

ABN AMRO Symbiotics Emerging Markets Impact Debt

Website Product Disclosure



Summary

ABN AMRO Symbiotics Emerging Markets Impact Debt (“the Sub-Fund”) is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund (“the Master Fund”) and as such the Sub-fund pursues the same sustainable investment objective of the Master Fund. Below is described the strategy of the Master Fund. The Sub-Fund is managed by ABN AMRO Investment Solutions (“the Management Company”).

The Master Fund pursues a double bottom line return, being both a sustainable fund as per article 9 of SFDR, and offering an attractive financial return by investing primarily in Emerging and Frontier Economies (“EFEs”) via debt instruments.

The Master Fund’s sustainable investment objectives aim to actively contribute to the achievement of the United Nations Sustainable Development Goals 2030 (“SDGs”) 1, 2, 5, 7, 8 and 11. The Master Fund may also target other SDGs in line with its Investment Philosophy.

In order to make a positive contribution to the above-mentioned SDGs, the Master Fund aims to invest principally in economic activities that (i) contribute to social and environmental objectives as per the Sustainable Investment Objective (SIO) of the Master Fund, (ii) do not significantly harm any other sustainable objectives and (iii) follow good governance practices.

To ensure that the Master Fund’s investments contribute to the targeted SDGs, its sustainable investments are first screened to ensure they do not cause significant harm to any environmental or social investment objectives through the use of an exclusion list and an ESG assessment aligned with the minimum safeguards defined by SFDR. The latter is a result of the analysis of the Investees’ impact on ESG Factors. Furthermore, the contribution of each investment to targeted SDGs is defined through an internal methodology. The SDG allocation of the investments is monitored to ensure consistency with the minimum share of sustainable investments and with the investment philosophy of the Master Fund. The sustainable performance of the Master Fund’s investments is periodically evaluated based on evolving sustainable performance standards. The main sustainability indicator used to measure the attainment of the SIO of the Master Fund is the share of investments allocated to each SDG. In addition, other non-financial indicators are used to measure the attainment of the SIO.

The Master Fund will report on the adverse impacts of its investments on sustainability factors through the Principal Adverse Impact (PAI) Indicators. Key topics underlying PAI indicators are assessed as part of the due diligence performed on target Investees. The ESG assessment considers, when possible, the exposure of the target Investee to the fossil fuel sector, to high impact climate sectors and to sectors likely to generate hazardous waste, among others, as well as related mitigation measures. It also aims at evaluating the Investee’s internal practices such as its management of human resources – including gender equality – and practices towards clients and communities.

All the data used to define the sustainability and the PAI indicators originates from Investees and is about the Investee itself or the end-beneficiaries of the investment. Indicators are based on actual data retrieval, except for GHG emissions. Data coverage range is expected to be between 80-100%. Data quality is ensured by a consistency check. The process of SDG allocation is audited internally and potential errors are documented and corrected. The collected data is then further cleaned and aggregated at portfolio level to ensure transparent reporting to stakeholders.

Data limitations can occur while the Investee is failing to provide information as data collection at end-borrower level can be cumbersome to setup or because the Investee cannot provide information leading to estimations with proxies when possible. When the latter is not possible, exposures to the related risks will be provided as complementary indicator, while not reporting on the quantification of the occurred risk.

For some investments, the External Investment Manager may engage with the Investee through Technical Assistance Programs and/or through Environmental & Social Action Plans, informally as part of the due diligences as well as indirectly through the use of exclusion lists and active participation in professional associations of Impact Investors.

The Sub-fund considers the DNSH principle based on the Master Fund methodology and data as explained below. The Master Fund's sustainable investments are first screened to ensure they do not cause significant harm to any Sustainable Investment Objectives (SIO). The evaluation of the risk of causing harm to environmental and social objectives is at the core investment process of the Master Fund. In its decision-making processes, the External Investment Manager uses:

- An **exclusion of any investment** that significantly harms any environmental and social investment objective via a pre-defined exclusion list applied whenever possible, depending on the type of Investees. Examples of excluded investments: production or trade in weapons, production or activities involving harmful or exploitative forms of forced labour and
- An **ESG assessment** (see details in section "Methodologies"), to select investments that are not likely to cause significant harm to any environmental or social objectives.

The specific Principal Adverse Impact (PAI) indicators, with their precise definition found in Table 1 and 2 of the Regulatory Technical Standards, are especially difficult to collect from non-EU Investees. However, the External Investment Manager ensures that the key topics underlying those PAI indicators are part of the assessment of target Investees.

