

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors. for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2024 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2024 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented. The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible e that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Since its creation in 2010, Amundi has made responsible investment one of its founding pillars. Responsible investing is one of our core values and an essential component of our investment management approach today. This commitment relies on three convictions:

- 1. The integration of Environmental, Social and Governance (ESG) criteria in investment decisions is a driver of long-term financial performance;
- 2. Economic and financial actors carry, alongside governments and consumers, a responsibility towards society;
- 3. The acceleration of our ESG ambition is the first lever of growth for Amundi globally.

We reflect our commitment and convictions in our investment management activities, in the development of our investment solutions range, and the advisory capabilities and services we deploy to support our clients.

We embrace the concept of "double materiality" around which we build our proprietary ESG analysis and rating methodology, as we believe both sets of criteria are material when making investment decisions in the interests of our beneficiaries, with the aim to generate sustainable returns. This means that our ESG analysis aims at not only assessing the way ESG factors can materially impact the value of companies, but also how companies can impact the environment and social matters or human rights.

We believe that long-term value creation and sustainable return generation go beyond short-term financial performance. This conviction has led us to integrate in our investment philosophy and practices major sustainability factors (such as climate change, natural capital preservation and social cohesion). We acknowledge that our sustainability journey is part of a collective effort made by businesses to contribute to addressing these issues, and efficiently allocate capital for the future. Our role in raising standards as an investor, but also in terms of ESG performance of the companies in which we invest in, is a key part of this contribution.

Being a long-term responsible investor also informs our global vision on risk. Amundi understands that risk is multi-faceted and operates over different time horizons. Nevertheless, we believe that investing for the long-term is an advantage. Our investment teams look beyond market risk, and take into account credit, liquidity, and reputational risks, as well as ESG risks generated by an issuer's activities. They are supported by an independent Risk Department, and an independent Responsible Investment business line that accesses specialised research and can provide its own in-depth analysis of ESG risks likely to impact portfolios.

In 2021, Amundi completed its first three-year ESG Action Plan, which aimed to establish an unprecedented level of ESG integration within its investment activities and throughout the organization. These ambitions translated into:



- Setting ESG performance objectives for 100% of our actively managed open-ended funds;
- Systematically considering ESG factors in our dialogue with investee companies, via our engagement and voting activities.

Following the completion of our first ESG Action Plan, Amundi has launched in December 2021 a new ESG Ambitions 2025 plan that will allow us to continue deepening ESG integration in investment solutions, strengthen our investment offering for sustainable development and set internal alignment objectives in line with Amundi's ESG commitments. This new 3-year Action Plan is comprised of an ambitious set of goals that aims to address clients' current and future responsible investing needs.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
- refinement of ESG analysis and incorporation
- stewardship activities with investees and/or with policymakers
- · collaborative engagements
- attainment of responsible investment certifications and/or awards

As Europe's largest asset manager, and a major shareholder in several companies via the funds and mandates it manages on behalf of its clients, Amundi believes that it is its responsibility to encourage and accelerate the transition of companies towards a more sustainable model. As part of this commitment, we joined the Net Zero Asset Managers (NZAM) initiative in July 2021, committing to support the global objective of carbon neutrality by 2050 or sooner. As part of our NZAM commitment, we announced in November 2022 our engagement that by 2025, 18% of our total AuM will be composed of funds and mandates with explicit net zero alignment objectives. In December 2021, we announced our ESG Ambitions 2025 plan, which set out ten concrete objectives to accelerate our ESG transformation and pave the way towards carbon neutrality by 2050.

Throughout the year 2023, Amundi has reached numerous objectives related to climate change and its responsible investment strategy, including*:

- Already incorporating ESG criteria into 100% of its actively managed open-ended funds and all its voting activity, we have increased the scope of our ESG analysis, which includes climate-related criteria, to over 19,000 issuers rated with an ESG score as of end of 2023.
- In 2023, we have launched a comprehensive range of Net Zero Ambition funds across the main asset classes (equities, fixed income, real estate, multi-asset, emerging markets, climate ETFs).
- We engaged with around 1500 companies on the transition to a low-carbon economy in 2023, compared to 1104 companies in 2022, and 547 in 2021.
- We expanded our biodiversity and natural capital engagement pool to 294 issuers in 2023 (up from 52 in 2021), partly due to the establishment of our new Biodiversity and Ecosystem Services Policy. The policy focuses on companies with high exposure to activities harmful to biodiversity that either lack sufficient processes/disclosure or have been involved in serious controversies.
- We have also supported 88% of climate-related shareholder resolutions presented at General Meetings in which it participated.
- Amundi was re-elected as part of the International Capital Market Association (ICMA) Principles' Steering Committee, and is elected in the Advisory Group of the Net Zero Asset Managers Initiative and the IGCN Global Stewardship Committee.



- Amundi joined Nature Action 100, a global investor engagement initiative that focuses on driving greater corporate ambition and action to reduce nature and biodiversity loss, and the Global Impact Investing Network, among other initiatives.
- 3,600 of Amundi employees attended a Climate Fresk workshop as of end 2023 (eg. 65% of the workforce worldwide), and more than 130 people volunteered to become ambassadors to raise awareness among their colleagues.
- One of the objectives of Amundi's climate strategy to train 100% of our employees in responsible investment by the end of 2023 has been achieved.
- We were awarded "Investor of the Year" at the Environmental Finance Bond Awards 2023 for the third year in a row, and "ESG/SRI investor of the Year" at GlobalCapital European Securitization Awards for the second year in a row.
- We increased our support to leading research initiatives on climate change mitigation and adaptation: MIT Joint Program on the Science and Policy of Global Change, OS-Climate, and EDHEC-Risk Climate Impact Institute.
- *For a full overview of Amundi's responsible investment strategy achievements, please refer to its 2023 Universal Registration Document available here: https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b

Section 3. Next steps

■ What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

The two major announcements that Amundi has made to advance our commitment to responsible investment by 2025 are:

- In July 2021 we joined the Net Zero Asset Managers (NZAM) initiative, committing to support the goal of carbon neutrality by 2050 or sooner, and we announced in November 2022 our engagement that by 2025, 18% of our total AuM will be composed of funds and mandates with explicit net zero alignment objectives.
- In December 2021, Amundi announced its ESG Ambitions 2025 plan, setting ten concrete objectives to accelerate Amundi's ESG transformation and contribute to the global goal of carbon neutrality by 2050. The ESG Ambitions 2025 plan allows us to contribute at our level to the global net zero objective, but we are aware that developing a climate resilient environment must be a collective effort. The ten objectives of the plan are based on three pillars related to A) our investments and saving solutions, B) our engagements and dialogues with companies, and C) our actions as a corporate.

In particular, the ten objectives of the ESG Ambitions 2025 plan are the following:

- A) Strengthen our range of savings solutions for sustainable development
- 1. Introduce a new environmental transition rating that assesses companies' efforts in decarbonising their operations and the development of their sustainable activities, covering actively managed open funds. All actively managed open include a rating that assesses companies' efforts in decarbonising their operations and the development of their sustainable activities.
- 2. Offer open funds with a Net Zero 2050 investment objective in all asset classes (real estate, multi-asset, developed market bonds, developed market equities).
- 3. Reach €20 billion of assets under management in impact funds.
- 4. Ensure that 40% of our ETF range is made up of ESG funds.



- 5. Develop Amundi Technology's ALTO* Sustainability offer.
- B) Amplify our outreach to companies
- 6. Work with 1,000 additional companies to define credible strategies to reduce their greenhouse gas emissions.
- 7. From 2022, exclude from our portfolios companies that generate over 30% of their activity from unconventional oil and gas sectors (oil sands, shale oil and gas).
- C) Set internal alignment goals that match the commitment
- 8. Take into account the level of achievement of these ESG objectives (weighting 20%) in the KPI calculation of performance shares for our 200 senior executives.
- 9. Reduce our own direct greenhouse gas emissions by approximately 30% (vs 2018) per employee in 2025, for any Amundi Group entity with more than 100 employees.
- 10. Present our climate strategy to shareholders (Say on Climate) at the Annual General Shareholders' Meeting in 2022.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Timothée Jaulin

Position

Head of ESG Development & Advocacy

Organisation's Name

Amundi

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'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

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ORGANISATIONAL OVERVIEW (00)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
001	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2023

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?



o (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?



o (B) No



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.2	CORE	00 2.1	N/A	PUBLIC	Subsidiary information	GENERAL

How many subsidiaries of your organisation are PRI signatories in their own rights?

- 1
- o 2
- o 3
- 0 4
- o 5
- o 6
- 78
- 0 9
- o 10

List any subsidiaries of your organisation that are PRI signatories in their own right and indicate if the responsible investment activities of the listed subsidiaries will be reported in this submission.

(1) Yes, the responsible investment activities of this subsidiary will be included in this report

(2) No, the responsible investment activities of this subsidiary will be included in their separate report

(A) Signatory name:

KBI Global Investors



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ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 4	CORE	00 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only	US\$ 2,250,226,118,291.00
(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]	US\$ 0.00
(C) AUM subject to execution, advisory, custody, or research advisory only	US\$ 0.00



ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
>10-50%	>0-10%
>10-50%	>0-10%
>0-10%	>0-10%
>0-10%	0%
>0-10%	0%
0%	>0-10%
0%	0%
0%	0%
>10-50%	>0-10%
0%	0%
	>10-50% >10-50% >0-10% >0-10% >0-10% 0% 0% 0% >10-50%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Structured, treasury, balanced

(I) Other - (2) Percentage of Externally managed AUM - Specify:

Structured, treasury, balanced



ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a further breakdown of your organisation's externally managed listed equity and/or fixed income AUM.

	(1) Listed equity	(2) Fixed income - SSA	(3) Fixed income - corporate	(4) Fixed income - securitised	(5) Fixed income - private debt
(A) Active	>75%	>10-50%	>50-75%	>0-10%	0%
(B) Passive	>0-10%	0%	0%		

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	OO 5, OO 5.1	SAM 3, SAM 8	PUBLIC	Asset breakdown: Externally managed assets	GENERAL

Provide a breakdown of your organisation's externally managed AUM between segregated mandates and pooled funds or investments.

75%
370
75%
50-75%
75%
75%
,



ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity	>50-75%
(B) Active – quantitative	>0-10%
(C) Active – fundamental	>10-50%
(D) Other strategies	0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL
Provide a further	breakdown of your	internally manage	d fixed income	AUM.		
(A) Passive – S	SSA >0-109	6				

(A) Passive – SSA	>0-10%
(B) Passive – corporate	>0-10%
(C) Active – SSA	>10-50%
(D) Active – corporate	>50-75%
(E) Securitised	>0-10%
(F) Private debt	>0-10%



ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL
Provide a furth	ner breakdown of your	nternally manage	d private equit	y AUM.		
(Δ) Venture (canital	0%				

(A) Venture capital	0%
(B) Growth capital	>10-50%
(C) (Leveraged) buy-out	>50-75%
(D) Distressed, turnaround or special situations	0%
(E) Secondaries	0%
(F) Other	0%

ASSET BREAKDOWN: INTERNALLY MANAGED REAL ESTATE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 RE	CORE	00 5	N/A	PUBLIC	Asset breakdown: Internally managed real estate	GENERAL
Provide a furth	er breakdown of your	internally manage	d real estate Al	JM.		
(A) Retail		>10-50%				
(B) Office		>50-75%				
(C) Industrial		>0-10%				
(D) Residentia	al	>0-10%				
(E) Hotel		>0-10%				



>0-10%
0%
0%
>0-10%
0%
>0-10%

(K) Other - Specify:

cash and forest

ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Inc	dicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OC) 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL
Pro	ovide a further	breakdown of your i	nternally manage	d infrastructure	e AUM.		
	(A) Data infrastr	ructure	0%				
	(B) Diversified		0%				
	(C) Energy and water resources		0%				
	(D) Environmental services		0%				
	(E) Network util	ities	0%				
	(F) Power generation (excl. renewables)		>10-50%				
	(G) Renewable power		>75%				
	(H) Social infras	structure	0%				
	(I) Transport		0%				



(J) Other 0%

MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 6	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What percentage of your organisation's externally managed assets are managed by PRI signatories?

>75%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(B) Fixed income – SSA	(2) >0 to 10%
(C) Fixed income – corporate	(2) >0 to 10%
(D) Fixed income – securitised	(2) >0 to 10%
(E) Fixed income – private debt	(2) >0 to 10%
(F) Private equity	(2) >0 to 10%
(G) Real estate	(2) >0 to 10%
(H) Infrastructure	(2) >0 to 10%
(I) Hedge funds	(2) >0 to 10%



STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(4) Fixed income - passive	(5) Private equity
(A) Yes, through internal staff	V	Ø	Ø	Ø	Ø
(B) Yes, through service providers					
(C) Yes, through external managers					
(D) We do not conduct stewardship	0	0	0	0	0
	(6) Real estate	(7) Infrastr	ucture (8) He	edge funds	(11) Other
(A) Yes, through internal staff	7	Z			Ø
(B) Yes, through service providers					
(C) Yes, through external managers					
(D) We do not conduct stewardship	0	0		•	0



STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 9 HF	CORE	OO 5	OO 9	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation have direct investments in listed equity across your hedge fund strategies?

(A) Yes(B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Hedge funds
(A) Yes, through internal staff	☑	Ø	
(B) Yes, through service providers	☑	Ø	
(C) Yes, through external managers			☑
(D) We do not conduct (proxy) voting	0	0	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(11) >90 to <100%
(B) Listed equity - passive	(11) >90 to <100%
(C) Hedge funds	(12) 100%

STEWARDSHIP NOT CONDUCTED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.

Stewardship, excluding (proxy) voting

(H) Hedge funds

We don't actively conduct stewardship directly or through our external managers for our alternative products range.



ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(A) Listed equity - passive	•	0
(B) Listed equity - active - quantitative		0
(C) Listed equity - active - fundamental		0
(E) Fixed income - SSA	•	0
(F) Fixed income - corporate	•	0
(G) Fixed income - securitised	•	0
(H) Fixed income - private debt	•	0
(I) Private equity	•	0
(J) Real estate	•	0
(K) Infrastructure	•	0
(V) Other: Structured, treasury, balanced	•	0



EXTERNAL MANAGER SELECTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 12	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager selection	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when selecting external investment managers?

	(1) Yes, we incorporate ESG factors when selecting external investment managers	(2) No, we do not incorporate ESG factors when selecting external investment managers
(A) Listed equity - active	•	0
(B) Listed equity - passive	•	0
(C) Fixed income - active	•	0
(E) Private equity	•	0
(H) Hedge funds	•	0
(K) Other: Structured, treasury, balanced	0	•



EXTERNAL MANAGER APPOINTMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 13	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager appointment	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when appointing external investment managers?

	(1) Yes, we incorporate ESG factors when appointing external investment managers	(2) No, we do not incorporate ESG factors when appointing external investment managers
(A) Listed equity - active	•	0
(B) Listed equity - passive	•	0
(C) Fixed income - active	•	0
(E) Private equity	•	0
(H) Hedge funds	•	0
(K) Other: Structured, treasury, balanced	0	•



EXTERNAL MANAGER MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	OO 5, OO 5.1	Multiple indicators	PUBLIC	External manager monitoring	1

For each externally managed asset class, does your organisation incorporate ESG factors, to some extent, when monitoring external investment managers?

	(1) Yes, we incorporate ESG factors when monitoring external investment managers	(2) No, we do not incorporate ESG factors when monitoring external investment managers
(A) Listed equity - active	•	0
(B) Listed equity - passive	•	O
(C) Fixed income - active	•	Ο
(E) Private equity	•	Ο
(H) Hedge funds	•	О
(K) Other: Structured, treasury, balanced	0	•

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12- 14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed

(C) Other

Amundi main ESG rating methodology cannot cover some instruments and issuers of Amundi's investable universes, sometimes because of the nature of the instruments or sometimes because of a lack of coverage by existing external data providers (this situation applies for instance to real assets, US municipal bonds or some securitized products). To expand its coverage, Amundi has developed specific methodologies that apply to private equity, private debt issuers, impact investing, real estate as well as to specific instruments such as green or social bonds. Even if each methodology is specific, they share the same target, which is the ability to anticipate and manage sustainability risks and opportunities as well as the ability to handle their potential negative impacts on the sustainability factors.



ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12- 14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions and/or in the selection, appointment and/or monitoring of external investment managers.

Externally managed

(Z) Other

This asset class is not covered by SAM team since it is only focused on quoted financial products.

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 LE	CORE	00 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	>0-10%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	>10-50%
(E) Thematic and integration	0%
(F) Screening and thematic	>0-10%
(G) All three approaches combined	0%
(H) None	>10-50%



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 LE	CORE	00 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

	Percentage coverage out of your total listed equity assets where a screening approach is applied
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	>75%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 FI	CORE	00 5.3 FI, 00 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Screening alone	>0-10%	>0-10%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	0%	0%	0%
(D) Screening and integration	>50-75%	>50-75%	>75%
(E) Thematic and integration	0%	0%	>0-10%
(F) Screening and thematic	0%	0%	0%
.,			



(G) All three approaches combined	0%	0%	0%
(H) None	>10-50%	>10-50%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 FI	CORE	00 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Positive/best-in-class screening only	0%	0%	0%
(B) Negative screening only	0%	0%	0%
(C) A combination of screening approaches	>75%	>75%	>75%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

● (A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>10-50%

- $\circ~$ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- o (C) Not applicable; we do not offer products or funds



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>10-50%

o (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

\square (A) Commodity type label (e.g. BCI)
□ (B) GRESB
☑ (C) Austrian Ecolabel (UZ49)
\square (D) B Corporation
□ (E) BREEAM
☐ (F) CBI Climate Bonds Standard
\square (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
\square (H) DDV-Nachhaltigkeitskodex-ESG-Impact
☐ (I) EU Ecolabel
\square (J) EU Green Bond Standard
☑ (K) Febelfin label (Belgium)
☑ (L) Finansol
☐ (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
☑ (N) Greenfin label (France)
\square (O) Grüner Pfandbrief
☐ (P) ICMA Green Bond Principles
☐ (Q) ICMA Social Bonds Principles
☐ (R) ICMA Sustainability Bonds Principles
☐ (S) ICMA Sustainability-linked Bonds Principles
☐ (T) Kein Verstoß gegen Atomwaffensperrvertrag
☐ (U) Le label ISR (French government SRI label)
☐ (V) Luxflag Climate Finance
☐ (W) Luxflag Environment
☑ (X) Luxflag ESG
☐ (Y) Luxflag Green Bond
\square (Z) Luxflag Microfinance
(AA) Luxflag Sustainable Insurance Products
☐ (AB) National stewardship code
☐ (AC) Nordic Swan Ecolabel
(AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
(AE) People's Bank of China green bond guidelines
☐ (AF) RIAA (Australia)
☑ (AG) Towards Sustainability label (Belgium)



PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5.3 FI, OO 11	LE 8, FI 10	PUBLIC	Passive investments	1

What percentage of your total internally managed passive listed equity and/or fixed income passive AUM utilise an ESG index or benchmark?

(A) Listed equity - passive	>10-50%
(B) Fixed income - passive	>10-50%

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	00 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds	>50-75%
(B) Social bonds	>10-50%
(C) Sustainability bonds	>10-50%
(D) Sustainability-linked bonds	>0-10%
(E) SDG or SDG-linked bonds	0%
(F) Other	0%
(G) Bonds not labelled by the issuer	0%



SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

previous responses)	reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
•	0	0	
0	•	0	



(T) External manager selection,appointment and monitoring (SAM)listed equity - active	0	•	0
(U) External manager selection, appointment and monitoring (SAM) – listed equity - passive	0	•	o
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	•	0	0
(X) External manager selection, appointment and monitoring (SAM) – private equity	0	•	o
(AA) External manager selection, appointment and monitoring (SAM) – hedge funds	0	0	•

OTHER ASSET BREAKDOWNS

PRIVATE EQUITY: SECTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 22	CORE	OO 21	N/A	PUBLIC	Private equity: Sectors	GENERAL

In which sector(s) are your internally managed private equity assets invested?

☑ (B) Materials

☑ (C) Industrials

☑ (D) Consumer discretionary

☑ (E) Consumer staples

☑ (F) Healthcare

 \square (G) Financials

☑ (H) Information technology

☐ (I) Communication services

☐ (J) Utilities

☑ (K) Real estate



PRIVATE EQUITY: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 23	CORE	00 21	N/A	PUBLIC	Private equity: Ownership level	GENERAL

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- \square (A) A majority stake (more than 50%)
- ☑ (B) A significant minority stake (between 10–50%)

Select from the list:

- o (1) >0 to 10%
- o (2) >10 to 50%
- **◎** (3) >50 to 75%
- o (4) >75%
- \square (C) A limited minority stake (less than 10%)

REAL ESTATE: BUILDING TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	00 21	RE 1, RE 9 - 10	PUBLIC	Real estate: Building type	GENERAL

What is the building type of your physical real estate assets?

- ☑ (A) Standing investments
- ☑ (B) New construction
- ☑ (C) Major renovation

REAL ESTATE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 25	CORE	00 21	N/A	PUBLIC	Real estate: Ownership level	GENERAL

What is the percentage breakdown of your physical real estate assets by the level of ownership?

☑ (A) A majority stake (more than 50%)

Select from the list:

- o (1) >0 to 10%
- o (2) >10 to 50%
- (3) >50 to 75%
- o (4) >75%
- ☑ (B) A significant minority stake (between 10–50%)

Select from the list:

● (1) >0 to 10%

- o (2) >10 to 50%
- ☑ (C) A limited minority stake (less than 10%)

Select from the list:

- **●** (1) >0 to 10%
- o (2) >10 to 50%

REAL ESTATE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	OO 21	RE 1, RE 6–8, RE 13	PUBLIC	Real estate: Management type	GENERAL

Who manages your physical real estate assets?

- ☑ (A) Direct management by our organisation
- ☑ (B) Third-party property managers that our organisation appoints
- \square (C) Other investors or their third-party property managers
- \square (D) Tenant(s) with operational control

INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	00 21	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

☑ (A) A majority stake (more than 50%)

Select from the list:

- o (1) >0 to 10%
- **(2) >10 to 50%**
- o (3) >50 to 75%
- o (4) >75%
- ☑ (B) A significant minority stake (between 10–50%)

Select from the list:

- o (1) >0 to 10%
- **(2) >10 to 50%**
- o (3) >50 to 75%
- o (4) >75%
- ☑ (C) A limited minority stake (less than 10%)

Select from the list:

- (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75%

INFRASTRUCTURE: STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	00 21	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the investment strategy for your infrastructure assets?

☑ (A) Core

☑ (B) Value added

☐ (C) Opportunistic

☐ (D) Other

INFRASTRUCTURE: TYPE OF ASSET

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	00 21	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the asset type of your infrastructure?

☑ (A) Greenfield

☑ (B) Brownfield

INFRASTRUCTURE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	00 21	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

Who manages your infrastructure assets?

 \square (A) Direct management by our organisation

☑ (B) Third-party infrastructure operators that our organisation appoints

☑ (C) Other investors, infrastructure companies or their third-party operators

 \Box (D) Public or government entities or their third-party operators

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	00 3, 00 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- \circ (A) Publish as absolute numbers
- (B) Publish as ranges



POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☑ (A) Overall approach to responsible investment
- ☑ (B) Guidelines on environmental factors
- ☑ (C) Guidelines on social factors
- ☑ (D) Guidelines on governance factors
- ☑ (E) Guidelines on sustainability outcomes
- ☑ (F) Guidelines tailored to the specific asset class(es) we hold
- **☑** (G) Guidelines on exclusions
- ☑ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☑ (I) Stewardship: Guidelines on engagement with investees
- ☑ (J) Stewardship: Guidelines on overall political engagement
- ☑ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☑ (L) Stewardship: Guidelines on (proxy) voting
- ☑ (M) Other responsible investment elements not listed here Specify:

Responsible investment governance structure, Reporting and transparency related to responsible investment.

o (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☑ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☑ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues Specify:

Biodiversity and ecosystem services, social cohesion and governance practices that strengthen sustainable development.

o (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

(A) Overall approach to responsible investment Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (B) Guidelines on environmental factors

Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (C) Guidelines on social factors

Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (D) Guidelines on governance factors

Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (E) Guidelines on sustainability outcomes

Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)
Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(G) Specific guidelines on human rights (may be part of guidelines on social factors) Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(H) Specific guidelines on other systematic sustainability issues Add link:

https://about.amundi.com/files/nuxeo/dl/0522366c-29d3-471d-85fd-7ec363c20646

(I) Guidelines tailored to the specific asset class(es) we hold Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

☑ (J) Guidelines on exclusions

Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(K) Guidelines on managing conflicts of interest related to responsible investment Add link:

https://about.amundi.com/files/nuxeo/dl/0522366c-29d3-471d-85fd-7ec363c20646

 $\ensuremath{\square}$ (L) Stewardship: Guidelines on engagement with investees



Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(M) Stewardship: Guidelines on overall political engagement Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(N) Stewardship: Guidelines on engagement with other key stakeholders Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

(O) Stewardship: Guidelines on (proxy) voting Add link:

https://about.amundi.com/files/nuxeo/dl/0522366c-29d3-471d-85fd-7ec363c20646

(P) Other responsible investment aspects not listed here Add link:

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

o (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1-6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

Amundi believes that investing responsibly is part of its fiduciary duties. This is explicitly mentioned in its Global Responsible Investment Policy. Examples include:

- Page 6: We recognise the responsibility placed in our hands when granted investment powers and place fiduciary duty at the core of our action. We work to deliver on that duty by investing and acting consistently with the long-term interests of our clients at heart. We believe that our proactive stewardship framework and responsible investing approach can deliver meaningful change and add value over a long-term horizon.
- Page 15: By integrating such issues, investors could better take into account long-term risks (financial, operational, reputational, etc.), fulfilling both their fiduciary duties and potential commitment to act as responsible investors.
- Page 18: As part of its fiduciary responsibility, Amundi has set minimum standards and exclusion policies on critical sustainability topics, triggering specific monitoring, and escalation procedures when breaches are identified, that can lead to engagement, specific voting actions (when applicable) or exclusion.
- o (B) No



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- ☑ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☑ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☑ (D) How different stewardship tools and activities are used across the organisation
- ☑ (E) Approach to escalation in stewardship
- **☑** (F) Approach to collaboration in stewardship
- ☑ (G) Conflicts of interest related to stewardship
- ☑ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☑ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☑ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☑ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- o (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

(A) We have a publicly available policy to address (proxy) voting in our securities lending programme Add link(s):

https://about.amundi.com/files/nuxeo/dl/0522366c-29d3-471d-85fd-7ec363c20646

- o (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- o (C) We rely on the policy of our external service provider(s)
- o (D) We do not have a policy to address (proxy) voting in our securities lending programme
- o (E) Not applicable; we do not have a securities lending programme



RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(B) Guidelines on environmental factors

(C) Guidelines on social factors

(D) Guidelines on governance factors

(2) >50% to 60%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change	(2) for a majority of our AUM
(B) Specific guidelines on human rights	(2) for a majority of our AUM
(C) Specific guidelines on other systematic sustainability issues	(2) for a majority of our AUM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☑ (A) Listed equity

- (1) Percentage of AUM covered
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%

 - o (7) >60% to 70%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - (10) >90% to <100%
 - o (11) 100%
- (2) If your AUM coverage is below 100%, explain why: (Voluntary)

We do not cover regulated investment companies (RIC) in the US.

