



# Global Responsible Investment Policy

# 2022

Confidence  
must be earned

**Amundi**  
ASSET MANAGEMENT

# Purpose and Scope

## PURPOSE

The document details how Amundi implements its commitment to act as a responsible asset manager in its investments and operations. It also outlines the key building blocks of Amundi's Responsible Investment Policy and its strategic orientations, which are under direct responsibility of Amundi's ESG and Climate Strategic Committee, chaired by Amundi's CEO.

## SCOPE

Unless specified in the relevant sections of the documents (for instance in the Exclusion Policy section), the set of commitments and processes described herein apply to, and on behalf of, all assets managed by Amundi Group entities.

The following affiliates and associated entities of the Amundi Group do not apply, or not to its full extent, Amundi's Responsible Investment Policy (please refer to their respective policy documents for further details):

- ABC-CA Fund Management Company
- Amundi BOC Wealth Management Company Limited
- Amundi-ACBA asset management
- KBI Global Investors Ltd.
- NH-Amundi Asset Management
- Pioneer Family of US mutual funds, retail separately managed accounts, and certain pooled vehicles advised by Amundi Asset Management US, Inc.
- SBI Mutual Funds
- Wafa Gestion

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# Amundi

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# Amundi's responsible commitments and ambitions

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. Amundi is a subsidiary of Crédit Agricole (“CA”), France largest bank and insurer. Founded by members of farm unions more than a century ago, CA has evolved into a recognized financial institution, remaining steadfast to its purpose: acting every day in the interest of its clients and society.

Aligned with our parent company's purpose, our goal is to deliver long-term value for our clients while being mindful of the societal and environmental challenges that impact both our clients and society.

Since our creation in 2010, our commitment to responsible investment has been foundational and remains central to our approach. This commitment relies on three convictions:

- 1. Economic and financial actors carry, as well, a strong responsibility towards society;**
- 2. The integration of Environmental, Social or Governance (ESG) criteria in investment decisions is a driver of long-term financial performance;**
- 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 clients define and implement their own approach.

As a responsible asset manager, part of Amundi's fiduciary duty is to contribute positively to addressing today's major socio-economic and environmental challenges in the interests of our clients, our stakeholders and of society. We embrace the concept of “double materiality” around which we build our proprietary ESG analysis and rating methodology. 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<sup>1</sup>.

1. For specific information on how these ratings and analysis is integrated in the investment decisions of specific investment strategies please refer to our product specific disclosure).

## 1

## Becoming the first global responsible asset manager

We believe that long-term value creation goes beyond short-term financial performance. This conviction has led us to address major sustainable factors (such as climate change, natural capital preservation and social cohesion) in our investment philosophy and practices. We embrace our responsibility to contribute to the collective efforts made to address these issues, and efficiently allocate capital for the future. Our role in raising standards, at the investor level as well as 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 changes 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<sup>2</sup> within its investment activities and throughout the organization. These ambitions translated into:

### Setting ESG performance objectives for 100% of our Amundi's actively managed open-ended funds<sup>3</sup>

The first item translates and implements our conviction that the integration of ESG criteria into research and investment decisions may be key drivers of long-term value creation. Setting a 100% objective enabled us to mainstream ESG integration and establish a baseline for systematic ESG integration. As a result, in-scope<sup>3</sup> actively managed open-ended portfolios aim to meet an ESG performance objective alongside a financial objective, in addition to any other specific relevant sustainable investment characteristics or objectives a portfolio must meet.

### Systematically considering ESG factors in our dialogue with investee companies, via our engagement and voting activities<sup>4</sup>

Amundi wishes to contribute to the transition towards a

sustainable and inclusive low carbon economy. As an asset manager, we believe that carrying out active dialogue with our investee companies to positively influence their behaviours and activities will enable us to deliver real impacts and outcomes. This is the reason why engagement and voting are key pillars of Amundi's Global Responsible Investment policy.

### Disseminating ESG best practices throughout the organisation, across all investment platforms and client segments

Mainstreaming ESG at the investment level requires a deep transmission of ESG knowledge across our entire organization. This objective echoes our belief that long-term and sustainable success lies in collective effort and solid processes. ESG and responsible investing has become a central matter to all Amundi's employees.

## 2

## Supporting transitions across sectors and across geographies

Amundi's approach to ESG and responsible investing is fundamentally best in class by design, universal by ambition, and grounded in reality by necessity.

