

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

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

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

Product name:

ABN AMRO Funds EdenTree European Sustainable Equities

Legal entity identifier:

549300EZ6OEX5H1FKA94

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: 50%**

☐ 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: 15%**

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

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

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

☐ with a social objective

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



What is the sustainable investment objective of this financial product?

ABN AMRO Funds EdenTree European Sustainable Equities (the "Sub-Fund") follows a multi-thematic sustainable investment strategy. The portfolio will be composed of issuers exposed to four long-term sustainable themes, namely (i) education, (ii) health and wellbeing, (iii) social infrastructure and (iv) sustainable solutions.

The sustainable investment objective of the Sub-Fund is to be aligned with the 2015 Paris Agreement, where world governments committed to curbing global temperature rise to below 2°C above pre-industrial levels. The Sub-Fund aims to achieve an aggregated portfolio temperature below 2°C, using the external data provider ISS and in particular its scenario alignment data which is based on the International Energy Agency's Sustainable Development Scenario. The approach used is based on three climate scenarios provided by the International Energy Agency (IEA) in their report World Energy Outlook 2019. The report presents three scenarios, Sustainable Development Scenario (SDS), Stated Policy Scenario (STEPS) and Current Policy Scenario (CPS). Each scenario expects a certain level of carbon budget and temperature increase in 2050. Each scenario is tied to a carbon budget. A carbon budget specifies the amount of fossil carbon that can be combusted worldwide to remain within a certain temperature. The carbon budget changes depending on scenario. For example, to remain within the limits of the SDS, less carbon can be combusted compared to the scenarios

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

that expect a significant temperature increase i.e. the CPS. The Sub-Fund relies on the Sustainable Development Scenario pathway which is fully aligned with the Paris Agreement by holding the rise in global temperatures to “well below 2°C and pursuing efforts to limit it to 1.5°C”. The approach is in line with the expectations of the Commission Delegated Regulation (EU) 2020/1818 in terms of GHG scopes, calculations and trajectories methodologies. In addition, as part of its social sustainable investment objective, the Sub-Fund invests in companies contributing positively to social solutions. To define the sustainable investment universe, a “pass-fail” approach is used using a set of criteria. The DNSH principle is always applied on the entire investment universe. No reference benchmark has been designated for the purpose of attaining the sustainable objectives followed by the Sub-Fund.

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

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

- Having a greenhouse gas emission reduction target. The criterion is sourced from the external data provider ISS and differentiates an issuer's targets as "No Target", "Non-Ambitious Target", "Ambitious Target", "Committed Science Based Target (SBT)", or "Approved Science Based target (SBT)" based on the existence and quality of greenhouse gas emissions reduction targets. Non-eligible issuers include the ones that have a “No Target”.
- Being aligned with the International Energy Agency (IEA) Sustainable Development Scenario (SDS) for the full analysed period (until 2050). The criterion is sourced from the external data provider ISS and identifies the year in which the company estimated future carbon emissions are non-longer aligned with the issuer's estimated carbon emissions budget required to be aligned with the IEA SDS. Non-eligible issuers include the ones that are not aligned with the IEA SDS scenario until 2050.
- Having a net positive aggregated SDG Social Solutions Score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an issuer's product portfolio on the achievement of social objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on social objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.
- The External Investment Manager and the Management Company agree on a trajectory of engagement with the company that could lead to meeting one or more of these criteria (e.g., SBTi engagement) within a reasonable timeline.

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

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

In addition, the Sub-Fund takes into consideration PAI No. 4 in Table 2 of Annex 2, applicable to investee companies, relating to investments in companies without carbon reduction initiatives. The Sub-Fund also takes into consideration PAI No. 15 of Table 3 of Annex 1, applicable to investee companies, relating to the lack of anti-corruption and anti-bribery policies.

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

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

With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund takes into account principal adverse impacts (PAI) 1 to 14 and 16 in portfolio management decisions and engagement activities as follows:

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

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

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

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

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

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

The Sub-Fund's sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights

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.

set forth in the 8 “fundamental” conventions identified in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (covering subjects considered to be fundamental principles and rights at work, e.g., freedom of association and the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation) and the International Bill of Human Rights.



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



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

With respect to Table 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022, the Sub-Fund takes into account principal adverse impacts (PAI) 1 to 14 and 16 in portfolio management decisions and engagement activities as follows:

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

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

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

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

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

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



No



What investment strategy does this financial product follow?