☑ (B) Fixed income

- (1) Percentage of AUM covered
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%
 - o (7) >60% to 70%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - o (10) >90% to <100%
 - **(11) 100%**

☑ (C) Private equity

- (1) Percentage of AUM covered
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%
 - o (7) >60% to 70%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - o (10) >90% to <100%
 - **(11) 100%**

☑ (D) Real estate

- (1) Percentage of AUM covered
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - (4) >30% to 40%
 - o (5) >40% to 50%



- o (6) >50% to 60%
- o (7) >60% to 70%
- o (8) >70% to 80%
- o (9) >80% to 90%
- o (10) >90% to <100%
- **(11) 100%**

☑ (E) Infrastructure

- (1) Percentage of AUM covered
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%
 - o (7) >60% to 70%
 - (1) 20070 to 1070
 - (8) >70% to 80%(9) >80% to 90%
 - o (10) >90% to <100%
 - **(11) 100%**
- \Box (F) Hedge funds
- ☐ (I) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

☑ (A) Actively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%
 - o (7) >60% to 70%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - (10) >90% to <100%
 - o (11) 100%
- (2) If your AUM coverage is below 100%, explain why: (Voluntary)

Clients with segregated mandates can require us to apply their own voting policy.

☑ (B) Passively managed listed equity

- (1) Percentage of your listed equity holdings over which you have the discretion to vote
 - o (1) >0% to 10%
 - o (2) >10% to 20%
 - o (3) >20% to 30%
 - o (4) >30% to 40%
 - o (5) >40% to 50%
 - o (6) >50% to 60%
 - o (7) >60% to 70%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - **(10)** >90% to <100%



- o (11) 100%
- (2) If your AUM coverage is below 100%, explain why: (Voluntary)

Clients with segregated mandates can require us to apply their own voting policy.

 \square (C) Direct listed equity holdings in hedge fund portfolios

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☑ (A) Board members, trustees, or equivalent
- $\ \square$ (B) Senior executive-level staff, or equivalent

Specify:

Amundi's CEO monitors the four Responsible Investment Steering Committees on a regular basis.

☑ (C) Investment committee, or equivalent

Specify:

ESG and Climate Strategic Committee, ESG Rating Committee, Voting Committee, ESG Management Committee.

☑ (D) Head of department, or equivalent

Specify department:

Chief Responsible Investment Officer who is also a member of the Executive Committee.

o (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	 ✓	Ø
(B) Guidelines on environmental, social and/or governance factors		



(2) Senior executive-level staff

(C) Guidelines on sustainability outcomes		☑
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	☑	☑
(E) Specific guidelines on human rights (may be part of guidelines on social factors)		☑
(F) Specific guidelines on other systematic sustainability issues		
(G) Guidelines tailored to the specific asset class(es) we hold		Ø
(H) Guidelines on exclusions		Ø
(I) Guidelines on managing conflicts of interest related to responsible investment		☑
(J) Stewardship: Guidelines on engagement with investees		Ø
(K) Stewardship: Guidelines on overall political engagement		☑
(L) Stewardship: Guidelines on engagement with other key stakeholders		☑
(M) Stewardship: Guidelines on (proxy) voting		Ø
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	0	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1-6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

(A) Yes

Describe how you do this:

Yes, Amundi's public positions and political engagement reflect our company commitments and priorities such as responsible investment. Examples include promoting the application of EU sustainable finance rules to the whole investment value chain, and seeking clarity and consistency in the sustainable finance framework.

Our positions on ESG matters are established in concertation with our Responsible Investment department and our policy orientations are validated through an internal process including:

- Regular reporting by the Head of Governance and Public Affairs to the Deputy CEO. The Deputy CEO is in charge of the "Strategy, Finance and Control" global division of Amundi, and is a member of Amundi's General Management Committee.
- A Strategic Public Affairs Committee under the chair of the Deputy CEO (which meets at least once every two months) with senior management, representing the main business lines or countries within Amundi. Its purpose is to identify and elaborate a common position on key advocacy matters for the short/medium/long term.
- A monthly Operational Public Affairs Committee that liaises with operational stakeholders in the business lines and in the local entities in the EU in order to share information and participate to the set-up and implementation of the strategic topics.

Amundi's political engagement focuses on:

- Participating in the work of recognised trade associations (mainly in France AFG and towards EU institutions EFAMA) which report their activities with transparency registers such as the European Transparency register and promote integrity in lobbying practices. The list of associations to which Amundi belongs includes: Paris Europlace, AMAFI (Association des Marchés Financiers), ASPIM (Association Française des Sociétés de Placement Immobilier), and France Invest (Capital Investment). Amundi is also a contributing and active member of ICMA (International Capital Market Association) in London, and most of its local subsidiaries are members of the local asset management associations. Examples include Assogestioni, BVI and Irish Funds (in the EU), IA (in the UK), ICI (in the USA), and Hong Kong IFA and JITA (in Asia).
- Answering public consultations launched by public authorities (e.g. ESMA, European Commission) see PGS 39.1 for details and links.
- Participating in workshops or panels organised by or involving co-legislators.
- o (B) No
- o (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☑ (A) Internal role(s)

Specify:

Dedicated Responsible Investment Business Line.

- ☐ (B) External investment managers, service providers, or other external partners or suppliers
- o (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

Describe: (Voluntary)

The Chairman of Amundi AM's supervisory committee, who has a specific weight within this body, is also Amundi SA's Deputy Chief Executive Officer. As such, he is fully qualified, as far as responsible investment is concerned. In addition, he continues to receive specific trainings in this field. Last but not least, a substantial part of its variable compensation depends on achievements supporting the Group's Responsible Investment strategy. For further information, please see Amundi SA's universal registration document, accessible on its website.

o (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

Indicate whether these responsible investment KPIs are linked to compensation

- o (2) KPIs are not linked to compensation as these roles do not have variable compensation
- o (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)



One of the objectives of Amundi's 2025 ESG Ambitions plan is to take into account the level of achievement of ESG objectives included in the plan (weighting 20%) in the KPI calculation of performance shares for our 200 senior executives.

In 2023, ESG objectives were also incorporated in the annual objectives of 99% of portfolio managers and sales representatives and the implementation

of the "ESG Ambitions 2025" plan accounted for 20% of the criteria supporting the performance share plan awarded to 200 Amundi senior executives.

o (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation		
(B) Specific competence in investors' responsibility to respect human rights		
(C) Specific competence in other systematic sustainability issues		
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	0	0

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☑ (A) Any changes in policies related to responsible investment
- ☑ (B) Any changes in governance or oversight related to responsible investment
- **☑** (C) Stewardship-related commitments



- ☑ (D) Progress towards stewardship-related commitments
- ☑ (E) Climate-related commitments
- ☑ (F) Progress towards climate-related commitments
- **☑** (G) Human rights-related commitments
- ☑ (H) Progress towards human rights-related commitments
- ☑ (I) Commitments to other systematic sustainability issues
- ☑ (J) Progress towards commitments on other systematic sustainability issues
- o (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☑ (A) Yes, including all governance-related recommended disclosures
- ☑ (B) Yes, including all strategy-related recommended disclosures
- ☑ (C) Yes, including all risk management-related recommended disclosures
- ☑ (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above Add link(s):

https://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

☑ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR) Link to example of public disclosures

https://about.amundi.com/files/nuxeo/dl/cdc78b19-cca0-427d-bf08-12c513b6665c

- \square (B) Disclosures against the European Union's Taxonomy
- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- ☑ (D) Disclosures against other international standards, frameworks or regulations Specify:

 $\label{lem:continuous} \textbf{GIIN Operating Principles for Impact Management}.$

Link to example of public disclosures

https://about.amundi.com/files/nuxeo/dl/8641d8ba-8e1a-4c15-b43f-b8df910e3ab4

☑ (E) Disclosures against other international standards, frameworks or regulations Specify:



Article 29 French Energy and Climate Law, TCFD recommendations.

Link to example of public disclosures

https://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

☑ (F) Disclosures against other international standards, frameworks or regulations Specify:

UK Stewardship Code and other stewardship codes.

Link to example of public disclosures

https://about.amundi.com/files/nuxeo/dl/1b9c7dba-406a-4f74-9bb2-0da3233ee609

☑ (G) Disclosures against other international standards, frameworks or regulations Specify:

Principles for Responsible Investment.

Link to example of public disclosures

https://www.amundi.com/institutional/files/nuxeo/dl/8a4f779b-4899-4190-80b4-bc5b92400f53

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

● (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_en?id=94607479886-02 https://about.amundi.com/files/nuxeo/dl/ed8bf237-9a62-45b0-91e8-90a9f73983d8 https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

- o (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- o (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year



STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- ☑ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☑ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☑ (D) Exclusions based on our organisation's climate change commitments
- ☐ (E) Other elements
- o (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

 $\ensuremath{\square}$ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- **(1)** for all of our AUM subject to strategic asset allocation
- o (2) for a majority of our AUM subject to strategic asset allocation
- o (3) for a minority of our AUM subject to strategic asset allocation
- ☑ (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- o (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- o (3) for a minority of our AUM subject to strategic asset allocation
- ☑ (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- o (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- o (3) for a minority of our AUM subject to strategic asset allocation
- ☑ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- o (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- o (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

• (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns



STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure	(6) Hedge funds
(A) Maximise our portfolio-level risk- adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	•	•	•	•	•	•
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	O	0	Ο	0	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

At Amundi, engagement aims to influence the activities or behaviour of investee companies in order to preserve long term economic capital as part of our search to create long-term value for our clients' portfolios. It therefore must be results-driven, proactive and integrated in our global ESG process. Engagement can nevertheless have various aims that could be presented in two categories:

• Engage an issuer to improve the way it integrates the environmental and social dimension in its processes, the quality of its governance in order to limit its sustainability risks;



• Engage an issuer to improve its impact on environmental, social, and human rights related or other sustainability matters that are material to society and the global economy and could translate into higher ESG-related risks (risk of controversies, fines or lower valuation).

Amundi engages investees or potential investees at the issuer level regardless of the type of securities held. Issuers engaged are primarily chosen based on their level of exposure to the engagement subject (often known as the engagement trigger).

The environmental, social, and governance issues that companies face potentially have a major impact on their activities. Thus, we consider that we need to assess issuers' ESG quality regardless of our position in the balance sheet (as a shareholder or a bondholder). If ESG issues have financial consequences for businesses, such issues are considered by our investment professionals (equity or credit analysts, fund managers) in their valuation models and investment processes. Meanwhile, we engage on ESG issues at issuer level. Investment professionals at Amundi may also engage with issuers on ESG topics that have financial materiality for the value of the instrument they are invested in, in addition to their holistic ESGrelated active dialogue with issuers.

Amundi's engagement spans continents and takes into account local realities. The aim is to have the same level of ambition globally but adapt questions and intermediate milestones to different geographies. We also wish our engagement activities to be impactful and additive to the global effort of the financial community.

Amundi engages issuers around 5 main areas:

- The transition towards a low carbon economy;
- Natural capital preservation (ecosystem protection & fighting against biodiversity loss);
- The Human Capital & Human Rights;
- Minimum standards in terms of clients' protections and societal safeguards;
- Strong Governance practices that strengthen sustainable development.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- o (B) We collaborate on a case-by-case basis
- o (C) Other
- o (D) We do not join collaborative stewardship efforts



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

Collective efforts can often have a great impact. Just as we encourage issuers to act collectively on key sustainability issues, investors also often collaborate. Collaborative initiatives can provide additional scale and scope for engagement or provide opportunities for greater impact.

When deciding between collaborative engagement or our own, Amundi will choose the most efficient method to push the agenda. Amundi may also supplement collaborative efforts with direct engagement if a collaborative engagement does not cover particular issues, sectors, or companies, or if the collaborative initiative does not address the topic in a way Amundi might wish. Amundi values both engagement types as means to have a positive impact on sustainable outcomes, while maintaining its independence in decision making. Amundi will only be active in a collaborative engagement when it is in line with its own policy.

Amundi normally plays an active role in collaborative initiatives. This generally means that Amundi takes the role of lead investor on engagement with one or more companies. Sometimes, an 'active role' also means that Amundi contributes to the planning, methodology and operations of the initiative.

By contrast, Amundi is occasionally a mere participant in a collective initiative. This is often the case when the initiative is dynamic and impactful without particular assistance from Amundi. For other collective groups, Amundi might contribute to the thought leadership on emerging topics or provide contacts and resources. As a participant, Amundi has the opportunity to gain insights into new and emerging problems, or advise the group on the feasibility of proposed methodologies to prepare for later active engagement.

List of collaborative stewardship initiatives that Amundi is part of :

RESPONSIBLE INVESTMENT

- PRI Principles For Responsible Investment
- UN Global Compact
- IFD Institut de la Finance Durable
- GIIN Operating Principles for Impact Management
- · GISD Global Investors for Sustainable Development Alliance
- High-Level Expert Group on Scaling up Sustainable Finance in Low and Middle-income countries
- WBA World Benchmarking Alliance
- EUROSIF European Sustainable Investment Forum
- GIIN Global Impact Investing Network
- CASI Capacity-building Alliance of Sustainable Investment



Environmental

- NZAM Net Zero Asset Managers
- IIGCC Institutional Investors Group on Climate Change
- AIGCC Asia Investor Group on Climate Change
- · CDP Disclosure Insight Action
- ICMA Green Bonds Principles
- CBI Climate Bonds Initiative
- Climate Action 100+
- TCFD Task Force on Climate-related Financial Disclosures
- The Japan TCFD Consortium
- OPSWF One Planet Sovereign Wealth Fund
- FAIRR Farm Animal Investment Risk and Return
- Finance for Biodiversity Pledge
- Nature Action 100

Social

- Access to Medicine Index
- · Access to Nutrition Index
- ICMA Social Bonds Principles
- WDI Workforce Disclosure Initiative
- FAIR Financer Accompagner Impacter Rassembler (ex Finansol)
- PLWF The Platform Living Wage Financials
- Investors for a Just Transition
- Investor Action on Antimicrobial Resistance
- The 30% Club France Investor Group
- The 30% Club Japan Investor Group
- The 30% Club Germany Investor Group
- Tobacco-Free Finance Pledge



Governance

- ICGN International Corporate Governance network
- · CII Council of Institutional Investors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff Select from the list:

1

☑ (B) External investment managers, third-party operators and/or external property managers, if applicable Select from the list:

4

☑ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

5

☑ (D) Informal or unstructured collaborations with investors or other entities

Select from the list:

3

☑ (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

Select from the list:

2

o (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

The engagement progress are measured and monitored as follow, and can trigger escalation:

Defining the Engagement Period.

An engagement period varies depending on the agenda, but the average engagement period is approximately three years. Amundi defines different milestones and engagement developments that are shared internally via our engagement tool, which is available to all investment platforms. Formal assessments are carried out, at least annually. We wish to have a collaborative, supportive, and pragmatic yet ambitious dialogue with our investees, to inspire a wide range of actions that will benefit not only the issuers themselves, but all stakeholders. We truly believe that dialogue is the cornerstone of a sound, strong development towards a sustainable and inclusive low-carbon economy.



Measuring an Engagement's Progress.

Alongside the engagement, Amundi assesses the progress made by the issuer towards certain objectives using milestones. Our first objective is to induce positive impact: the way we decide to engage will always be determined by its effectiveness. Triggering deep change in large organisations can prove complicated stressful, or even be considered impossible by issuers.

Adopting a longer-term view and considering intermediary targets for engagements that take into account the situations and circumstances in which the company operates is an essential element of engagement for it to be effective. We keep the long term goal in mind while seeking manageable and measurable improvements in the short to medium term.

As investors, we must be both demanding and pragmatic to promote transition towards a sustainable, inclusive low-carbon economy in a timely manner. We understand the current limitations on effectively measuring and addressing key themes in sustainability, climate, biodiversity, and human rights. We consider sustainability to be a moving benchmark, and as such, our engagement strategies will evolve over time to better integrate new developments.

Engagement Escalation: incentivizing change through a toolbox approach.

When engagement fails or if the issuer's action/ remediation plan appears weak, we may undertake escalation, even up to exclusion from the active investment universe, meaning all active investing strategies over which Amundi has full discretion.

Escalation modes include (in no particular order), questions at AGMs, votes against some resolutions in AGMs, public statements, filing or cofiling of a shareholder resolution, negative overrides in one or several criteria of our ESG score, ESG score caps and, ultimately, exclusion if the matter is critical.

Escalation modes could use our voting activities, if some equities are held, and in themes that are critical (climate, biodiversity & natural capital, social, corruption related issues, severe controversies and/or violations of Global Compact principles as defined by the UN) or in case of lack of answers on engagement related to sustainability factors, Amundi could decide to vote against the discharge resolution, or against the renewal of the mandate of the chairperson or certain board members.

In addition to escalation through our voting activities, failed engagement might have a direct impact on our full capacity to invest in a company through a downgrade of related criteria in the ESG score, and if the issue is critical, it could lead to a downgrade of the overall ESG score. Amundi has committed to integrating ESG criteria into the investment process of actively managed open-ended funds wherever technically feasible, with the objective of fulfilling financial objectives while maintaining portfolios' average ESG scores above the average ESG score of their respective investment universes. Negatively overriding ESG scores creates a penalty in our capacity to invest in the issuer.

The ultimate escalation mode could be exclusion in case of failure to engage and remediate on a critical issue.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Stewardship activity is an integral part of Amundi's ESG strategy. Amundi promotes a transition towards a sustainable, inclusive low-carbon economy. Separately from the systematic integration of ESG criteria within our active investment, Amundi has developed a practice of active stewardship through:

- A pro-active engagement policy that seeks to improve the mid to long-term risk/return profile of our portfolios. The objective is:
- To better manage sustainability risks by contributing to the spread of best practices and driving better integration of sustainability in the governance, operations and business models of our investees.
- To better cope with impacts on sustainability factors by triggering positive change concerning how investees manage their own impacts on specific topics that are paramount to the sustainability of our society and of our economy.
- To support the mid-and long-term growth of our investees by urging them to accelerate their own transition towards a more sustainable, inclusive and low carbon business model and to increase their Capex/R&D investments in highly needed areas for this transition.
- A voting policy emphasising the need for corporates' governance and boards to grasp both the risks and opportunities of environmental and social challenges and ensure that companies are appropriately positioned and prepared to handle the transition towards a sustainable, inclusive low carbon economy.

Engagement, a Key Pillar in Amundi's "ESG Ambition 2025 Plan".

Engagement will continue to play an even greater role going forward. In 2021, Amundi announced its new "ESG Ambition 2025 Plan". Voting & engagement play a key role. Our ambition is to scale up the different initiatives we created with the investment platforms in 2020 and 2021 to leverage our engagement effort by empowering the various investment professionals who already have active dialogues with issuers.

The ESG Research, Engagement and Voting team has developed a comprehensive set of materials and tools that guide investment professionals in identifying engagement themes, selecting the issuers targeted and conducting a rigorous engagement by having precise, ambitious and pragmatic demands as well as tracking improvement.

As the systematic consideration of environmental and societal issues already plays a key role in dialogue with companies across all Amundi investment platforms (beyond the ESG Research, Engagement, and Voting team), we truly believe that our investment professionals, alongside the ESG analysts, play a central role in reaching Amundi's engagement ambitions.

Our voting activity is an integrated arm of our stewardship activities. Insufficient improvements following an active engagement could trigger a negative vote. Engagements are also triggered by our voting activity to encourage issuers and issuers' boards to better integrate sustainability and long-term views in their companies' strategic planning.



STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

☑ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

- o (2) in a majority of cases
- (3) in a minority of cases

☑ (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

- o (2) in a majority of cases
- o (3) in a minority of cases
- o (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- o (A) We recall all securities for voting on all ballot items
- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

Provide details on these criteria:

The decision to recall the shares will be based on a qualitative appraisal, taking into account the nature of the proposal, the magnitude of Amundi's voting power, and/or the potential consequences of the vote. For SRI labelled funds, shares are systematically recalled for all issuers several days before the General Meeting's record date in order to maintain the right to vote at the Meeting.

- o (C) Other
- o (D) We do not recall our securities for voting purposes
- o (E) Not applicable; we do not have a securities lending programme



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- o (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- o (C) We vote in favour of shareholder resolutions only as an escalation measure
- o (D) We vote in favour of the investee company management's recommendations by default
- o (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☑ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- o (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- o (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

(A) Yes, for all (proxy) votes Add link(s):

https://about.amundi.com/proxy-voting-records

- o (B) Yes, for the majority of (proxy) votes
- o (C) Yes, for a minority of (proxy) votes
- o (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- o (B) Within three months of the AGM/EGM
- o (C) Within six months of the AGM/EGM
- o (D) Within one year of the AGM/EGM
- o (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution		
(A) Yes, we publicly disclosed the rationale	(3) for a minority of votes	(2) for a majority of votes		
(B) Yes, we privately communicated the rationale to the company	(3) for a minority of votes	(2) for a majority of votes		
(C) We did not publicly or privately communicate the rationale, or we did not track this information	0	0		
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	0	0		

(A) Yes, we publicly disclosed the rationale - Add link(s):

https://about.amundi.com/files/nuxeo/dl/0522366c-29d3-471d-85fd-7ec363c20646 https://legroupe.amundi.com/files/nuxeo/dl/4b80ae33-ba39-4fed-a5d3-285681756536



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Our service provider's platform provides us with the voting status in order to monitor the completion of our votes and take corrective actions if need be. Moreover, by communicating our voting intentions to issuers before AGMs, we also increase the level of control. This process gives the opportunity to the issuers to confirm that our votes have been correctly processed and received.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

	(1) Listed equity	(2) Direct listed equity holdings in hedge fund portfolios
(A) Joining or broadening an existing collaborative engagement or creating a new one		
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal		
(C) Publicly engaging the entity, e.g. signing an open letter	☑	
(D) Voting against the re-election of one or more board directors	☑	
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director		
(F) Divesting	Ø	Ø
(G) Litigation		



(H) Other		
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☑ (A) Joining or broadening an existing collaborative engagement or creating a new one
- ☑ (B) Publicly engaging the entity, e.g. signing an open letter
- ☑ (C) Not investing
- ☑ (D) Reducing exposure to the investee entity
- ☑ (E) Divesting
- \Box (F) Litigation
- ☑ (G) Other

Specify:

Amundi engages investees or potential investees at the issuer level regardless of the type of holdings held. When engagement fails, Amundi has the possibility to escalate using our voting activities if some equities are held. This can include filing/co-filing/submitting a shareholder resolution or proposal. Amundi could decide to vote against the discharge resolution, or against the renewal of the mandate of the chairperson or some board members.

o (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 38	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your SSA and/or private debt fixed income assets.

(A) SSA - Approach to escalation

In the event that Amundi's stewardship efforts with an SSA issuer do not meet its objectives, several potential escalation measures have been put in place. The escalation approach is not very different from the one we have for corporate issuers, except that we cannot escalate through voting (as SSAs generally have no equity outstanding).

First measure of escalation may be to (negatively) adjust the issuer's ESG rating, taking into account the analyst's view, to reflect the failed engagement and its impact on the issuer's ESG profile. Another measure of escalation may also be to make the engagement public, demonstrating that inaction could be detrimental to the issuer's reputation and attractiveness for investors. We would publish the objectives and conclusions of our engagement with that issuer in our annual engagement report. The final measure, used as a last resort, is to exclude the issuer from our investment universe.

(B) Private debt - Approach to escalation



Amundi Alternative & Real Assets believes that daily engagement with companies is a key part of promoting concrete change and contributing to the transition to a sustainable and low-carbon economy. In this respect, the form of engagement promoted by Amundi Alternative & Real Assets believes relies on its desire to help companies improve their environmental, social and governance practices, in particular via the active and ongoing dialogue it maintains with its counterparties. Due to the close working relationships enjoyed by each area of expertise with its operators, issuers, partners and investee companies, Amundi Alternative & Real Assets' role, is one of awareness-raising, support and encouragement over the long term.

However, if our stewardship efforts with a private debt investee company failed to reach our objectives, we have several potential measures for escalation. Our escalation approach does not differ much from the one we have for other asset classes (except for that we could not escalate through voting if we have no voting rights associated to the company).

If individual stewardship efforts do not achieve the desired objective, we can participate in collaborative engagement. We can also make the engagement public. Another measure could be to downgrade the ESG rating of the issuer, to reflect the failed engagement and its impact on the ESG profile of the issuer.

The ESG team may also bring this to the attention of the Private Debt Investment Committee in order to inform the assessment of overall performance. In the event of a deterioration of an ESG aspect, that is contrary to Amundi's responsible investment policy, the committee may validate further corrective measures aimed at protecting investors' capital and their reputation.

These corrective measures may take the form of a demand for repayment, a disposal on the secondary market where a liquid asset is involved, or stricter monitoring of the borrower. The exclusion of the issuer from our investment universe is the final measure, used as a last resort option.

Please note that the investment decision-making process and the investment memorandum for each area of expertise systematically include the ESG due diligence results. Furthermore, for the corporate private debt, the ESG representative has the right to veto investment decisions in advance of or at meetings of the investment committee.

In addition to dialogue with companies, Amundi Alternative & Real Assets supports a number of collective initiatives and actively participates in industry working groups. This commitment, made together with other investors, seeks to drive and develop responsible investment in real assets. It allows companies to pool their resources, share good practices and team up to find solutions. For Amundi Alternative & Real Assets, this means providing its expertise in the field of responsible investment and to putting forward proposals to improve practices within our business sectors.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☑ (A) Yes, we engaged with policy makers directly
- ☑ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☑ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI



o (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☑ (A) We participated in 'sign-on' letters
- ☑ (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups Describe:

We can participate to panels and expert/consultative groups. For example, an Amundi representative is a member of the Consultative Working Group to ESMA Sustainability Standing Committee. Link: https://www.esma.europa.eu/about-esma/governance-structure/standing-committees

$\ensuremath{\square}$ (D) We engaged policy makers on our own initiative

Describe:

For example, we engage with policy makers at a supranational (EU) or local level. As an illustration this is evidenced in public registers:

- in the European Union transparency registers where the EU Commissioners, members of the Cabinet or Director General, and MePs disclose meetings with Amundi. Link: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_en? id=94607479886-02;
- in the French transparency register monitored by the "Haute Autorité pour la Transparence de la Vie Publique" (HATVP) where certain elected officials shall declare influencing interest. Link: https://www.hatvp.fr/fiche-organisation/?organisation=437574452##.

☐ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

☑ (A) We publicly disclosed all our policy positions

Add link(s):

https://ec.europa.eu/info/law/better-regulation/have-your-say

https://www.esma.europa.eu/press-news/consultations

https://finance.ec.europa.eu/document/download/f2bef3cb-9228-47ab-b1cf-1dbe802f431a_en?filename=2023-sfdr-implementation-targeted-responses en 1.zip

 $https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13765-European-sustainability-reporting-standards-first-set/F3429681_en$

https://www.esma.europa.eu/system/files/webform/200622/94960/ESMA_CP_SFDR_Review_AMUNDI_ASSET_MANAGEMENT.docx https://www.esma.europa.eu/system/files/webform/102114/91792/ESMA_CP_FUNA_AMUNDI%20ASSET%20MANAGEMENT_REPLY FORM docx

- \square (B) We publicly disclosed details of our engagements with policy makers
- o (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year



STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

Title of stewardship activity:

Engagement with Martin Marietta Materials, Inc- Environmental shareholder proposal filed by Amundi

(1) Led by

- o (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity

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- ☐ (2) Social factors
- \square (3) Governance factors
- (3) Asset class(es)
 - ☑ (1) Listed equity
 - ☑ (2) Fixed income
 - ☐ (3) Private equity
 - \square (4) Real estate
 - ☐ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Since 2020, Amundi has been leading a collaborative engagement supported by other investor members of the CA 100+ coalition with Martin Marietta Materials, a construction materials company based and operating in the United States. The company has been identified as a climate underachiever in the CA 100+ Net Zero Company Benchmark. At that time, the company failed to release critical climate-related information and disclosed carbon emissions reduction targets that cover only part of its activities and material scopes. The company presented limited climate ambitions overall, which Amundi considered unaligned with the Paris Agreement. Despite our engagements with the company in 2021 and 2022, multiple critical elements of its climate strategy were still considered inadequate.