Our ESG analysis & scoring methodology is designed to enable comparison between economic actors regarding their ESG practices within a given sector, distinguishing best and worst ESG practices at sector level utilizing third party and in-house research to promote what we believe are best practices across the entire economy. Not only does it enable us to select companies based on ESG criteria relevant for their sectors but it also provides a critical referential whenever we engage companies and other issuers on ESG issues.

While supporting the most advanced players and projects with already transitioned business models remains key, we believe supporting the transition for the rest of the economy is also critical to achieve a system-wide change. In that respect, responsible investment strategies promoting best practices in geographies or sectors that have not yet transitioned can play a determining role.

Acting responsibly, Amundi strives to manage industry-leading investment solutions, services and advices, which we believe address the investment needs and profiles of our clients. This requires us to be transparent on the trade-offs and comparative benefits of certain responsible investing approaches versus others.

2. The explicit and systematic inclusion of ESG issues in investment analysis and investment decisions (Principles for Responsible Investment – PRI).

3. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For in scope entities, wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Please review a Fund's offering documents for complete information on ESG integration.

4. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For in-scope entities, institutional clients may choose alternative proxy voting policies.

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## Tailoring our approach to client needs, reporting openly and transparently to our clients

We recognise the fiduciary duty placed in our hands when our clients entrust us with their money. We work to deliver on that duty by investing with their long-term interests at heart. We believe that our pro-active stewardship framework and responsible investing approach can deliver meaningful change and add value over a long-term horizon. However, in some areas, it could take longer and we are prepared to stay the course. “Investing for the long term is an advantage” is one of our core investment beliefs. We believe clients should benefit from our long-term investment approach.

On all portfolios where our exclusion policy applies, we exclude investment in assets from issuers that we deem of the lowest ESG quality (rated G on our A-G scale). However, exclusion is a last resort option. The Amundi ESG rating scale and exclusion policy are discussed in detail in later sections in this document.

Our ambition is to apply Amundi’s stewardship policy to all portfolios directly managed by Amundi, wherever applicable<sup>5</sup>. Our responsible investment solutions encompass different approaches that can be exclusive or combined: best-in-class screening with ESG-risk budget or selectivity requirements, negative or norms-based screening, activity-based or sector-based screening, sustainability themed investing, impact investing, and additional corporate engagement and shareholder action approaches.

In all instances, we ensure that our contractual relationships with clients explicitly set out our delivery of responsible investing and stewardship on their behalf, and we work diligently to try to deliver against those client requirements. Amundi always welcomes the opportunity to be fully transparent and open with its clients, and maintains clear channels of communication. This includes providing investors with a wealth of documentation on its responsible investment approach, responsible investment policies and specific reports. Furthermore, Amundi is able to provide both general and customised ESG reporting depending on individual client needs.

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## Going further: Ambition 2025

Following the completion of our first ESG action plan, Amundi has launched a new social and environmental 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 plan is comprised of an ambitious set of goals that we believe will address clients’ current and future responsible investing needs. Please find details of our corporate ambitions in the Ambition 2025 brochure [here](#).

# A dedicated organisation

1

## Specialised resources

### A dedicated Business Line

Amundi has integrated ESG at the heart of its management and has created a dedicated Responsible Investment Business Line, organized in four teams:

#### A ESG Research, Engagement and Voting

This international team spans across Paris, Dublin, London and Tokyo. ESG Research analysts meet, engage and maintain dialogue with companies to improve their ESG practices, with the responsibility of rating these companies and defining exclusion rules. ESG Research analysts work alongside a team of specialists dedicated to exercising voting and conducting pre-meeting dialogue. These specialists exercise voting rights at General Assemblies’ of companies in which Amundi invests on behalf of its clients.

5. Refer to “Purpose and Scope” for out or partially out of scope affiliates and associated entities of the Amundi Group. For in scope entities, wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Please review a Fund’s offering documents for complete information on ESG integration.

## B ESG Method and Solutions

This team of quantitative analysts and financial engineers is in charge of maintaining and developing Amundi's proprietary ESG scoring system and ESG-related data management systems (including selecting external data providers to generate proprietary ESG scores, and making sustainability-related data and analytics available). They help analysts and portfolio managers integrate ESG and sustainability considerations into their investment decisions, as well as business development teams to create innovative solutions by integrating sustainability-related data within financial products (ESG ratings, climate data, impact metrics, controversies...). They oversee the development and integration of analytical ESG tools in Amundi Portfolio Management Systems and Client Reporting Systems and are also in charge of implementing clients' specific ESG exclusion rules.

