



AAF Comfort Invest III

Website Product Disclosure



Summary

No Sustainable Investment Objective

ABN AMRO Funds Comfort Invest III (the “Sub-Fund”), promotes environmental or social characteristics, but does not have as its objective sustainable investment.

Environmental/social characteristics

The analysis of ESG factors is systematically integrated into the investment decision making process of ABN AMRO Funds Comfort Invest III (the “Sub-Fund”). ABN AMRO Investment Solutions (the “Management Company”) defines ESG integration as the process of recognising the financial materiality (or significance) of environmental, social and corporate governance factors as part of the investment process.

The Sub-Fund invests in direct investments or indirect investments through internal/delegated strategies that promote environmental (climate risks) and social (human rights) characteristics by taking into account the ESG criteria of the Management Company or in external funds offering a degree of ESG integration that the Management Company considers to be satisfactory.

External funds can promote environmental and/or social characteristics, but these characteristics may differ from one external fund to another, as well as from the characteristics taken into account in direct investments or indirect investments through internal/delegated strategies.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

Investment Strategy

The Sub-Fund invests in direct investments or indirect investments through internal/delegated strategies which take into account the ESG criteria of the Management Company or in external funds offering a degree of ESG integration that the Management Company considers to be satisfactory.

Regarding direct investments: the Management Company uses normative exclusion filters on controversial sectors in combination with ESG risk criteria. The ESG risk management approach involves a positive selection of issuers based on ESG risk ratings. The evaluation methodology and selection process may differ depending on the type of issuer.

Regarding investments via funds (internal/delegated, external) aligned with E/S characteristics: the Management Company will select funds that qualify as investment products in accordance with article 8(1) of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector, or funds which contribute to environmental and social objectives and qualifies as an investment product in accordance with article 9 of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector. Funds are selected in accordance with the Management Company's quality standards and are subject to a selection process.

Proportion of Investment

The Sub-Fund plans to invest at least 80% of its net assets in assets that have been determined as “eligible” as per the ESG process in place (hence in investments that are aligned with the promoted environmental and social characteristics. Consequently, up to 20% of the investments may not be aligned with these characteristics.

Monitoring of the Environmental/Social characteristics

The monitoring of environmental or social characteristics of the investment product is ensured through a dedicated control framework. The Management Company, through its Business Control & Oversight team, performs pre-trade controls based on the indicators and objective set in the precontractual document as well as periodic ex-post controls to ensure that the portfolio complies with the commitments made. If a “non-compliant matter” is detected by the Management Company, its Business Control & Oversight team will first analyse it and engage in dialogue with the External Investment Manager if necessary.

Data sources and processing

The Management Company monitors the attainment of the environmental and/or social characteristics of the funds under delegated management as well as external funds by using its own data providers. When the Management Company carries out direct management, the Management Company uses its own data providers to assess the attainment of the environmental and/or social characteristics of the Sub-Fund.

The Management Company uses three external data providers as its main sources:

- The Management Company assesses the environmental and/or social characteristics of the Sub-Fund's constituents using the external data provider Sustainalytics. The Management Company uses Sustainalytics for ESG risk scores, controversies, product involvement as well as alignment with global standards.
- The Management Company uses Morningstar to analyse the Sub-Fund's peer group, as well as for various ESG data calculations at portfolio level.
- The Management Company uses the data provider ISS for climate and impact data. The Management Company also uses ISS as a proxy voting solution.

Similar to the Management Company, external asset managers managing delegated sub-funds or open-ended investment funds have their own data providers and methodologies with respect to their data environment. They will be responsible for defining their own methodologies regarding data processing and ensuring data quality.

Due Diligence

The Management Company carries out due diligences for the selection of delegated strategies as well as for open-ended investment funds. The Management Due Diligence analysts team (MDD) identifies and selects high quality investment strategies and monitors the universe of approved strategies. The MDD team focuses on all investment and sustainability-related elements of an investment strategy. The Management Company's indepth 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. As part of the monitoring process, the MDD team periodically reviews the performance of the strategy to ensure that it remains aligned with the investment style of the portfolio. The ESG team supports the MDD team in reviewing the process and methodologies implemented by the external asset managers when considering ESG and sustainability issues. The ESG team provides qualitative feedback during the selection phase and supports the MDD team throughout its analysis process, using the "5-P approach" aforementioned. In addition, during the monitoring phase, the ESG team will monitor the Sub-Fund's characteristics and performance related to the environmental and/or social characteristics defined (including the review of underlying investments).



No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.