While the company demonstrated some efforts on a few issues, notably on the extension of its Net Zero Commitment to scope 1 (as opposed to scope 2 only before), no agreement was found on those four critical ones:

- Raise the ambition of interim targets on direct cement greenhouse gas emissions intensity;
- Avoid the use of offsets to achieve scope 2 interim target;
- Seek for an external validation of its targets (e.g., Science Based Targets initiative SBTi);



- Report main greenhouse gas emissions drivers.

In this context, in 2023 Amundi decided to file a shareholder proposal at the company AGM. The proposal called the company to set proper interim greenhouse gas emissions reduction targets, in line with the Paris Agreement, and backed by a robust decarbonisation strategy.

Our resolution received the support of the two major proxy advisors (ISS and GlassLewis) and reached a 32.8% approval rate at the annual general meeting. A significant support given the particular context of ESG pushback in the USA.

During the summer, Amundi received an invitation from Martin Marietta Materials for a meeting. In September, we discussed with the management about the substantial progress the company made within the last months; it notably:

- 1. Started to report to CDP (2023 edition);
- 2. Signed in September 2023 the commitment letter that requires the Company to develop and submit science-based targets (covering all scopes 1&2 emissions and scope 3 deemed material by the SBTi) for 1.5°C validation to the SBTi within the two next years;
- 3. Converted around 90% of the cement production into Portland Limestone Cement, a type of cement with lower clinker content (it can be reduced from 90-95% to 80-85%).

We welcomed those significant improvements positively as this will allow investors to assess and provide more accurate, fact-based recommendations to the Company on its climate strategy.

There is still room for progress and we will continue engaging with the company, but we value the achievements made by the Company in 2023 and consider significant positive outcomes from our engagement.

(B)	Examp	le	2:
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Title of stewardship activity:

Engaging with an Asian Multilateral Development Bank

- (1) Led by
 - **(1)** Internally led
 - o (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
 - \Box (1) Environmental factors
 - ☑ (2) Social factors
 - \square (3) Governance factors
- (3) Asset class(es)
 - ☐ (1) Listed equity
 - ☑ (2) Fixed income
 - \square (3) Private equity
 - ☑ (4) Real estate
 - ☑ (5) Infrastructure
 - ☐ (6) Hedge funds ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.



Amundi engaged with a regional development bank that supports projects in developing member countries that create economic and development impact, delivered through both public and private sector operations, advisory services, and knowledge support. The bank launched its first themed bond for sustainable development ('water bonds') in 2010 and has since expanded its theme bond offerings to include heath, gender, and education bonds. The projects funded by the theme bonds are intended to align with the UN SDGs on quality education, gender equality, clean water and sanitation, and good health. Total issuance of theme bonds exceeded

USD 5.8 billion in 2022, an increase from USD 5.1 billion in the previous year. The bank was identified for engagement as their theme bonds do not contain a framework that complies with international standards and has limited details in terms of reporting of bond proceeds and impact data.

Since 2022, Amundi has raised the issue with the bank to develop a framework for their themed bonds that is aligned with the ICMA Principles for Green, Social or Sustainability bond issuances, which is a minimum requirement in our investment screening process. In addition, the bank has previously developed a Green and Blue Bond Framework that complies with the ICMA Green Bond Principles and received a second-party opinion. Given their past experience, we

are therefore encouraging the issuer to transpose the best practices from their green and blue bond framework to their themed bonds.

Key objectives for our engagement were as follows:

- Publish a framework that aligns with ICMA Principles covering the four core pillars of: 1. Use of proceeds, 2. Process for project selection and evaluation, 3. Management of proceeds, 4. Reporting.
- Commit to reporting on allocation of bond proceeds and specifying the impact indicators used for projects, with reference to reporting guidance from the ICMA Harmonised Framework for Impact Reporting.
- Encouraging other reporting best practices, including pro-rated impact data reporting and breakdown between financing and refinancing share.

Since engagement, the bank acknowledged that the themed bonds are not aligned with the ICMA Principles, citing that the bonds were initially offered under private placement and the target pool of investors were generally comfortable with the how the bonds were structured despite lacking in ICMA alignment or not having a second-party opinion attached. The investor pool preferred the specific themes tagged to the bonds instead of the generic "social" or "sustainability" labels prescribed by ICMA. The bank has also provided assurance that in practice, all requirements set out by the ICMA Principles were met. For instance, the bank publishes annually a Development Effectiveness Review report that details the bank's performance results for the past year across 60 indicators and progress towards their strategic priorities. The indicators range from extent of access to education for women, to employment growth and amount of health financing by the bank. However, the reporting practice continues to be done at an aggregate level based on all of the bank's activities, and there is limited information as to how the bond allocations were distributed. On reporting, we still prefer to see it done at the bond level for greater transparency on how the proceeds were disbursed. The bank has also expressed that they do not discount the possibility of considering ICMA alignment in the future.

We will continue to encourage the bank to develop a framework that is ICMA aligned to meet our investment requirements and expectations. We will also continue to encourage better practices

in reporting to improve on the transparent communication of bond proceed allocation and impact data.

(C) Example 3:

Title of stewardship activity:

Engagements in Private Equity

- (1) Led by
 - **(1)** Internally led
 - o (2) External service provider led
 - o (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
 - \square (1) Environmental factors
 - ☐ (2) Social factors
 - **☑** (3) Governance factors
- (3) Asset class(es)
 - ☐ (1) Listed equity



√	(3)	Private equity
	(4)	Real estate
	(5)	Infrastructure
	(6)	Hedge funds
	(7)	Forestry
	(8)	Farmland
	(9)	Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

By the end of 2023, we had made 173,288

engagements with 6 investees on the 5 macro themes identified by Amundi AM2. Following Amundi AM policy, Amundi Private Equity Funds promotes two main ESG issues:

- The energy transition, especially by promoting the calculation of a carbon footprint and the implementation of a

decarbonisation strategy,

- The social cohesion, especially through employee's welfare and the implementation of profit-sharing systems with employees.

The year 2023 confirms the growing importance of CSR within small and medium sized companies, with the appointment of CSR managers (parttime or full-time), the inclusion of CSR issues on Supervisory Boards, and the development of CSR reporting. The latter practice is strongly encouraged by growing European regulations, in particular the Corporate Sustainability Reporting Directive, to which 75% of our investees will be submitted to by FY25.

We are therefore seeing Corporate Sustainable Responsibility governance becoming more structured, enabling us to strengthen our engagement requests on this subject through for example: the systematic appointment of a CSR Manager within the company, a CSR representative on the Supervisory Board, the inclusion of CSR criteria in the variable remuneration of senior executives, the entry of women (still highly under-represented) on the Supervisory Board or in company management, and the inclusion of independent directors. Some of our requests have been well received and rapidly implemented by companies: appointment of a CSR Manager, CSR representative on the CSR Council, inclusion of CSR criteria in executive remuneration (1/3 refusal). Other requests still seem to require time: the integration of female profiles comes up against the difficulty of finding them in very male-dominated sectors, and the advantage of opening up the Supervisory Board to independent members is not yet well understood. As far as environmental issues are concerned, our commitment is still focused on the need to carry out a carbon footprint - only 40% of our investees had done so by the end of 2022 – and then on defining a plan to reduce greenhouse gas (GHG) emissions that is aligned with the Paris Agreement. So, we still have a lot of awareness-raising to do on how to reconcile business growth and GHG reduction.

In terms of social issues, our commitment is focused on gender equality and a better profit sharing system. Indeed, the workforce of our investees is very male-dominated, partly due to the large number of companies in the industrial sector. Only 3 of our investees (16%) have a gender balanced workforce, while 4 of our investees (22%) have a strongly underrepresented gender (to the disadvantage of women for 3 of the 4 investees). Despite this situation, we are happy to see that all companies are above the 75% minimum level required by the State Equality Index and that 36% of them even obtain above 85%. Companies are facing a tight labour market, with recruitment difficulties and a sharp decline in employee loyalty. As a result, Amundi PEF was one of the first signatories of France Invest's Value Sharing Charter, and promotes all initiatives in this direction among its holdings. Indeed, we consider value sharing to be a priority because 1. it is a means of attracting and retaining talent in a tight labour market, 2. it represents an additional income and the recognition of employees' contribution to their company's success, and 3. it contributes to a better alignment of interests between employees, management and company shareholders. Thus, we are delighted to announce that 60% of our investees have opened their capital to their employees.

In 2024, our commitment priorities will be as follows:

- We will continue to follow our current dialogue with the 6 investees that already have an ESG roadmap.
- We will extend our engagement and the ESG roadmaps to the other investees in our portfolio.
- We will deepen our engagement with our investees on the CSRD legislation, as many SMEs/ ETIs still underestimate the work required (materiality matrix, identification of relevant indicators, collection and consolidation of indicators, etc.).
- (D) Example 4:

Title of stewardship activity:



aging with Türkiy

Engaging with Turkiye on thermal coal
(1) Led by (2) External service provider led (3) Led by an external investment manager, real assets third-party operator and/or external property manager (2) Primary focus of stewardship activity (1) Environmental factors (2) Social factors (3) Governance factors (3) Asset class(es) (1) Listed equity (2) Fixed income (3) Private equity (4) Real estate (5) Infrastructure (6) Hedge funds (7) Forestry (8) Farmland (9) Other (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution. Türkiye ratified the Paris Agreement and announced a 2053 Net-Zero GHG emissions target in 2021, but did not commit to phase out thermal coal (as an OECD country, Türkiye should phase out coal by 2030). On the contrary, the government encourages domestic coal
production and coal power generation via the guaranteed purchase of the electricity generated. The share of coal in electricity generation was 34% in 2022.
We reached out to the Turkish Treasury at the beginning of 2023 and set up a meeting with representatives of the Ministry of Finance and Ministry of Environment & Energy to discuss any potential plans for a coal phase out.
Representatives of the government acknowledged that a coal phase down would not be possible before 2037-38, as the demand for energy continues to grow. They explained that Türkiye - although an OECD member - was still an emerging economy, hence the 2030 target date for coal phase out would not be relevant. They pledged to update the country's Nationally Determined Contribution (NDC) to the UNFCCC and to publish a National Energy Plan that would clarify the country's climate strategy.
Since our meeting, Türkiye updated its NDC and published a National Energy Plan. Unfortunately, the National Energy Plan sees no change to the country's thermal coal policy. We will continue to discuss with Türkiye ways to accelerate the transition of its power sector as the country is seeking to increase the share of renewable energies in its electricity mix.
(E) Example 5: Title of stewardship activity:
Following up on Our Deforestation Engagement with a Singaporean Palm Oil Company
(1) Led by (1) Internally led (2) External service provider led (3) Led by an external investment manager, real assets third-party operator and/or external property manager (2) Primary focus of stewardship activity (1) Environmental factors (2) Social factors (3) Governance factors (3) Asset class(es) (1) Listed equity (2) Fixed income (3) Private equity (4) Real estate



\square (5) Infrastructure	
\square (6) Hedge funds	
☐ (7) Forestry	
\square (8) Farmland	
□ (9) Other	

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We continued our engagement in 2023 with a large Singaporean palm oil company which began the year previous. The company has faced allegations of deforestation and related human rights abuses in the past, but now has a robust NDPE policy, which incorporates the concepts of HCV,HCS and FPIC.

When we initiated our engagement with the company, we wanted to better understand the overarching deforestation strategy while also pushing for improved action on the subject. This year, we were able to push the company further on some more specific KPIs, such as reaching full

traceability and providing information about the production of certified volumes along the supply chain.

Key objectives for our 2023 engagement were as follows:

- 1. Create a time-bound commitment for reaching full traceability along the supply chain.
- 2. Disclose information on the % volumes of certified product.
- 3. KPIs on the % or number of blacklisted/under review suppliers.
- 4. Introduce policies that specifically target the current lack of focus on biodiversity and conservation priorities.

Even during our first year of engagement in with the company in 2022, we were pleased to see several strong policies that had recently been introduced. In 2023, we welcomed the continued development across many of the key objectives. For example, in 2023, the company confirmed that it was planning to reach 100% traceability by year's end. There are still a number of areas we would like to see developed in the coming years. This includes, introducing timelines for remediation in the grievance policy, and a third-party ethics/complaints line. The company reports that these aspects are under consideration. The company confirmed that it is looking to introduce more land conservation projects, something we encouraged. Specifically, we have asked the company to consider how they would measure the performance of these land conservation projects via KPIs.

We will follow up with the company in 2024, in the hope of closing engagement on objectives that the company is close to achieving, such as full traceability (to mill and plantation levels), the introduction of some biodiversity and landscaping projects, accompanied by KPIs to measure progress, and finally, improvements to the grievance mechanism. Throughout, the company has proved willing and keen to engage and we are somewhat optimistic about the future of the company's deforestation policy and conduct.



CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☑ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Amundi has a Global Responsible Investment Policy that enables to consider across in-scope investment processes not only financial criteria, but also ESG criteria. Amundi believes that this approach, which provides a more holistic view of companies, consolidates value creation over the long term. Furthermore, a strong sustainability policy allows issuers to better manage regulatory and reputational risks and contributes to improving their operational efficiency. Strategically, this approach aims to protect Amundi's portfolios from ESG and climate risks and to design strategies harnessing the opportunities related to addressing these issues.

Investment portfolios may be exposed to variably acute and chronic climate risk depending on companies' sectors and geography, and increased climate risk can have a significant impact on the financial performance of sectors with high climate risk. While Amundi strives to identify both short- and long-term physical risks that potentially have material impact on investment portfolios, the information available for assessing the potential financial impact is limited and often lacks standardization across sectors and regions. Therefore, Amundi's approach to physical climate risk assessment is applied to dedicated climate strategies. Amundi's approach to physical climate risk assessment is based on data and methodology developed by Trucost. Trucost maps the location data for companies' physical assets against seven climate hazards (fire, cold wave, heatwave, sea level rise, flood, tornado and drought) to analyse issuers' sensitivity to these different risks.

Amundi's takes a threefold approach for identifying and managing climate, market and transition risks:

- Calculate "carbon risk": the degree of exposure to risk should be assessed before taking action to reduce such risk;
- Assess: scoring in terms of energy transition to reflect a company's exposure to energy transition risk and how this risk is anticipated and managed by management;
- Anticipate: estimating the impact of non-convergence risk (vs. +2°C objective) on the performance of a portfolio of securities.

Several tools are available to apply this approach in practice.

Measuring the carbon footprint of portfolios is one way of identifying and assessing climate risk. Amundi's carbon footprint analysis of companies is based on carbon emissions data from private issuers provided by Trucost. Where necessary, missing data is supplemented with data from the parent company of the issuer. Portfolio assets that can be rated (excluding derivatives and government securities, for example) are used to calculate the portfolio's carbon footprint. Amundi calculates two carbon footprint indicators: carbon emissions per million euros invested and carbon emissions per million euros of turnover. These data and methodologies are used in fund reports and inform Amundi's strategy of measuring and, where appropriate, reducing the carbon footprint of investment portfolios. Amundi publicly discloses scope 1, 2 and 3 emissions of their investments.



Amundi has gradually diversified the indicators used to cover climate-related risks and opportunities. These include portfolio Temperature alignment metric, carbon reduction target metrics (assessing alignment with Paris Agreement targets), physical risk indicators, as well as "green-" and "brown-share" indicators. As tools for calculating transition and physical risks that complement issuers' carbon metrics (carbon footprint or intensity), the introduction of these new indicators gives Amundi a more forward-looking and comprehensive view of its climate-related risk and opportunities at issuer and portfolio level.

As part of its "2025 ESG Ambitions" plan, Amundi has announced its intent to take the integration of extra-financial objectives into its active portfolio management even further in connection with the climate issue. Amundi is therefore developing a proprietary rating system to evaluate the transition efforts of issuers in relation to a net zero scenario, taking into account both efforts to decarbonize their businesses and the development of their green activities.

☑ (B) Yes, beyond our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

At portfolio level, for strategies committed to Net Zero alignment, Amundi has set internal Net Zero targets that go beyond our standard planning horizon and that is based on Amundi's analysis of NZE Scenario of the International Energy Agency:

- 30% carbon intensity reduction target in 2025 vs. 2019, and -60% vs. 2030 (minimum targets that need to be exceeded) on scope 1, 3 and part of scope 3.
- 16% absolute emission reduction target in 2025 vs. 2019, and -41% vs. 2030 on scope 1, 3 and part of scope 3.

Ultimately, as part of the NZAM commitment, Amundi has set a demanding objective in which by 2025, 18% of its assets under management would be composed of funds and mandates with objectives aligned with a Net Zero trajectory. This objective is constructed as follows:

- In the numerator, only asset classes with Net Zero standards recognized by Amundi and applicable are taken into account: listed equities, corporate bonds and real estate. In addition, only investment strategies with alignment objectives or constraints set out in their reference documents will be counted. Asset classes for which insufficient data is available and/or methodologies have not been completed are excluded at this stage (e.g., sovereign bonds).
- The following assets are not included in the denominator: assets under joint ventures, fund hosting and specific advisory mandates for which Amundi does not have full management discretion.

Amundi has been particularly active in terms of climate-related research in 2023, with over 20 research papers published. In addition to analyses dedicated to environmental and climate issues, the year was marked by an increase in the inclusion of research on social cohesion and biodiversity, both quantitative and qualitative, as well as climate-related research with a focus on emerging markets.

Amundi has published a compilation of its climate-related research in 2023, as part of its commitments in its Say on Climate resolution: https://about.amundi.com/files/nuxeo/dl/48b284d2-4539-43ee-a212-468930187961

o (C) No, we have not identified climate-related risks and/or opportunities affecting our investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

In December 2021, Amundi announced its ESG Ambitions 2025 plan, setting ten concrete objectives to accelerate Amundi's ESG transformation and increase our climate commitment in our investments and saving solutions, in our engagements and dialogues with companies, and by acting responsibly as a corporate. One of the objectives of this plan is to engage with 1000 additional companies on their climate strategies by 2025. In 2023, we actively engaged with an additional 966 companies. Another objective is that we aim at introducing a new energy transition rating that assesses companies' efforts in decarbonizing their operations and developing sustainable activities, covering €400 billion of actively managed funds. Moreover, since the end of 2022 Amundi also excludes companies whose activity is exposed to exploration and production of unconventional oil and gas extraction (covering "shale oil and gas" and "oil sands") by over 30%. Application perimeter is defined by the Amundi Global Responsible Investment Policy.

In addition, mechanisms for identifying, assessing and responding to ESG risks and opportunities, including those related to climate, are fully integrated into Amundi's portfolio management processes: through ALTO*, our portfolio managers have access to a wide range of climate metrics. ESG criteria, including those related to climate, are already integrated into 100% of our open-ended funds and in all our voting practices since 2021.

Another example of how we integrate climate-related risks and opportunities affecting our investments in our overall investment strategy is our approach vis-a-vis Say on Climate. Amundi adopted a demanding approach to the analysis of Say on Climate resolutions in the 2023 season, a practice done since 2022 and that it had encouraged in 2021 by voting mainly in favour of these resolutions. Amundi asked the companies that have submitted a climate strategy at their General Meetings to present comprehensive targets (in terms of figures scope and baseline scenarios), a precise agenda (short, medium and long term objectives) as well as clear resources to achieve their climate goals (including a three- to five-year investment plan), before analysing each strategy in its entirety in order to assess its soundness and alignment with the Paris Agreement.

Last but not least, in July 2021 we joined the Net Zero Asset Managers (NZAM) initiative, committing to support the goal of net zero greenhouse gas emissions by 2050 and to support investing aligned with net zero emissions by 2050 or sooner. In November 2022, Amundi has set a target of 18% of funds and mandates having objectives compatible with a Net Zero trajectory, to be achieved by 2025. As part of this commitment, we have launched a Net Zero Ambition range of funds across the major asset classes, with a common intermediary objective of reducing their portfolios' carbon intensity by 30% by 2025 and 60% by 2030 compared to 2019 or with a decarbonisation trajectory aligned with either the Climate Transition Benchmark (CTB) or the Paris Aligned Benchmark (PAB) carbon intensity.

o (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

☑ (A) Coal

Describe your strategy:

Coal combustion is the single largest contributor to human-induced climate change. In 2016, Amundi implemented a dedicated sector policy on thermal coal, triggering the exclusion of certain companies and issuers. Each year since then, Amundi has progressively reinforced the rules and thresholds of its thermal coal sector policy.

Phasing out coal is paramount to achieve the decarbonisation of our economies. That is the reason why Amundi is committed to phase out thermal coal from its investments by 2030 in OECD and EU countries and in 2040 in non-OECD countries. Consistent with the United Nations Sustainable Development Goals (SDGs) and the 2015 Paris Agreement, this strategy is based on the research and recommendations of the Crédit Agricole Scientific Committee, which takes into account scenarios designed by the International Energy Agency's (IEA) Sustainable Development Scenario, Climate Analytics Report and Science Based Targets.

The policy is applicable to all investee companies, but predominately affects mining, utilities, and transport infrastructure companies. This policy is applicable across all actively managed strategies and passively managed ESG strategies over which Amundi has full discretion.

In line with our 2030/2040 phase out timeline from thermal coal, the following rules and thresholds are the baseline for which companies are considered too exposed to be able to phase out from thermal coal at the right pace.

Amundi engages with all companies having thermal coal exposure for which Amundi has requested the company to publish a public thermal coal phase out policy consistent with Amundi's 2030/2040 phase out timeline. For companies that are:

- · Excluded from Amundi's active investment universe according to our policy, and
- Have thermal coal policies Amundi considers lagging. Amundi policy consists in voting against the discharge of the board or management or the re-election of the Chairman and of some Directors.

Amundi policy consists in voting against the discharge of the board or management or the re-election of the Chairman and of some Directors.

Where applicable, Amundi excludes:

- Mining, utilities, and transport infrastructure companies that are developing coal projects that have permitted status and are in the construction phase as defined in the coal developers list of the Crédit Agricole Group.
- Companies with coal projects in earlier stages of development, including announced, proposed, with pre-permitted status, are monitored on a yearly basis.

For companies considered too exposed to be able to phase out from thermal coal at the right pace, Amundi excludes:

• All companies with revenue in thermal coal mining extraction and thermal coal power generation >50% of their revenue without analysis,



All coal power generation & coal mining extraction companies with a threshold between 20% and 50% with a poor transition path.

Concerning mining extraction, Amundi excludes:

- Companies generating >20% of their revenue from thermal coal mining extraction,
- Companies with annual thermal coal extraction of 70 MT or more without intention to reduce.

In 2023, we communicated our coal policy expectations to all investee companies flagged internally for thermal coal revenue exposure, that were not aligned with the Paris Agreement timeframes, for the third year. In 2023, 232 Companies were engaged on thermal coal exit. Out of total companies engaged in 2023, ~60% were companies excluded from Amundi active funds and ESG ETFs (but held in other ETFs or Passive Strategies).

In 2023, Amundi took voting actions against 31 issuers due to lack of engagement momentum concerning thermal coal. Based on engagement performance by 2023 year end, we submitted 192 companies for voting escalation due to lack of reply to our engagements or lack of timely phase out for the voting campaign 2024.

Describe your strategy:

As one of the objectives of the ESG Ambitions 2025 plan, since the end of 2022 Amundi also excludes companies whose activity is exposed to exploration and production of unconventional hydrocarbons (covering "shale oil and gas" and "oil sands") by over 30%.

Moreover, in 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power etc.).

There were two broad aims for our engagement that apply to all sectors:

- 1. Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.
- 2. Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, oil & gas companies represented 23% of Amundi's 656 engagements on Net Zero.

☑ (C) Oil

Describe your strategy:

As one of the objectives of the ESG Ambitions 2025 plan, since the end of 2022 Amundi also excludes companies whose activity is exposed to exploration and production of unconventional hydrocarbons (covering "shale oil and gas" and "oil sands") by over 30%.

Moreover, in 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).



There were two broad aims for our engagement that apply to all sectors:

- 3. Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.
- 4. Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, oil & gas companies represented 23% of Amundi's 656 engagements on Net Zero.

☑ (D) Utilities

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

- 5. Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.
- 6. Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, utilities companies represented 19% of Amundi's 656 engagements on Net Zero.

☑ (E) Cement

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, materials companies (including cement, chemicals and metals & mining) represented 19% of Amundi's 656 engagements on Net Zero.

✓ (F) Steel

Describe your strategy:



In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, materials companies (including cement, chemicals and metals & mining) represented 19% of Amundi's 656 engagements on Net Zero.

☑ (G) Aviation

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, transportation companies (including aviation and shipping) represented 3% of Amundi's 656 engagements on Net Zero.

☑ (H) Heavy duty road

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:



Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, automobiles (including light and heavy-duty road) companies represented 5% of Amundi's 656 engagements on Net Zero.

☑ (I) Light duty road

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, automobiles (including light and heavy-duty road) companies represented 5% of Amundi's 656 engagements on Net Zero.

☑ (J) Shipping

Describe your strategy:

In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, transportation companies (including aviation and shipping) represented 3% of Amundi's 656 engagements on Net Zero.

☐ (K) Aluminium	
☐ (L) Agriculture, forestry, fish	ery
☑ (M) Chemicals	
Describe your strategy:	



In 2023 Amundi continued and extended the sector coverage of our dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers, steel producers, aviation, shipping, rail, cement, and chemicals. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources availability, costs, purchasing power, etc.).

There were two broad aims for our engagement that apply to all sectors:

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C objective.

In 2023, materials companies (including cement, chemicals and metals & mining) represented 19% of Amundi's 656 engagements on Net Zero.

	(N)	Construction	and	buildings
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☐ (O) Textile and leather

☑ (P) Water

Describe your strategy:

At Amundi, we view companies to be at the heart of both the challenge and the solution to water management. Companies have the potential to act now on water to limit the regulatory, financial, or operational risks they may face. In doing this, companies may even be able to improve management of entire watersheds, benefiting ecosystems and society.

In our first year of the engagement campaign (2022), we engaged sectors exposed to water and water scarcity risks, focusing, in particular, on food & beverage, among others. In 2023, we re-engaged all these sectors (engaging over 130 companies on water in 2023) but also added a specific focus on fashion and mining, moving beyond ad hoc engagement to a more systematic strategy with industry specific best practice recommendations for companies identified as particularly exposed.

The motivation for this was to take the opportunity of discussing water use to also capture issues related to water pollution. The textile industry is responsible for an estimated 20% of global water pollution, and this is a critical topic for all sectors when exploring water stewardship and the supply of unpolluted freshwater.

In addition to the engagement above, Amundi remains a participant in the Value Water Finance Initiative which was launched by Ceres in 2022 and is the first investor group of its kind and it seeks to engage 72 companies that have high water footprints from a range of sectors to drive wide scale improvements in water system management.

The ultimate long term vision from Ceres is that "companies will recognize fresh water as the world's most precious natural resource, essential to whole industries and all communities and ecosystems. By sustainably managing water use, eliminating point and nonpoint pollution, taking collective action, adopting good governance practices, and supporting the human right to water, companies will achieve sustainable water management."