The ESG assessment takes into consideration, when possible, the exposure of the target Investee to the fossil fuel sector, to high impact climate sectors and to sectors likely to generate hazardous waste, among others, as well as related mitigation measures. The ESG assessment also aims at evaluating, when possible, the internal practices of the Investee such as its management of human resources – including gender equality – and practices towards clients and communities.

To be able to report on the PAI indicators mentioned in Table 1 and 2 of the RTS, as well as a selection from Table 3 (Deforestation Policy and Grievance Mechanisms), despite the complications linked to its investment universe mentioned above, the External Investment Manager will use proxy calculations when necessary and possible, or report on complementary indicators and explanations on the limitations of the report. See section (i) "Limitations to methodologies and data" for more information. The External Investment Manager also coordinates with peers to align approaches with the goal to maximize the chances that the Investees will be able in the long term to provide relevant and comparable data.

The main ESG assessment methodology is partly based on the International Finance Corporation Performance Standards, which are normally broadly based on other international standards such as the United Nations (UN) Guiding Principles on Business and Human Rights, International Bill of Human Rights, International Labour Organization Standards, and Equator Principles. It is however not based on the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises as the Master Fund invests mostly in small to mid-size companies in emerging and frontier economies.

UN Guiding Principles on Business and Human Rights	Broadly considered and adapted to the Master Fund type of Investee.
OECD Guidelines for Multinational Enterprises and Key considerations for banks implementing the OECD Guidelines for Multinational Enterprises (“Key Considerations for Banks”)	<p>OECD Guidelines for Multinational Enterprises are not applicable as the Master Fund invests mostly in small to mid-size enterprises in emerging markets. Note that all transversal standards, such as human rights, employment, environment, bribery, consumer interests, competition and taxation, are broadly considered and adapted to the Investees. Science and technology fall out of scope.</p> <p>The <u>Key Considerations for Banks</u> are applicable to the Investees of the Master Fund that are microfinance institutions, banks and leasing companies, and savings and loans cooperatives.</p> <p>These 6 key considerations for banks are broadly covered by the methodology of the External Investment Manager:</p> <p>Measure 1: Embed responsible business conduct into policies and management systems</p> <p>Measure 2: Identify and assess actual and potential adverse impact</p> <p>Measure 3: Cease, prevent and mitigate adverse impacts</p> <p>Measure 4: Track implementation and results</p> <p>Measure 5: Communicate how impacts are addressed</p> <p>Measure 6: Provide for or cooperate in remediation when appropriate</p>



Sustainable investment objective of the financial product

ABN AMRO Symbiotics Emerging Markets Impact Debt (“the Sub-Fund”) is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund (“the Master Fund”) and as such the Sub-fund pursues the same sustainable investment objective of the Master Fund. Below is described the strategy of the Master Fund. The Sub-Fund is managed by ABN AMRO Investment Solutions (“the Management Company”).

The mission of the Master Fund is to invest in sustainable impact investments as currently illustrated by the United Nations Sustainable Development Goals (SDGs) 2030 adopted by all United Nations Member States in 2015, and aims to promote SDG 1, 2, 5, 7, 8 and 11. The Master Fund may also target other SDGs in line with its strategy. No assurance can be given that the objectives will be achieved.



Investment Strategy

Description of the strategy

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund and pursues the investment strategy of its Master Fund.

To meet the Sustainable Investment Objective of the Master Fund, the External Investment Manager verifies that each investment contributes to at least one of the SDGs targeted. At the pre-investment stage, at least one SDG

is assigned to each investment proposal, following a methodology designed by the External Investment Manager. The share of sustainable investments of the Master Fund that is allocated to each SDG is monitored to ensure consistency with the minimum share of sustainable investments, in line with the strategy of the Master Fund. The External Investment Manager will work on a best effort basis to achieve the SIOs. Nevertheless, no guarantee can be given that they will be achieved due to temporary lack of investment opportunities, corporate actions or external events.

Good governance

Due to the specificity of the universe (private debts, MSMEs), the good governance criteria (relying on external provider data) as defined in the exclusion policy of the Management company of the Master Fund are not applicable here. Therefore, the Master Fund will implement the Master good governance policy at investment level.

The Master Fund assesses the Good Governance Practices of Investees during the initial due diligence which is updated on a regular basis. Criteria used to assess the Investee's governance practices usually include supervisory management composition, structure, quality, independence, alignment with the company's mission, and compliance with AML/CFT rules. These criteria constantly evolve depending on the evolution of the regulations and business practices.