Environmental/social characteristics of the financial product

The analysis of ESG factors is systematically integrated into the investment decision making process of ABN AMRO Funds Comfort Invest III (the "Sub-Fund"). ABN AMRO Investment Solutions (the "Management Company") defines ESG integration as the process of recognising the financial materiality (or significance) of environmental, social and corporate governance factors as part of the investment process.

The Sub-Fund invests (i) in direct investments or indirect investments through internal/delegated strategies that promote environmental (climate risks) and social (human rights) characteristics by taking into account the ESG

criteria of the Management Company or (ii) in external funds offering a degree of ESG integration that the Management Company considers to be satisfactory.

External funds can promote environmental and/or social characteristics, but these characteristics may differ from one external fund to another, as well as from the characteristics taken into account in direct investments or indirect investments through internal/delegated strategies.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.



Investment Strategy

Description of the strategy

To select eligible securities, the Management Company performs both a financial and non-financial analysis, using ESG criteria in combination with exclusions filters.

The Sub-Fund invests in direct investments or indirect investments through internal/delegated strategies which take into account the ESG criteria of the Management Company or in external funds offering a degree of ESG integration that the Management Company considers to be satisfactory.

Regarding direct investments: the Management Company uses normative exclusion filters on controversial sectors in combination with ESG risk criteria. The ESG risk management approach involves a positive selection of issuers based on ESG risk ratings. The evaluation methodology and selection process may differ depending on the type of issuer.

Regarding investments via funds (internal/delegated, external) aligned with E/S characteristics: the Management Company will select funds that qualify as investment products in accordance with article 8(1) of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector, or funds which contribute to environmental and social objectives and qualifies as an investment product in accordance with article 9 of Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector. Funds are selected in accordance with the Management Company's quality standards and are subject to a selection process.

Good governance practices

The Sub-Fund incorporates good governance into its investment decision-making process, utilising both qualitative and quantitative assessments of governance practices.

For direct investments and indirect investments through internal/delegated strategies, the Management Company's good governance framework is employed to evaluate corporate governance, establishing criteria to identify companies that fail to meet good governance standards and exclude them from the initial investment universe. This framework aligns with widely recognized industry standards, covering aspects such as sound management structures, employee relations, remuneration of staff and tax compliance.

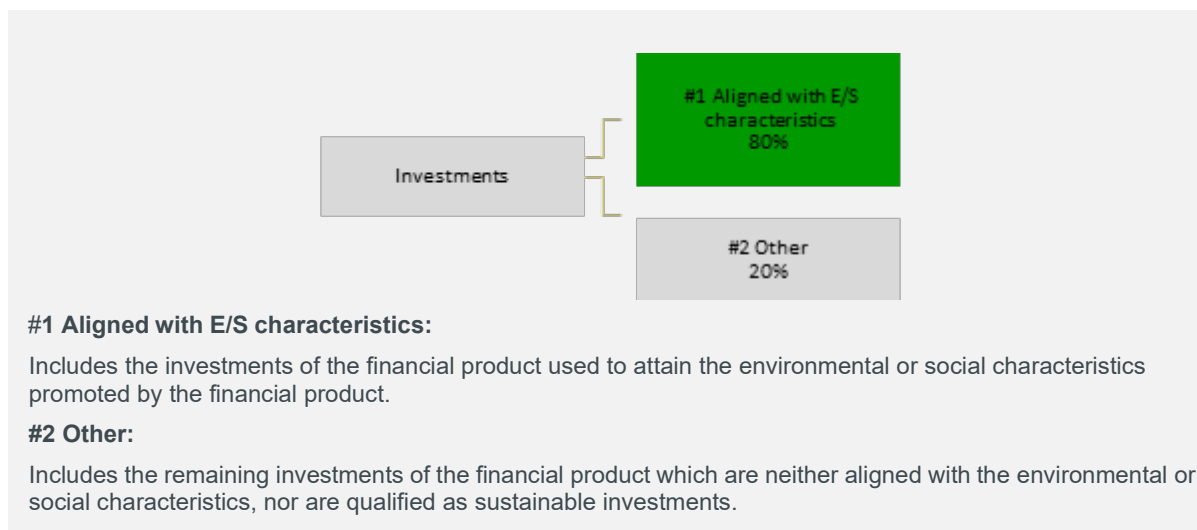
External funds aligned with E/S characteristics apply their own good governance policies, which may vary from those of the Management Company and from one external fund to another.



Proportion of investments

The Sub-Fund invests at least 80% of its net assets in assets that have been determined as "eligible" as per the ESG process in place (hence in investments that are aligned with the promoted environmental and social characteristics (#1 Aligned with E/S characteristics)).

Consequently, up to 20% of the investments may not be aligned with these characteristics (#2 Other).