The portfolio will seek to have exposure to issuers exposed to four long-term sustainable themes, namely education, health and wellbeing, social infrastructure and sustainable solutions.

The external investment manager investment philosophy is founded on the understanding that performance and principles are inseparable when seeking to create long-term investment returns for clients. The external investment manager believes consistent, long-term returns are more likely to be achieved by investing responsibly in sustainable businesses. The Sub-Fund follows an active, long term, value orientated investment philosophy identifying companies which are trading at attractive valuation levels using a variety of different metrics.

The external investment manager pursues an integrated approach whereby the investment and SRI cases of any stock idea are considered together. The initial investment universe is composed of all large and mid-cap stocks listed in developed European countries. The relatively strict ESG criteria are an important element in defining the external investment manager's final investment universe. The external investment manager applies both negative and positive screenings.

The external investment manager's in-house responsible investment experts undertake an in-depth analysis of the risk factors most applicable to the company and the sector, using a variety of sources, including company produced reports, market knowledge, and third-party research. The external investment manager aims to identify companies with a well-developed approach to ESG risk management. All investments undergo an ESG/Responsibility review, which considers six areas of business risk (i.e., environment and climate change, business ethics, community, employment and labour, human rights and corporate governance). The external investment manager seeks to see positive direction in all six ESG areas over a 3–5-year period.

As part of the process, the external investment manager embraces 4 themes (i.e., education, health and well-being, social infrastructure, and sustainable solutions) that consider positive impacts. Within the sustainable solutions theme, the Sub-Fund seeks to achieve positive environmental impact by investing primarily in companies that are leading the way to a zero-carbon economy and have either an approved SBTi emissions reduction plan, an ambitious carbon reduction plan, are working towards a carbon reduction plan or offer solutions that contribute to a zero-carbon economy. Sustainability is seen as a key "locomotive for change" in investment decision making. Engagement is an important part of the investment process. The External investment Manager engages with investee companies on various ESG topics directly, in collaboration with its peers, and through initiatives. EdenTree engages in long-term as well as in shorter-term tactical engagements.

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

The binding elements of the investment strategy are:

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

Company Exclusions based on International Standards and Policies	Exclusion Criteria
Companies non-compliant with the UN Global Compact's Principles	No

Companies non-compliant with SFDR Sustainable Investments mandatory norms and conventions	No
Companies listed on ABN AMRO Investment Exclusion List (IEL)	No
Companies listed on AAIS Good Governance Blacklist	No
Company Exclusions based on Revenue Thresholds	
Adult Entertainment Production	>5%
Controversial Weapons direct ownership	No
Controversial Weapons indirect ownership Involvement	>10%
Military Contracting Weapons	>0%
Military Contracting Weapons related products and /or services	>5%
Small Arms	>0%
Fur and specialty leather production	>5%
Unconventional fossil fuels (Arctic oil & gas exploration, oil sands and shale energy extraction methods)	Combined Revenues >5%
Thermal Coal Extraction	>5%
Thermal Coal Power Generation	>10%
Cannabis (recreational purposes)	>5%
Gambling	>5%
Genetically Modified Organisms	>5%
Tobacco Producing Companies	>0%
Tobacco Products Related Products/Services	>5%
Tobacco Products Retail and/or Distribution	>5%

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

- *Companies that do not pass the external investment manager ESG suitability analysis as defined by the ESG/responsibility review of the External investment Manager. All investments undergo an ESG/Responsibility review, which considers six areas of business risk (i.e., business ethics, community, corporate governance, employment and labour, environment and climate change, human rights). The external investment manager seeks to see positive direction in all six ESG areas over a 3–5-year period. All companies failing in meeting the External Investment Manager's ESG/responsibility review are excluded from the investment universe.*
- *Sustainable investment eligibility criteria (the below criteria may not be cumulative):*
 - *Having a greenhouse gas emission reduction target. The criterion is sourced from the external data provider ISS and differentiates an issuer's targets as*

"No Target", "Non-Ambitious Target", "Ambitious Target", "Committed Science Based Target (SBT)", or "Approved Science Based target (SBT)" based on the existence and quality of greenhouse gas emissions reduction targets. Non-eligible issuers include the ones that have a "No Target".

