

(節譯文)

荷寶資本成長基金

可變資本投資公司

6 route de Trèves, L-2633 Senningerberg

盧森堡大公國

盧森堡商業登記處編號：B 58.959

(「本公司」)

致本基金股東通知書

郵件寄送

盧森堡，2022 年 9 月 28 日

親愛的投資人

台端為本公司之股東，本公司之董事會（「**董事會**」）謹此通知台端有關本公司及其子基金（「**子基金**」）之若干變更。

除非下文另有說明，本次變更將自 2022 年 9 月 28 日後之 30 日起生效。

1. (與台灣登記無關，故略譯)

2. (與台灣登記無關，故略譯)

3. 永續性揭露

於公開說明書「附件一—各子基金之資訊」，各子基金之「子基金的風險特性」部分業已完成以提供關於永續性風險概況之進一步資訊。

此外，「附件八—子基金之永續性揭露」已更換為最新版本，其就被認定為 SFDR 第 8 條或第 9 條類型之各子基金提供關於 SFDR 之詳細資訊。

4. (與台灣登記無關，故略譯)

請注意自 2022 年 9 月 28 日起，修正版之公開說明書將得於本公司之註冊辦事處索取。

謹提醒股東，依公開說明書之規定，本公司不收取任何買回費用，不同意上述變更之股東得買回其股份而毋庸支付任何費用。

(中譯文僅供參考，與原文相較不盡完整，亦有歧異，如有疑義應以英文本為準)



除另有定義外，本通知書中任何定義詞彙應與公開說明書內之定義相同。

倘台端需要任何進一步之資訊（或於可索取後要求更新之公開說明書之副本），請聯繫台端通常之（荷寶）業務人員或本公司註冊辦事處，或得瀏覽下列網站：
www.robeco.com/riam。

誠摯地，

荷寶資本成長基金董事會

Robeco Capital Growth Funds
Société d'investissement à capital variable
6 route de Trèves, L-2633 Senningerberg
Grand Duchy of Luxembourg
R.C.S. Luxembourg: B 58.959
(the “**Company**”)

NOTICE TO SHAREHOLDERS OF THE FUND

By mail

Luxembourg, 28 September 2022

Dear Investor,

As a Shareholder in the Company, the board of directors of the Company (the “**Board of Directors**”) hereby informs you of certain changes concerning the Company and its sub-funds (the “**Sub-funds**”).

Unless otherwise indicated below, the changes will become effective as from 28 September 2022 + 30 days.

1. Change of Investment policy and SFDR classification of the Sub-funds RobecoSAM Global SDG Engagement Equities, RobecoSAM Global Gender Equality Equities, RobecoSAM SDG Credit Income, RobecoSAM Global SDG Credits, RobecoSAM SDG High Yield Bonds, RobecoSAM Climate Global Bonds and RobecoSAM Euro SDG Credits

Under “Appendix I – Information per Sub-fund” of the Prospectus, the Sub-funds RobecoSAM Global SDG Engagement Equities, RobecoSAM Global Gender Equality Equities, RobecoSAM SDG Credit Income, RobecoSAM Global SDG Credits, RobecoSAM SDG High Yield Bonds, RobecoSAM Climate Global Bonds and RobecoSAM Euro SDG Credits will be reclassified from Article 9 to Article 8 of Regulation (EU) 2019/2088 (“**SFDR**”), meaning the investment policy is amended to reflect that the Sub-funds no longer have sustainable investment as their objective and that they will promote environmental and/or social characteristics.

These reclassifications are made after due consideration and new insights on the regulatory interpretation, where the Company has decided to narrow the internal definition for sustainable investment to only positive SDG scores. This technical redefinition automatically leads to reclassification of the above mentioned Sub-funds from Article 9 to 8, while the fund strategies themselves do not change.

2. Change of the Financial instruments and Investment Restrictions in the Investment policy of the Sub-funds RobecoSAM Global Green Bonds, RobecoSAM Climate Global Credits, RobecoSAM QI Global SDG & Climate Multi-Factor Credits and RobecoSAM US Green Bonds

Under “Appendix I – Information per Sub-fund” of the Prospectus, the first two to four paragraphs, of the Financial instruments and Investment Restrictions section of the Sub-funds RobecoSAM Global Green Bonds, RobecoSAM Climate Global Credits, RobecoSAM QI Global SDG & Climate Multi-Factor Credits

and RobecoSAM US Green Bonds have been amended to reflect the stricter use of derivatives as follows:

a. For RobecoSAM Global Green Bonds:

“The Sub-fund will invest in financial derivative instruments for hedging as well as liquidity management, but also to actively take positions in the global bond, money market, interest rates and currency markets. This includes the usage of derivatives to manage currency and duration exposures in a cost-effective manner.

