

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

Product name: ABN AMRO
Symbiotics Emerging Markets
Impact Debts

Legal entity identifier:
969500WKS63D789PRS84

Sustainable investment objective

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective: 5%**

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: 70%**

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**

Nota bene : The Sub-fund is a feeder of a Master fund; The table above shows the objectives aimed by the Master fund.



What is the sustainable investment objective of this 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 Sub-Fund, through its Master fund, follows a multi-thematic sustainable investment strategy that encompasses sustainability objectives in line with the UN Sustainable Developments Goals (SDGs). The Master fund aims to invest principally in sustainable positive impact investments as currently illustrated by the SDGs and aims to promote among other goals SDG n°1, n°2, n°5, n°7, n° 8 and n°11. As part of its social sustainable investment objective, in line with the Master fund objectives, the Sub-Fund selects investments

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.

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

contributing positively to social solutions and in a lesser extent, as part of its environmental objective investments contributing positively to environmental solutions. The Sub-Fund may also target other SDGs in line with the Master fund Investment philosophy. No assurance can be given that the objectives will be achieved.

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

Find below more details on the contribution to the above mentioned SDGs based on the information provided by the Master fund :

SDG 1: No Poverty

Target 1.4: "By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance."

Master fund contribution:

"Ensuring that low-income individuals have access to financial services, including microfinance."

The Master fund contributes to SDG 1, target 1.4 when the investment proceeds mainly support Investees whose activities serve the needs of low-income households, including but not limited to the supply of microcredits and small loans used for household needs, housing or education.

SDG 2: Zero Hunger

Target 2.3: "By 2030, double the agricultural productivity and incomes of small-scale food producers, in particular women, indigenous peoples, family farmers, pastoralists and fishers, including through secure and equal access to land, other productive resources and inputs, knowledge, financial services, markets and opportunities for value addition and non-farm employment."

Master fund contribution:

"Providing small-scale food producers access to productive resources through financial services and products."

The Master fund contributes to SDG 2, target 2.3 when investment proceeds go mainly to Investees which activities focus on small-scale agriculture including, but not limited to, the provision of loans to small scale farmers and micro-, small- and medium-sized enterprises (MSMEs) active in the food production sector.

SDG 5: Gender Equality

Target 5.1: "End all forms of discrimination against all women and girls everywhere."

Master fund contribution:

"Providing women with equal access to economic resources and opportunities."

The Master fund contributes to SDG 5, target 5.1 when the investments proceeds mainly support activities addressing women needs and contribute to women empowerment, including but not limited to, a portfolio of loans granted to women borrowers.

SDG 7: Affordable and Clean Energy

Target 7.1: "By 2030, ensure universal access to affordable, reliable and modern energy services."

Master fund contribution:

"Ensuring universal access to affordable, reliable and modern energy services."

The Master fund contributes to SDG 7, target 7.1 when the investment proceeds mainly finance Investee activities providing access to clean energy to low-income households and MSMEs.

SDG 8: Decent Work and Economic Growth

Target 8.3: "Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of MSMEs, including through access to financial services."

Target 8.10: "Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all."

Master fund contribution:

"Encouraging the growth of MSMEs."

"Strengthening the capacity of domestic financial institutions to expand access to banking and financial services for all."

The Master fund contributes to SDG 8, target 8.3 when the investment proceeds are channeled mainly to MSMEs.

SDG 11: Sustainable Cities and Communities

Target 11.1: "By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums."

Target 11.2: "By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons."

Master fund contribution:

"Ensuring access to adequate, safe and affordable housing and basic services."

"Ensuring access to safe, affordable and sustainable transport systems for all."

The Master fund contributes to SDG 11, target 11.1 or 11.2, when the use of proceeds mainly supports assets that are either green buildings, affordable housing, transportation systems, green vehicles or companies active in one of these sectors.

The sustainable objective, the use of proceed, the contribution definitions and calculations are defined and carried out by the Master fund based on the internal methodology of the Master fund.

● **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.

*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 sustainable investment objective of the Master fund is **the share of investments allocated to each SDG.***

*In addition, the Master fund uses **other non-financial indicators** which include, but are not limited to:*

- *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*

The sustainability indicators are defined and measured by the Master fund based on the internal methodology of the Master fund. The Sub-Fund will report on the sustainability indicators based on information provided by the Master fund.

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

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 environmental or social Sustainable Investment Objectives.