## C ESG Business Development & Advocacy

Present in Paris, Boston, Tokyo and Hong Kong, this team is in charge of supporting and developing the ESG offering and solutions that match investors' needs and challenges, ESG advisory and services for all Amundi clients, and managing ESG advocacy and collaboration with responsible finance initiatives, and developing training programs for our clients.

## D ESG COO Office

This team is in charge of coordinating and streamlining developments between the Responsible Investment Business Line with the support functions of the Group, such as producing dashboards for the monitoring of the Business Line's activities (Business, Budget, IT, Audit, projects), and supervising major transversal projects.

## ESG at the core of our practices

### Responsible Investment Business Line level

The Responsible Investment Business Line is an expertise centre that provides ESG rating, assessment and scoring methodologies as well as qualitative analysis. A large perimeter of listed companies and issuers are evaluated based on a proprietary ESG rating methodology described in the section ESG Analysis. It also provides research, support and knowledge transfer to the investment hubs across the firm. All team members collaborate with investment professionals to help them integrate ESG into their investment processes and expertise where relevant.

## Investment level

ESG analysis is embedded into Amundi's portfolio management systems, made available in real time in the fund managers' tools to provide them with a seamless access to corporate and sovereign issuers' ESG ratings alongside financial ratings<sup>6</sup>.

Portfolio managers and investment analysts from all investment platforms have access at all times to issuers' ESG scores, and related ESG analytics and metrics.

This enables fund managers to factor in sustainability risks in their investment decision process and apply Amundi's exclusion policy whenever applicable<sup>7</sup>. They are also able to design and manage their portfolio in compliance with specific ESG rules and ESG objectives that may apply to the investment strategies and products that fall under their remit.

Across Amundi, a broad range of responsible investment solutions are managed, including impact, sustainability-themed and best-in-class strategies.

In addition, Amundi has taken the commitment to integrate ESG criteria into the investment process of actively managed open-ended fund<sup>8</sup>, with an objective to maintain portfolio average ESG scores above the average ESG score of their respective investment universe, in addition to financial objectives.

## Risk Management level

ESG criteria are embedded within Amundi's control framework, with responsibilities spread between the first level of controls performed by the Investment teams themselves and second level of controls performed by the Risk teams, who monitor compliance with ESG objectives and constraints of a fund at all times. The Risk department is part of the responsible investment governance (described in section Dedicated Governance). They oversee adherence to regulatory requirements, contractual requirements and management of risks related to these topics.

6. For investment universes and issuers covered by Amundi ESG rating, see next section.

7. For more detailed information on the scope of application of the exclusion policy, please refer to the Appendix at page 22.

8. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For in scope entities, wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Please review a Fund's offering documents for complete information on ESG integration.

Risk teams monitor ESG rules in the same way any rule is monitored within their overall perimeter of control, relying on the same tools and procedures as other investment professionals in our firm. The ESG rules consist of regulatory, Amundi internal and/or client exclusion rules, as well as eligibility criteria and rules specific to funds as described in their legal documentation. Regarding these rules, compliance controls are automated in Amundi's proprietary compliance tool 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 bring portfolios back into compliance.

### Across the firm

Amundi's responsible investment ambition is supported across the organization with specific resources dedicated to ESG in other divisions.

## 2 Dedicated governance

With the support of these teams, four Responsible Investment steering committees have been put in place and are monitored by Amundi's CEO on a regular basis.

### ESG and Climate Strategic Committee

Chaired by Amundi's CEO, this committee meets on a monthly basis to steer, validate and monitor Amundi's ESG and Climate strategy. It validates major strategic orientations of the Responsible Investment policy and monitors the progress and achievements of the Ambition 2025 plan.

### ESG Rating Committee

Chaired by Amundi's Chief Responsible Investment Officer, this committee meets on a monthly basis. It is composed of senior managers from investment, responsible investment, and risk and compliance business lines<sup>9</sup>. It defines and validates Amundi's ESG rating methodology and validates the exclusion and sector policies' application rules and reviews issues related to ESG ratings.

### Voting Committee

Chaired by Amundi's Responsible Investment Supervisor, this committee meets on a monthly or on an *ad hoc* basis if needed. This committee supervises the application of Amundi's Voting policy<sup>10</sup>, implementation rules and public reporting. This committee also acts as an advisor for voting decisions on individual cases and ensures the alignment of voting activities with key ESG engagement themes<sup>11</sup>.

