	>0%
Military Contracting Weapons related products and /or services	>5%
Small Arms	>0%
Fur and specialty leather production	>5%
Unconventional fossil fuels (Arctic oil & gas exploration, oil sands and shale energy extraction methods)	Combined Revenues >5%
Thermal Coal Extraction	>5%
Thermal Coal Power Generation	>10%
Cannabis (recreational purposes)	>5%
Gambling	>5%
Genetically Modified Organisms	>5%
Tobacco Producing Companies	>0%
Tobacco Products Related Products/Services	>5%
Tobacco Products Retail and/or Distribution	>50%
<b>Government Exclusions based on Norms and Policies</b>	
Countries listed on ABN AMRO Sanctions List	No
Ratification Treaty of the Non-Proliferation of nuclear weapons (NPT)	Yes
Ratification Paris Agreement	Yes
Ratification ILO Conventions 182 on the Worst Forms of Child Labour	Yes

*The table above is a non-exhaustive set of exclusions which may evolve over time (with no prior notice).*

- *Sustainable investment eligibility criteria (the below criteria may not be cumulative):*
- *Having net positive aggregated social solutions score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an issuer's product portfolio on the achievement of social objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on social objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*
- *Having net positive aggregated environmental solutions score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an*

*issuer's product portfolio on the achievement of Environmental objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on environmental objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*

- *Having a net positive aggregated overall SDG. This criterion assesses the overall, aggregated impact of an issuer's product portfolio on the achievement of sustainability objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objective scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on sustainability objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.*
- *Exposure to Green, Social, Sustainability or SDG bonds and related debts instruments*
- *Exposure to companies that do not meet the above criteria, but for which there is a trajectory of engagement with the company that could lead to meeting one or more of these criteria.*

#### ● **What is the policy to assess good governance practices of the investee companies?**

As part of its “Good Governance Policy”, the Management Company of the Sub-Fund determines if a company does not follow good governance practices. Companies that do not follow good governance practices are excluded from the initial investment universe of the Sub-Fund. The data source used for all below mentioned criteria and to define the pass/fail good governance test of the Management Company is Sustainalytics.

Note that the good governance requirements outlined in the SFDR regulation are only applicable to investments in corporates.

<b>SFDR Component</b>	<b>Indicator</b>	<b>Exclusion Criteria</b>	<b>Description</b>
Sound Management Structure	UN Global Compact - Principle 10	Watchlist and Non-Compliant status	Principle 10 of the UN Global Compact is related to anti-bribery and corruption and states businesses should work against corruption in all its forms, including extortion and bribery.
	Governance controversy assessment	High & Severe Levels (equivalent to levels 4/5 and 5/5)	As part of the controversy assessment, the following topics are included: accounting irregularities, bribery and corruption, anti-competitive practices, sanctions as well as board composition.
Employee Relations	UN Global Compact – Principles 3, 4, 5 and 6	Watchlist and Non-Compliant status	Principle 3, 4, 5 and 6 of the UN Global Compact are related to labour conditions. The principles state that businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

	<i>Social Controversy Assessment</i>	<i>High &amp; Severe Levels (equivalent to levels 4/5 and 5/5)</i>	<i>As part of the controversy assessment, the following topics are included: freedom of association, child/forced labour, health and safety, community relations, respect of human rights, labour standards, discrimination and harassment.</i>
<i>Tax Compliance</i>	<i>Governance Controversy Assessment</i>	<i>High &amp; Severe Levels (equivalent to levels 4/5 and 5/5)</i>	<i>As part of the controversy assessment, taxes avoidance and evasion are taken into consideration.</i>
<i>Remuneration of Staff</i>	<i>Governance Controversy Assessment</i>	<i>High &amp; Severe Levels (equivalent to levels 4/5 and 5/5)</i>	<i>As part of the controversy assessment, remuneration is taken into consideration</i>



