

Boston Partners Global Investors, Inc.

Principal Adverse Impacts Statement

Applicable to clients subject to the SFDR

Summary:

Boston Partners integrates sustainability considerations into its investment process. Boston Partners Sustainability and Engagement Policy (the “Policy”) can be found here: <https://www.boston-partners.com/wp-content/uploads/2021/02/esg-policy-2021.pdf>

Boston Partners incorporates consideration of principal adverse impacts (“PAI”) into its investment process through the sustainability research produced by the Sustainability and Engagement Team (the “ESG Team”) and as described in the Policy.

Definition of PAI:

PAI are generally defined as those impacts of investment decisions that result in negative effects on sustainability factors. These factors are listed in Tables 1 to 3 of Annex 1 to the Final Report on draft Regulatory Technical Standards promulgated under Regulation (EU) 2019/2088 of the European Parliament on sustainability-related disclosures in the financial services sector (“SFDR”).

Description of Policies to Identify and Prioritize PAI:

The ESG Team records material PAI for each issuer in its research analysis. The PAI are from original source documents of the issuer such as its sustainability report and annual financial report. Each issuer typically does not disclose all PAI and some PAI are not relevant for each issuer. The ESG Team looks for trends in PAI of the issuer noting both improving trends and deficiencies.

The ESG Team analyses are provided to the fundamental financial analyst responsible for issuing an investment recommendation about an issuer and are considered by the analyst for materiality to the investment recommendation.

For funds subject to the SFDR, certain exclusions may be instituted by the fund. These exclusions typically address issuers or industries where PAI may be material.

Engagement Policies:

The ESG Team engages regularly with issuers regarding sustainability deficiencies, including those related to PAI and publishes summaries of those engagements on the Boston Partners’ website and monitors changes in the issuer’s PAI. Boston Partners also votes proxies for most of the assets under its management. Boston Partners’ proxy voting policy considers PAI to the extent material to the client’s investment in the issuer.

Reporting on PAI:

Boston Partners will report regularly on PAI for funds subject to the SFDR beginning in 2022.

International Standards:

Boston Partners is a signatory to the UN PRI. Boston Partners considers an issuer's adherence to recognized reporting standards such as GRI and SASB, applicable corporate governance codes, membership in industry organization such as the Responsible Business Alliance, alignment with the UN Sustainable Development Goals and similar compacts and conventions. Boston Partners' analysis notes where issuers have set GHG emission targets that are in line with the Paris Agreement and if targets have been approved by the SBTi.

PAI Responsibility:

The ESG Team has primary responsibility for Boston Partners' sustainable investment activities. The ESG Team reports to the Boston Partners' Chief Investment Officer/Chief Executive Officer and research analyses are reviewed by the Director of Research.