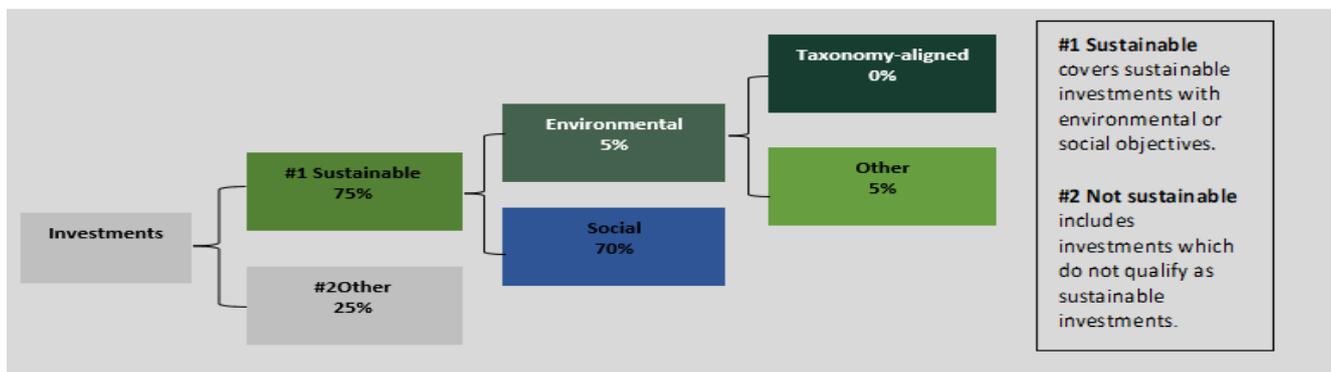


Proportion of investments

The Master Fund will make a minimum of 70% of sustainable investments with a social objective. The Master Fund will make a minimum of 5% of sustainable investments with an environmental objective.

Sustainable Investments with an environmental objective(s), will be in activities that in most cases do not qualify as environmentally sustainable under the Taxonomy Regulation to reach climate change mitigation and adaptation objectives in accordance with Article 9(a) and (b) of the Taxonomy Regulation. Indeed, the Master Fund invests in emerging markets where the technical standards required by the European regulation are not adapted, and whose market participants are not subject to reporting requirements against European Regulations. The Investees are nevertheless assessed in terms of environmental quality through a comprehensive assessment tool and/or, for green and sustainability bonds, through the ICMA Standards.

Up to 25% of the investments are not aligned with these characteristics (#2 Other) “#2 Not sustainable”, as defined by the Master Fund, includes cash, cash-equivalents, liquid instruments and hedging instruments and are located at Mater fund level. The assets that are not invested in “sustainable investments” are mainly cash that is not yet invested during ramp-up phases of the Master Fund and reflects the nature and pace of the investment decisions made by a fund investing in illiquid markets. Derivative financial instruments are used, when judged necessary, to ensure that the Master Fund extends financing in local currency to its Investees while reducing the foreign exchange currency risk for its shareholders. Providing financing in local currency is seen as part of the mission of the Sub-Fund to ensure that Investees can also extend local currency loans to their own borrowers and as such protect them from foreign exchange risk. This share of assets that is held in not sustainable investments does not affect the delivery of the Sustainable Investment Objective even if it does not directly contribute to its achievement.



Monitoring of the sustainable investment objective

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund. The monitoring of sustainable investment objective is carried out by the External Investment Manager at Master Fund level.

The sustainable performance of the Master Fund's investments in Investees is annually monitored and reported based on evolving social performance standards. Data is directly provided by the Investees and monitoring is internally done at different levels of the investment value chain. On top of the share of investments allocated to each of the targeted SDGs, some of the key non-financial indicators used by the Master Fund to measure the attainment of its Sustainable Investment Objective include:

SDG	Sustainability Indicator
SDG 1	Number of end borrowers reached with micro loans.
SDG 2	Number of end borrowers reached with a loan for agricultural activity.
SDG 5	Number of women end borrowers reached.
SDG 7	Number of end borrowers reached with renewable energy supply loans.
SDG 8	Number of end borrowers reached with MSME loans.
SDG 11	Number of end borrowers reached with housing loans.