Monitoring of environmental or social characteristics

The Management Company may (i) delegate part of the management of the sub-funds to a minimum of two External Investment Managers which are selected by the Management Company who will make investment decisions as part of the portfolio, (ii) invest in units or shares of open-ended investment funds which qualify as UCITS, and/or qualify as other undertakings for collective investment, and (iii) manage directly the sub-funds.

Depending on the nature of the three constituents mentioned above, the Management Company performs diverse controls to ensure that the Sub-Fund complies with the environmental and/or social commitment made.

1. Delegated Management of part of the Sub-Fund to External Investment Managers

When the Management Company delegates part of the management of the Sub-Fund to External Investment Managers, controls are performed at two levels. With respect to pre-trade controls, the External Investment Managers perform controls using their own frameworks as well as including the guidelines given by the Management Company. With respect to post-trade controls, these are performed at both the External Investment Managers' and the Management Company's level, each using its own frameworks.

In the event that a "non-compliant matter" is detected by the Management Company, its Business Control & Oversight team will first analyse it and engage in dialogue with the External Investment Manager if necessary. Depending on the nature of the non-compliance, the Management Company's ESG team may decide to monitor it using its proprietary "ESG Watchlist". If the non-compliance persists over time, an escalation process is put in place by the Management Company to ensure a timely remediation plan in the best interest of shareholders.

2. Investment in units or shares of open-ended investment funds

When the Management Company invests in units or shares of open-ended funds which qualify as UCITS, and/or qualify as other undertakings for collective investment, the environmental and/or social characteristics or the sustainable investment objective of these open-ended funds are defined by the asset managers managing these products. Hence, the asset managers are the accountable parties for both the pre-trade and the post-trade controls. The asset managers will use their own proprietary frameworks.

3. Direct Management of the sub-funds

When the Management Company is directly managing the sub-funds, the Management Company oversees all controls related to the achievement of the environmental and/or social characteristics. The Management Company's Business Control & Oversight team will therefore perform pre-trade and post-trade controls according to its proprietary frameworks. In the event that a "non-compliant matter" is detected by the Management Company, its Business Control & Oversight team will first analyse it and engage in dialogue with the portfolio managers and ESG team if necessary. If the non-compliance persists over time, an escalation process is put in place by the Management Company to ensure a timely remediation plan in the best interest of shareholders.



Methodologies

Regarding direct investments or indirect investments through internal/delegated strategies, the following sustainability indicators are used to measure the extent to which the environmental and/or social characteristics promoted by the Fund are being achieved:

On the corporate side:

- Absence of companies that do not meet the criteria defined in the Management Company's exclusion framework
- Assessment of the level of controversy
- Compliance with the UN Global Compact
- ESG risk ratings of companies
- Scope 1 and Scope 2 greenhouse gas emissions. Scope 1 emissions come from a company's internal operations, including on-site energy production, vehicle fleets, manufacturing operations and waste. Scope 2 emissions are indirect emissions generated by the production of energy used by the company

On the Sovereign side:

- Absence of countries that do not meet the criteria defined in the Management Company's exclusion framework
- Country ESG risk ratings

With regard to external funds aligned with E/S characteristics, there is no certainty that they will use the same sustainability indicators as the Management Company. Nevertheless, external funds must present a degree of ESG integration that the Management Company considers to be satisfactory.



Data sources and processing

The Management Company monitors the attainment of the environmental and/or social characteristics of the funds under delegated management as well as external funds by using its own data providers. When the Management Company carries out direct management, the Management Company uses its own data providers to assess the attainment of the environmental and/or social characteristics of the Sub-Fund.

The Management Company uses three external data providers as its main sources:

- The Management Company assesses the environmental and/or social characteristics of the Sub-Fund's constituents using the external data provider Sustainalytics. The Management Company uses Sustainalytics for ESG risk scores, controversies, product involvement as well as alignment with global standards (e.g., OECD Guidelines for Multinational Enterprises).
- The Management Company uses Morningstar to analyse the Sub-Fund's peer group, as well as for various ESG data calculations at portfolio level.
- The Management Company uses the data provider ISS for climate and impact data. The Management Company also uses ISS as a proxy voting solution.

Once collected from these sources, the data is integrated and stored in the internal front-to-back tool and/or available in the Management Company's dedicated data management system (which directly and continuously obtains data from the providers). Information is also available via dedicated portals developed by external data providers, access to which is limited to specific users of the Management Company. The Management Company verifies that the data is available, reported (or calculated), and reliable over time. On a case-by-case basis (e.g., if an ESG score is missing), the Management Company may use other sources of information to form its own opinion regarding the ESG suitability of any investment opportunity with the Sub-Fund's strategy.