- Being aligned with the International Energy Agency (IEA) Sustainable Development Scenario (SDS) for the full analysed period (until 2050). The criterion is sourced from the external data provider ISS and identifies the year in which the company estimated future carbon emissions are non-longer aligned with the issuer's estimated carbon emissions budget required to be aligned with the IEA SDS. Non-eligible issuers include the ones that are not aligned with the IEA SDS scenario until 2050.
- Having a net positive aggregated SDG Social Solutions Score by reference to the Sustainable Development Goals. The criterion is sourced from the external data provider ISS. This criterion assesses the overall, aggregated impact of an issuer's product portfolio on the achievement of social objectives. For corporate issuers the SDG Solutions Score considers only the most distinct objectives scores, i.e., the highest positive and/or the lowest negative score, based on contributing and obstructing impacts on social objectives. The SDG Solutions Score is calculated as the sum of the highest positive and the lowest negative objective score and ranges on a scale from -10.0 to 10.0. Non-eligible issuers include the negative and neutral score.
- The External Investment Manager and the Management Company agree on a trajectory of engagement with the company that could lead to meeting one or more of these criteria (e.g., SBTi engagement) within a reasonable timeline.

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

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

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

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

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

The external investment manager believes that strong transparency and accountability mechanisms should lead to improved management of ESG risks and opportunities. This external investment manager assesses prospective investments for issues relating but not limited to ownership and control, board structure, board diversity, pay practices, accounting and tax practices, political and lobbying practices, and stakeholder engagement. The external investment manager reviews policies, such as codes of conduct and anti-bribery and corruption policies, as well as compliance infrastructure to assess governance practices. The external investment manager examines the history and pattern of corporate behaviour going back five years and assesses remediation of governance controversies.



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

The Sub-Fund invests at least 90% of its net assets in assets that have been determined as “eligible” as per the sustainable investment process in place, hence in investments that are defined as sustainable (#1 Sustainable). The external investment manager’s proprietary sustainable analysis covers 100% of the “#1 Sustainable” investments. ” #1 Sustainable” investments include a minimum of 50% assets with environmental objectives and 15% with social objectives. Investments with environmental objectives are made in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

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

Asset allocation
describes the share
of investments in
specific assets.

Taxonomy-aligned activities are expressed as a share of:

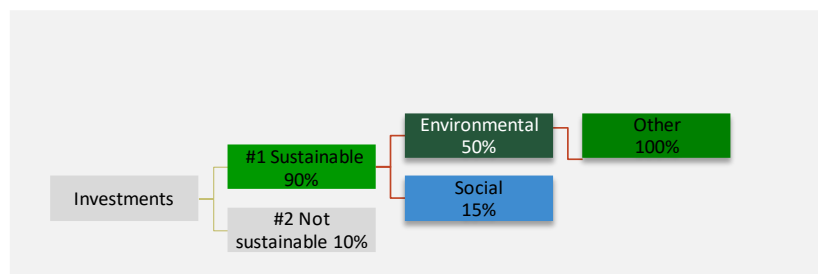
- **turnover**
reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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

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

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



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



#1 Sustainable covers sustainable investments with environmental or social objectives. **#2 Not sustainable** includes investments which do not qualify as sustainable investments.

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

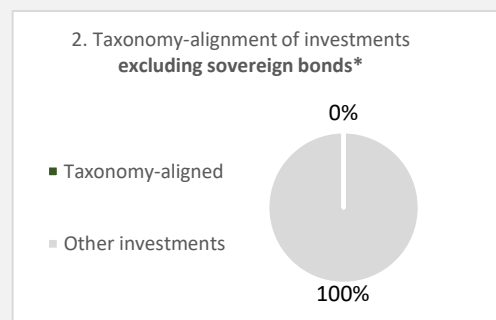
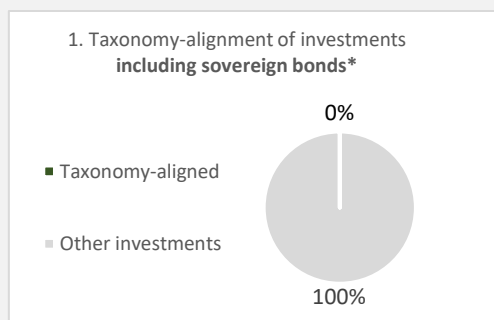
Not Applicable



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

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

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



* 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 Sub-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.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 100%. The Sub-Fund commits to make a minimum of 50% sustainable investments with an environmental objective not aligned with the EU Taxonomy.



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

The Sub-Fund commits to make a 15% minimum share of sustainable investments with a social objective.



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

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



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

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

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

Not Applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

Not Applicable

- ***How does the designated index differ from a relevant broad market index?***

Not Applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

Not Applicable

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



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>