Methodologies

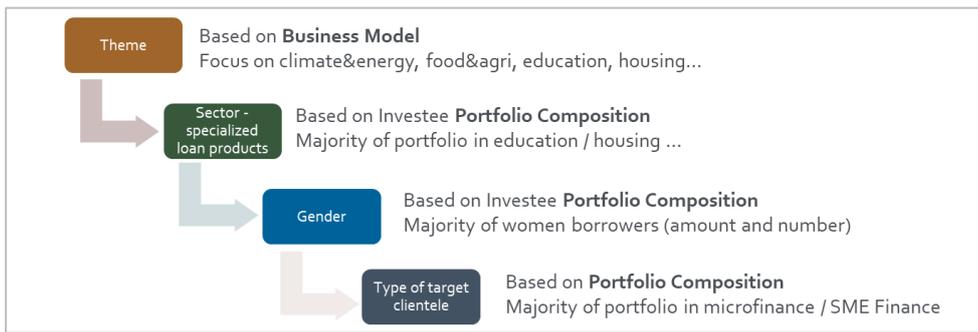
The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund. Methodology that applies is that of the External Investment Manager.

1. SDG Allocation Methodology

The External Investment Manager designed an SDG allocation methodology to define whether an investment is contributing to reach the SIOs of the Master Fund. It describes how each deal can contribute to the SDGs and the rules applied to select them.

The list of SDGs that investments can contribute to is broader than the main SIOs of the Master Fund, while being in line with the investment strategy of the Master Fund.

This illustration sums up the above-mentioned determination rules:



2. ESG Assessment

An ESG assessment is conducted for each target Investee before an investment is made, that evaluates the Investee's exposure to E&S risks and its practices towards such risks. It evaluates Investees on their direct and indirect ESG footprint, where the indirect impact can be Investee's borrowers, clients or suppliers.

The ESG assessment focuses on the assessment of the Investee's risk of doing harm:

- (i) The measurement of the exposure to ESG risks:
 - E: risk of doing harm to the environment (ecosystems, air, water, land, biodiversity, etc.)
 - S: risk of doing harm to people (employees, clients, communities)
 - G: risk of doing harm due to governance weaknesses (such as non-transparency, lack of commitment to Investee's values, weak internal controls, etc.)

Assessed risks include risk of fraud, corruption, occupational injury, over-indebtedness of end-beneficiaries, or causing environmental damage, among others.

- (ii) The assessment of the management of ESG risks: policies, practices and E&S risk management procedures in place to efficiently mitigate E&S risks.

Each potential investee's ESG assessment determines its risk level, on a scale ranging from γ (extreme risk) to $\alpha\alpha$ (negligible ESG risk).

The Investee ESG assessment is included in the information package reviewed by the Investment Committees and is taken into account in the investment decision making.

Any changes to the Investee's ESG practices are monitored periodically and assessed with the Investees in case of material deviation compared to the previous assessment. If the Investee is no longer aligned with an acceptable ESG risk level, the External Investment Manager does not renew its investment beyond the current outstanding one or may decide to terminate the relationship with the Investee.

Third parties or third-party originators currently propose a minority of the target Investees, often through syndications. For those deals, an analysis of their ESG-related methodologies is undertaken to ensure their alignment with the External Investment Manager's standards.



Data sources and processing

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund. Data sources used and data processing that apply are that of the External Investment Manager.

Data flow within the fund	Description
Data sources	Directly via Investees, particularly via field visits and annual monitoring surveys.
Data quality	Data quality is ensured by a consistency check realized when these are received. For SDG Contribution, the allocation process is also verified and potential errors historized, documented and corrected.
Data processing	Collected data is then further cleaned and aggregated at portfolio level to ensure transparent reporting to stakeholders.
Data estimation	KPIs are based on actual data retrieval except for GHG emissions and share of non-renewable energy which are estimated thanks to a proxy calculation (see below). Data coverage is expected to range between 80-100%.



Limitations to methodologies and data

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund. Data and methodologies used are that of the External Investment Manager.

Any limitation to methodologies are mentioned in their respective descriptions. Data limitations can occur while the Investee is failing to provide the requested indicators, because collection at end-borrowers level can be cumbersome to setup. A few Principal Adverse Impact indicators will, in this respect, be calculated through the use of proxy data only, as Investees are not able to provide them. It is the case for GHG emissions and share of non-renewable energy. For a few other PAI Indicators, the External Investment Manager will provide complementary indicators and explanations as it did not find any option to provide reliable and quality data. For those, only exposure to the related risks will be provided as complementary indicators, while not reporting on the quantification of the occurred risk: energy consumption intensity per high impact climate sector, activities negatively affecting biodiversity-sensitive areas, emissions to water, hazardous waste ratio.