Amundi has been pleased to play a role in this investor-led effort for change, with our involvement beginning in 2023 as co-leads for an engagement on water stewardship with the American multinational fast food company, though the Valuing Water Finance Initiative. Given the company's extensive and complex supply chain, we have been keen to begin collaborative discussions with the company on how they can expand and improve on their current water stewardship policies and practices, which are predominantly quite operations rather than supply chain focused at present.

Amundi co-lead an initial conversation with the company in autumn 2023 after extensive research.

Key objectives for our engagement were as follows:

Development of supply chain level targets that leverage the learnings from the company's biennial water risk assessment;



- Setting time-bound, science or contextual targets, and/or policies to address impacts on water quality from point and nonpoint sources across the value chain;
- Demonstrate recognition of the human right to water in corporate policies via clear action on WASH, for example.

The company already has some positive policies in place relating to water stewardship. For example, for the first time this year the company included chicken, beef, dairy and packaging suppliers in its water risk assessment, identifying some high-risk locations along the supply chain. They have also set water reduction targets for withdrawals and consumption in direct operations.

However, we need to see the company expand beyond these baseline targets and implement a more constructive action plan. For example, we would like to see timebound quantifiable and context based targets for water that relate to the entire supply chain, not just operations, based on the findings from current risk assessments.

This was our first year engaging with the company, and while the company was very open and receptive to our feedback, they admitted conflicting demands and pressures on them make addressing such issues a challenge at this time. We look forward to understanding what, if any developments are made when we follow up with the company over the coming 12 months.

- ☐ (Q) Other
- o (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☑ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☑ (D) Yes, using other scenarios

Specify:

In November 2023, Amundi and the MIT Joint Program on the Science and Policy of Global Change published the research paper "Climate-Related Stress-Testing and Net-Zero Valuation: A Case Study for Selected Energy-Intensive Companies". This paper combines Amundi's expertise in asset management and financial valuations, and MIT's expertise in climate and energy-transition scenarios. It connects long-term climate scenarios with corresponding financial impacts at the company level. Its key findings include:

- Expanding the approach established by the Network for Greening the Financial System (NGFS), the authors have developed a methodology for calculating company-specific cash flows and valuation metrics, along with the consequences for the cost of borrowing, under different transition scenarios.
- The research shows a substantial premium in the equity market for renewable energy companies, alongside a reduction in debt costs for entities deeply engaged in low-carbon-intensive technologies.
- The paper's focus on selected major carbon-intensive corporations reveals that these key energy players could face up to a 50-basis-point rise in capital costs by 2030 in a net-zero- consistent scenario, barring substantial investments and low-carbon assets acquisition.
- The methodology can be expanded to different regions, economic sectors, and policy scenarios. It equips decision-makers with a deeper understanding of how different factors—including growth projections, inflation, policy shifts, and global trade developments—can influence company valuations and other climate-related financial impacts.



o (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

☑ (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

At Amundi, the Responsible Investment department is the centre of expertise responsible for identifying and assessing the risks and opportunities relating to ESG issues. These include inter alia environmental risks, social risks, governance risks, controversy risks, physical risks, transition risks, biodiversity risks, litigation or liability risks related to environmental factors. These risks can have several types of consequences, including, but not limited to, reputational risks, impairment of asset value, litigation and portfolio underperformance. The department's ESG indicators are used in particular by portfolio managers, and by the Risk and Reporting departments.

The environmental, social and governance risks and opportunities are assessed by means of a proprietary ESG rating assigned to issuers by Amundi's Responsible Investment teams. Our ESG analysts are sector specialists tasked with:

- Staying abreast of emerging and advanced ESG topics and monitor trends of each business sector;
- Assessing sustainability risks and opportunities as well as negative exposure to sustainability factors;
- Selecting relevant KPIs and weights associated in Amundi's proprietary ESG scoring system.

Our ESG analysis methodology is comprised of 38 criteria to determine the ESG profile of each sector of activity. Of the 38 criteria presented in section 1, 17 are cross-sector criteria, common to all companies whatever their business sector, and 21 are sector-specific criteria. The weighting of ESG criteria is a key element of ESG analysis. The weight attribution model considers that ESG criteria can have an influence on the value of a firm by means of 4 vectors: regulation, reputation, business model, operational efficiency. The most material risks are given the highest weighting. ESG ratings are calculated by using the ESG criteria and weights assigned by the analysts and combining the ESG scores obtained from our external data providers. There is only one ESG rating for each issuer, regardless of the benchmark universe chosen. The ESG rating is therefore "sector neutral": no sector is privileged or, conversely, disadvantaged.

Amundi is striving to broaden the range of indicators used to integrate climate-related risks and opportunities. Please refer to the tables on page 63-65 of the Climate and Sustainability Report 2023 for an overview of the objectives and related metrics used for the physical and transition risks. The metrics are:

- Carbon emissions;
- Energy Transition rating;
- Exposure to brown activity;



- Carbon reduction targets;
- Involvement in green activities;
- Physical risk exposure score.

Using a wide range of indicators, Amundi is able to set short, medium and long-term targets. For this purpose, Amundi relies on a broad set of data providers to guarantee that its measurements and assessments are as accurate as possible. The type of data, the data provider, and the methodologies used for the metrics are presented in the chapter 8.2.3 of the Climate and Sustainability Report 2023.

(2) Describe how this process is integrated into your overall risk management

Sustainability risks are integrated into Amundi's internal control and risk management system. The table at page 74 of Amundi's Climate and Sustainability Report 2023 details the internal control system implemented by Amundi.

Responsibilities for sustainability risks are spread between:

- The first level of controls performed by the investment teams themselves, and
- The second level of controls performed by the Risk teams, who monitor compliance with ESG objectives and constraints.

The Risk department is part of Amundi's "Responsible Investment" governance. It oversees adherence to regulatory requirements and management of risks related to these topics.

Risk teams monitor ESG rules in the same way as the other management rules. They rely on the same tools and procedures and cover our exclusion policies as well as eligibility criteria and ESG rules specific to funds. Compliance controls are automated in Amundi's proprietary compliance tool (ALTO Investment Compliance) with:

- Pre-trade alarm or blocking alerts, in particular with regards to exclusion policies;
- Post-trade alerts: fund managers are notified of potential breaches and are required to quickly bring portfolios back into compliance.

All the risks associated with the asset management business are presented in the Universal Registration Document 2023 in part 5.2.

☑ (B) Yes, we have a process to manage climate-related risks

(1) Describe your process

Amundi's approach to sustainability risk management is based on the following three pillars:

- The exclusion policy, which deals with the most significant ESG risks, detailed in chapter 1.1.1 of Amundi's Climate and Sustainability Report 2023;
- The ESG risk assessment detailed in section 8.2 of the Climate and Sustainability Report 2022 and the integration of these assessments into the investment process detailed in chapter 1.1.1 of the Climate and Sustainability Report 2023;
- The Stewardship Policy, which helps to trigger positive changes in the way companies manage their impact on key sustainability issues, and thus mitigate the associated risks.

(2) Describe how this process is integrated into your overall risk management

Sustainability risks are integrated into Amundi's internal control and risk management system. The table at page 74 of the Climate and Sustainability Report 2023 details the internal control system implemented by Amundi.

Responsibilities for sustainability risks are spread between:

- The first level of controls performed by the investment teams themselves, and



- The second level of controls performed by the Risk teams, who monitor compliance with ESG objectives and constraints.

The Risk department is part of Amundi's "Responsible Investment" governance. It oversees adherence to regulatory requirements and management of risks related to these topics.

Risk teams monitor ESG rules in the same way as the other management rules. They rely on the same tools and procedures and cover our exclusion policies as well as eligibility criteria and ESG rules specific to funds. Compliance controls are automated in Amundi's proprietary compliance tool (ALTO Investment Compliance) with:

- Pre-trade alarm or blocking alerts, in particular with regards to exclusion policies;
- Post-trade alerts: fund managers are notified of potential breaches and are required to quickly bring portfolios back into compliance.

All the risks associated with the asset management business are presented in the Universal Registration Document 2023 in part 5.2.

o (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

☑ (A) Exposure to physical risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used
 - o (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

☑ (B) Exposure to transition risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used
 - o (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

- ☐ (C) Internal carbon price
- ☑ (D) Total carbon emissions
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used
 - o (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
 - (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b

☑ (E) Weighted average carbon intensity

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used



- o (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

☑ (F) Avoided emissions

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used
 - (2) Metric or variable used and disclosed
 - o (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.amundi.fr/fr_instit/ezjscore/call/ezjscamundibuzz::sfForwardFront::paramsList=service=ProxyGedApi&routeId=_dl_23b9306 4-4287-454e-85dc-5177e3f29076 download

☑ (G) Implied Temperature Rise (ITR)

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - o (1) Metric or variable used
 - o (2) Metric or variable used and disclosed
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

- \square (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- (I) Proportion of assets or other business activities aligned with climate-related opportunities
 - (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - o (2) Metric or variable used and disclosed
 - o (3) Metric or variable used and disclosed, including methodology
- \square (J) Other metrics or variables
- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☑ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - o (1) Metric disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

☑ (B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - o (1) Metric disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

☑ (C) Scope 3 emissions (including financed emissions)



- (1) Indicate whether this metric was disclosed, including the methodology
 - o (1) Metric disclosed
 - (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b https://about.amundi.com/files/nuxeo/dl/00df3137-e7cd-4ac5-8da5-9c9422d48cf2

o (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- o (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

	(A)	The UN	Sustainable	Develop	ment Goa	ls (SDGs) and tard	ets
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- **☑** (B) The UNFCCC Paris Agreement
- ☑ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☑ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business

Conduct for Institutional Investors

- ☑ (E) The EU Taxonomy
- \Box (F) Other relevant taxonomies
- ☑ (G) The International Bill of Human Rights
- ☑ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☑ (I) The Convention on Biological Diversity
- ☑ (J) Other international framework(s)

Specify:

United Nations Global Compact (UNGC), TCFD recommendations, Ottawa and Oslo treaties, SFDR, ICMA Principles.

- \square (K) Other regional framework(s)
- \square (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☑ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☑ (B) Consult with key clients and/or beneficiaries to align with their priorities
- \square (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☑ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☑ (F) Understand the geographical relevance of specific sustainability outcome objectives
- \square (G) Other method
- o (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- o (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☑ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- \square (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- \square (C) We have been requested to do so by our clients and/or beneficiaries
- ☑ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☐ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- \square (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other



HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

☑ (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

We assess the human rights context of our investments through regular research and controversy reviews and assessing company policies and performance on human rights matters.

In 2023, we introduced a dedicated Human Rights policy which underscores Amundi's commitment to respect the human rights principles set up by the International Bill of Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, in line with the UN Global Compact. The policy focuses on engaging with corporates on the protection and promotion of respect for human rights (in direct operations and throughout the value chain), by ensuring that companies are taking the necessary steps to identify salient human rights risks within their global operations, prevent abuses before they occur, and provide or enable effective remediation where required.

(B) We assessed whether individuals at risk or already affected might be at heightened risk of harm Explain how these activities were conducted:

As part of our regular controversy review, we assess the extent to which human rights controversies impact stakeholders.

☑ (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

Explain how these activities were conducted:

Where possible, in the event of controversies or specific concerns, we consulted trade unions, most notably through UNI Global Union, regarding individual companies and sectors.

We also consult with human rights researchers and relevant non-governmental organisations on specific risks, such as forced labour or high-risk areas. This outreach is often enabled by investor networks and collective engagement groups.

☑ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

Specify:

As noted above, we engage with companies on remediation of human rights and other social controversies and on making improvements to their human rights policies and performance, where weaknesses are identified.

Explain how these activities were conducted:

• (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

☑ (A) Workers

Sector(s) for which each stakeholder group was included



☐ (1) Energy
\square (2) Materials
\square (3) Industrials
\square (4) Consumer discretionary
\square (5) Consumer staples
☑ (6) Healthcare
\square (7) Finance
(8) Information technology
\square (9) Communication services
☐ (10) Utilities
\square (11) Real estate
☐ (B) Communities
\square (C) Customers and end-users
☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

☑ (A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

Used on a regular basis in our ESG research and quarterly controversy review processes.

☑ (B) Media reports

Provide further detail on how your organisation used these information sources:

Used on a regular basis in our ESG research and quarterly controversy review processes.

☑ (C) Reports and other information from NGOs and human rights institutions

Provide further detail on how your organisation used these information sources:

Used on a regular basis in our ESG research and quarterly controversy review processes.

☑ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

Provide further detail on how your organisation used these information sources:

To identify risks specific to countries to which our investee companies have exposure, and to assess specific geographic areas of concern link to adverse human rights outcomes. Some examples include the annual ITUC report on labour rights and the ILO estimates of Modern Slavery, among others.

☑ (E) Data provider scores or benchmarks

Provide further detail on how your organisation used these information sources:

Used on a regular basis in our ESG research and quarterly controversy review processes.

☑ (F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

These are primarily derived from sources A-E and H-J, and automated alerts come from third-party data providers and sell-side research.

☑ (G) Sell-side research

Provide further detail on how your organisation used these information sources:

Used on a regular basis in our ESG research and quarterly controversy review processes.

☑ (H) Investor networks or other investors

Provide further detail on how your organisation used these information sources:



Used where possible and relevant in our ESG research and quarterly controversy review processes.

(I) Information provided directly by affected stakeholders or their representatives

Provide further detail on how your organisation used these information sources:

Used where available on a regular basis in our ESG research and quarterly controversy review processes, although availability of this information is limited.

☑ (J) Social media analysis

Specify:

Used sparingly, typically to follow a specific issue or organisation whose reports are not available otherwise, e.g., trade unions or local NGOs

Provide further detail on how your organisation used these information sources:

☑ (K) Other

Specify:

OECD National Contact Points data.

Provide further detail on how your organisation used these information sources:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

- \square (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities
- ☑ (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

Describe:

We regularly engage with companies on remediation of human rights controversies. However, in 2023 we also started to engage with companies on grievance and remediation effectiveness, asking investee companies to evidence effectiveness of grievance procedures and remedy readiness should controversies occur and remediation be required. In 2023, we conducted 42 engagements focussed specifically on grievance and remedy.

• (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year



MANAGER SELECTION, APPOINTMENT AND MONITORING (SAM)

OVERALL APPROACH

EXTERNAL INVESTMENT MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 1	CORE	OO 21	N/A	PUBLIC	External investment managers	4

For the majority of your externally managed AUM in each asset class, which responsible investment aspects does your organisation consider important in the assessment of external investment managers?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(5) Private equity
Organisation				
(A) Commitment to and experience in responsible investment	Ø	Ø	Ø	Ø
(B) Responsible investment policy(ies)	Ø	Ø	Ø	Ø
(C) Governance structure and senior-level oversight and accountability	Ø	Ø	Ø	Ø
People and Culture				
(D) Adequate resourcing and incentives	Ø	Ø	Ø	Ø
(E) Staff competencies and experience in responsible investment	Ø	Ø	Ø	Ø
Investment Process				
(F) Incorporation of material ESG factors in the investment process	Ø	Ø	Ø	Ø



(G) Incorporation of risks connected to systematic sustainability issues in the investment process	☑		Ø	7
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment				V
Stewardship				
(I) Policy(ies) or guidelines on stewardship		Ø	Ø	Ø
(J) Policy(ies) or guidelines on (proxy) voting	Ø	☑	Ø	
(K) Use of stewardship tools and activities	Ø	☑	Ø	
(L) Incorporation of risks connected to systematic sustainability issues in stewardship practices				Ø
(M) Involvement in collaborative engagement and stewardship initiatives		Ø	Ø	Ø
(N) Engagement with policy makers and other non-investee stakeholders	☑	Ø	Ø	☑
(O) Results of stewardship activities	Ø	Ø	Ø	Ø
Performance and Reporting				
(P) ESG disclosure in regular client reporting	Ø	Ø	Ø	
(Q) Inclusion of ESG factors in contractual agreements	Ø	Ø	Ø	
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	0	Ο	0	0



SERVICE PROVIDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	00 21	N/A	PUBLIC	Service providers	4

Which responsible investment aspects does your organisation consider important when assessing all service providers that advise you in the selection, appointment and/or monitoring of external investment managers?

- \square (A) Incorporation of their responsible investment policy into advisory services
- $\hfill\square$ (B) Ability to accommodate our responsible investment policy
- \square (C) Level of staff's responsible investment expertise
- ☐ (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance
- ☐ (E) Other
- (F) We do not consider any of the above responsible investment aspects important when assessing service providers that advise us in the selection, appointment and/or monitoring of external investment managers
- (G) Not applicable; we do not engage service providers in the selection, appointment or monitoring of external investment managers

SELECTION

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	00 12, 00 21	SAM 5, SAM 6, SAM 7	PUBLIC	Responsible investment practices	General

During the reporting year, did your organisation select new external investment managers or allocate new mandates to existing investment managers?

- (A) Yes, we selected external investment managers or allocated new mandates to existing investment managers during the reporting year
- o (B) No, we did not select new external investment managers or allocate new mandates to existing investment managers during the reporting year
- \circ (C) Not applicable; our organisation is in a captive relationship with external investment managers, which applies to 90% or more of our AUM



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	CORE	SAM 4	N/A	PUBLIC	Responsible investment practices	4

During the reporting year, what responsible investment aspects did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

Organisation

☑ (A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (B) Responsible investment policy(ies) (e.g. the alignment of their responsible investment policy with the investment mandate)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (C) Governance structure and senior-level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)

Select from dropdown list

- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

People and Culture

□ (D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)

☑ (E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

Investment Process

☑ (F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

☑ (G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates

 \Box (H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks)

Performance and Reporting

(I) ESG disclosure in regular client reporting



Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- ☑ (J) Inclusion of ESG factors in contractual agreements

Select from dropdown list

- (1) for all of our mandates
- o (2) for a majority of our mandates
- o (3) for a minority of our mandates
- (K) We did not review and evaluate any of the above responsible investment aspects when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 7	CORE	OO 9, OO 21, SAM 4	N/A	PUBLIC	Stewardship	4

During the reporting year, which aspects of (proxy) voting did your organisation, or the service provider acting on your behalf, review and evaluate when selecting new external investment managers or allocating new mandates to existing investment managers?

- ☐ (A) The alignment of their policy(ies) or guidelines on (proxy) voting with the investment mandate
- \square (B) Historical information on the number or percentage of general meetings at which they voted
- \square (C) Analysis of votes cast for and against
- \Box (D) Analysis of votes cast for and against resolutions related to risks connected to systematic sustainability issues
- \square (E) Details of their position on any controversial and high-profile votes
- \Box (F) Historical information of any resolutions on which they voted contrary to their own voting policy and the reasons why
- \square (G) Details of all votes involving companies where the external investment manager or an affiliate has a contractual relationship or another potential conflict of interest
- o (H) We did not review and evaluate any of the above aspects of (proxy) voting when selecting new external investment managers or allocating new mandates to existing investment managers during the reporting year
- (I) Not applicable; our organisation did not select new external investment managers or allocated new mandates to existing investment managers for listed equity and/or hedge funds that hold equity.

APPOINTMENT

SEGREGATED MANDATES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 8	CORE	OO 5.2, OO 13, OO 21	N/A	PUBLIC	Segregated mandates	4

Which responsible investment aspects do your organisation, or the service provider acting on your behalf, explicitly include in clauses within your contractual agreements with your external investment managers for segregated mandates?

- ☑ (A) Their commitment to following our responsible investment strategy in the management of our assets Select from dropdown list
 - o (1) for all of our segregated mandates
 - (2) for a majority of our segregated mandates
 - o (3) for a minority of our segregated mandates
- ☑ (B) Their commitment to incorporating material ESG factors into their investment activities



Select from dropdown list

- o (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- ☑ (C) Their commitment to incorporating material ESG factors into their stewardship activities

Select from dropdown list

- o (1) for all of our segregated mandates
- (2) for a majority of our segregated mandates
- o (3) for a minority of our segregated mandates
- □ (D) Their commitment to incorporating risks connected to systematic sustainability issues into their investment activities
- ☐ (E) Their commitment to incorporating risks connected to systematic sustainability issues into their stewardship activities
- ☑ (F) Exclusion list(s) or criteria

Select from dropdown list

- o (1) for all of our segregated mandates
- o (3) for a minority of our segregated mandates
- ☑ (G) Responsible investment communications and reporting obligations, including stewardship activities and results

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☑ (H) Incentives and controls to ensure alignment of interests

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- $\ensuremath{\square}$ (I) Commitments on climate-related disclosure in line with internationally-recognised frameworks such as the TCFD

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☑ (J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights

Select from dropdown list

- \circ (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- **◎** (3) for a minority of our segregated mandates
- ☑ (K) Their acknowledgement that their appointment is conditional on the fulfilment of their agreed responsible investment commitments

Select from dropdown list

- o (1) for all of our segregated mandates
- o (2) for a majority of our segregated mandates
- (3) for a minority of our segregated mandates
- ☐ (L) Other
- o (M) We do not include responsible investment aspects in clauses within our contractual agreements with external investment managers for segregated mandates



MONITORING

RESPONSIBLE INVESTMENT PRACTICES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	4

For the majority of your externally managed AUM in each asset class, which aspects of your external investment managers' responsible investment practices did your organisation, or the service provider acting on your behalf, monitor during the reporting year?

	(active)	(2) Listed equity (passive)	(3) Fixed income (active)	(5) Private equity
Organisation				
(A) Commitment to and experience in responsible investment (e.g. commitment to responsible investment principles and standards)	Ø	 ✓	Ø	Ø
(B) Responsible investment policy(ies) (e.g. the continued alignment of their responsible investment policy with the investment mandate)	Ø	Ø	Ø	Ø
(C) Governance structure and senior level oversight and accountability (e.g. the adequacy of their governance structure and reported conflicts of interest)	Ø	Ø		Ø
People and Culture				
(D) Adequate resourcing and incentives (e.g. their team structures, operating model and remuneration structure, including alignment of interests)				☑



(E) Staff competencies and experience in responsible investment (e.g. level of responsible investment responsibilities in their investment team, their responsible investment training and capacity building)	Ø	☑	Ø	Z
Investment Process				
(F) Incorporation of material ESG factors in the investment process (e.g. detail and evidence of how such factors are incorporated into the selection of individual assets and in portfolio construction)	Ø	☑	Ø	☑
(G) Incorporation of risks connected to systematic sustainability issues in the investment process (e.g. detail and evidence of how such risks are incorporated into the selection of individual assets and in portfolio construction)	Ø	☑	Ø	
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment (e.g. their process to measure and report such risks, their response to ESG incidents)				
Performance and Reporting				
(I) ESG disclosure in regular client reporting (e.g. any changes in their regular client reporting)	Ø		Ø	☑
(J) Inclusion of ESG factors in contractual agreements	Ø	Ø	Ø	Ø
(K) We did not monitor any of the above aspects of our external investment managers' responsible investment practices during the reporting year	0	0	O	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 10	PLUS	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

During the reporting year, which information did your organisation, or the service provider acting on your behalf, monitor for externally managed ESG passive products and strategies?

	(1) Listed equity (passive)
(A) How the external investment managers applied, reviewed and verified screening criteria	
(B) How the external investment managers rebalanced the products as a result of changes in ESG rankings, ratings or indexes	
(C) Evidence that ESG passive products and strategies meet the responsible investment criteria and process	
(D) Other	
(E) We did not monitor ESG passive products and strategies	
(F) Not applicable; we do not invest in ESG passive products and strategies	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 11	PLUS	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

Describe an innovative practice you adopted as part of monitoring your external investment managers' responsible investment practices in a specific asset class during the reporting year.

For Equity and Fixed Income asset classes, we added new requests as part of our monitoring regarding SFDR level 2 and EU Taxonomy. We added questions about their definition of sustainable investment, how they make sure that sustainable investments respect the Do Not Significantly Harm criteria and how they consider principal adverse impacts (PAIs), how they take into account sustainability risks and how the Executive Board is implied in sustainable/ESG topics. Regarding the EU Taxonomy, we had a request regarding their methodology. Regarding selected products from external investment managers, we had a precise focus regarding the share of sustainable investment and green taxonomy activity, and which PAIs are monitored.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 14, OO 21	N/A	PUBLIC	Responsible investment practices	1

For the majority of your externally managed AUM in each asset class, how often does your organisation, or the service provider acting on your behalf, monitor your external investment managers' responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(5) Private equity
(A) At least annually	Ø	Ø	Ø	7
(B) Less than once a year				
(C) On an ad hoc basis				



ENGAGEMENT AND ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 15	PLUS	00 14, 00 21	N/A	PUBLIC	Engagement and escalation	4

Describe how your organisation engaged with external investment managers to improve their responsible investment practices during the reporting year.

We did not engage with external investment managers on responsible investment.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	CORE	OO 14, OO 21	N/A	PUBLIC	Engagement and escalation	4

What actions does your organisation, or the service provider acting on your behalf, include in its formal escalation process to address concerns raised during monitoring of your external investment managers' responsible investment practices?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(5) Private equity
(A) Engagement with their investment professionals, investment committee or other representatives				Ø
(B) Notification about their placement on a watch list or relationship coming under review				Ø
(C) Reduction of capital allocation to the external investment managers until any concerns have been rectified	Ø	☑	Ø	
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	Ø	☑	Ø	
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified				Ø



(F) Other				
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	o	o	o	o

VERIFICATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	OO 14, OO 21	N/A	PUBLIC	Verification	1

For the majority of your externally managed AUM in each asset class, how did your organisation, or the service provider acting on your behalf, verify that the information reported by external investment managers on their responsible investment practices was correct during the reporting year?

	(1) Listed equity (active)	(2) Listed equity (passive)	(3) Fixed income (active)	(5) Private equity
(A) We checked that the information reported was verified through a third-party assurance process				
(B) We checked that the information reported was verified by an independent third party				
(C) We checked for evidence of internal monitoring or compliance				
(D) Other				
(E) We did not verify the information reported by external investment managers on their responsible investment practices during the reporting year	•	•	•	O



LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	00 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion	0	0	0
No, we do not have a formal or ormal process to identify and or orporate material ESG factors		0	0



MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Yes, we have a formal process that includes scenario analyses			
(B) Yes, we have a formal process, but it does not include scenario analyses	(2) for a majority of our AUM	(2) for a majority of our AUM	(2) for a majority of our AUM
(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion	0	0	0
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	0	0	0

(B) Yes, we have a formal process but it does not include scenario analysis - Specify: (Voluntary)

Amundi has developed two main ESG scoring methodologies, one for corporates issuing listed instruments and one for sovereign entities. Bespoke methodologies and frameworks developed for specific needs and asset classes or instruments such as real assets12 or use-of-proceeds bonds complement these methodologies.

Our approach is based on texts that are universal in scope, such as the United Nations Global Compact (UNGC), the Organisation for Economic Co-operation and Development's (OECD) Principles of Corporate Governance and the International Labour Organization (ILO) recommendations.

The ESG score aims to measure the ESG performance of an issuer, e.g. its ability to anticipate and manage the sustainability risks and opportunities inherent to its industry and to its individual circumstances. The ESG score also assesses the ability of the issuers' management team to handle potential negative impact of their activities on the sustainability factors.



PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

	(1) Active - quantitative	(2) Active - fundamental
(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(2) in a majority of cases
(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process	(1) in all cases	(2) in a majority of cases
(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process	(1) in all cases	(2) in a majority of cases
(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes	0	0



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors	(1) in all cases	(2) in a majority of cases	(2) in a majority of cases
(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors	(2) in a majority of cases	(2) in a majority of cases	(2) in a majority of cases
(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability	(1) in all cases	(2) in a majority of cases	(2) in a majority of cases
(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors		(2) in a majority of cases	(2) in a majority of cases
(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process	0	0	0



ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	00 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Amundi Funds Net Zero Ambition Global Equity and Amundi Funds Net Zero Ambition Top European Players assesses the credibility and feasibility of companies' decarbonization targets. In particular, Net Zero Ambition Global Equity uses a new proprietary methodology that places a cost value on carbon 'externalities' (such as emissions that impact us all) using the concept of 'Environmental Capital'. Environmental Capital adjusts the company's assumed Return on Invested Capital (ROIC) to include the costs and cap-ex the company will need to spend to reduce its carbon intensity.

These equity portfolios are large-cap focused and include 1) "Climate Champions", which are the companies that are well advanced in their carbon mitigation; 2) "Climate Committed", which are companies that are taking corrective actions to address climate challenges but need to invest more in decarbonization; and 3) "Climate Enablers", which are the companies that produce technologies or innovative products and services that pave the way towards a low carbon economy. Both portfolios are constructed to have carbon intensities aligned with Paris Aligned Benchmarks.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(2) for a majority of our AUM	(2) for a majority of our AUM
(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(2) for a majority of our AUM	(2) for a majority of our AUM



(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(2) for a majority of our AUM	(2) for a majority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(3) for a minority of our AUM		
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	0	0	0

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:

Passive equity: Specific targets such as for example in the Paris Aligned Benchmark, index-level decarbonisation trajectory, etc.



PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 7	PLUS	OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

In passive management, ESG factors are embedded into the index methodology. Amundi offers a wide range of ESG, Climate aligned, and Sustainable Thematic ETF/Index funds, such as MSCI ESG Leaders, S&P 500 PAB (Paris-aligned Benchmark), or MSCI ACWI IMI New Energy ESG Filtered ETFs.

An example is the MSCI ESG Leaders index. The benchmark excludes companies involved in severe controversies, or operating in controversial activities like controversial Weapons and Nuclear weapons. It also excludes companies which derive more than a certain percentage of their revenues in thermal coal, unconventional oil & gas, alcohol, gambling, tobacco, and conventional weapons, which are excluded from the Index.

On top of the exclusion rules, the MSCI World ESG Leaders Index is constructed by applying a Top 50% Sector Best-in-Class selection process, and used in a range of ETFs covering 11 different regional indexations within the MSCI World Index universe. The methodology selects, within each sector, the companies with the highest ESG ratings until the selection covers 50% of the market capitalization of the sector in the parent Index.

Another example is the S&P 500 Net Zero 2050 Paris-Aligned ESG index. This index goes beyond the minimum requirements of the EU Climate Benchmark Regulation defining the characteristics of PAB indices (Paris-aligned benchmarks). In particular it was one of the first indices to allow a forward-looking perspective on likely future greenhouse gas emissions, and to use a carbon budget allocation method to allocate each company a total amount of carbon emission per year. A Sectoral decarbonisation Approach (SDA) and a Greenhouse Gas per unit of Value Added Approach (GEVA) which are both models recommended by the Science Based Target initiative (SBTi), are used for assessing past and projecting future decarbonisation trajectories. By making sure that the portfolio collectively remains within the allocation budget to 1.5°C, it allows to overweight companies which stand below carbon emission budgets and underweight those above budget, achieving a significant level of organic decarbonisation versus decarbonisation obtained through portfolio rebalancing. This index also provides additional constraints related to the limitation of physical risks to the portfolio linked to global warming.

Moving to the Climate Transition and "Solutions" fund category, a third example is the MSCI ACWI IMI New Energy ESG Filtered index, used as underlying index of a thematic ETF pursuing an environmental thematic objective. New Energy is a sector transverse concept where a traditional sector classification approach is unable to capture the full opportunity set. The theme perimeter is defined as including Alternative Energy, Energy efficiency, Smart grids, and the Battery value chain while excluding some undesirable activities. Company identification uses a twofold approaches. A direct revenue based approach based on a research-driven attribution of revenues according to the index provider's "Sustainable Impact Metrics Taxonomy", and a detection of companies operating in/ exposed to the thematic activities via a Natural Language Processing and Text mining methodology followed by a research-driven attribution of revenues to these activities. The strategy also adds ESG rating and exclusion screens.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 8	PLUS	OO 19, OO 21	N/A	PUBLIC	Passive investments	1

How does your organisation select the ESG index(es) or benchmark(s) for your passive listed equity assets?

☑ (A) We commission customised indexes Explain:



We select indices which may be derived from standard flagship ESG indices and additionally make sure that these indices respond to our internal SRI policy leading to customisation features. For example, this may involve requiring that the index incorporates the right exclusion policies related to Unconventional oil and gas, or Arctic Oil drilling and extraction, or a zero tolerance on new thermal coal developments. The resulting index is often customised, however not exclusive as per the UCITS ETF framework.

(B) We compare the methodology amongst the index providers available Explain:

We compare the methodologies proposed by index providers and also conduct requests for proposals upon our guidelines with all major index providers. We compare not only the index methodologies but the scope of company data coverage and the quality of the ESG data used as well as the models used when data estimates are completing company-disclosed data. This involves comparing index providers in terms of understanding of the objectives and the philosophy of the passive strategy that we or our clients are pursuing, This also involves comparing index providers in terms of understanding, anticipation and interpretation of new regulations, and in terms of capacity to innovate and produce the new data points needed for the strategy.

(C) We compare the costs of different options available in the market Explain:

Costs remain an essential criteria through the whole selection process.

☑ (D) Other

Specify and explain:

We also assess the index provider's research capacity, its capacity to provide ex-ante and ex-post analytics on indices, as well as its capacity to contribute to market education, and its capacity for marketing its own index concepts in areas close to the passive strategies that we are targeting.

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- ☑ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- \Box (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☑ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- o (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	00 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) Active - quantitative	(2) Active - fundamental
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings	✓	☑
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents	☑	
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities	☑	
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	☑	☑
(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion	0	0



PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	00 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

0

Example of ESG Integration Impacting Valuation Analysis from a leading US manufacturer of paperboard packaging products. It is the largest producer of folding cartons in North America (37%+ share) and has 1.45mn tons of coated unbleached kraft (CUK) production, 1.2mn tons of solid bleached sulfate (SBS) production and 1mn tons of coated recycled board (CRB) production.

The Company announced its plans in early 2023 to build a \$1 billion CRB facility in Waco, Texas dedicated to producing recycled paperboard, a responsible packaging alternative. The plant, slated to ramp up production in 2026, supports the company's vision of a renewable future. In addition, the plant is slated to improve the company's overall environmental footprint. As the Company optimizes its network of paper mills and packaging facilities, absolute greenhouse gas emissions are projected to decrease by about 12 percent.

With a renewed focus on plastic waste, paper based cups and plates could see additional growth as they are regarded as being the more environmentally friendly substrate. ESG improvement story about improving the resource efficiency of the business. Recent actions of consolidating paper machines will drive sustained improvements in profitability & lower emissions. This has been a profitable position across a number of portfolios in 2023 as the company's margins are benefiting from greater efficiencies from the new cleaner plants and demanded for packaging alternatives.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☑ (A) We share a list of ESG screens
- ☑ (B) We share any changes in ESG screens
- ☑ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- o (D) We do not share the above information for all our listed equity assets subject to ESG screens



FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, our investment process incorporates material governance factors	(1) for all of our			
	AUM	AUM	AUM	AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our			
	AUM	AUM	AUM	AUM
(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons	(1) for all of our			
	AUM	AUM	AUM	AUM
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	0	٥	٥	0
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	O	0	0	0



MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	00 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, we have a formal process that includes scenario analyses			
(B) Yes, we have a formal process, but does it not include scenario analyses	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion	0	0	0
(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets	0	0	0



PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
Fl 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) We incorporate material environmental and social factors	\checkmark	V	Ø	Ø
(B) We incorporate material governance-related factors	Ø	Ø	V	Ø
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	0	0	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(2) for a majority			
	of our AUM	of our AUM	of our AUM	of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our			
	AUM	AUM	AUM	AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	0	0	0	0



(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

IndicatorType of indicatorDependent onGateway toDisclosureSubsectionPRI PrincipleFI 5COREOO 21N/APUBLICESG incorporation in research1

0

0

0

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

0

☑ (A) We use a qualitative ESG checklist

Select from dropdown list:

- o (2) in a majority of cases
- o (3) in a minority of cases

☑ (B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- o (2) in a majority of cases
- o (3) in a minority of cases

☑ (C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy

Select from dropdown list:

- o (2) in a majority of cases
- o (3) in a minority of cases
- \Box (D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available
- \square (E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function

Select from dropdown list:

- (1) in all cases
- o (2) in a majority of cases
- o (3) in a minority of cases
- ☑ (F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates

Select from dropdown list:

- o (2) in a majority of cases
- o (3) in a minority of cases
- ☑ (G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process

Specify:

Internal due diligence template.

- o (2) in a majority of cases
- o (3) in a minority of cases
- o (H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

	(1) SSA	(2) Corporate	(3) Private debt
(A) We incorporate it into the forecast of financial metrics or other quantitative assessments			
(B) We make a qualitative assessment of how material ESG factors may evolve	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) We do not incorporate significant changes in material ESG factors	Ο	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 7	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

At what level do you incorporate material ESG factors into the risks and/or returns of your securitised products?

(A) At both key counterparties' and at the underlying collateral pool's levels Explain: (Voluntary)

The integration of the ESG factors into the risks and returns of our securitized products consists in applying "a beat the benchmark" approach to select a better portfolio than its investible universe. It is implemented through the following steps. To assess the ESG performance of each securitisation, an analysis is performed for both the reference entity issuing or managing the securitisation and its collateral.

- 1. ESG assessment of the reference entity (seller of the loans, sponsor of a CMBS or CLO manager). The Amundi proprietary rating methodology for bond issuers is applied.
- 2. ESG assessment of the collateral: focus on specific environmental and social features depending on its nature. Moreover, for all labelled bonds, an additional ESG analysis is performed. This process allows to have a 100% coverage ratio of Amundi ABS (ex. cash, derivatives and non-rateable securities).
- o (B) At key counterparties' level only
- \circ (C) At the underlying collateral pool's level only



ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(2) for a majority of our AUM
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	0	0	O

(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways - Specify:



Engagement: regarding securitisations, a dialogue has been engaged with issuers to explain our ESG goals and how our methodology take their practices in consideration, both at issuer and collateral levels. Explanations are provided on how they can improve their practices.

PASSIVE INVESTMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 9	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Passive investments	1

Provide an example of how material ESG factors influenced weightings and tilts in the design of your passively managed funds.

In Fixed Income passive investment, Amundi offers ESG, Climate-aligned, Green bonds and Green bond tilted ETFs or Index funds. Such ETFs where ESG factors are integrated cover all market segments: credit, govies and Aggreggate exposures, IG and HY rating, fixed and floating rates.

Examples of material ESG factors:

Amundi has a number of funds tracking Bloomberg MSCI Euro Corporate ESG Sustainability SRI indices, which exclude companies with a negative social or environmental impact (ratings from MSCI ESG Research) such as: red flags (controversies), controversial weapons, military weapons, civilian firearms, tobacco, alcohol, adult entertainment, gambling, genetically modified organisms, nuclear power, thermal coal or oil sands.

In addition to these exclusions, a filtering process is implemented which retains issuers with a minimum ESG rating of "BBB" (on a scale from AAA to CCC). ESG materiality is additionally ensured by making sure that at least 20% of the eligible universe is excluded based on the ESG rating.

Another example is the Euro Corporate Bond Net Zero Ambition PAB ETF replicating the Bloomberg MSCI Euro Corporate PAB Green Tilted Index. The index applies the minimum requirements for PABs of the EU Climate Benchmark Regulation, which defines the characteristics of PABs. The initial carbon emissions reduction of 50% versus the parent market capitalisation weighted index, and the 7% on-going year-on-year emission reduction, are applied both on absolute greenhouse gas emissions, and on emission intensity by sales, since these indicators (not used for equities) are relevant in the context of corporate bonds. In addition to PAB exclusions related to fossil fuel exposure, DNSH policy and controversies, a significant number of activity-based exclusions are added. An important and innovative feature is that the weights of corporate green bonds are at least double those of the parent index. In addition, the green revenues of companies included in the index are at least doubled (and the green-to-brown ratio is multiplied by a factor of 4x) in order to increase the representation of transition solution providers.

A last example is in the Government bond area. A Euro-government bond ETF with a more sustainable profile has been designed which maintains similar financial characteristics while allocating a minimum weighting of 30% to government green bonds.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 10	PLUS	OO 19, OO 21	N/A	PUBLIC	Passive investments	1

How does your organisation select the ESG index(es) or benchmark(s) for your passive fixed income assets?

☑ (A) We commission customised indexes Explain:



We select indices which may be derived from standard flagship ESG indices and additionally make sure that these indices respond to our internal SRI policy leading to customisation features. For example, this may involve requiring that the index incorporates the right exclusion policies related to Unconventional oil and gas, or Arctic Oil drilling and extraction, or a zero tolerance on new thermal coal developments. The resulting index can be customised, however not exclusive as required in the UCITS ETF framework.

(B) We compare the methodology amongst the index providers available Explain:

We compare the methodologies proposed by index providers. We also conduct requests for proposals upon our guidelines with all major index providers. We compare not only the index methodologies but the scope of company data coverage, and the quality of the ESG data used as well as the models used when data estimates are completing company-disclosed data. This involves comparing index providers in terms of understanding of the objectives and the philosophy of the passive strategy that we or our clients are pursuing, This also involves comparing index providers in terms of anticipation and interpretation of new regulations, and capacity to innovate and produce the new data points needed for the strategy.

(C) We compare the costs of different options available in the market Explain:

Costs remain an essential criteria through the whole selection process.

☑ (D) Other

Specify and explain:

We also assess the index provider's research capacity, its ability to provide ex-ante and ex-post analysis on indices, its ability to contribute to market education and market its own index concepts in areas close to the passive strategies we target.



POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	00 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM			
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM			
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	
(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process	0	0	0	0

(D) We use another method of incorporating material ESG factors into our portfolio's risk management process - Specify:

As part of our "ESG Mainstreaming" approach, all our open-ended funds, fixed income funds included, now include an environmental and social impact analysis of the companies in which we invest.

Concretely, it means we give preference to the most highly rated companies, while remaining under-weight, or even excluding, the lowest-rated companies, with the objective of a portfolio ESG rating above the ESG rating of the benchmark representative of the investment universe.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	00 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) SSA	(2) Corporate	(3) Securitised	(4) Private debt
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	Ø	☑	Ø	Ø
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	☑	☑	☑	
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities				
(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents	Ø	Ø	Ø	Ø
(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion	O	o	0	0
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	0	0	0	0



PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	00 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

☑ (A) We used a qualitative ESG checklist

Select from dropdown list:

- o (2) in the majority of cases
- o (3) in the minority of cases

☑ (B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- o (2) in the majority of cases
- o (3) in the minority of cases
- \Box (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available
- ☑ (D) We used industry body guidelines

Select from dropdown list:

- o (2) in the majority of cases
- o (3) in the minority of cases
- ☑ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments Specify:

Internal ESG scoring tool.

- o (1) in all cases
- o (3) in the minority of cases
- o (F) We did not incorporate material ESG factors when monitoring private debt investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

A comprehensive approach means incorporating the ESG-identified factors into arobust credit research framework to help identify both short and long term risks to prevent any security impairment in the portfolio while pursling relative-value opportunities.

The underlying principle is to understand how ESG factors could affect the value of a certain issuer's debt. To do that, we focus on issues such as materiality, for instance, what is the effect on credit metrics and credit value? This task can be difficult due to the fact that, as opposed to equity investors, fixed-income investors face several challenges that could compound the impact of ESG risk. For instance:

- Marurity: the credit risk materialisation cycle Inked to ESG may take some time to come tothe fore and, as such, may not always be relevant to short-term securities, as opposed to longer-term ones issued by the same issuer.
- Credi quality: higher credit quality is generally better insulated from business risks stemming from different sources, with ESG-related issues being one of them.

Amundi's credit team approach to materiality consists of foursteps:

- 1. Based on our proprietary ESG sector analysis research, we highlight for each sector the most impactful topics and identify the most crucial ESG issues as far as their impact on credit metrics is concerned;
- 2. We analyse the issuer business or financial metric profile irrespective of ESG issues;
- 3. We analyse the issuer ESG profile by determining materiality based on the most impactful ESG factor for each sector, as established in step 1; and
- 4. We explicitly layer the ESG impact of the issuer's business profile and whenever possible, we assess the impact of its financial metrics in an attempt to establish if those ESG issues are relevant in the credit context.

The goal of this approach is to make full usage of the ESG information delivered by the scoring process, since focusing purely on the rating may capture only one dimension, as the rating is the average of E, S and G pillars, while, when conducting credit analysis, investors may also be interested in dle tail risks identified by each criterion.

For credit research, every element has its own impact on credit metrics and poor performance in one area could be attreat to the overall credit quality.

If serious, poor ESG practices may threaten credit quality or result in a lower internal rating than the issuer might otherwise receive. Hence, the ESG rating will be an input into the business profile rating. The ESG weight in the business profile is up to each analyst to assess and will vary according to sector and materiality.



ESG needs to be evaluated in terms that actually alter the metrics and value of the issuer's debt. If ESG issues are not expected to weight on financial metrics or on the business profile enough to affect the internal rating, the conclusion is that they are not material. Materiality is measured as the ESG relevance on the fundamental, standalone internal rating of the business profile.

The effect on credit metrics and value is the acid test of materiality. The threats and benefits of ESG can impact the following measures: revenue, profitability, cash flow, debt and leverage.

The impact can be minimal (less than 5%), moderate (S-10%), or elevated (above 10%). We can also assign these categories to the ESG analysis without an explicit estimate of the financial impact. Some minimal impact should not affect the business profile rating, while a moderate impact will have a variable fallout on the rating.

All elevated impact should decrease or increase the business profile rating by at least one notch. A combinaison of ESG and fundamental credit anatyss can help assess the sustainability and profitability of any company's business.

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 15	PLUS	OO 20, OO 21	N/A	PUBLIC	Thematic bonds	3

What percentage of environmental, social and/or other labelled thematic bonds held by your organisation has been verified?

As a percentage of your total labelled bonds:

(A) Third-party assurance	(4) >50–75%
(B) Second-party opinion	(5) >75%
(C) Approved verifiers or external reviewers (e.g. via CBI or ICMA)	(5) >75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	00 17 FI, 00 21	N/A	PUBLIC	Thematic bonds	1

What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?

- ☑ (A) The bond's use of proceeds
- $\ \square$ (B) The issuers' targets
- ☑ (C) The issuers' progress towards achieving their targets
- ☑ (D) The issuer profile and how it contributes to their targets
- o (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- o (F) Not applicable; we do not invest in non-labelled thematic bonds



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	CORE	Multiple, see guidance	N/A	PUBLIC	Thematic bonds	1, 2, 6

During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?

- \square (A) We engaged with the issuer
- \square (B) We alerted thematic bond certification agencies
- \square (C) We sold the security
- \square (D) We blacklisted the issuer
- \square (E) Other action
- (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year
- o (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☑ (A) We share a list of ESG screens
- ☑ (B) We share any changes in ESG screens
- ☑ (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- o (D) We do not share the above information for all our fixed income assets subject to ESG screens



REAL ESTATE (RE)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 21, OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☑ (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail and education) and geography
- ☑ (B) Guidelines on our ESG approach to new construction
- ☑ (C) Guidelines on our ESG approach to major renovations
- (D) Guidelines on our ESG approach to standing real estate investments
- ☑ (E) Guidelines on pre-investment screening
- ☑ (F) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☑ (G) Guidelines on our approach to ESG integration into long-term value creation efforts
- ☑ (H) Guidelines on our approach to ESG reporting
- ☑ (I) Guidelines on our engagement approach related to third-party property managers
- ☑ (J) Guidelines on our engagement approach related to tenants
- ☑ (K) Guidelines on our engagement approach related to construction contractors
- o (L) Our responsible investment policy(ies) does not cover real estate-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 2	CORE	00 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- o (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- o (C) We added responsible investment commitments in side letters upon a client's request
- o (D) We did not make any formal responsible investment commitments for the relevant reporting year
- $\circ\;$ (E) Not applicable; we have not raised funds in the last five years



PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3	CORE	00 21	RE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential real estate investments?

- (A) We assessed ESG materiality for each property, as each case is unique Select from dropdown list:
 - **(1)** for all of our potential real estate investments
 - \circ (2) for a majority of our potential real estate investments
 - o (3) for a minority of our potential real estate investments
- o (B) We performed a mix of property level and property type or category level ESG materiality analysis
- o (C) We assessed ESG materiality at the property type or category level only
- o (D) We did not conduct ESG materiality analysis for our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 3.1	CORE	RE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential real estate investments?

- \square (A) We used GRI standards to inform our real estate ESG materiality analysis
- \square (B) We used SASB standards to inform our real estate ESG materiality analysis
- \square (C) We used the UN Sustainable Development Goals (SDGs) to inform our real estate ESG materiality analysis
- ☑ (D) We used GRESB Materiality Assessment (RC7) or similar to inform our real estate ESG materiality analysis
- \square (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our real estate ESG materiality analysis
- ☑ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our real estate ESG materiality analysis
- ☐ (G) We used geopolitical and macro-economic considerations in our real estate ESG materiality analysis
- ☑ (H) We used green building certifications to inform our real estate ESG materiality analysis
- \square (I) We engaged with the existing owners and/or managers (or developers for new properties) to inform our real estate ESG materiality analysis
- ☑ (J) Other

Specify:

We use a specific tool based on a breeam-in-use international certification in our ESG analysis.



DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	00 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence your selection of real estate investments?

☑ (A) Material ESG factors were used to identify risks

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments

☑ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list:

- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments

☑ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments

(D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments

☑ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments

☑ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- o (G) Material ESG factors did not influence the selection of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	00 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential real estate investments?

☑ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments



- o (3) for a minority of our potential real estate investments
- ☑ (B) We send detailed ESG questionnaires to target properties

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- $\ \square$ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list:

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- ☑ (D) We conduct site visits

Select from dropdown list:

- o (1) for all of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- ☑ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list:

- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- ☑ (F) We conduct detailed external stakeholder analysis and/or engagement

Select from dropdown list:

- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- ☑ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence, e.g. commercial, accounting and legal

- (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- o (3) for a minority of our potential real estate investments
- ☑ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal Select from dropdown list:
 - (1) for all of our potential real estate investments
 - o (2) for a majority of our potential real estate investments
 - o (3) for a minority of our potential real estate investments
- □ (I) Other
- o (J) We do not conduct due diligence on material ESG factors for potential real estate investments



SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY PROPERTY MANAGERS

SELECTION PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process of third-party property managers	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party property managers?

- ☑ (A) We requested information from potential third-party property managers on their overall approach to material ESG factors
- \square (B) We requested track records and examples from potential third-party property managers on their management of material ESG factors
- ☑ (C) We requested information from potential third-party property managers on their engagement process(es) with stakeholders
- ☑ (D) We requested documentation from potential third-party property managers on their responsible procurement practices, including responsibilities, approach and incentives
- ☑ (E) We requested the assessment of current and planned availability and aggregation of metering data from potential third-party property managers
- ☐ (F) Other
- o (G) We did not include material ESG factors in our selection of third-party property managers

APPOINTMENT PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process of third-party property managers	1, 4

How did you include material ESG factors when appointing your current third-party property managers?

- $\ensuremath{\square}$ (A) We set dedicated ESG procedures in all relevant property management phases
 - Select from dropdown list:
 - (1) for all of our third-party property managers
 - o (2) for a majority of our third-party property managers
 - o (3) for a minority of our third-party property managers
- ☑ (B) We set clear ESG reporting requirements

Select from dropdown list:

- o (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- ☑ (C) We set clear targets on material ESG factors

- o (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- \square (D) We set incentives related to targets on material ESG factors



☑ (E) We included responsible investment clauses in property management contracts

Select from dropdown list:

- o (1) for all of our third-party property managers
- o (3) for a minority of our third-party property managers

☑ (F) Other

Specify:

Property Manager scoring based on ESG criteria.

Select from dropdown list:

- **(1)** for all of our third-party property managers
- o (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- o (G) We did not include material ESG factors in the appointment of third-party property managers

MONITORING PROCESS OF THIRD-PARTY PROPERTY MANAGERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process of third-party property managers	1, 4

How do you include material ESG factors when monitoring current third-party property managers?

- ☑ (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors Select from dropdown list:
 - (1) for all of our third-party property managers
 - o (2) for a majority of our third-party property managers
 - o (3) for a minority of our third-party property managers
- ☐ (B) We monitor the performance of quantitative and/or qualitative targets on material social factors

Select from dropdown list:

- (1) for all of our third-party property managers
- o (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- ☑ (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors Select from dropdown list:
 - (1) for all of our third-party property managers
 - o (2) for a majority of our third-party property managers
 - o (3) for a minority of our third-party property managers
- ☑ (D) We monitor progress reports on engagement with tenants

Select from dropdown list:

- (1) for all of our third-party property managers
- o (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- \square (E) We require formal reporting at least yearly
- ☑ (F) We have discussions about material ESG factors with all relevant stakeholders at least yearly

Select from dropdown list:

- (1) for all of our third-party property managers
- o (2) for a majority of our third-party property managers
- o (3) for a minority of our third-party property managers
- \square (G) We conduct a performance review of third-party property managers against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- ☐ (H) We have internal or external parties conduct site visits at least yearly

- o (1) for all of our third-party property managers
- (2) for a majority of our third-party property managers



o (3) for a minority of our third-party property managers

☐ (I) Other

o (J) We do not include material ESG factors in the monitoring of third-party property managers

CONSTRUCTION AND DEVELOPMENT

CONSTRUCTION REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	OO 24	N/A	PUBLIC	Construction requirements	1

What ESG requirements do you currently have in place for all development projects and major renovations?

- ☑ (A) We require the management of waste by diverting materials (e.g. from construction and demolition, reusable vegetation, rocks and soil) from disposal
- (B) We require the minimisation of light and noise pollution that would affect the surrounding community
- ☑ (C) We require the performance of an environmental and social site impact assessment
- ☑ (D) We require the protection of the air quality during construction
- ☑ (E) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- ☑ (F) We require the protection of surface water, groundwater and aquatic ecosystems by controlling and retaining construction pollutants
- (G) We require constant monitoring of health and safety at the construction site
- \square (H) We require engagement with local communities and other stakeholders during the design and/or planning process
- ☐ (I) Other
- o (J) We do not have ESG requirements in place for development projects and major renovations

MINIMUM BUILDING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	OO 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

- ☑ (A) We require the implementation of the latest available metering and internet of things (IoT) technology Select from dropdown list:
 - \circ (1) for all development projects and major renovations
 - (2) for a majority of our development projects and major renovations
 - o (3) for a minority of our development projects and major renovations
- \square (B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings

Select from dropdown list:

- (1) for all development projects and major renovations
- o (2) for a majority of our development projects and major renovations
- o (3) for a minority of our development projects and major renovations
- ☑ (C) We require the use of certified (or labelled) sustainable building materials

- (1) for all development projects and major renovations
- o (2) for a majority of our development projects and major renovations
- (3) for a minority of our development projects and major renovations



☑ (D) We require the installation of renewable energy technologies where feasible

Select from dropdown list:

- o (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- (3) for a minority of our development projects and major renovations
- \Box (E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction

☑ (F) We require water conservation measures

Select from dropdown list:

- o (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- o (3) for a minority of our development projects and major renovations
- ☑ (G) We require common health and well-being measures for occupants

Select from dropdown list:

- o (1) for all development projects and major renovations
- (2) for a majority of our development projects and major renovations
- o (3) for a minority of our development projects and major renovations
- ☐ (H) Other
- o (I) We do not have minimum building requirements in place for development projects and major renovations

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11	CORE	00 21	RE 11.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your real estate investments?