Similar to the Management Company, external asset managers managing delegated sub-funds or open-ended investment funds have their own data providers and methodologies with respect to their data environment. They will be responsible for defining their own methodologies regarding data processing and ensuring data quality.



Limitations to methodologies and data

The methodologies and data used have the following limitations:

- **Data quality:** the approach followed includes quantitative analysis and qualitative analysis of a company's sustainability credentials. The methodology is subject to limitations, including reliance on the quality of data provided by investee companies or third-party research providers as well as quantification of qualitative data.
- **Coverage:** The overall analysts, ESG team and management team in charge of the analysis of the Sub-Fund is not staffed to cover the entire investment universe and methodological limitations exist. In addition, with respect to external data providers, although the number of companies covered by data providers has increased significantly over time, and continues to increase, there may be instances where a specific company is not assessed by them. This is because either the data provider does not cover the company in question, or the company has not provided the data necessary for a proper assessment by the data provider.
- **Discrepancy in ratings:** The Data used for the analysis of the Sub-Fund is obtained from different data providers that have different methodologies for assessing ESG/Sustainability performance. The result of their assessment may be, to some extent, subjective and inconsistent.
- **Estimated data:** Not all data points are reported data and some of the data used are estimated. For example, in the case of Carbon score or ESG ratings, some of the more technical calculations are based on estimated data.



Due diligence

The Management Company carries out due diligences for the selection of delegated strategies as well as for open-ended investment funds:

- The MDD team identifies and selects high quality investment strategies and monitors the universe of approved strategies. The MDD analysts 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 asset management company in charge of the strategy on its commitment to and transparency on ESG 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. As part of the monitoring process, the MDD team periodically reviews the performance of the strategy to ensure that it remains aligned with the investment style of the portfolio. The MDD team provides transparency and regular monitoring of the strategy's portfolio. ESG ratings and other sustainable characteristics of the portfolio's underlying assets are also monitored regularly. In addition, MDD analysts meet periodically with portfolio managers to discuss recent performance as well as recent transactions in order to monitor alignment with promoted environmental and/or social characteristics. 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 ESG factors. During the calls, portfolio managers clarify if there were any changes in the team and processes. Analysts and investment managers also discuss recent engagements and milestones during the period. In addition, MDD analysts monitor any significant events that may affect the portfolio, e.g., with respect to their investments, financial and ESG analysts, investment process, engagement capacity. Each change may affect the strategy's 5-P based rating, which may result in a change in the strategy's ratings, including the sustainability rating.

- The ESG team supports the MDD team in reviewing the process and methodologies implemented by the external asset managers when considering ESG and sustainability issues. The ESG team provides qualitative feedback during the selection phase and supports the MDD team throughout its analysis process, using the "5-P approach" aforementioned. In addition, during the monitoring phase, the ESG team will monitor the Sub-Fund's characteristics and performance related to the environmental and/or social characteristics defined. The ESG team will also monitor the Sub-Fund's underlying investments against the overall environmental and/or social characteristics, as well as the ESG indicators for all the Sub-Fund's holdings. If a holding is identified as not meeting the environmental and/or social characteristics of the Sub-Fund, the ESG team will further investigate the issue through an internal analysis. In addition, the ESG team is responsible for periodically reviewing the exclusion lists, assessing the relevance of the latest ESG information regarding restricted companies and updating the lists, accordingly, thereby adjusting the portfolios. The ESG team also ensures the proper understanding and implementation of regulatory requirements on green finance, such as SFDR, RTS or Taxonomy, throughout the entire product range. Lastly, the ESG team is responsible for the sustainable labelling of the Management Company's product range. Overall, the ESG team plays a very transversal role in the Management Company's organization, as ESG is at the heart of its investment strategy.



Engagement policies

When the Management Company delegates part of the management of the Sub-Fund to External Investment Managers or invests in an open-ended investment fund, the engagement is the responsibility of the external asset manager managing the product. That said, there is a distinction between external delegated funds and external (non-delegated) open-ended investment funds. As part of its sub-advisory business model, the Management Company does not delegate all stewardship activities and is responsible for proxy voting. External Investment Managers may act as advisors and guide the Management Company before voting on resolutions to leverage on specific matters on which they engage with some companies. In any case, the Management Company remains the final decision maker on proxy voting. With respect to investments in external (nondelegated) open-end investment funds, the Management Company is not responsible for proxy voting. When it comes to direct management of the sub-funds, engagement on material issues may be carried out at Management Company Group level (through, among others, a collaborative engagement programme).



Designated reference benchmark

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