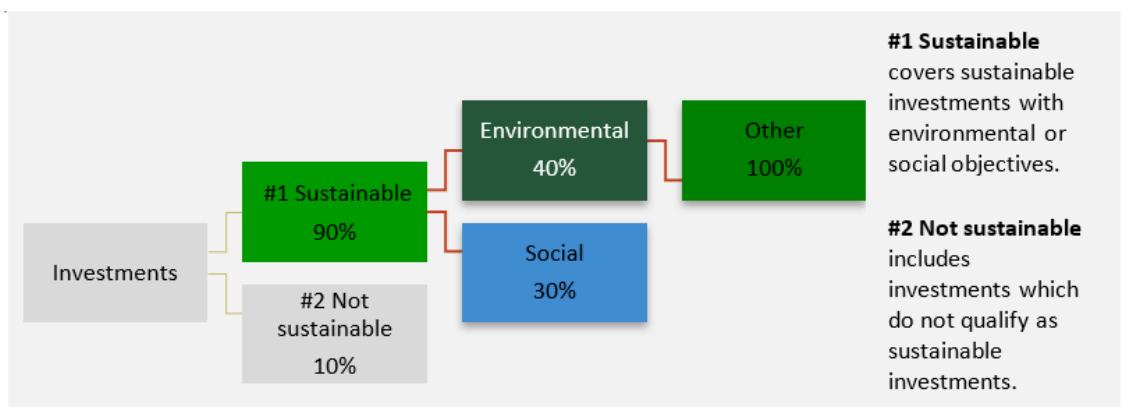
**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:  
 - **turnover** reflecting the share of revenue from green activities of investee companies  
 - **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.  
 - **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

## What is the asset allocation and the minimum share of sustainable investments?

The Sub-Fund invests at least 90% of its net assets in assets that have been determined as "eligible" as per the sustainable investment process in place, hence in investments that are defined as sustainable (#1 Sustainable). The proprietary sustainable analysis covers 100% of the "#1 Sustainable" investments. #1 Sustainable investments include a minimum of 40% assets with environmental objectives and 30% with social objectives. Investments with environmental objectives are made in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

Up to 10% of the investments are not aligned with these characteristics (#2 Not Sustainable). "#2 Not Sustainable" includes derivatives, bank deposits at sight, including cash held in current accounts with a bank accessible at any time. These are used for hedging purposes. The proportion and use of investments that are considered as not sustainable does not affect the delivery of the sustainable investment objective, as these investments are neutral to such objective. Besides, minimum environmental or social safeguards are only applied to the underlying investments when relevant. The nature of these assets does not undermine the sustainable objectives pursued by the Sub-Fund. A more detailed description of the specific asset allocation of this Sub-Fund can be found in the prospectus of this Sub-Fund.



### How does the use of derivatives attain the sustainable investment objective?

Not Applicable.

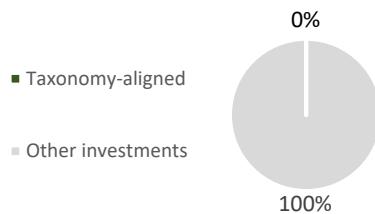


To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

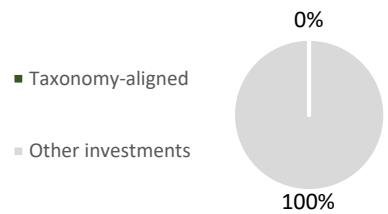
*The Sub-Fund's sustainable investments with an environmental objective are not aligned with the EU taxonomy (i.e. 0%) as the investments with an environmental objective are made in economic activities that do not qualify as environmentally sustainable under the EU taxonomy.*

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

*The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 100%. The Sub-Fund commits to make a minimum of 40% sustainable investments with an environmental objective not aligned with the EU Taxonomy.*



### What is the minimum share of sustainable investments with a social objective?

*The Sub-Fund commits to make a 30% minimum share of sustainable investments with a social objective.*



### What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

*"#2 Not sustainable" includes derivatives, bank deposits at sight, including cash held in current accounts with a bank accessible at any time. These are used for hedging and efficient management portfolio purposes. The proportion and use of investments that are considered as not sustainable does not affect the delivery of the sustainable investment objective, as these investments are neutral to such objective. Besides, minimum environmental or social safeguards are only applied to the underlying investments when relevant. The nature of these assets does not undermine the sustainable objectives pursued*

by the Sub-Fund. A more detailed description of the specific asset allocation of this Sub-Fund can be found in the prospectus of this Sub-Fund.



### Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No specific ESG-related index has been designated for this Sub-Fund.

**Reference benchmarks**  
are indexes to measure whether the financial product attains the sustainable investment objective.

- **How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?**  
*Not applicable*
- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**  
*Not applicable*
- **How does the designated index differ from a relevant broad market index?**  
*Not applicable*
- **Where can the methodology used for the calculation of the designated index be found?**  
*Not applicable*



### Where can I find more product specific information online?

More product-specific information can be found on the website:

- ABN AMRO Investment Solution's Sustainable Investment Policy:

<https://www.abnamroinvestmentsolutions.com/en/socially-responsible-investment-abn-amro-investment-solutions/sustainability-related-disclosures.html>

- Documents of the Sub-Fund:

<https://www.abnamroinvestmentsolutions.com/en/fund-range/fund-range.html>