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 research, analysis and decision-making processes, the Master fund uses:

- *An exclusion of any investments that significantly harm Sustainable Investment Objectives, via an exclusion list defining which activities will be excluded from any investments, such as production or trade in weapons, commercial logging operations for use in primary tropical moist forest, and production or activities involving harmful or exploitative forms of forced labour, depending on the type of Investees*
- *An ESG assessment to select investments that are not likely to cause significant harm to any environmental or social objectives.*

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 above analysis is performed by the Master fund at investment level based on its own data and internal methodology.

To be noted : the Sub-Fund will not implement the Exclusion Policy of the Management Company but will implement the Exclusion policy of the Master fund as part of the DNSH risk assessment.

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

The Sub-fund considers PAIs as described below by the Master fund.

The specific 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 Master fund assesses the key topics underlying those PAI indicators as part of its due diligence 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.

To ensure that the Master fund will be able to report on most of the PAI indicators mentioned in Table 1 and 2 of the RTS, as well as a selection from Table 3, despite the complications linked to its investment universe mentioned above, the Master fund will use proxy calculations when necessary and possible. It will notably be the case for GHG emissions when data is not available at Investee level. The Master fund 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.

Available PAI indicators will be disclosed in the Financial Annual Reports of the Master fund.

The PAI indicators are defined and measured by the Master fund and will be reported in the annual report of the Sub-Fund based on the information provided by the Master Fund. The Sub-Fund does not consider all PAIs but strive to enlarge the data collection as explained by the Master fund.

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 is globally aligned with the above principles as explained below by the Master fund.

The Master fund main ESG assessment methodology is partly based on the International Finance Corporation Performance Standards, which are 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 Sub-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 Sub-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”): *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.*

The Key Considerations for Banks are applicable to the Investees of the Master-fund that are microfinance institutions, banks and leasing companies, and savings and loans cooperatives.

These 6 key considerations for banks are broadly covered by the methodology of the Master fund:

- *Measure 1: Embed responsible business conduct into policies and management systems*
- *Measure 2: Identify and assess actual and potential adverse impact*
- *Measure 3: Cease, prevent and mitigate adverse impacts*
- *Measure 4: Track implementation and results*
- *Measure 5: Communicate how impacts are addressed*
- *Measure 6: Provide for or cooperate in remediation when appropriate*

The due diligences in implementing these principles are carried out by the Master fund at investment level.



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

- ✘ *Yes, the Sub-Fund expects the Master fund to consider and mitigate adverse impacts of its investments on society and environment through a combination of portfolio management decisions, engagement, and exclusion of activities. As explained below:*

The Master fund integrates the risk of occurrence of Principal Adverse Impacts (PAI) into its core investment process through its research, analysis and decision-making processes, as part of its ESG assessment framework.

The Master fund does so principally via:

- *An exclusion of investments that significantly harm Sustainable Investment Objectives, via an exclusion list, such as production or trade in weapons, commercial logging operations for use in primary tropical moist*

forest, and production or activities involving harmful or exploitative forms of forced labour, whenever possible depending on the type of Investees; and

- An ESG assessment to select investments that are not likely to cause significant harm to any environmental and social objectives.

The Master fund' ESG assessment evaluates the PAI before investing and through periodic monitoring. This monitoring can lead to investment decisions reconsiderations and actions will be undertaken accordingly by the Master fund.

More information on Principal Adverse Impacts on Sustainability Factors to be disclosed pursuant to Article 11(2) of Regulation (EU) 2019/2088 is available on the Website of the portfolio manager of the Master fund:

<https://symbioticsgroup.com/sustainability-related-disclosures/>

Further information on principal adverse impacts will be provided in an annex to the Sub-Fund's annual report based on information provide by the Master fund.

No



What investment strategy does this financial product follow?

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. The selection process is binding as explained in the below section.

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

The Master fund considers the following binding elements at investment level as described below.

To meet its Sustainable Investment Objective, the Master fund verifies that each investment contributes to at least one of the targeted SDGs targeted. At the pre-investment stage, at least one SDG is assigned to each investment proposal, following a methodology designed by the Master fund. The share of sustainable investments allocated to each SDG is monitored by the Master fund to ensure consistency with the minimum share of sustainable investments and with the investment philosophy.

In addition, the ESG assessment aims to monitor that the Investee is not preventing the Sub-Fund from achieving its Sustainable Investment Objective while not doing significant harm to sustainability factors.

Nevertheless, no guarantee can be given that the Master fund's Sustainable Investment Objectives will be achieved due to temporary lack of investment opportunities, corporate actions or external events. Consecutively, the Sub-fund may not achieve its sustainable objective in these specific circumstances.

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

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

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 Sub-fund are not applicable here.

Therefore, the Sub-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.