☑ (A) Yes, we tracked KPIs on environmental factors

Percentage of real estate assets this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%

☑ (B) Yes, we tracked KPIs on social factors

Percentage of real estate assets this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%

☑ (C) Yes, we tracked KPIs on governance factors

Percentage of real estate assets this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%
- o (D) We did not track KPIs on material ESG factors across our real estate investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11.1	PLUS	RE 11	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your real estate investments during the reporting year.

(A) ESG KPI #1

Energy intensity

(B) ESG KPI #2

Carbon intensity

(C) ESG KPI #3

Climate change analysis

(D) ESG KPI #4

Health and well-being

(E) ESG KPI #5

Mobility/transportation

(F) ESG KPI #6

Waste

(G) ESG KPI #7

Water

(H) ESG KPI #8

Property managers rating based on ESG performances

(I) ESG KPI #9

Biodiversity

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	OO 21	N/A	PUBLIC	Monitoring	1

During the reporting year, what ESG building performance data did you collect for your real estate assets?

☑ (A) Energy consumption

Select from dropdown list:

- o (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- \circ (3) for a minority of our real estate assets

☑ (B) Water consumption

- o (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- o (3) for a minority of our real estate assets
- ☑ (C) Waste production



Select from dropdown list:

- o (1) for all of our real estate assets
- o (2) for a majority of our real estate assets
- ☐ (D) Other
- o (E) We did not collect ESG building performance data for our real estate assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	00 21, 00 26	RE 13.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your real estate investments?

☑ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

Select from dropdown list:

- (1) for all of our real estate assets
- o (2) for a majority of our real estate assets
- o (3) for a minority of our real estate assets
- (B) We implement certified environmental and social management systems across our portfolio

Select from dropdown list:

- o (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- o (3) for a minority of our real estate assets
- $\ensuremath{\square}$ (C) We make sufficient budget available to ensure that the systems and procedures needed are established

Select from dropdown list:

- o (1) for all of our real estate assets
- (2) for a majority of our real estate assets
- o (3) for a minority of our real estate assets
- $\ \square$ (D) We hire external verification services to audit performance, systems, and procedures

Select from dropdown list:

- \circ (2) for a majority of our real estate assets
- o (3) for a minority of our real estate assets
- ☑ (E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans Select from dropdown list:

 - o (2) for a majority of our real estate assets
 - o (3) for a minority of our real estate assets
- ☑ (F) We develop minimum health and safety standards

- o (1) for all of our real estate assets
- o (3) for a minority of our real estate assets
- ☐ (G) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users
- ☐ (H) Other
- o (I) We do not have processes in place to help meet our targets on material ESG factors for our real estate investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13.1	PLUS	RE 13	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.

(A) Process one

We put in place our engagement policy for our property managers. This policy leads to a commitment by property managers to respect ESG principles define by Amundi Real Estate. After their commitment Property Manager are assessed on how they apply them to their activities. Finally, work is undertaken between Amundi RE and the property management companies to promote the improvement of these practices over time.

(B) Process two

We also set up a dedicated mission with an external support to facilitate the integration of our ESG issues by the property manager notably for the data collection process. It is a key part of our ESG assessement methodology. This allow us to improve our ESG analysis and help us to be more efficient on project we conduct on our buildings.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 14	CORE	00 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period?

☑ (A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list:

- (1) for all of our real estate investments
- (2) for a majority of our real estate investments
- o (3) for a minority of our real estate investments
- ☑ (B) We adjust our ESG action plans based on performance monitoring findings at least yearly

Select from dropdown list:

- (1) for all of our real estate investments
- o (2) for a majority of our real estate investments
- o (3) for a minority of our real estate investments
- ☑ (C) We, or the external advisors that we hire, support our real estate investments with specific ESG value-creation opportunities

- o (1) for all of our real estate investments
- o (3) for a minority of our real estate investments
- ☐ (D) Other
- o (E) We do not manage material ESG risks and opportunities post-investment



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 15	PLUS	00 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the real estate investments where you hold a minority stake.

As a part of investments where we hold a minority stake we have an approach at two levels:

- Fund level: we ensure that the ESG strategy at fund level is aligned with our ESG commitments. We also develop an ESG questionnaire to assess the ESG commitments of the fund.
- Property Level: When it's possible we use our ESG methodology assessment at building level.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	PLUS	00 21	N/A	PUBLIC	Monitoring	1, 2

Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.

We have two level for our ESG actions plans and every year we update the ESG analysis and the actions plans to take into account the improvement realized during the previous exercise.

- Fund level: we define objectives at the fund level. Regarding these objectives we build some indicators to monitor their realization. We are developing an action plan to address the gaps and ensure that the fund can meet the commitments it has made.
- Asset level: we establish an ESG action plan for each asset. This action plan resume the action which could be taken to improve the Environmental Social and Governance performance of the asset. Each action specifies the issue it addresses (e.g. water; energy; health and wellbeing; etc.). The actions are also accompanied by the number of points that they allow to be gained on the total ESG score of the asset to facilitate arbitrage between them by Asset Management team.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	00 21	N/A	PUBLIC	Monitoring	1

What proportion of your real estate assets has obtained a green or sustainable building certification?

- o (A) All of our real estate assets have obtained a green or sustainable building certification
- (B) A majority of our real estate assets have obtained a green or sustainable building certification.
- o (C) A minority of our real estate assets have obtained a green or sustainable building certification
- o (D) None of our real estate assets have obtained a green or sustainable building certification



STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	00 21	N/A	PUBLIC	Stakeholder engagement	1, 2

How does your third-party property manager(s) engage with tenants?

- ☑ (A) They engage with real estate tenants on energy, water consumption and/or waste production Select from dropdown list:
 - (1) for all of our buildings or properties

 - o (3) for a minority of our buildings or properties
- ☑ (B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance

Select from dropdown list:

- \circ (1) for all of our buildings or properties
- o (3) for a minority of our buildings or properties
- ☑ (C) They engage with real estate tenants by offering green leases

Select from dropdown list:

- o (1) for all of our buildings or properties
- (2) for a majority of our buildings or properties
- o (3) for a minority of our buildings or properties
- ☑ (D) They engage with real estate tenants by identifying collaboration opportunities that support targets related to material ESG factors

- o (1) for all of our buildings or properties
- o (2) for a majority of our buildings or properties
- (3) for a minority of our buildings or properties
- ☐ (E) They engage with real estate tenants by offering shared financial benefits from equipment upgrades
- ☐ (F) Other
- o (G) Our third-party property manager(s) do not engage with tenants



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 19	PLUS	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

During the reporting year, how did you or the organisations operating on your behalf engage with the local community above and beyond what is required by relevant regulations for asset design, use and/or repurposing?

Amundi Real Estate continues its commitment with the Real Estate Observatory Durable (Observatoire de l'immobilier Durable - OID) of which it is one of the members founders by assuming the function of secretary General on the Board of Directors of the OID. The creation of the OID, in 2012, was part of a logic of transparency, with the objective of promoting the development sustainability in real estate. The OID disseminates data on the evolution of performance energy and environmental aspects of tertiary real estate France and also represents a place of exchange and reflection with the holding of working groups and regular publications. The OID was recognized as an association of general interest in February 2020. Amundi Real Estate also received at the launch in 2021 of two groups of places piloted by the OID:

- BIG Biodiversity Impulsion Group: research program and implementation of collective actions aimed at measure and accelerate the contribution of city stakeholders to the biodiversity;
- ESREI European Sustainable Real Estate Initiative: this initiative brings together players in the real estate sector to discuss ESG issues and the state of regulations in this area across Europe, and will produce regular tools and publications to support players operating in several countries.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 20	CORE	00 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of real estate investments?

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory Select from dropdown list:
 - (1) for all of our real estate investments
 - o (2) for a majority of our real estate investments
 - o (3) for a minority of our real estate investments
- ☑ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB

Select from dropdown list:

- o (1) for all of our real estate investments
- o (3) for a minority of our real estate investments
- ☑ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)

Select from dropdown list:

- o (2) for a majority of our real estate investments
- o (3) for a minority of our real estate investments
- ☑ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

Select from dropdown list:

- o (2) for a majority of our real estate investments
- o (3) for a minority of our real estate investments
- ☑ (E) The outcome of our latest ESG risk assessment of the property(s)

- (1) for all of our real estate investments
- o (2) for a majority of our real estate investments
- \circ (3) for a minority of our real estate investments



☑ (F) Key ESG performance data on the property(s) being sold

Select from dropdown list:

- **◎ (1)** for all of our real estate investments
- o (2) for a majority of our real estate investments
- o (3) for a minority of our real estate investments
- ☐ (G) Other
- o (H) No responsible investment information was shared with potential buyers of real estate investments during the reporting year
- o (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 21	CORE	00 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report on your targets on material ESG factors and related data to your investors?

- ☑ (A) We reported through a publicly disclosed sustainability report
- ☑ (B) We reported in aggregate through formal reporting to investors
- \square (C) We reported at the property level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- ☑ (E) We reported at digital or physical events or meetings with investors
- \Box (F) We had a process in place to ensure that serious ESG incidents were reported
- ☐ (G) Other
- o (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year



INFRASTRUCTURE (INF)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 21, OO 29, OO 30	N/A	PUBLIC	Investment guidelines	1 to 6

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☑ (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- \square (B) Guidelines on our ESG approach to greenfield investments
- \square (C) Guidelines on our ESG approach to brownfield investments
- ☑ (D) Guidelines on pre-investment screening
- ☐ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☑ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☑ (G) Guidelines on our approach to ESG reporting
- \square (H) Guidelines on our engagement approach related to the workforce
- ☑ (I) Guidelines on our engagement approach related to third-party operators
- ☑ (J) Guidelines on our engagement approach related to contractors
- \square (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
- o (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 2	CORE	00 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- o (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- $\circ~$ (C) We added responsible investment commitments in side letters upon a client's request
- o (D) We did not make any formal responsible investment commitments for the relevant reporting year
- o (E) Not applicable; we have not raised funds in the last five years



PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3	CORE	00 21	INF 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?

- (A) We assessed ESG materiality at the asset level, as each case is unique Select from dropdown list
 - (1) for all of our potential infrastructure investments
 - o (2) for a majority of our potential infrastructure investments
 - o (3) for a minority of our potential infrastructure investments
- o (B) We performed a mix of industry-level and asset-level ESG materiality analyses
- o (C) We assessed ESG materiality at the industry level only
- o (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3.1	CORE	INF 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?

☐ (A) We used GRI standards to inform our infrastructure ESG materiality analysis
☐ (B) We used SASB standards to inform our infrastructure ESG materiality analysis
☐ (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis
☐ (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
☐ (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by
development finance institutions) in our infrastructure ESG materiality analysis
☑ (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis
tools, to inform our infrastructure ESG materiality analysis
☑ (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG
materiality analysis
☐ (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis
\Box (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure
ESG materiality analysis
□ (J) Other



DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?

☑ (A) Material ESG factors were used to identify risks

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments

☑ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments

☑ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☐ (D) Material ESG factors were used to identify opportunities for value creation

☑ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☐ (F) Material ESG factors impacted investments in terms of the price offered and/or paid
- o (G) Material ESG factors did not influence the selection of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	00 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?

☑ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments

☑ (B) We send detailed ESG questionnaires to target assets

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- (C) We hire third-party consultants to do technical due diligence on specific material ESG factors



- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☑ (D) We conduct site visits

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☑ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☑ (F) We conduct detailed external stakeholder analyses and/or engagement

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments

☑ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments

☑ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- (1) for all of our potential infrastructure investments
- o (2) for a majority of our potential infrastructure investments
- o (3) for a minority of our potential infrastructure investments
- ☐ (I) Other
- o (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY OPERATORS

SELECTION PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 6	CORE	OO 30	N/A	PUBLIC	Selection process of third-party operators	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party operators?

- ☑ (A) We requested information from potential third-party operators on their overall approach to material ESG factors
- ☐ (B) We requested track records and examples from potential third-party operators on how they manage material ESG factors
- ☑ (C) We requested information from potential third-party operators on their engagement process(es) with stakeholders
- \Box (D) We requested documentation from potential third-party operators on their responsible procurement and/or contractor practices, including responsibilities, approach, and incentives
- ☐ (E) Other
- o (F) We did not include material ESG factors in our selection of third-party operators



APPOINTMENT PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 7	CORE	OO 30	N/A	PUBLIC	Appointment process of third-party operators	1, 4

How did you include material ESG factors when appointing your current third-party operators?

☑ (A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management

Select from dropdown list

- (1) for all of our third-party operators
- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- ☑ (B) We set clear ESG reporting requirements

Select from dropdown list

- (1) for all of our third-party operators
- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- \square (C) We set clear targets for material ESG factors
- $\hfill\square$ (D) We set incentives related to targets on material ESG factors
- ☐ (E) Other
- o (F) We did not include material ESG factors when appointing third-party operators

MONITORING PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 8	CORE	OO 30	N/A	PUBLIC	Monitoring process of third-party operators	1, 4

How do you include material ESG factors when monitoring current third-party operators?

- ☑ (A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors Select from dropdown list
 - (1) for all of our third-party operators
 - o (2) for a majority of our third-party operators
 - \circ (3) for a minority of our third-party operators
- ☑ (B) We monitor the performance of quantitative and/or qualitative targets on material social factors

Select from dropdown list

- (1) for all of our third-party operators
- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- ☑ (C) We monitor the performance of quantitative and/or qualitative targets on material governance factors

Select from dropdown list

- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- ☑ (D) We require formal reporting at least yearly



- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- ☑ (E) We have discussions about material ESG factors with all relevant stakeholders at least yearly

Select from dropdown list

- (1) for all of our third-party operators
- o (2) for a majority of our third-party operators
- o (3) for a minority of our third-party operators
- \Box (F) We conduct a performance review of third-party operators against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors
- $\hfill \Box$ (G) We have internal or external parties conduct site visits at least yearly
- ☐ (H) Other
- o (I) We do not include material ESG factors in the monitoring of third-party operators

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9	CORE	00 21	INF 9.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

☑ (A) Yes, we tracked KPIs on environmental factors

Percentage of infrastructure assets this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%
- \square (B) Yes, we tracked KPIs on social factors
- ☑ (C) Yes, we tracked KPIs on governance factors

Percentage of infrastructure assets this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%
- o (D) We did not track KPIs on material ESG factors across our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9.1	PLUS	INF 9	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your infrastructure investments during the reporting year.

(A) ESG KPI #1

Production of Energy

(B) ESG KPI #2

Consumption of Energy

(C) ESG KPI #3



GHG produced

(D) ESG KPI #4

Waste

(E) ESG KPI #5

Accidents

(F) ESG KPI #6

Gender

(G) ESG KPI #7

Carbon Footprint

- (H) ESG KPI #8
- (I) ESG KPI #9
- (J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10	CORE	OO 21, OO 30	INF 10.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?

☑ (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

Select from dropdown list

- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- \square (B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses
- ☐ (C) We implement certified environmental and social management systems across our portfolio
- ☐ (D) We make sufficient budget available to ensure that the systems and procedures needed are established
- ☐ (E) We hire external verification services to audit performance, systems, and procedures
- ☑ (F) We collaborate and engage with our third-party operators to develop action plans
 Select from dropdown list
 - (1) for all of our infrastructure investments
 - o (2) for a majority of our infrastructure investments
 - o (3) for a minority of our infrastructure investments
- \square (G) We develop minimum health and safety standards
- ☐ (H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users
- ☐ (I) Other
- o (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10.1	PLUS	INF 10	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.

(A) Process one



Quarterly reporting

(B) Process two

ESG Data collection

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	00 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☑ (A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☑ (B) We adjust our ESG action plans based on performance monitoring findings at least yearly

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- \square (C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities
- ☐ (D) Other
- o (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 12	PLUS	00 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the infrastructure investments where you hold a minority stake.

Even in a minority position, our policy is implemented, based mainly on contractual schemes with our third party operators.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 13	PLUS	00 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are defined, implemented and monitored throughout the investment period.

Follow up of Due Diligence (DD) questionnaires and reporting once in portfolio.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14	CORE	00 21	INF 14.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the asset level?

☑ (A) We assign our board responsibility for ESG matters

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments

(B) We ensure that material ESG matters are discussed by our board at least yearly

Select from dropdown list

- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments

☑ (C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments

☑ (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☐ (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors
- \square (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments

(G) We apply penalties or incentives to improve ESG performance in management remuneration schemes

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☐ (H) Other
- (I) We do not ensure that adequate ESG-related competence exists at the asset level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14.1	PLUS	INF 14	N/A	PUBLIC	Monitoring	1, 2

Describe up to two initiatives adopted as part of your ESG competence-building efforts at the asset level during the reporting year.

(A) Initiative one

Regular discussion upon reception of quarterly reporting.

(B) Initiative two



STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 15	PLUS	00 21	N/A	PUBLIC	Stakeholder engagement	1, 2

How do you ensure that appropriate stakeholder engagement is carried out during both due diligence for potential investments and the ongoing monitoring of existing investments?

We propose a convention / suppliers code of Ethics (ESG) to our partners / operators at the beginning of the relationship and we ask questions via questionnaires along all the life and operations of the assets.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	00 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?

- ☑ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
 - Select from dropdown list
 - (1) for all of our infrastructure investments
 - o (2) for a majority of our infrastructure investments
 - o (3) for a minority of our infrastructure investments
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
- ☑ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)

Select from dropdown list

- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☐ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company

Select from dropdown list

- (1) for all of our infrastructure investments
- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☑ (F) Key ESG performance data on the asset or portfolio company being sold

Select from dropdown list

- o (2) for a majority of our infrastructure investments
- o (3) for a minority of our infrastructure investments
- ☐ (G) Other
- (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
- $\circ\,$ (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year



DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 17	CORE	00 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☑ (A) We reported through a publicly-disclosed sustainability report
- ☑ (B) We reported in aggregate through formal reporting to investors
- ☑ (C) We reported at the asset level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- ☑ (E) We reported at digital or physical events or meetings with investors
- ☑ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☐ (G) Other
- o (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year



PRIVATE EQUITY (PE)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 1	CORE	00 21	N/A	PUBLIC	Investment guidelines	1 to 6

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☑ (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- ☑ (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- ☑ (C) Guidelines on pre-investment screening
- ☑ (D) Guidelines on minimum ESG due diligence requirements
- ☑ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☑ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☑ (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- ☑ (H) Guidelines on our approach to ESG reporting
- (I) Our responsible investment policy(ies) does not cover private equity–specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 2	CORE	00 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- o (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- $\circ~$ (C) We added responsible investment commitments in side letters upon clients' request
- o (D) We did not make any formal responsible investment commitments for the relevant reporting year
- o (E) Not applicable; we have not raised funds in the last five years



PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3	CORE	00 21	PE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

- (A) We assessed ESG materiality at the portfolio company level, as each case is unique Select from dropdown list
 - **(1)** for all of our potential private equity investments
 - o (2) for the majority of our potential private equity investments
 - o (3) for a minority of our potential private equity investments
- o (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
- o (C) We assessed ESG materiality at the industry level only
- o (D) We did not conduct ESG materiality analyses for our potential private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3.1	CORE	PE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?

- \square (A) We used GRI standards to inform our private equity ESG materiality analysis
- ☐ (B) We used SASB standards to inform our private equity ESG materiality analysis
- ☐ (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- □ (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- \Box (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- ☑ (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- ☑ (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- ☑ (I) Other

Specify:

Internal ESG Research



DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your private equity investments?

☑ (A) Material ESG factors were used to identify risks

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for the majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments

☑ (B) Material ESG factors were discussed by the investment committee (or equivalent)

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for the majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments

☑ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for the majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments

(D) Material ESG factors were used to identify opportunities for value creation

Select from dropdown list

- o (1) for all of our potential private equity investments
- (2) for the majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments

☑ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for the majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments

☑ (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list

- o (1) for all of our potential private equity investments
- o (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments
- o (G) Material ESG factors did not influence the selection of our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 5	CORE	00 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

$\ensuremath{\square}$ (A) We do a high-level or desktop review using an ESG checklist for initial red flags

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments



- o (3) for a minority of our potential private equity investments
- ☑ (B) We send detailed ESG questionnaires to target companies

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments
- ☑ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list

- o (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments
- ☑ (D) We conduct site visits

Select from dropdown list

- o (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments
- ☑ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments
- ☑ (F) We conduct detailed external stakeholder analyses and/or engagement

Select from dropdown list

- o (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments
- ☑ (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- (1) for all of our potential private equity investments
- o (2) for a majority of our potential private equity investments
- o (3) for a minority of our potential private equity investments
- ☑ (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal Select from dropdown list

 - o (2) for a majority of our potential private equity investments
 - o (3) for a minority of our potential private equity investments
- ☐ (I) Other
- o (J) We do not conduct due diligence on material ESG factors for potential private equity investments

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6	CORE	OO 21	PE 6.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

☑ (A) Yes, we tracked KPIs on environmental factors

Percentage of portfolio companies this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%



(5) >95%

☑ (B) Yes, we tracked KPIs on social factors

Percentage of portfolio companies this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%

☑ (C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- o (1) >0 to 10%
- o (2) >10 to 50%
- o (3) >50 to 75%
- o (4) >75 to 95%
- **(5)** >95%
- o (D) We did not track KPIs on material ESG factors across our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6.1	PLUS	PE 6	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your private equity investments during the reporting year.

(A) ESG KPI #1

Number of women in the most important operational governance body in terms of hierarchy (management committee, executive committee, management board, etc.).

(B) ESG KPI #2

Business ethics (corruption, etc.) litigation experienced by the company during the past year.

(C) ESG KPI #3

Is Corporate Social Responsibility (CSR) the subject of a communication (eg: assessment, report, etc.) to the Board / CS at least once a year?

(D) ESG KPI #4

The 5 good CSR practices implemented by the company over the past year.

(E) ESG KPI #5

Is the remuneration of the executive officer(s) conditioned by the achievement of performance objectives in terms of CSR?

(F) ESG KPI #6

Carbon footprint carried out by the company and the scopes concerned (scopes 1 & 2; scopes 1, 2 & 3).

(G) ESG KPI #7

Environmental initiatives implemented to reduce the carbon footprint of the company's products or services.

(H) ESG KPI #8

Net job creation.

(I) ESG KPI #9

Where applicable, capital held by employees (as a percentage of the share of capital).

(J) ESG KPI #10

Use of CSR / ESG criteria in the selection and / or monitoring of your suppliers.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7	CORE	00 21	PE 7.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?

☑ (A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance

Select from dropdown list

- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- \square (B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses
- ☐ (C) We implement certified environmental and social management systems across our portfolio
- (D) We make sufficient budget available to ensure that the systems and procedures needed are established Select from dropdown list
 - o (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - o (3) for a minority of our private equity investments
- ☐ (E) We hire external verification services to audit performance, systems, and procedures
- ☑ (F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users

Select from dropdown list

- (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- ☑ (G) We implement 100-day plans, ESG roadmaps and similar processes

Select from dropdown list

- (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- ☐ (H) Other
- o (I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7.1	PLUS	PE 7	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you have put in place during the reporting year to help meet your targets on material ESG factors.

(A) Process one

Decision has been taken that 100% of our investees should have an ESG roadmap by 2025. Thus, new investees have to develop an ESG roadmap 6 months after the investment, at the latest. For investees prior to 2022, we have planned on a 18 month-basis how to implement ESG roadmaps, identifying first the most at risk companies. ESG roadmaps are realised in order to meet upcoming and past legislations, material ESG factors, etc.

(B) Process two

ESG roadmaps are monitored at least every 6 months by the ESG analyst and sometimes on a quarterly basis. Annually, we also do a complete ESG reporting by sending an ESG questionnaire to all our investees in order to follow their ESG implementation. Following this reporting, we give feedback to the companies and modify the ESG roadmap accordingly.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 8	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe material ESG risks and ESG opportunities that you integrate into your 100-day plans, including those accountable for their successful completion and how the process is monitored.

ESG risks and opportunities integrated into the 100 day-plan depend on the company's material issues and level of maturity evaluated during the ESG due diligence. For each issue for which we identify a gap between the actual level of maturity of the company and the materiality of the issue, we define with the company actions to be implemented rapidly. If audits, policy and action plans can be put in place rapidly, results might need more time to be highlighted.

Both the investment team at Amundi, and more specifically the ESG team, and the investee management team are responsible for the successful completion of the 100-day plan.

In 2022, we invested in a tech company and as lead on the ESG Roadmap, we managed to integrate 22 ESG actions to implement, including:

- ESG KPIs in the variable remuneration of the Executive Board: carbon assessment (Scopes 1, 2 & 3);
- Improving the State Equality Index up to 85%;
- Completing a materiality matrix in order to be prepared for the CSRD;
- Having at least one woman at the Executive Committee;
- · Implementing a Responsible Digital policy;
- Widening the number of employees who can be shareholders;
- Implementing a Diversity & Inclusion Policy.

We are happy to see that in 2023, the carbon assessment has already been done, that a woman has been promoted to the Executive Committee and that the company is very near to reach the 85% for the Gender Equality Index. In April 2024, we presented the 22 actions follow-up during a Board meeting and we updated the actions according to their achievement/in progress/fail status. We will keep working closely with the company in order to ensure that it meets its ESG targets during the detention phase. The investment team is fully responsible for the success of the ESG roadmap and is present at all our meetings with the company.

We even managed to work closely with the other co-investors and with some debt actors in order to be stronger regarding our ESG requirements.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 9	CORE	00 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

☑ (A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list



- o (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

☑ (B) We adjust our ESG action plans based on performance monitoring findings at least yearly

Select from dropdown list

- o (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- \square (C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities

☑ (D) We engage with the board to manage ESG risks and ESG opportunities post-investment

Select from dropdown list

- o (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- ☐ (E) Other
- o (F) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 10	PLUS	00 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the private equity investments in which you hold a minority stake.

While we a hold a minority stake, we ensure to partner with the other investors in order to identify the right ESG risks and to make them taken into account and mitigated by the company top management. Partnership with other investors allow us to be more powerful. ESG risks are discussed with the company Board of Directors, at least annually and quite often more regularly, through the implementation of the ESG roadmap and its follow-up.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 11	PLUS	00 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.

For each investment, we conduct an ESG Due Diligence that allows us to highlight any gap between the actual level of maturity of the company on a specific issue and the materiality of the issue. This Due Diligence allows us to identify the issues we have to follow more carefully and more closely with the company. After the investment, we share our results with the company and define an action plan in order to improve the company maturity on the most material issues on which we have identified a gap.

Every year, we conduct an annual survey through a questionnaire in order to formalize the progress made by the company. In case of obstacles or more rapid progress, we can re-evaluate our action plan in order to stick to the reality of the company. The results of this survey are shared annually with the management of the company. At the end of the investment, we can highlight the progress made by the company by comparing the level of maturity of the company on its most material issues before we were an investor and when we disinvest.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12	CORE	00 21	PE 12.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the portfolio company level?