Due diligence

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund.

Due Diligences at the Master Fund's investments level are carried out by the External Investment Manager as described below:

Target Investee assessment is done through a due diligence process undertaken with sufficient knowledge of global, regional and local markets and laws. Analysis is based on interviews with key personnel, review of core documentation (policies and procedures), field visits when possible and observation of business practices. The analysis of ESG Factors is an integral part of the due diligence, both from an impact and risk perspective. A second level of review of the assessment and periodic monitoring is performed independently. This process ensures that assessment methodologies are properly and consistently applied across all markets of investment.

Nonetheless, the Management Company carries out due diligences for the selection and monitoring of externally managed strategies. The Management Due Diligence (MDD) is actively carrying out due diligences on the underlying assets of the Master Fund. More globally, the MDD team identifies and selects high quality external investment strategies and monitors the universe of approved strategies. The MDD analyst team focuses on all investment and sustainability-related elements of an investment strategy, such as organization, team, investment, portfolio construction, process, track record, etc. MDD's research reports include a thorough sustainability due diligence and a separate sustainability rating. For all strategies, MDD analysts assess the External Portfolio Managers and the strategies commitment to and transparency on sustainable investing. They also assess to what extent, and at what stages, ESG criteria are integrated into the investment strategies and

effectively taken into account in the investment process and the portfolio. This analysis is carried out by means of a questionnaire sent via the Management Company's proprietary platform, Deeligenz, as well as during meetings with the professionals involved in the strategy (e.g. portfolio managers, financial analysts, ESG analysts, management team, etc.). The Management Company's in-depth analysis is based on a "5-P approach": Parent, People, Process, Portfolio and Performance. Each of the previously outlined aspects is evaluated and ultimately leads to a final rating of the strategy.

More specifically, in regard of this Sub-Fund, the MDD team reviews periodically the performance of the Master Fund to ensure that it remains aligned with the investment style of the portfolio. The MDD team has the transparency of the Master Fund and regularly asks the External Investment Manager for in-depth analysis of the Master Fund portfolio investments. The MDD analysts have quarterly meetings with the External Portfolio Manager of the Master Fund to discuss recent performance as well as recent transactions to monitor alignment with the initially selected investment and sustainability philosophy. To prepare for the meeting, MDD analysts send out a monitoring questionnaire using the management company's proprietary platform, Deeligenz, with questions related to the portfolio, performance, and sustainability. During the calls, the External Investment Manager of the Master Fund clarifies if there have been any changes in the team and processes. Analysts and External Investment Manager also discuss their recent engagements and milestones during the period. In addition, the MDD analysts monitor any significant events that may affect the external portfolio manager, e.g., with respect to their investments, financial and ESG analysts, investment process, capacity for engagement. Each change may affect the strategy's rating based on the 5-Ps, which may lead to a change in the strategy's ratings, including the sustainability rating.

Moreover, the ESG team may support the analysts team in reviewing the process and methodologies implemented by the External Investment Manager of the Master Fund when it comes to consider ESG issues. The ESG team will give a qualitative feedback during the selection phase as a second look and more globally, the opinion of the ESG team is sought in case a significant event could impact (positively or negatively) the External Investment Manager and the Master Fund sustainability score.



Engagement policies

The Sub-Fund is a feeder of the Master Fund Symbiotics Sicav II – ABN AMRO Impact Fund and as such, the sub-fund is mainly investing in its Master Fund. The External Investment Manager is responsible for the engagement actions.

The External Investment Manager can, for some of the investments, engage with Investees through Technical Assistance Programs proposed by the External Investment Manager's Association for Sustainable Development and/or through Environmental & Social Action Plans. Moreover, as part of the due diligences, informal engagement is done through the establishment of long-term relationship with the Investees, discussing strategic topics and proposing non-binding improvement suggestions.

In case of important deficiency and/or occurrence of any adverse sustainability impact noticed either during due diligence or at the monitoring stage, the information is relayed to the relevant teams internally and the decision (e.g., non-renewal of the investment) made adequately.

Indirect engagement is also done through the use of exclusion lists and through active participation in professional associations of Impact Investors such as the Investor Working Group of the Social Performance Task Force or the Global Impact Investing Network (GIIN) where it shares practices, results and performance with other market players to raise ethical and social standards.



Attainment of the sustainable investment objective

No specific ESG-related index has been designated for the Sub-Fund and for the Master Fund.