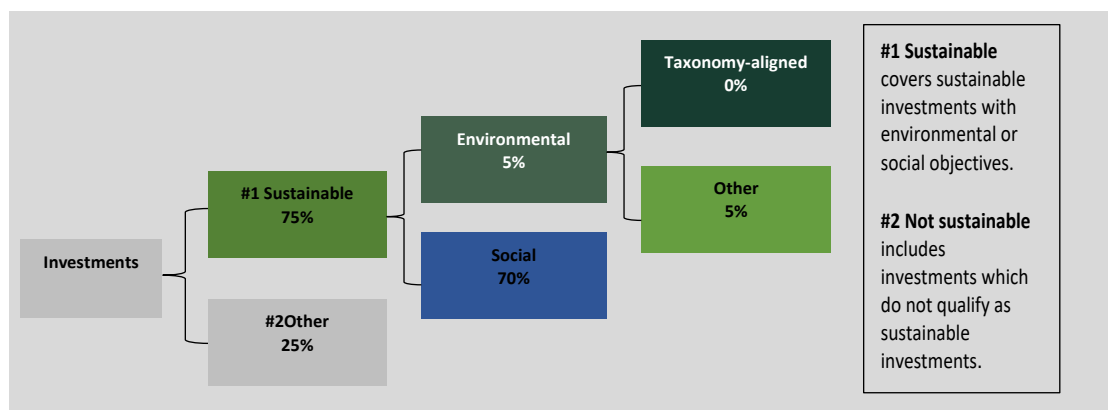


What is the asset allocation and the minimum share of sustainable investments?

The Sub-Fund invests at least 75% of 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 of the Master fund covers 100% of the “#1 Sustainable” investments.” #1 Sustainable investments include a minimum of 5% assets with environmental objectives and 70% with social objectives. Investments with environmental objectives are made in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy (0%).

Up to 25% of the investments are not aligned with these characteristics (#2 Not Sustainable).

Asset allocation describes the share of investments in specific assets.



Nota bene : The thresholds mentioned on the picture are those committed at Master fund level.

● **How does the use of derivatives attain the sustainable investment objective?**

The Sub-fund may employ currency derivatives to hedge its non-euro share but those are not set at investment level. The Sub-Fund does not use derivatives to attain the sustainable investment objective.

The Master fund may employ techniques and instruments such as derivative instruments at investment level for efficient management and hedging purposes. Investment in financial derivative instrument is not the aim of the Master Fund, and thus does not seek to achieve any Sustainable Investment Objective. However, providing financing in local currency that may be hedged at the Master Fund level through derivatives instruments, is seen as part of the mission of the Master Fund to ensure that Investees can also extend local currency loans to their own borrowers and as such protect them from foreign exchange risk.

Taxonomy-aligned activities are expressed as a share of:

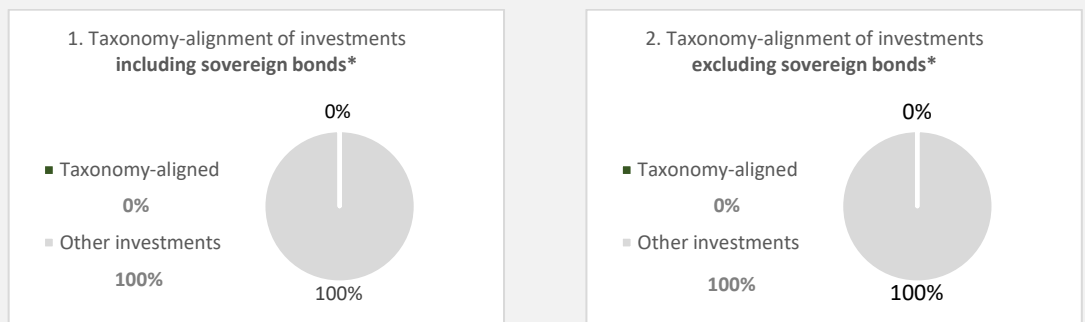
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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



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

Not Applicable.

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.*



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

● **What is the minimum share of investments in transitional and enabling activities?**

The Master fund does not have a minimum share of investments in transitional and enabling activities (i.e., 0%), as it does not commit to a minimum proportion of environmentally sustainable investments aligned with the EU Taxonomy.

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 Master fund commits to make a minimum of 5% sustainable investments with an environmental objective not aligned with the EU Taxonomy. The threshold mentioned in this section is committed by the Master fund at investment level.



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

The Master fund commits to make a 70% 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”, as defined by the Master fund, includes cash, cash-equivalents, liquid instruments and hedging instruments and are located at Master 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.



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 and for its Master fund

- ***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

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

- **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>

- *Documents of the Master fund:*

<https://symbioticsgroup.com/sustainability-related-disclosures>

