



## Article 10 (SFDR)

### Website disclosure for an Article 8 fund

**Adepa Asset Management S.A.**  
**BA<sup>3</sup> ROBECO CRESCITA SOSTENIBILE**

## A. Summary

### **Investment Strategy**

The Sub-Fund is actively managed. The objective of the Sub-Fund is to gain exposure to global equity and fixed income markets by mainly investing through UCITS including ETFs with focus on environmental, social and governance (ESG) factors with a best-in-class approach of the underlying investments. The Sub-Fund strives for financial return, while taking into account sustainability criteria. The asset allocation strategy is subject to the investment restrictions and a limit on ex-ante volatility. At the same time the Sub-Fund is promoting certain ESG (i.e. Environmental, Social and corporate Governance) characteristics and integrating sustainability risks in the investment process.

### **Benchmark**

There is no reference benchmark designated for the purpose of attaining the sustainable investment objective of the Sub-Fund.

### **Proportion of investments**

At least 75% of this product is invested in Article 8 or Article 9 funds. At least 40% of the investments are sustainable investments. Those 40% are neither taxonomy-aligned. While the sum of socially sustainable investments and sustainable investments with an environmental objective always adds up to the Sub-fund's minimum proportion of 40% sustainable investments, the minimum share of socially sustainable investments is 2%, and the minimum share of sustainable investments with an environmental objective is 7%.

### **Monitoring and due diligence (applicable at underlying target fund level)**

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 Robeco's risk appetite and sustainability risk management policies. 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 the Financial Risk Management and Investment Restrictions departments of Robeco.

### **Data sources, methodologies and limitations (applicable at underlying target fund level)**

The Sub-Fund uses several sources for gathering sustainability 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. Robeco maintains comprehensive methodology documents of their proprietary analytical frameworks on their website. In addition, for some social and environmental characteristics, Robeco relies on externally sourced content for which they aim to select the best of breed vendor for each of their target characteristics. The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, Robeco struggles to find adequate information on the principal adverse indicators. To overcome this issue, Robeco has resorted to using multiple data providers, since each has its own respective strengths and weaknesses.

### **Engagement strategy (applicable at underlying target fund level)**

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

sustainable investment objective of the Sub-Fund, it can be that adverse sustainability impacts are addressed via the value engagement program.

## **B. No sustainable investment objective**

The Sub-Fund promotes environmental or social characteristics but does not have as its objective a sustainable investment.

## **C. Environmental or social characteristics of the Fund**

### **What are the environmental or social characteristics promoted by the Fund?**

- The Sub-Fund is a portfolio of underlying Robeco funds, promoting each various E/S characteristics, including but not limited to mitigation of the resource scarcity challenge, investing in companies aligned with circular economy principles, promoting social impact by investing in gender equality leaders, contributing to an efficient healthcare system, contributing to clean, safe and sustainable water supply, electrification of transportation, etc.
- The characteristics common to all target funds are related to the exclusion criteria from Robeco's Exclusion Policy:
  - Corporate exclusion criteria, focusing on standards for company activities and practices and can lead to the exclusion of securities from a company
    - Behavior-based exclusions (including specific exclusion thresholds for Controversial behavior, climate standards, good governance, AML/CFT
    - Product-based exclusions (including specific exclusion thresholds for weapons, fossil fuels and other products such as tobacco)
  - Sovereign exclusion criteria, looking at the governance of countries and can lead to the exclusion of sovereign bonds (federal or local) from the government of a country

## **D. Investment strategy**

### **What investment strategy does the Fund use to meet the environmental or social characteristics provided by the Fund?**

The Sub-Fund is actively managed. The objective of the Sub-Fund is to gain exposure to global equity and fixed income markets by mainly investing through UCITS including ETFs with focus on environmental, social and governance (ESG) factors with a best-in-class approach of the underlying investments.

The Sub-Fund strives for financial return, while taking into account sustainability criteria. The asset allocation strategy is subject to the investment restrictions and a limit on ex-ante volatility. At the same time the Sub-Fund is promoting certain ESG (i.e. Environmental, Social and corporate Governance) characteristics and integrating sustainability risks in the investment process.

To achieve this, the Sub-Fund will follow a balanced allocation strategy exclusively in UCITS within the Robeco Funds range of collective investment schemes within equity and fixed

income UCITS including exchange traded Funds (“ETFs”) in compliance with provisions set out in Art. 41(1) of the Law of 2010.

The Robeco’s Fund range refers to Dutch and Luxembourg domiciled UCITS Funds, which meet the criteria of Article 8 and article 9 of the Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial sector. The investment in UCITS may range up to 100% of the net assets of the Sub-Fund, but the maximum weight allowed for each UCITS is 20% of the Sub-Fund’s net assets. All eligible UCITS will be classified as either Article 8 or Article 9 (within the meaning of SFDR, Regulation (EU) 2019/2088, of 27 November 2019 on Sustainability-related disclosures in the financial sector). Thus, products promoting environmental and/or social (E/S) characteristics as per SFDR Article 8, or having sustainable investment(s) as its objective as per SFDR Article 9.