☑ (A) We assign the board responsibility for ESG matters

Select from dropdown list

- (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

(B) We ensure that material ESG matters are discussed by the board at least yearly

Select from dropdown list

- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

☑ (C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only

Select from dropdown list

- o (1) for all of our private equity investments
- o (3) for a minority of our private equity investments
- □ (D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)

☑ (E) We support the portfolio company in developing and implementing its ESG strategy

Select from dropdown list

- (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

☑ (F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors

Select from dropdown list

- o (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

☑ (G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems

Select from dropdown list

- (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments

☑ (H) We include penalties or incentives to improve ESG performance in management remuneration schemes

Select from dropdown list

- o (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- ☐ (I) Other
- (J) We do not ensure that adequate ESG-related competence exists at the portfolio company level



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12.1	PLUS	PE 12	N/A	PUBLIC	Monitoring	1, 2

Describe up to two initiatives taken as part of your ESG competence-building efforts at the portfolio company level during the reporting year.

(A) Initiative 1

As CSRD comes into force next year for listed companies (for which our portfolio companies are suppliers) and will gradually cover smaller companies, presentation of the Directive, its implication and challenges for businesses has been made to our portfolio companies by our ESG analyse team. We also help them to build their ESG materiality matrix in order to identify which ESG KPIs they will need to report.

(B) Initiative 2

In addition, we help them to identify and to select the best suppliers in terms of consulting and software in order to meet their strategic needs and regulation requirements.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 13	CORE	00 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory Select from dropdown list
 - (1) for all of our private equity investments
 - o (2) for a majority of our private equity investments
 - o (3) for a minority of our private equity investments
- ☐ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD
- ☑ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
 Select from dropdown list
 - (1) for all of our private equity investments
 - o (2) for a majority of our private equity investments
 - o (3) for a minority of our private equity investments
- ☑ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

Select from dropdown list

- o (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company

Select from dropdown list

- o (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- ☑ (F) Key ESG performance data on the asset or portfolio company being sold

Select from dropdown list

- o (1) for all of our private equity investments
- o (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- ☐ (G) Other



- o (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting vear
- o (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 14	CORE	00 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

burning the reporting year, now and you report your tangets on material 200 factors and related data to your investors.	
☑ (A) We used a publicly disclosed sustainability report	
☑ (B) We reported in aggregate through formal reporting to investors	
\Box (C) We reported at the portfolio company level through formal reporting to investors	
☐ (D) We reported through a limited partners advisory committee (or equivalent)	
☑ (E) We reported back at digital or physical events or meetings with investors	
\Box (F) We had a process in place to ensure that reporting on serious ESG incidents occurred	
☐ (G) Other	
o (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year	



SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?	
☑ (A) Sustainability outcome #1	
(1) Widely recognised frameworks used to guide action on this sustainability outcome	
\square (1) The UN Sustainable Development Goals (SDGs) and targets	
☑ (2) The UNFCCC Paris Agreement	
\square (3) The UN Guiding Principles on Business and Human Rights (UNGPs)	
\square (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduc	t:
for Institutional Investors	
\square (5) The EU Taxonomy	
\square (6) Other relevant taxonomies	
☐ (7) The International Bill of Human Rights	
\square (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight	
core conventions	
☐ (9) The Convention on Biological Diversity	
(10) Other international, regional, sector-based or issue-specific framework(s)	
(2) Classification of sustainability outcome	
☑ (1) Environmental	
□ (2) Social □ (3) Governance-related	
☐ (4) Other	
(3) Sustainability outcome name	
(b) Castallability Catcollic Hallic	
NZAM AUM commitment	
(4) Number of targets set for this outcome	
o (1) No target	
o (3) Two or more targets	
☑ (B) Sustainability outcome #2	
(1) Widely recognised frameworks used to guide action on this sustainability outcome	
(1) The UN Sustainable Development Goals (SDGs) and targets	
 ✓ (2) The UNFCCC Paris Agreement □ (3) The UN Guiding Principles on Business and Human Rights (UNGPs) 	
☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduc	\t
for Institutional Investors	, (
☐ (5) The EU Taxonomy	
\Box (6) Other relevant taxonomies	
☐ (7) The International Bill of Human Rights	
\Box (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight	
core conventions	
\Box (9) The Convention on Biological Diversity	
☐ (10) Other international, regional, sector-based or issue-specific framework(s)	



	(2) Classification of sustainability outcome ☑ (1) Environmental □ (2) Social □ (3) Governance-related □ (4) Other (3) Sustainability outcome name
	NZAM engagement threshold
√	(4) Number of targets set for this outcome ○ (1) No target ● (2) One target ○ (3) Two or more targets (C) Sustainability outcome #3 (1) Widely recognised frameworks used to guide action on this sustainability outcome ☑ (1) The UN Sustainable Development Goals (SDGs) and targets ☐ (2) The UNFCCC Paris Agreement ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs) ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors ☐ (5) The EU Taxonomy ☐ (6) Other relevant taxonomies ☐ (7) The International Bill of Human Rights ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
	 □ (9) The Convention on Biological Diversity □ (10) Other international, regional, sector-based or issue-specific framework(s) (2) Classification of sustainability outcome ☑ (1) Environmental ☑ (2) Social □ (3) Governance-related □ (4) Other (3) Sustainability outcome name
	Supporting impact investing
	 (4) Number of targets set for this outcome ○ (1) No target ⑥ (2) One target ○ (3) Two or more targets
	(1) Widely recognised frameworks used to guide action on this sustainability outcome (1) The UN Sustainable Development Goals (SDGs) and targets (2) The UNFCCC Paris Agreement (3) The UN Guiding Principles on Business and Human Rights (UNGPs) (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business (5) The EU Taxonomy (6) Other relevant taxonomies (7) The International Bill of Human Rights (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions (9) The Convention on Biological Diversity (10) Other international, regional, sector-based or issue-specific framework(s)
	(2) Classification of sustainability outcome ☐ (1) Environmental ☐ (2) Social ☐ (3) Governance-related ☐ (4) Other (3) Sustainability outcome name
	\-\/ - \ - \ \ \/ \ \ \ \ \ \ \ \ \ \ \



Human rights policy & engagement

	(4)	Number of targets set for this outcome
		(1) No target(2) One target
		(2) One target (3) Two or more targets
[7]	(E)	Sustainability outcome #5
۰		Widely recognised frameworks used to guide action on this sustainability outcome
	(+)	☐ (1) The UN Sustainable Development Goals (SDGs) and targets
		☑ (2) The UNFCCC Paris Agreement
		☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
		☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct
		for Institutional Investors
		☐ (5) The EU Taxonomy
		☐ (6) Other relevant taxonomies
		☐ (7) The International Bill of Human Rights
		☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight
		core conventions
		☑ (9) The Convention on Biological Diversity
		☑ (10) Other international, regional, sector-based or issue-specific framework(s)
	(2)	Classification of sustainability outcome
		☑ (1) Environmental
		☐ (2) Social
		\square (3) Governance-related
		☐ (4) Other
	(3)	Sustainability outcome name
		Biodiversity policy & engagement
	(4)	Number of targets set for this outcome
		(1) No target
		o (2) One target
		o (3) Two or more targets
√		Sustainability outcome #6
	(1)	Widely recognised frameworks used to guide action on this sustainability outcome
		(1) The UN Sustainable Development Goals (SDGs) and targets
		(2) The UNFCCC Paris Agreement
		☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
		(4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct
		for Institutional Investors
		☐ (5) The EU Taxonomy
		☐ (6) Other relevant taxonomies
		\Box (7) The International Bill of Human Rights \Box (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight
		core conventions
		☐ (9) The Convention on Biological Diversity
		☐ (10) Other international, regional, sector-based or issue-specific framework(s)
	(2)	Classification of sustainability outcome
	(2)	☑ (1) Environmental
		☑ (2) Social
		☑ (3) Governance-related
		☑ (4) Other
	(3)	Sustainability outcome name
	(-)	Supporting SDGs financing through the development of sustainable capital markets
	(<u>/</u> 1)	Number of targets set for this outcome
	(+)	(1) No target
		• (2) One target
		(2) One target (3) Two or more targets
	(G)	Sustainability outcome #7



\square (H) Sustainability outcome #8
\square (I) Sustainability outcome #9
\square (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	NZAM AUM commitment
(1) Target name	AuM with explicit Net Zero alignment objectives
(2) Baseline year	
(3) Target to be met by	2025
(4) Methodology	The methodologies Amundi uses to implement the NZ AUM Targets are based on the UN Asset Owner Alliance Target Setting Protocol and the PAII Net Zero Investment Framework for its listed corporate equity and bond portfolio and the CREEM risk assessment tool for its real estate portfolio. Amundi has adopted an approach at portfolio level, requiring to set clear targets for the AuM committed to be managed in line with net zero objectives.

The frameworks used reflect the diversity of portfolios managed through a client-centric approach, adapted to their needs, constraints and to their own climate targets. The majority of Amundi AUM consists of portfolios managed as segregated accounts (mandates or dedicated funds), on behalf of single clients (as opposed to pooled vehicles and commingled funds). Consequently, Amundi may apply Net Zero target methodologies that reflect its clients' own frameworks and chosen target protocols.

For commingled funds, the method may be adapted to the specificity of the investment universe or asset class considered. Amundi has thus developed a specific framework for real estate products while carbon reduction targets for listed equity or listed corporate bonds are based on the PAII NZIF (by default).

If ultimately the framework adopted by our institutional clients will depend of the protocol they choose, Amundi has adopted as a main reference and by default option the PAII NZIF for its corporate bond and equity portfolios Net Zero frameworks as well as for its group level ambition.

Amundi recognizes that only scenario compatible with the objective to limit global warming to 1.5° C, with no or low overshoot (i.e.



with limited necessary removal of atmospheric carbon to bring the temperature back to below 1.5°C) should be deemed compatible with the highest level of ambition set in the Paris Agreement. Amundi considers that Net-zero alignment commitment must be clear and binding for the investment strategies in-scope, consequently, the 18% will be only composed of funds and mandates with explicit net zero alignment objectives. Only net zero investment frameworks compatible with this principle are validated and eligible, including:

- For PAII Net Zero Investment Framework, the following Net Zero baselines:

1.

-30% carbon intensity reduction target in 2025 vs. 2019 (tCO2e/ \in M turnover), and -60% vs. 2030 (minimum targets that need to be exceeded) on scope 1, 3 and part of scope 3*.

2.

-16% absolute emission reduction target in 2025 vs. 2019, and -41% vs. 2030 on scope 1, 3 and part of scope 3.

*Credit and equity strategies have the option to align portfolio carbon intensity with either the Climate Transition Benchmark (CTB) or the Paris Aligned Benchmark (PAB) carbon intensity.

- For NZAO investment mandates, targets in line with the v1, v2, v3 and v4 of the UN Asset Owner Alliance Target Setting Protocol (including \leq 5 year and 2030 targets).
- For real estate portfolio targets compatible with CREEM net zero trajectories set at asset levels.

Moreover, Amundi has launched a product range of actively managed open-ended funds across all asset classes (real estate, multi-asset, developed market bonds, developed market equities, etc.) with Net Zero alignment objectives. All of Amundi's actively managed Net Zero Ambition strategies shall be aligned with Amundi Net Zero framework.

(5) Metric used (if relevant)

Percentage of AuM with explicit Net Zero alignment objectives.

The numerator consists of sum of AuM of 'products' (whole funds or mandates) with net zero alignment targets reflected in the legal documentation in line with Amundi Net Zero framework. At this stage, only asset classes with recognized Net Zero standards are considered: Equity, Corporate Bonds, and Real estate.

The denominator consists of Amundi total AuM, deducting Joint-Ventures' AuM, fund hosting and advisory.

- (6) Absolute or intensity-based (if relevant)
- (7) Baseline level or amount (if relevant):



(8) Target level or amount (if relevant)	18% of AuM with explicit Net Zero alignment objectives by 2025, corresponding to USD \$347 billion. Disclaimer: This relies on pro-forma assumptions and stable market hypothesis
	between the 31st of December 2021 and the 31st of December 2025.
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer- term target for this?	(1) Yes
	(B1) Sustainability Outcome #2: Target details
(B1) Sustainability Outcome #2:	NZAM engagement threshold
(1) Target name	Engagement on companies' climate strategies.
(2) Baseline year	2021
(3) Target to be met by	2025
(4) Methodology	Work with 1,000 additional companies to define credible strategies to reduce their greenhouse gas emissions, vote at their Annual General Meetings and link management remuneration packages to these strategies.
(5) Metric used (if relevant)	Number of companies engaged
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	In 2021, Amundi engaged directly or through collaborative engagement 579 companies, amongst which 434 HCIS issuers, representing 71% of HCIS carbon footprint, and 74% of HCIS carbon footprint from issuers without SBTi engagement.
(8) Target level or amount (if relevant)	Work with 1,000 additional companies to define credible strategies to reduce their greenhouse gas emissions, vote at their Annual General Meetings and link management remuneration packages to these strategies.
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer- term target for this?	



(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3:	Supporting impact investing
(1) Target name	Increasing AuM in impact funds
(2) Baseline year	2021
(3) Target to be met by	2025
(4) Methodology	These funds will invest in companies that pursue positive environmental or social performance. The impact will be measured and reported annually.
(5) Metric used (if relevant)	€ AuM
(6) Absolute or intensity-based (if relevant)	(1) Absolute
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	Reach €20bn of assets under management in impact funds.
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2.1	PLUS	SO 1, SO 2	N/A	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your long-term targets.

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(A1) Sustainability Outcome #1: NZAM AUM commitment	AuM with explicit Net Zero alignment objectives	2050	Work in partnership with asset owner clients on decarbonization goals, consistent with an ambition to reach Net Zero emissions by 2050 or sooner across all Assets under Management ('AuM').

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- ☐ (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- \Box (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- \square (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
- o (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets



TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1
Does your organisation track progress against your nearest-term sustainability outcomes targets?						

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1:	NZAM AUM commitment				
Target name: AuM with explicit Net Zero alignment objectives					
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes				
	(B1) Sustainability outcome #2:				
(B1) Sustainability outcome #2:	NZAM engagement threshold				
Target name: Engagement on companies' climate strategies.					
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes				
	(C1) Sustainability outcome #3:				
(C1) Sustainability outcome #3:	Supporting impact investing				
Target name:	Increasing AuM in impact funds				
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes				



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	NZAM AUM commitment
(1) Target name	AuM with explicit Net Zero alignment objectives
(2) Target to be met by	2025
(3) Metric used (if relevant)	Percentage of AuM with explicit Net Zero alignment objectives. The numerator consists of sum of AuM of 'products' (whole funds or mandates) with net zero alignment targets reflected in the legal documentation in line with Amundi Net Zero framework. At this stage, only asset classes with recognized Net Zero standards are considered: Equity, Corporate Bonds, and Real estate. The denominator consists of Amundi total AuM, deducting Joint-Ventures' AuM, fund hosting and advisory.
(4) Current level or amount (if relevant)	ND
(5) Other qualitative or quantitative progress	Amundi joined the Net Zero Asset Managers initiative in July 2021 and made its Initial Target Disclosure in November 2022. It will start reporting on its progress towards the target in November 2023.
(6) Methodology for tracking progress	
	(B1) Sustainability Outcome #2: Target details
(B1) Sustainability Outcome #2:	NZAM engagement threshold
(1) Target name	Engagement on companies' climate strategies.
(2) Target to be met by	2025
(3) Metric used (if relevant)	Number of companies engaged
(4) Current level or amount (if relevant)	Our climate engagement plan has been extended to 966 new companies (as of 31/12/2023).



(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	
	(C1) Sustainability Outcome #3: Target details
(C1) Sustainability Outcome #3:	Supporting impact investing
(1) Target name	Increasing AuM in impact funds
(2) Target to be met by	2025
(3) Metric used (if relevant)	€ AuM
(4) Current level or amount (if relevant)	Increase of impact investment assets under management, reaching €13.2bn (as of 31/12/2023).
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- ☑ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets Select from drop down list:
 - **☑** (1) Individually
 - ☑ (2) With other investors or stakeholders
- \square (B) Stewardship: engagement with external investment managers
- ☑ (C) Stewardship: engagement with policy makers

Select from drop down list:

- ☑ (1) Individually
- ☑ (2) With other investors or stakeholders



☑ (D) Stewardship: engagement with other key stakeholders

Select from drop down list:

☑ (1) Individually

☑ (2) With other investors or stakeholders

☑ (E) Capital allocation

o (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes ir

	(A) Across all sustainability outcomes
(1) Capital allocation activities used	
(2) Explain through an example	
	(B) Sustainability Outcome #1:
(B) Sustainability Outcome #1:	NZAM AUM commitment
(1) Capital allocation activities used	(1) Asset class allocation(2) Sector allocation(4) Divestment from assets or sectors
(2) Explain through an example	In 2022, Amundi has announced its initial target for 18% of total AuM to be composed of funds and mandates with explicit net zero alignment objectives and has launched a comprehensive range of Net Zero Ambition funds across the main asset classes (equities, fixed income, real estate, multi-asset, emerging markets, climate ETFs). Amundi Net Zero Ambition Actively managed product range is based on a number of principles that aim to provide issuers with capital to support the decarbonisation of the real economy, including (but not limited to):
	(i) Specific exclusion targeting the fossil fuels sector.
	(ii) Integration of forward looking / sector neutral climate KPI ,such as Temperature or SBTi metrics.



	(iii) Exposure	constraint to	high emitting	a sectors.
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(iv) Decarbonization target in line with reductions in 1.5 $^{\circ}$ C scenarios with no or limited temperature overshoot.

Moreover, as of 31/12/2023, Amundi offered a minimum of one Net Zero Ambition solution in five different asset classes.

As of end of 2023, Amundi engaged discussion with more than 600 existing clients and prospects on the opportunity to align portfolios to Net Zero objectives.

(C) Sustainability Outcome #2:		
(0) Sustainability Sutcome #2.		
NZAM engagement threshold		
(5) Other		
In 2023, Amundi engaged with 966 additional companies on their climate strategies.		
(D) Sustainability Outcome #3:		
Supporting impact investing		
(1) Asset class allocation(2) Sector allocation(4) Divestment from assets or sectors		
In 2023, Amundi has increased its impact investing assets under management to €13.2bn. These funds will invest in companies that pursue positive environmental or social performance. The impact will be measured and reported annually.		
(E) Sustainability Outcome #4:		
Human rights policy & engagement		
(1) Asset class allocation		
In 2023, Amundi expanded its engagement pool to 152 issuers. A few companies have already made improvements to their human rights strategy (see Amundi 2023 Engagement Report).		



(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:	Biodiversity policy & engagement
(1) Capital allocation activities used	(5) Other
(2) Explain through an example	In 2023, Amundi expanded its engagement pool to 294 issuers (from 56 in 2021). A few companies have already made improvements to their biodiversity strategy (see Amundi 2023 Engagement Report).
	(G) Sustainability Outcome #6:
(G) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Capital allocation activities used	(1) Asset class allocation (2) Sector allocation
(2) Explain through an example	2023 highlights from AP EGO fund portfolio in partnership with the IFC: - 54 green bonds in the portfolio, accounting for 91.3% of the asset allocation; - 21 EMs with green projects financed; - 1,357 cumulative tCO2e avoided emissions per \$1 million invested per year based on the fund's green bond investments; - \$1.5 billion invested by AP EGO fund in green bond; - 1,498,764 tCO2e avoided emissions since inception. Launched by the IFC, the Green Bond Technical Assistance Program (GB-TAP) intends to accelerate the growth of the green bond asset class in emerging markets through trainings, knowledge sharing and spreading best practices on issuer reporting. With Amundi's contribution, the GB-TAP has achieved several milestones since inception in 2018: - 1148 trained market stakeholders from 319 financial institutions in 77 EM countries; - 118 green, social and sustainability bond issuances, representing \$11.8bn total face value. Highlights for the Asia Climate Bonds portfolio:
	As of end 2021, almost half of the portfolio (46.1%) was comprised of bonds issued with the aim of financing infrastructure programs in sectors including power and renewable electricity, telecommunication services, transportation, gas utilities, and the road and rail sectors. A fourth of our allocation was dedicated to financing projects from other productive sectors, such as automobiles, chemicals, paper and forest products, and semiconductor equipment, totalling an exposure of 25.1%. The portfolio also had a significant exposure to green buildings development projects (18.9%), and a more limited exposure to financial institutions (7.3%).
	In terms of geographical allocation, the portfolio majorly focused on Asia.



Country allocations in Asia included India, China, Singapore, South Korea, Philippines, Indonesia, and Malaysia. The second and third regions in the allocation were the Middle East and Eastern Europe. In Latin America, the exposure was concentrated in Brazil (8.1%) but diversified at the issuer level.

There was a marginal exposure to developed market issuers, mainly through the Netherlands and in France. France & Netherlands are AIIB's non-regional members, but operate in various countries located across EM.

The 3 A-List issuers, which are defined as high-ranking climate bond issuers under the CCIF, represent 8.1% of the portfolio and operate in the green building and infrastructure sectors.

The 51 B-List issuers, which are defined to be on the fringes of transforming into A-List issuers, made up the remaining part of the bond allocation and operate in various sectors (green building, infrastructure, and other productive sectors).

In 2024, IFC, a member of the World Bank Group, and Amundi announced the final closing of the SEED, which stands for - Sustainable Emerging Economy Development Debt, a sub-fund of Amundi Planet II. Launched in 2021 on the sidelines of COP26 in Glasgow, the fund has raised \$436 million from institutional investors, including IFC, Alecta, Cassa Depositi e Prestiti ("CDP"), and APK-Pensionskasse, thereby mobilizing private investment in emerging market sustainable bonds, with the objective of promoting a green, resilient, and inclusive economic recovery.

Thematic bond(s) label

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 7	PLUS	00 17 FI, SO 1	N/A	PUBLIC	Capital allocation	1

During the reporting year, did you use thematic bonds to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Sustainability Outcome #1: NZAM AUM commitment (B) Sustainability Outcome #2: NZAM engagement threshold (C) Sustainability Outcome #3: Supporting impact investing (A) Green/climate bonds (B) Social bonds (C) Sustainability bonds (C) Sustainability bonds (D) Sustainability -linked bonds (D) Sustainability Outcome #4: Human rights policy & engagement



Biodiversity policy & engagement

STEWARDSHIP WITH INVESTEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

Through its stewardship activities, Amundi seeks to have a tangible impact on the economy, as we believe that active ownership could trigger stronger outcomes than divestment in general. At Amundi, engagement is a continuous and purpose driven process aiming at influencing the activities or behaviour of investee companies in order to preserve long-term economic capital as part of our search to create long-term value for our clients' portfolios. It therefore must be result-driven, proactive and integrated in our global ESG process. Engagement has various aims that can be presented in two categories:

- Engage an issuer to improve the way it integrates the environmental and social dimension in its processes, the quality of its governance in order to limit its sustainability risks;
- Engage an issuer to improve its impact on environmental, social, and human rights related or other sustainability matters that are material to society and the global economy and could translate into higher ESG-related risks (risk of controversies, fines or lower valuation).

Amundi promotes a transition towards a sustainable, inclusive low-carbon economy. Apart from the systematic integration of ESG criteria within our active investment, Amundi has developed an active stewardship activity through:

- A pro-active engagement policy that seeks to:
- Contribute to best practice dissemination and drive a better integration of sustainability in our investees' governance, operations and business models;
- Trigger positive change concerning how investees are managing their impacts on specific topics that are paramount to the sustainability of our society and of our economy;



- Support the investees in their own transition towards a more sustainable, inclusive and low carbon business models;
- Push investees to increase their level of investment in capital expenditure/research & development in highly needed areas for this transition;
- A voting policy emphasizing the need for corporates' governance and boards to grasp the environmental and social challenges, both risks and opportunities, and ensure that corporates are appropriately positioned and prepared to handle the transition towards a sustainable, inclusive low carbon economy.

Engagement progress

Amundi assesses the progress made by the issuer towards certain engagement objectives through the use of milestones. Our first objective is to induce positive impact and the way we decide to engage will always be defined by its effectiveness. Triggering deep change in large organizations might prove to be complicated, stressful and even considered impossible by issuers. Adopting a longer-term view and considering different intermediary targets for engagement that take into account the particular situation and circumstances is an essential element for engagement to be effective: keep the long-term goal in mind while seeking manageable and measurable improvements in the short to medium term. As investors we must be both demanding and pragmatic to promote a transition towards a sustainable, inclusive and low-carbon economy in a timely manner. We understand the current limitations to effectively measure and address key themes in sustainability including climate science, biodiversity, and human rights. We consider sustainability to be a moving benchmark, and as such, our engagement strategies will evolve overtime to better integrate these developments.

Engagement escalation

When engagement fails or if the remediation plan of the issuer appears weak, we consider escalation measures first and divestment from the active investment universe as a last resort. Escalation modes include (in no particular order) negative overrides in one or several criteria, questions at AGMs, votes against management, public statements, ESG score caps and ultimately exclusion.

Escalation modes through our voting activities. If we hold equity in themes that are critical (climate, social, severe controversies and/or violations of UN Global

Compact principles), or in the case of unsuccessful engagement, Amundi could decide to vote against the discharge of the board or management, or the re-election of the Chairman and of some Directors.



In addition to escalation through our voting activities, failed engagement might have a direct impact on our full capacity to invest in a company. ESG research analysts can downgrade the related criteria in the ESG score, and if the issue is critical, it could lead to a downgrade of the overall ESG score. Amundi has committed to integrate ESG criteria into the investment process of actively managed open-ended funds, with an objective to maintain, in addition to financial objectives, portfolio average ESG scores above the average ESG score of the respective investment universe. Negatively overriding ESG scores therefore reduces Amundi's capacity to invest in the issuer.

The ultimate escalation mode could be exclusion in case of failure to engage and to remediate a critical issue.

(2) Stewardship tools or activities used

(1) Engagement

- (2) (Proxy) voting at shareholder meetings
- $\hbox{(3) Filing of shareholder resolutions or proposals}\\$
 - (4) Nominating directors to the board
- (7) Working directly with portfolio companies and/or real asset management teams (9) Other

(3) Example

Amundi has a dedicated Net Zero engagement campaign. Our initial 2022 campaign focused primarily on four high-emitting sectors: Oil & Gas, Utilities, Vehicle Manufacturers, and Steel Producers. As our engagement on this topic has evolved in 2023, we have broadened our sector-specific coverage to include Cement, Chemicals, Transportation (air, maritime & rail).

Furthermore, we have conducted extensive reviews and updates to our guidance on Oil & Gas, Utilities, Steel, Autos and non-sector specific. As with the initial 2022 campaign, our work in 2023 addressed both ambition and disclosure issues via two broad aims for our engagement that apply to all sectors:

1.

Improve transparency, comparability, and accountability of companies regarding their climate disclosure and strategy.

2. Push companies to raise the ambition of their climate-related targets at levels Amundi considers aligned with the Paris Agreement, ideally at a 1.5°C level.

We provided companies with detailed recommendations on what we consider necessary to achieve Net Zero and what related disclosure Amundi expects. This section provides updates on engagements reported on in last year's edition, and introduces new case studies aligned with our broadened sector guidance. Specifically, we have augmented our assessment criteria and engagement themes to include additional topics: Methane abatement, Physical climate risk, Strategic plans to achieve transition goals.

