



Modern Slavery Statement

Robeco Hong Kong Limited

ABN 50 436 122 863 / ARBN 156 512 659

For Financial Year End 31 December 2025

This Modern Slavery Statement is made by **Robeco Hong Kong Limited**, specifically for its Australia representative office ("**Robeco Australia**"), for the financial year from **1 January 2025 to 31 December 2025**, in accordance with the Australian Modern Slavery Act 2018 (Cth) (the "**Act**").

Modern slavery takes many forms, and references to modern slavery in this statement mean slavery, servitude, forced and/or compulsory labour and human trafficking.

Our Business and Robeco Group Structure

Robeco Australia is a representative office of Robeco Hong Kong Limited in Australia and is ultimately a part of Robeco Holding B.V. ("Robeco Group" or "we"), which is itself a subsidiary of ORIX Corporation Europe N.V.. ORIX Corporation Europe N.V. is wholly owned by Tokyo based ORIX Corporation, a financial services group.

Robeco Group established its presence in Australia in 2012, with offices in Sydney and Melbourne, operating within the Asia Pacific regional structure, which also includes offices in Hong Kong, Shanghai, Singapore, and Tokyo.

Robeco Australia's activities focus on client engagement, distribution support, and representing Robeco Group's global investment expertise within the Australian market. Strategic and operational decisions are overseen by Robeco Hong Kong Limited management team, with reporting lines to both the Hong Kong management team and corresponding functional heads in Rotterdam, the Netherlands, where Robeco's headquarter is located.

Robeco Australia is exempted from the requirement to hold an Australian financial services licence under the Corporations Act 2001 (Cth) pursuant to ASIC Class Order 03/1103.

Policy Framework

Robeco Group supports the Act and is committed to operating free from modern slavery. We take a proportionate, risk-based approach to modern slavery and do not tolerate any form of modern slavery, in any part of our business and/or supply chain.

We believe that the risk of modern slavery within our business and supply chains is relatively low. This is largely due to the sector we operate within (financial services), the large number of high-skilled individuals we employ and the nature of our supply chain.

Despite the perceived low risk, we believe that sustainable business practices are crucial to the success of a company and therefore we seek to manage carefully all forms of risk and the wider impact of our businesses and employees' actions. We are committed to maintaining the highest level of ethical standards in the conduct of our business and within our supply chains and the actions of all our stakeholders and suppliers are key to maintaining our high standards and success.

Since 2014, Robeco Group has participated in the United Nations Global Compact, a strategic initiative

for business committed to aligning their strategies and operations with ten agreed principles. These principles cover areas such as human rights and labour, amongst others. By incorporating these principles into our policies and procedures we seek to uphold our basic responsibilities to all those within our business and supply chain.

The Integrity Incident and Whistleblowing Procedure is designed to encourage the responsible reporting of violations of the Code of Conduct (the “Code”) and/or any other malpractice, and to protect the individual(s) reporting any such abuse. Any violation of the Code is considered as an integrity incident and may lead to sanctions, depending on the severity of the violation. Our overall approach to incidents can be found in the Incident Management Framework.

Employees

All permanent and temporary employees are required to comply with the Code which promotes ethical conduct, accountability and transparency. Employees must do an e-learning training and pass a test on the Code. In addition, employees must confirm that they have received and read the Code. Failure to comply with the Code, any applicable laws, regulations or other internal rules may result in sanctions. The Code is refreshed annually, and all employees must attest to complying with its requirements.

Supply Chain

It is important to us that our suppliers respect all applicable local laws and conduct themselves to a morally and ethically high standard.

We perform a double materiality assessment to determine material Impacts, Risks, and Opportunities (IROs). This includes an assessment of working conditions in our entire value chain and a impact assessment for forced and child labor in particular. Given the nature of the goods and services we procure the risk of modern slavery occurring in our operations is considered to be low. Despite this low risk, we do have measures in place that focus on avoiding modern slavery in its value chain. Visibility and control may be more limited at lower tiers of the supply chain, and these areas remain a focus of the Robeco Group’s ongoing supplier governance and due diligence efforts.

We adopt a risk-based approach across its operations and supply chains, informed by relevant international standards. As part of our onboarding and/or due diligence process, we take into account the suppliers’ geographic location of operations, the nature of goods and services procured, and the level of reliance on outsourced, subcontracted, or multi-tier supply arrangements. These factors help

determine where heightened risks may arise and where enhanced oversight or engagement may be required.

Further, as part of our corporate social responsibility commitment, Robeco Group has seven principles of sustainable procurement that detail what we expect from our key suppliers and those within our suppliers' own sphere of influence. We view our key suppliers as long-term partners and we recognise the importance of fostering strong, collaborative relationships with them. To do this, we require our key suppliers to respect our seven principles which include matters relating to human rights and labour. We expect our key suppliers to support and respect the protection of human rights, as laid out in the United Nation's Universal Declaration of Human Rights. Our key suppliers must not be complicit in any human rights abuses, and we require that their own supply chains are ethically managed. Our key suppliers should understand that all forms of modern slavery must be eliminated and will not be tolerated.

To assess the effectiveness of our suppliers in managing modern slavery risks, Robeco Group has a procurement policy in place which defines clear roles and processes in engagement of suppliers with the goal of ensuring a better financial control, reduce risk exposure and improve efficiency. The policy is periodically reviewed by relevant internal functions to assess whether existing controls remain effective and to identify opportunities for continuous improvement.

Specifically, for Robeco Australia, we maintain a service-based supply chain, primarily consisting of professional services such as legal, accounting, audit, IT, office administration, and facility management providers; and with service providers that provide client engagement and distribution support. Given the nature of Robeco Australia's operations as a representative office engaged mainly in asset management and client service activities, the risk of modern slavery within our direct operations is relatively low.

Further details on our double materiality assessment, policies applicable to procurement and third-party management practices, please refer to our Integrated Annual Report, which is available upon request.

Approval

In preparing this statement, relevant entities and internal stakeholders within Robeco Group are consulted through internal coordination, review of relevant policies and procedures, and circulation of draft versions of the statement for input and validation.

This statement is prepared for Robeco Hong Kong Limited in respect of its Australia representative office. While it does not constitute a joint statement covering multiple reporting entities, it reflects alignment within Robeco Group frameworks and policies relating to modern slavery risk management.

This statement has been approved with the authority of the Board of Directors of Robeco Hong Kong Limited and is signed on its behalf by:



Florence Lam
Director



Stephen Dennis
Head of Australia, New Zealand & Oceania

Robeco Hong Kong Limited

Version: June 2026