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

The assessment of the good governance is performed at the level of the underlying target funds, and following this methodology:

As part of the due diligence process, a control is performed on compliance with Robeco's Good Governance policy: [docu-robeco-good-governance-policy.pdf](#)

The policy describes how Robeco determines if and when a company does not follow good governance practices and is therefore excluded from the initial investment universe for Article 8 and 9 products. Robeco's Good Governance policy applies to the Sub-Fund and tests on a set of governance criteria that reflect widely recognized industry-established norms and include topics as employee relations, management structure, tax compliance and remuneration.

### **Does the Fund consider principal adverse impacts on sustainability factors?**

Yes. The principal adverse impacts (PAI) are considered at the level of the underlying target funds, and following this methodology:

The Sub-Fund considers principal adverse impacts on sustainability factors as referred to in Annex 1 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), via the Climate Transition Benchmark

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 in 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)
  - 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.

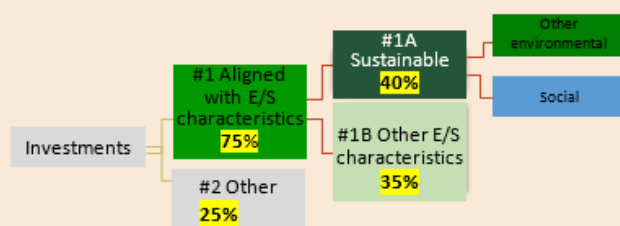
In addition, based on yearly review of Robeco's performance on all mandatory and selected voluntary indicators, holdings of the Sub-Fund that cause adverse impact might be selected for engagement.

More information is available via Robeco's PAI Statement, published on Robeco's website, [docu-robeco-principal-adverse-impact-statement.pdf](#). The Sub-Fund will periodically report how it has considered the principal adverse impacts of its investments in the Company's annual report, which will be made available each year on or before 30 April at the Sub-Fund page highlighted in final section of this document.

## E. Proportion of investments

### What is the planned asset allocation for the Fund?

- At least 75% of this product is invested in Article 8 or Article 9 Funds.
- At least 40% of the investments are sustainable investments not aligned with EU Taxonomy.
- The minimum share of sustainable investments with an environmental objective is 7%, and the minimum share of socially sustainable investments is 2%. But in any case, the sum of both (i.e. sustainable investments with an environmental objective AND socially sustainable investments) always adds up to the Sub-Fund's minimum proportion of 40% sustainable investments.
- If the Investment Manager and/or the Sub-Investment Manager considers this to be in the best interest of the Shareholders, and notably for defensive purposes, the Sub-Fund may hold, up to 20% of its net assets, in liquid assets such as bank deposits at sight, but not including other bank deposits, money market instruments and money market funds. This 20% limit in ancillary liquid assets shall only be temporarily breached for a period of time strictly necessary in the event of exceptionally unfavorable market conditions, when such breach is justified having regard to the interests of the Shareholders.
- For hedging and investment purposes, the Sub-Fund may use financial derivative instruments traded on a regulated market, the Sub-Fund may at all time take exposure to derivatives on any eligible underlying, such as equity or bond indices, transferable securities, interest rates and currencies, at all times in compliance with the Grand Ducal Regulation. In addition, derivative instruments traded over the counter (OTC) may be used for hedging and investment purpose (for instance, currency forward may be used in order to hedge or take the exposure to eventual foreign currencies to which the Sub-Fund underlying may be denominated). Such instruments can be used provided they are contracted with first class financial institutions specialized in this type of transactions.
- Still, minimum environmental and social safeguards are ensured via the application of Robeco's exclusion policy on the entire financial product.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? What is the minimum share of investments in transitional and enabling activities?**

The Sub-Fund does not commit to make sustainable investments with environmental objective aligned with the EU Taxonomy.

The Sub-Fund also does not have a minimum share of investments in transitional and enabling activities.

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

The Sub-Fund intends to make sustainable investments, measured as positive scores via Robeco's SDG Framework. Among those could be investments with environmental objectives that do not qualify as Taxonomy-aligned. The environmental objectives of the Sub-Fund are attained by investing in companies that score positively on SDG 12 (Responsible consumption and production), SDG 13 (Climate action), SDG 14 (Life below water), and SDG 15 (Life on land) in Robeco's SDG Framework.

While the sum of sustainable investments with an environmental objective and socially sustainable investments always adds up to the Sub-Fund's minimum proportion of 40% sustainable investments, the minimum share of sustainable investments with an environmental objective is 7%.

**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

If the Investment Manager and/or the Sub-Investment Manager considers this to be in the best interest of the Shareholders, and notably for defensive purposes, the Sub-Fund may hold, up to 20% of its net assets, in liquid assets such as bank deposits at sight, but not including other bank deposits, money market instruments and money market funds.