Another example is Amundi's biodiversity engagement campaign. Amundi began engaging with companies on biodiversity strategy in 2021, growing the engagement pool from 52 companies in 2021 to 294 in 2023 across a diverse range of sectors. The expansive nature of the initial engagement sample in 2021 meant that Amundi could begin to identify best practices within and across sectors and geographies, and use this as guidance for companies. We have built on that initial work annually, continuing to develop our company, sector, and global expectations.

Amundi also expanded its efforts on biodiversity in 2023 in part due to the establishment of its new biodiversity policy. The policy focuses on companies with high exposure to activities harmful to biodiversity that either lack sufficient processes/disclosure or have been involved in serious controversies.



It is applicable to issuers who are flagged for the following topics:

- Deforestation
- Controversial use of water
- Deep-sea mining
- Extractives activities (metals & mining and oil & gas companies) operating in biodiversity sensitive areas,
- Pesticide producers
- Major single-use plastic producers
- Consumer companies with high exposure to plastic packaging

Amundi engages with all companies identified in the policy and as well as other companies where biodiversity linked topics are deemed highly material.

We may engage both on the key activities driving biodiversity loss and the company's overall strategies concerning natural capital preservation. For these biodiversity topics, we engage with companies on direct operations and throughout the value chain, asking them to better integrate biodiversity and ecosystem services into their strategy with company and issue-specific engagement objectives.

The human rights engagement campaign is yet another example.

In 2021, we began a dedicated engagement effort to encourage companies to adopt robust policies and processes aligned with global norms and best practices to foster better respect of human rights by our investee companies. In 2023, we engaged with 152 issuers on human rights policies, processes and strategies to mitigate against key material risks. In addition to this, we also engaged with issuers on a number of human rights issues material to the company and/or a subject of a controversy, including: freedom of association and collective bargaining, child labour risks, downstream human rights risks, human rights due diligence and stakeholder engagement in highrisk areas, right to a safe and healthy working environment, digital rights. Generally, in our engagements we expect companies to:

- Put in place formal Board-level and managerial oversight and policy on human rights;
- Undertake risk assessments of human rights indicators in operations and value chains and disclose most salient risks identified;
- Measure human rights performance through specific KPIs:
- Carry out regular human rights due diligence to avoid or mitigate adverse human rights impacts;
- Ensure there is a grievance mechanism to allow stakeholders to raise concerns without retaliation.

Our expectations also include a formal commitment to provide access to remedy. In 2023, we conducted dedicated engagements on this topic.

	(B) Sustainability Outcome #1:
(B) Sustainability Outcome #1:	NZAM AUM commitment
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	



(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	NZAM engagement threshold
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	
	(D) Sustainability Outcome #3:
(D) Sustainability Outcome #3:	Supporting impact investing
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	
	(E) Sustainability Outcome #4:
(E) Sustainability Outcome #4:	Human rights policy & engagement
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	
	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity policy & engagement
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	



(G) Sustainability Outcome #6:

(G) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Describe your approach	
(2) Stewardship tools or activities used	
(3) Example	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

☑ (A) We prioritise the most strategically important companies in our portfolio.

Describe how you do this:

We look at the weight at each portfolio level rather than the weight at aggregate level.

The environmental, social, and governance issues that companies face potentially have a major impact on their activities. Thus, we consider that we need to assess issuers' ESG quality regardless of our position in the balance sheet (as a shareholder or a bondholder). If ESG issues have financial consequences for businesses, such issues are considered by our investment professionals (equity or credit analysts, fund managers) in their valuation models and investment processes. Meanwhile, we engage on ESG issues at issuer level. Investment professionals at Amundi may also engage with issuers on ESG topics that have financial materiality for the value of the instrument they are invested in, in addition to their holistic ESG related active dialogue with issuers.

Amundi also engages at the level of instruments (for example, on Green, Social and Sustainable bonds – otherwise known as GSS bonds) to promote better practices and transparency.

Select from the list:



0 4

☑ (B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes. Describe how you do this:

Amundi's engagement spans continents and takes into account local realities. The aim is to have the same level of ambition globally but adapt questions and intermediate milestones to different geographies. We also wish our engagement activities to be impactful and additive to the global effort of the financial community. Amundi engages issuers around 5 main areas:

- The transition towards a low carbon economy
- Natural capital preservation (ecosystem protection & fighting against biodiversity loss)



- The Human Capital & Human Rights
- Minimum standards in terms of clients' protections and societal safeguards
- Strong Governance practices that strengthen sustainable development

Amundi engages investees or potential investees at the issuer level regardless of the type of securities held.

Issuers engaged are primarily chosen based on their level of exposure to the engagement subject (often known as the engagement trigger).

Select from the list:



0 4

☑ (C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.

Describe how you do this:

In 2023, Amundi launched a dedicated net zero engagement campaign. The Net Zero engagement campaign has been organized on a sector basis, reflecting our sector specific approach. We have engaged with 656 companies in 2023, operating primarily in 4 highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers and steel producers. We selected companies from a broad range of regions, including developed and non-developed markets in order to compare and contrast the level of awareness, practices, and barriers (regulations, resources, availabilities, costs, purchasing power...)

There were two broad aims for our engagement that apply to all sectors:

- 1. Encourage alignment with the ICMA Harmonised Framework for Impact Reporting (the "Framework") the Framework outlines recommendations for impact reporting in order to provide green bond issuers with guidance on core indicators and impact reporting metrics for certain projects and sectors.
- 2. Encourage adoption of the Life Cycle Assessments approach for their green bond impact reporting (the "LCA") an impact evaluation of relevant energy, material inputs and environmental releases associated with each process, component product, and/or service over the cycles of design, production, use, consumption and disposal.

Select from the list:



0 4

☐ (D) Other



STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 11	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, how did your organisation use engagement with policy makers to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

Amundi's public positions and political engagement reflect our company commitments and priorities such as responsible investment. Examples include promoting the application of EU sustainable finance rules to the whole investment value chain, and seeking clarity and consistency in the sustainable finance framework.

Our positions on ESG matters are established in concertation with our Responsible Investment department and our policy orientations are validated through an internal process including:

- Regular reporting by the Head of Governance and Public Affairs to the Deputy CEO. The Deputy CEO is in charge of the "Strategy, Finance and Control" global division of Amundi, and is a member of Amundi's General Management Committee.
- A Strategic Public Affairs Committee under the chair of the Deputy CEO (which meets at least once every two months) with senior management, representing the main business lines or countries within Amundi. Its purpose is to identify and elaborate a common position on key advocacy matters for the short/medium/long term;
- A monthly Operational Public Affairs Committee that liaises with operational stakeholders in the business lines and in the local entities in the EU in order to share information and participate to the set-up and implementation of the strategic topics.

Amundi's political engagement focuses on:



- participating in the work of recognised trade associations (mainly in France AFG and towards EU institutions EFAMA) which report their activities with transparency registers such as the European Transparency register and promote integrity in lobbying practices. The list of associations to which Amundi belongs includes: Paris Europlace, AMAFI (Association des Marchés Financiers), ASPIM (Association Française des Sociétés de Placement Immobilier), and France Invest (Capital Investment). Amundi is also a contributing and active member of ICMA (International Capital Market Association) in London, and most of its local subsidiaries are members of the local asset management associations. Examples include Assogestioni, BVI and Irish Funds (in the EU), IA (in the UK), ICI (in the USA), and Hong Kong IFA and JITA (in Asia). Amundi has also contributed to the creation of the Singapore-Asia Taxonomy of Sustainable Finance, which has been launched by the Monetary Authority of Singapore in December 2023;
- answering public consultations launched by public authorities (e.g. ESMA, European Commission) see PGS 39.1 for details and links;
- participating in workshops or panels organised by or involving co-legislators.

(2) Engagement tools or activities used

(1) We participated in 'sign-on' letters

- (2) We responded to policy consultations
- (3) We provided technical input via government- or regulator-backed working groups (4) We engaged policy makers on our own initiative

(3) Example(s) of policies engaged on

In addition to the political engagement approach described in part 1, Amundi has committed to reduce its exposure to thermal coal in its portfolios, with a formal exit for OECD countries by 2030 and for the rest of the world by 2040, in line with the Paris Agreement. Our commitment to such deadlines does impact our capacity to invest in companies exposed to thermal coal, notably utilities and mining companies. As we recognise that companies are constrained by the legislative framework and energy policies of the countries in which they operate, we have decided to engage with sovereign issuers on this topic.

Amundi decided to engage with countries' governments alongside utility companies and domestic banks, in order to find the right path towards a low carbon energy mix.

We selected a few countries with significant reliance on coal in power generation to pursue this engagement campaign: Australia, Indonesia, Kazakhstan, South Africa and Türkiye.

Our intentions are to:

- Explain to sovereign issuers Amundi's thermal coal policy and its impact on the investee companies we hold, notably utilities and mining companies;
- Obtain clarifications on the country's thermal coal phase out plans and target date;
 Exchange on ways for the government to support the energy transition of its economy, through a transformation of local utility companies and support from the financial sector.

The outcome of our first year's engagement campaign on thermal coal with sovereigns is mixed.

On the negative side, only two sovereign issuers (Türkiye and Australia) answered to our request and accepted to engage with us on this topic. Nevertheless, given that engagement at the sovereign level is only a nascent practise, it is encouraging that we managed to engage with representatives of these two countries.



(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	NZAM AUM commitment
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	
	(C) Sustainability Outcome #2:
(C) Sustainability Outcome #2:	NZAM engagement threshold
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	
	(D) Sustainability Outcome #3:
(D) Sustainability Outcome #3:	(D) Sustainability Outcome #3: Supporting impact investing
(D) Sustainability Outcome #3: (1) Describe your approach	
(1) Describe your approach(2) Engagement tools or activities	
(1) Describe your approach(2) Engagement tools or activities used(3) Example(s) of policies engaged	
(1) Describe your approach(2) Engagement tools or activities used(3) Example(s) of policies engaged	Supporting impact investing
(1) Describe your approach(2) Engagement tools or activities used(3) Example(s) of policies engaged on	Supporting impact investing (E) Sustainability Outcome #4:



(3) Example(s) of policies engaged on

	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity policy & engagement
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	
	(G) Sustainability Outcome #6:
(G) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	



STEWARDSHIP: ENGAGEMENT WITH OTHER KEY STAKEHOLDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 12	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with other key stakeholders	2, 5

Does your organisation engage with other key stakeholders to support the development of financial products, services, research, and/or data aligned with global sustainability goals and thresholds?

(A) Across all sustainability outcomes

(1) Standard setters
(2) Reporting bodies
(6) External service providers (e.g. proxy advisers, investment consultants, data providers)
(7) Academia
(8) NGOs
(9) Other key stakeholders

Amundi engages with a variety of stakeholders besides investees and policymakers, both individually and collaboratively.

(2) Provide further detail on your engagement

An example of collaborative engagement is the ASCOR project. The ASCOR (Assessing Sovereigns' Climate-related Opportunities and Risks) project is a coalition of international institutional investors as well as investor networks (UN Net Zero Asset Owner Alliance, PRI) aimed at creating a framework and database to assess the climate action and Paris Agreement alignment of sovereign issuers (both developed and emerging markets). The projects academic research partner is the TPI Global Climate Transition Centre based at the London School of Economics' Grantham Research Institute. Amundi is involved in the ASCOR project through funding and active participation in the working groups.

Investors willing to assess sovereign issuers' climate-related risks and opportunities currently face two main hurdles:

- 1. There is no internationally agreed climate-related framework dedicated to sovereign debt instruments.
- 2. While a lot of sovereign data is publicly available, it is often not harmonised, comparable or even consistent, which makes it difficult to conduct an appropriate analysis.

This lack of reliable tools hampers investors' ability to undertake material analysis and to engage with governments on climate change, and subsequently undermines the climate-related investment case.



The aim of the ASCOR project is "for every sovereign debt issuing country to eventually be assessed against a framework which will analyse emissions pathways performance, policy action, and opportunities to finance the transition. The framework will also focus on fairness, recognising the principle of common but differentiated responsibilities that underpins the United Framework Convention on Climate Change."

Such a framework should facilitate dialogue between private investors and sovereign issuers and help prioritise issuer engagement efforts to support increased climate ambition. It will also support investors in achieving their net-zero commitments. The ASCOR tool is available since December 2023: it is the first publicly available, independent, and open-source investor framework and database assessing the climate action and alignment of sovereign bond issuers.

Amundi also engages individually with standard setting organisations (eg. Amundi's Head of SRI Fixed Income Process is in the Steering Committee of the ICMA Principles, and the Head of ESG Method and Solutions is in the Sustainable Reporting Standards Working Group of the EFRAG) and with academic research chairs. Amundi believes that research is fundamental to keep innovating in the responsible investment field, in particular the fight against climate change. Amundi believes that research is fundamental to keep innovating in the responsible investment field, in particular the fight against climate change. For this reason, Amundi thinks it is important to support key initiatives on climate mitigation and adaptation. In 2023, Amundi has therefore renewed its support to the EDHEC-Risk Climate Impact Institute and will start to support OS-Climate by the Linux Foundation as well as the MIT Joint Program on the Science and Policy of Global Change.

	(B) Sustainability Outcome #1:
(B) Sustainability Outcome #1:	NZAM AUM commitment
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(C) Sustainability Outcome #2:
(C) Sustainability Outcome #2:	(C) Sustainability Outcome #2: NZAM engagement threshold
(C) Sustainability Outcome #2: (1) Key stakeholders engaged	



(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:	Supporting impact investing
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(E) Sustainability Outcome #4:
(E) Sustainability Outcome #4:	Human rights policy & engagement
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity policy & engagement
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(G) Sustainability Outcome #6:
(G) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	



STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

	(A) Initiative #1
(1) Name of the initiative	Engaging on PFAS.
(2) Indicate how your organisation contributed to this collaborative initiative	 (A) We were a lead investor in one or more focus entities (e.g. investee companies) (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) (C) We publicly endorsed the initiative (E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support
(3) Provide further detail on your participation in this collaborative initiative	Our general call to the company is to use past experience to develop best practices for handling and reducing chemicals of concern in production, shift the portfolio to safer alternatives and continue to work towards phasing out PFAS. Specific asks for 2023/2024 were: 1. Transparency on what they submit to the TSCA on use of substances of concern; 2. A clear definition of safer by design products and the setting of targets for safer by design developments to progressively reduce the use of critical substances in portfolios;

Engagement Outcomes and Issuer Momentum:

Momentum in the first year can be broken down as follows according to the above objectives.

3. A public roadmap for phasing out the use of PFAS where possible and a clear

justification for use where there are no alternatives for critical uses.

Objective 1

The company stated its restructuring phase as the reason for classifying the US reporting as confidential information, as most of the chemicals were no longer part of its business and committed to disclose chemicals in use to the TSCA in the future.



Objective 2

The company can demonstrate greater efforts in the transition of its product portfolio to safer alternatives. This includes a product development process in which 25% of the most important projects are focused on "Safer by Design" developments. Their understanding of "Safer by Design" corresponds to the recommendation of the EU Commission. All the principles of green chemistry are taken into account. In addition, the company commissioned ERM to improve the guidelines and procedures for handling substances of concern from 2021, which applies to all operations. As a result, 40-50 new standards for the elimination, reduction and avoidance of substances of concern have since been introduced, which are coordinated by a separate team

Current screening and evaluation of products against substances of concern are done on a large scale with five product reviews a day and customers are a clear driving factor for further progress. The company has also begun to work with suppliers on reformulations. They acknowledged the need for investors to communicate concrete reduction targets on substances of concern in portfolios and report on related KPIs to quantify progress.

Objective 3

worldwide.

The company still uses short-chain PFAS but for industrial uses only that includes crucial uses for the semiconductor sector. They committed to working on replacing PFAS wherever possible.

For some of them they can define a roadmap, for others the roadmap will be available medium term but will take some time, and for several they don't have a solution yet, for the last ones there will be an appeal to the European regulators. They cannot predict with any certainty how long it will take to phase out these industrial products that use PFAS, but committed to share justifications and transparency on which short-chain PFAS will not be phased out for now.

(B) Initiative #2

(1) Name of the initiative

Promoting Living Wages for Direct Employees at Starbucks

- (2) Indicate how your organisation contributed to this collaborative initiative
- (A) We were a lead investor in one or more focus entities (e.g. investee companies)
- (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative

In 2021, Amundi began engaging with Starbucks, a US domiciled coffee company that has roughly 380,000 employees globally, making it highly exposed to wage and employee related risks, including problems of reputation, turnover, and employee morale and productivity. At the start of our engagement, Starbucks already had relatively robust wages and benefits programs compared to many restaurant peers. The company was an early adopter of a \$15 dollar minimum back in 2021 and now reports a US average of nearly \$17/hour which, while still below a living wage is higher than what many retailers and restaurants report. Furthermore, Starbucks offers unique benefits compared to peers such as a stock program for salaried employees, including those that are part-time.



Our engagement with Starbucks was initially triggered by an excessive CEO to median pay ratio (which is a principle adverse impact according to SFDR regulation). In 2021, the ratio was 1579:1 (up from 1211:1 in 2020 during the Covid-19 Pandemic), which made Starbucks a major outlier compared to US peer averages. Later, wage-related controversies further justified the engagement and began to take a more prominent role in the conversations, as the company has been repeatedly and increasing flagged for controversies related to poor working conditions, discrimination, and union busting, including the alleged termination of hundreds of workers who voted to unionize which is a violation of US Federal law. Freedom of association and right to collective bargaining is viewed as a key enabler of a living wage (including by the OECD) as strong wage institutions can help to ensure that established wages and broader employment conditions are reflective of industry context and employee needs.

For the past few years, the engagement objectives can be summarized as follows:

- · Increase company awareness on the material importance of fair wages for lowest paid employees with the aim to ensure all workers earn a living wage;
- · Increase company reporting around key employee related metrics (average hourly wage by state, turnover rates, internal promotions rates and others);
- · Improve company best practices around worker pay and welfare including pay, non-wage benefits, training, job satisfaction, and promotion;
- Formal freedom of association/collective bargaining policy, including disclosure on how the company is working with unions to address worker pay concerns;
- \cdot Engagement with franchisees and licensees to promote best practice when it comes to labor policies and practices.



Due to the rising severity of the union busting concerns, some metrics took a back seat this year in favor of supporting strong policies and practices around freedom of association and right to collective bargaining, the implementation of which would then support progress on the attainment of fair wages.

To support our engagement efforts, Amundi took actions through voting at Starbucks during the 2023 AGM to push on the objectives outlined above. In late 2022/early 2023, the situation regarding union busting continued to worsen, and Starbucks failed to extend wage increases to employees at unionized stores which is considered a union busting practice. Due to continued excessive CEO to median pay ratio Amundi voted against the remuneration report.

In 2023 Amundi also participated in collaborative engagements with Starbucks to support the promotion of living wages in their global supply chain through the Platform Living Wage Financials (PLWF). In 2023, investor members of the PLWF (including Amundi) decided that due to the labour rights issues at the company, it was essential to also discuss the living wage for direct employees. From Amundi's, perspective, this was a valuable way to re-emphasize Amundi's living wage expectations for Starbucks in a way that showed that they were not unique to Amundi alone but also important for many other investors.

(C) Initiative #3

(1) Name of the initiative

Access to Medicine Index

- (2) Indicate how your organisation contributed to this collaborative initiative
- (A) We were a lead investor in one or more focus entities (e.g. investee companies)
- (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)

(3) Provide further detail on your participation in this collaborative initiative

In 2019, the ATM Foundation launched and coordinated its first collaborative engagement for investors to help steer the direction of pharmaceutical companies towards better serving access to medicine and SDG3 in LMICs. This investor-led engagement, which included more than 150 participants in 2022, is a long-term project given that improving access to healthcare is likely to be a constantly evolving target. Amundi has participated in this collaborative engagement since its launch, which illustrates our active support of the ATM Foundation.

From the start, Amundi has been assigned as co-lead in the engagement with the French pharmaceutical company Sanofi. Our expectations for the company were informed by its standing in the ATMi.

The ATM Foundation did not publish its ATMi ranking in 2023, and therefore we cannot conclude on the overall progress of the initiative.

Regardless of this, we were able to engage Sanofi both directly and as part of the ATMi collaborative campaign to assess its progress and make further recommendations.

In 2023, we were pleased to note that Sanofi is making progress according to plan with the roll-out of its Global Health Unit (GBU), which aims to provide access to medicines in 40 countries with the highest unmet medical needs.



The GBU works with local, regional, and global partners to provide affordable medicines, support health systems, and foster innovative solutions for non-communicable diseases such as diabetes (through both oral medicines and insulins), cardiovascular disease, and cancer. One of the initiatives of the GBU is the Impact brand, which offers 30 essential medicines at no profit. The Global Health Unit also has an Impact Investment Fund that supports startups and innovators who can deliver scalable and sustainable healthcare solutions in underserved regions. For instance, in Africa, the GBU is working at solutions to allow healthcare practitioners to better reach patients in remote locations through mobile phones.

In the first two years since the launch of the GBU, Sanofi primarily progressed via a trial-and-error process in order to "learn" how to operate in the countries in scope depending on local specificities (medical needs, healthcare infrastructure, ability to operate) and thus to offer the most adapted solutions for local populations. Indeed, Sanofi is not looking to register drugs just for the sake of ticking a box but is looking to have an impact with its registered drugs and making sure they effectively reach the patients, which can be very challenging in low-income countries with poor infrastructures or sometimes facing (civil) war.

In the first nine months of 2023, the GBU had reached close to 176,000 patients (41% more than in 2022) through the distribution of Sanofi's products across 27 countries, which were for the most part either low-income (12 countries) or lower-middle-income (10 countries).

In addition, the GBU has so far actively developed 33 local partnerships across LMIC countries, bringing its total reach in these regions in 2023 to 31 countries, including 15 low-income countries and 13 lower-middle-income countries.

We are particularly pleased to note the GBU's focus on low- and lower-middle-countries; i.e., countries for which ATM was expecting the pharmaceuticals industry to focus more efforts. Indeed, in its 2022 index report, ATM noted that only 15% of access plans include at least one of the 27 low-income countries. Another positive move from Sanofi with its GBU is its focus on non-communicable diseases, which, according to ATM, represent an area where access plans lag well behind those for infectious diseases.

(D) Initiative #4

(1) Name of the initiative

Ranking Digital Rights (RDR) Corporate Accountability Index

(2) Indicate how your organisation contributed to this collaborative initiative

- (A) We were a lead investor in one or more focus entities (e.g. investee companies)
- (B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)



(3) Provide further detail on your participation in this collaborative initiative

One of the growing challenges for technology companies remains balancing the rights of their users, particularly to privacy and freedom of expression, with their commercial strategies, which include benefitting from user information through data monetization, particularly via targeted advertising. Data monetization has multiple pitfalls, most notably potential for leakages, misuse and breaches of user rights. As such, regulators around the world have been developing legal frameworks to preserve the rights of technology users. In a well-known case, Facebook (now Meta Platforms) was required by the US Federal Trade Commission to pay a \$5 billion civil penalty for violating the company's own privacy promises. The company also saw a ban on monetizing data of users under 18. This illustrates just one way in which digital rights issue can materialize for companies.

To enable more systematic assessment of technology companies' management of those issues for investors and other stakeholders, the Ranking Digital Rights (RDR) Corporate Accountability Index assesses 26 major global digital platforms and telecommunications companies on the quality of their policies and disclosures related to freedom of expression, privacy and security online. The RDR's framework consists of three key pillars, governance, freedom of association and privacy, with the methodology is publicly disclosed on the RDR website. In 2018, the RDR and the Investor Alliance on Human Rights launched a collaborative investor engagement, informed by the RDR findings and recommendations for improvement. The engagement is supported by an investor statement, current signed by 176 investors representing over USD9.2 trillion in assets.

Amundi joined the engagement in 2021, as a leading on the engagement with one British telecommunications and one emerging market telecommunications company, as well as collaborating with a group of investors on an engagement with a European telecommunications corporation. In 2022, we started a new engagement with a South Korean digital platform which Amundi led alone. In 2023, we continued to follow up with the engagement pool and also started co-leading on an engagement with an emerging market interactive media company.

Our key RDR engagement objectives were as follows:

In line with RDR recommendations, all RDR-ranked companies are encouraged to:

- · Implement robust human rights governance;
- Be transparent on the implementation of key policies relevant to digital rights;
- Give users meaningful control over their data and data inferred about them;
- · Account for harms linked to algorithms and targeted advertising.



Additionally, Amundi expects companies to put in place systematic digital rights assessments across their activities and relations with partners in their value chains. These can take the form of, for instance, human rights impact assessments and third-party due diligence.

The RDR results were previously published annually, and since 2022, the ratings for the digital platforms and telecommunications companies are published separately, to reflect sectoral differences. However, there was no ranking published in 2023, and therefore we continued to engage with companies directly and with our co-leads.



CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☑ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- \square (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- \Box (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy ☐ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☑ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- o (H) We did not verify the information submitted in our PRI report this reporting year

THIRD-PARTY EXTERNAL ASSURANCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 2	CORE	OO 21, CBM 1	N/A	PUBLIC	Third-party external assurance	6

For which responsible investment processes and/or data did your organisation conduct third-party external assurance?

(A) Policy, governance and strat

Select from dropdown list:

- \circ (1) Data assured
- (2) Processes assured
- o (3) Processes and data assured
- ☐ (B) Manager selection, appointment and monitoring
- ☐ (C) Listed equity
- ☐ (D) Fixed income
- \square (E) Private equity
- \Box (F) Real estate
- \square (G) Infrastructure



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
СВМ 3	PLUS	CBM 1	N/A	PUBLIC	Third-party external assurance	6

Provide details of the third-party external assurance process regarding the information submitted in your PRI report.

(1) Description	of the	third-party	external	assurance	process
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Certain ı	responsible invest	ment data and p	rocesses are v	erified by a t	hird party.	as well as certa	ain reports as ex	colained in the r	next column

- (2) Assurance standard(s) used by the third-party assurance provider

 □ (A) PAS 7341:2020
 □ (B) ISAE 3000 and national standards based on this
 □ (C) Dutch Standard 3810N (Assurance engagements regarding sustainability reports)
 □ (D) RevR6 (Assurance of Sustainability)
 □ (E) IDW ASS 821 (Assurance Standard for the Audit or Review of Reports on Sustainability Issues)
 □ (F) Accountability AA1000 Assurance Standard (AA1000AS)
 □ (G) IFC performance standards
 □ (H) SSAE 18 and SOC 1
 □ (I) Other national auditing/assurance standard with guidance on sustainability; specify:
 □ (J) Invest Europe Handbook of Professional Standards
 □ (K) ISAE 3402 Assurance Reports on Controls at a Service Organisation
 □ (L) AAF 01/20
- ☐ (M) AAF 01/06 Stewardship Supplement
- ☐ (N) ISO 26000 Social Responsibility
- ☐ (O) ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information
- \square (P) ASAE 3410 Assurance Engagements on Greenhouse Gas Statements
- ☐ (Q) PCAF
- ☐ (R) NGER audit framework (National Greenhouse and Energy Reporting)
- $\hfill \square$ (S) Auditor's proprietary assurance framework for assuring RI-related information
- \square (T) Other greenhouse gas emissions assurance standard; specify:
- (3) Third-party external assurance provider's report that contains the assurance conclusion

https://about.amundi.com/files/nuxeo/dl/48abea4f-1ecf-4f4c-a5bf-2110d952425b

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
СВМ 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- \square (A) Board, trustees, or equivalent
- ☑ (B) Senior executive-level staff, investment committee, head of department, or equivalent
 - Sections of PRI report reviewed

 (1) the entire report
 - (2) selected sections of the report
- \circ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year