### ESG Management Committee

This Committee is comprised of the senior leadership members of the Responsible Investment Business Line. This committee meets on a weekly basis and is responsible for:

- Setting objectives and priorities for the ESG and voting teams;
- Building a consolidated view of ESG capabilities and resources across the Group; and
- Promoting ESG across Amundi, addressing key client requests and business opportunities.

9. The Chief Responsible Investment Officer reports to the Responsible Investment Supervisor.

10. KBI, Amundi US or Joint venture voting policies are not under the remit of this committee's supervision.

11. Responsible Investment Supervisor reports to the Amundi CEO.

# ESG analysis and integration

Amundi has developed its own ESG analysis framework and scoring methodology. This methodology is both proprietary and centralised, enabling a self-defined, independent and consistent approach to responsible investing throughout the organisation, in line with the values and views of Amundi.

Amundi has developed two main ESG scoring methodologies, one for corporates issuing listed instruments and one for sovereign entities. This is complemented by methodologies developed for specific needs and specific asset classes or instruments such as private assets<sup>12</sup> or use-of-proceeds bonds.

Our approach is based on texts that are universal in scope, like the United Nations Global Compact, the Organisation for Economic Co-operation and Development's (OECD) guiding principles on corporate governance, the International Labour Organization (ILO), etc.

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 management team to handle potential negative impact of their activities on the sustainability factors<sup>13</sup>.

We source our data from 15 main data providers:



## 1 ESG for corporate issuers

### The Best-in-Class principles

Amundi bases its ESG analysis of corporates on a best-in-class approach. Each issuer is assessed with a quantitative score scaled around the average of their sector, which distinguishes between what we believe are best practices from worst practices at sector level. Amundi's assessment relies on a combination of extra-financial data from third

parties and qualitative analysis of associated sector and sustainability themes. The quantitative score is translated into a letter rating which ranges from a scale of A for best practices to G, for the worst ones. Where applicable, G-rated companies are excluded from investment in actively managed funds<sup>14</sup>.

12. Including but not limited to: Real estate, private equity, private debt, impact investing.

13. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment - Principal adverse impacts are impacts of investment decisions that result in negative effects on sustainability factors - Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

14. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For more detailed information on the scope of application of the exclusion policy, please refer to the Appendix at page 22.

## The ESG dimensions

Amundi’s analysis framework has been designed to assess corporate behaviour in three fields: Environment, Social, and Governance (ESG). Amundi assesses companies’ exposure to ESG risks and opportunities, including sustainability factors and sustainability risks, and how corporates manage these challenges in each of their sectors. As far as issuers of listed securities are concerned, Amundi scores issuers regardless of the instrument type, equity or debt.

### A Environmental dimension

There are risks and opportunities linked to environmental issues. Our analysis on this dimension examines how issuers address this topic, and assesses companies’ ability to control their direct and indirect environmental impact, by limiting their energy consumption, reducing their greenhouse emissions, fighting resource depletion and protecting biodiversity.

### B Social dimension

In this dimension, we measure how an issuer manages its human capital and its stakeholders<sup>15</sup>, drawing on fundamental principles with a universal reach. The “S” in ESG has multiple meaning. It covers the social aspect linked to an issuer’s human capital, those linked to human rights in general and the responsibilities towards the stakeholders.

### C Governance dimension

In this dimension, we assess an issuer’s ability to establish an effective corporate governance framework that ultimately supports the issuer’s value over the long term.

#### The ESG specific criteria

Our ESG analysis framework is comprised of 38 criteria, of which 17 are cross-sector criteria, common to all companies whatever their business sector, and 21 sector-specific criteria. These criteria were designed to either assess how sustainability issues might affect the issuer as well as the quality of the management of this dimension. Impact on sustainability factors as well as quality of the mitigation undertaken are also considered. These criteria are available in fund managers’ front office portfolio management system.