The buying or selling of the following exchange traded and over-the-counter derivatives are permitted: bond and FX futures, interest rate swaps and currency forwards. The Sub-fund will invest in financial derivative instruments for hedging and optimal portfolio management purposes but also to actively take positions in the global bond, money market and currency markets.”

b. For RobecoSAM Climate Global Credits:

“The Sub-fund will invest in financial derivative instruments for hedging as well as liquidity management, but also to actively take positions in the global bond, money market, interest rates and currency markets. This includes the usage of derivatives to manage currency and duration exposures in a cost-effective manner.

In case the Sub-fund uses derivatives for other purposes than duration and/or currency adjustments and/or inflation adjustments, the underlying of such investments shall comply with the investment policy.

The buying or selling of the following exchange traded and over-the-counter derivatives are permitted: bond and FX futures, interest rate swaps and currency forwards. The Sub-fund will not invest into assets with a rating lower than "B-" by at least one of the recognised rating agencies. The Sub-fund will invest in financial derivative instruments for hedging and optimal portfolio management purposes but also to actively take positions in the global bond, money market, interest rates and currency markets.”

c. For RobecoSAM QI Global SDG & Climate Multi-Factor Credits:

“The Sub-fund will invest in financial derivative instruments for hedging and liquidity portfolio management purposes. This includes the usage of derivatives to manage currency and duration exposures in a cost-effective manner.

The buying or selling of the following exchange traded and over-the-counter derivatives are permitted: bond and FX futures, interest rate swaps and currency forwards. The Sub-fund will invest in financial derivative instruments for hedging and optimal portfolio management purposes.”

d. For RobecoSAM US Green Bonds:

“The Sub-fund will invest in financial derivative instruments for hedging as well as liquidity management, but also to actively take positions in the global bond, money market, interest rates and currency markets. This includes the usage of derivatives to manage currency and duration exposures in a cost-effective manner.

The Sub-fund may invest up to 10% of its net assets in onshore debt securities issued within the PRC through Bond Connect.

In case the Sub-fund uses derivatives for other purposes than duration and/or currency adjustments and/or inflation adjustments, the underlying of such investments respects the investment policy.

The buying or selling of the following exchange traded and over-the-counter derivatives are permitted: bond and FX futures, interest rate swaps and currency forwards. The Sub-fund will invest in financial derivative instruments for hedging and optimal portfolio management purposes but also to actively take positions in the global bond, money market and currency

markets.”

With the EU Commission adopting the Regulatory Technical Standards (RTS) under the SFDR and the subsequent release of the final delegated regulation, it has become clear that the interpretation of the RTS in a derivatives context is stricter than initially interpreted. As a consequence, the Company will allow only a limited use of derivatives for duration management within the fixed income portfolios in Article 9 Sub-funds.

3. Sustainability disclosures

Under “Appendix I – Information per Sub-fund” of the Prospectus, the section “Risk profile of the Sub-fund” of each Sub-fund has been completed with further information on the sustainability risk profile.

Furthermore, “Appendix VIII – Sustainability Disclosures per Sub-fund” has been replaced with a new version providing detailed information in relation to SFDR for each Sub-Fund classified as Article 8 or 9 of SFDR.

4. Addition of a Climate Transition Benchmark for the Sub-Funds RobecoSAM Smart Energy Equities, RobecoSAM Smart Materials Equities and RobecoSAM Smart Mobility Equities

Under “Appendix VI – Benchmarks” of the Prospectus a Climate Transition Benchmark (CTB) has been added for the Sub-Funds RobecoSAM Smart Energy Equities, RobecoSAM Smart Materials Equities and RobecoSAM Smart Mobility Equities. The Company is of the view that Sub-funds classified as Article 9 of SFDR with an explicit carbon objective are required to follow a Climate Transition Benchmark (CTB) or a Paris Aligned Benchmark (PAB). As the Sub-funds’ objectives explicitly name to contribute to Climate Action (SDG 13), a custom CTB has been added to measure the carbon target of each of these Sub-funds.

Please note that the revised Prospectus will be available at the registered office of the Company as from 28 October 2022.

Shareholders are reminded that, as provided in the Prospectus, the Company does not charge any redemption fee and Shareholders who disagree with the changes outlined above may redeem their Shares free of charge.

Any defined term in this letter shall have the same meaning as in the Prospectus unless otherwise defined herein.

Should you require any further details (or require a copy of the updated Prospectus, once available), please contact your usual (Robeco) sales person or the registered office of the Company or you can visit the website at www.robeco.com/riam.

Yours faithfully,
The Board of Directors of Robeco Capital Growth Funds