This 20% limit in ancillary liquid assets shall only be temporarily breached for a period of time strictly necessary in the event of exceptionally unfavorable market conditions, when such breach is justified having regard to the interests of the Shareholders.

For hedging and investment purposes, the Sub-Fund may use financial derivative instruments traded on a regulated market, the Sub-Fund may at all time take exposure to derivatives on any eligible underlying, such as equity or bond indices, transferable securities, interest rates and currencies, at all times in compliance with the Grand Ducal Regulation. In addition, derivative instruments traded over the counter (OTC) may be used for hedging and investment purpose (for instance, currency forward may be used in order to hedge or take the exposure to eventual foreign currencies to which the Sub-Fund underlying may be denominated). Such instruments can be used provided they are contracted with first class financial institutions specialized in this type of transactions.

Minimum environmental and social safeguards are ensured via the application of Robeco's exclusion policy on the entire financial product.

## F. Monitoring of environmental or social characteristics

### **What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by the Fund?**

The below indicators are monitored at the level of the underlying target funds:

1. The % of investments in securities that are on Robeco's Exclusion list as result of the application of Robeco's Exclusion policy.
2. The number of companies that are in violation of the ILO standards, UNGPs, UNGC or OECD Guidelines for Multinational Enterprises and hence are a part of the Enhanced Engagement program and/or excluded.
3. The number of holdings and agenda items voted.

### **How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the Fund and what are the related internal/external control mechanisms?**

The following steps are taken at the level of the underlying target funds by Robeco:

1. .
2. All exclusions are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
3. All exclusions in relation to Controversial behavior are coded in the Trading & Compliance module, through which investing in an excluded asset is not possible. In addition, post-trade checks take place.
4. The proxy voting policy is reviewed on an annual basis, including voting principles in relation to ESG topics. Changes to the policy are presented to the Sustainability and Impact Strategy Committee. Voting behaviour on ESG topics are monitored in the first line. On an annual basis the implementation of the voting policy is tested as part of their ISAE framework.

## G. Methodologies

### **What is the methodology to measure the attainment of the environmental or social characteristics promoted by the Fund using the sustainability indicators?**

The methodology being applied at the level of the underlying target funds:

Robeco maintains comprehensive methodology documents of their proprietary analytical frameworks on our 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, Robeco relies on externally sourced content for which they aim to select the best of breed vendor for each of their target characteristics. Each vendor will have its own approach and set of internal processes, over which Robeco has only limited influence as an end consumer. 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

### **What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?**

The data sources and processing that is applied at target fund level is the following:

The following data sources are used by Robeco:

1. The exclusion process uses several data sources such as Sustainalytics, RSPO (Roundtable on Sustainable
2. Palm Oil), World Bank, and Freedom House, Fund for Peace and International Sanctions.
3. The controversial behavior process uses data derived from Sustainalytics and the internal process.
4. The proxy voting process uses data derived from internal processes, aided by content from Glass Lewis and ISS.

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.

It is currently complex to report sufficiently accurate yet broad numbers on the proportion of data that is estimated. Robeco has calculated the weighted proportion of assets covered per PAI within their standard equity and fixed income benchmarks. These figures have been calculated per provider and, where relevant, they use this coverage figure as a determining factor in their choice of vendor for that PAI since, ceteris paribus, they prefer higher coverage for their investible universe.

Robeco intends to investigate a methodology for determining the proportion of data that has been internally enriched to support wider applications, e.g., by cascading to the broader corporate structure or using sector averages as proxies. 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 the limitations to the methodologies and data sources?**

The limitations to methodologies and data that are relevant for the underlying target funds are the following:

The primary limitation to the methodology or data source is the lack of corporate disclosure. Like many other financial market participants, Robeco struggles to find adequate information on the principal adverse indicators. To overcome this issue, they have resorted to using multiple data providers, since each has its own respective strengths and weaknesses. They

do not expect the corporate reporting landscape to change significantly until the anticipated introduction of CSRD in 2025.

In terms of methodology, Robeco frequently sees 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. They 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.

Robeco's environmental objectives are predominantly linked to more mature themes, specifically carbon, water and waste. Disclosure is far greater today within these areas and so they are able to evaluate a satisfactory proportion of their 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 is the due diligence carried out on the underlying assets and what are the internal and external controls in place?**

The due diligence that is being applied at the underlying target fund level is the following:

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 Robeco's risk appetite and sustainability risk management policies.

Information in relation to due diligence carried out can be found in the Robeco Investment Due Diligence Policy available at

<https://www.robeco.com/en/key-strengths/sustainableinvesting/sustainability-reports-policies.html>.

## K. Engagement policies

### **Is engagement part of the environmental or social investment strategy?**

Yes, the underlying target funds follow Robeco's engagement policies.

### **If so, what are the engagement policies (including any management procedures applicable to sustainability-related controversies in investee companies)?**

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 sustainable investment objective 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.

#### L. Reference benchmark

**Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the Fund?**

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