	Environment	Social	Governance
<b>CROSS-SECTOR CRITERIA</b>	<ul style="list-style-type: none"> <li>■ Emissions &amp; Energy</li> <li>■ Water Management</li> <li>■ Biodiversity &amp; Pollution</li> <li>■ Supply Chain - Environment</li> </ul>	<ul style="list-style-type: none"> <li>■ Health &amp; Safety</li> <li>■ Working Conditions</li> <li>■ Labour Relations</li> <li>■ Supply Chain - Social</li> <li>■ Product &amp; Customer Responsibility</li> <li>■ Community Involvement &amp; Human Rights</li> </ul>	<ul style="list-style-type: none"> <li>■ Board Structure</li> <li>■ Audit &amp; Control</li> <li>■ Remuneration</li> <li>■ Shareholders’ Rights</li> <li>■ Ethics</li> <li>■ Tax Practices</li> <li>■ ESG Strategy</li> </ul>
	Environment	Social	
<b>SECTOR-SPECIFIC CRITERIA</b>	<ul style="list-style-type: none"> <li>■ Clean Energy</li> <li>■ Green Car</li> <li>■ Green Chemistry</li> <li>■ Sustainable Construction</li> <li>■ Responsible Forest Management</li> <li>■ Paper Recycling</li> <li>■ Green Investing &amp; Financing</li> <li>■ Green Insuring</li> <li>■ Green Business</li> <li>■ Packaging</li> </ul>	<ul style="list-style-type: none"> <li>■ Bioethics</li> <li>■ Responsible Marketing</li> <li>■ Healthy Product</li> <li>■ Tobacco Risk</li> <li>■ Vehicle Safety</li> <li>■ Passenger Safety</li> <li>■ Responsible Media</li> <li>■ Data Security &amp; Privacy</li> <li>■ Digital Divide</li> <li>■ Access to Medicine</li> <li>■ Financial Inclusion</li> </ul>	

15. Stakeholders other than shareholders.

To be effective, ESG analysis must be capable of focusing on key criteria depending on the business and sector activity. The weighting of ESG criteria is a critical element of our ESG analysis framework. For each sector, ESG analysts weigh 4 to 5 sector-specific criteria deemed the most important.

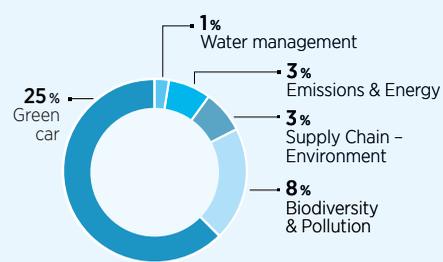
Our ESG Research analysts will typically increase their level of scrutiny and expectations whenever the risk faced by a company on any given ESG criterion is deemed high and material.

For example, in the automotive sector, CO<sub>2</sub> emissions are highly related to the emissions of car manufacturers' vehicle fleets. Our ESG Research Analysts will therefore focus on investments in R&D<sup>16</sup>: vehicle efficiency and alternative vehicles (electric, hybrid). We believe this criterion is all the more relevant in that it represents a risk for car manufacturers (e.g. potential market share for energy-efficient vehicles due to rising fuel costs).

### Example of sector weight attributions

	E	S	G
Automotive	40%	34%	26%
Banking	24%	29%	47%
Telecom	15%	53%	32%

### Breakdown of environmental criterion in the automotive sector



### The ESG scoring and rating methodology and process

The ESG rating of an issuer is a weighted average of the scoring for E, S and G dimensions, each dimension being itself the weighted average of the internal reference values. The output of each the scores for the 38 criteria are translated into an ESG rating from A to G. At the end of this process, companies are attributed an ESG rating from A to G. There is only one ESG rating for each issuer, regardless of the chosen reference universe. The ESG rating is thus “sector neutral”, that is to say that no sector is privileged or, on the opposite, disadvantaged.

ESG ratings are updated on a monthly basis, based on the data provided by our external data providers' raw data. Developments on issuers' ESG practices are followed continuously,

Our ESG Research Analysts regularly readjust their ESG analysis & rating methodology according to the environment and current events.

## 2 ESG for sovereign issuers

Amundi ESG sovereign scoring methodology aims at assessing the ESG performance of sovereign issuers. E, S and G factors can have an impact on the issuer's ability to repay its debt in the medium and long-term. They can also reflect on how countries are faring in dealing with major sustainability issues that affect global stability.

Amundi's methodology relies on a set of about 50 ESG indicators deemed relevant by Amundi ESG research to address sustainability risks<sup>17</sup> and sustainability factors<sup>14</sup>. Each indicator can weigh in several data points, coming from different sources, including open-source international databases (such as from the World Bank Group, the United Nations, etc.) and proprietary databases. Amundi has defined the weights of each ESG indicator contributing to the final Amundi sovereign ESG scores, and its various sub-components (E, S and G).

16. Research & Development.

17. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment. Principal adverse impacts are impacts of investment decisions that result in negative effects on sustainability factors. Sustainability factors mean environmental, social and employee matters, respect for human rights and anti-bribery matters.

The indicators are sourced from an independent data provider.

All indicators have been grouped into 8 categories in order to provide greater clarity, each category falling into one of the pillars E, S or G. Similar to our corporate ESG rating scale, issuers' ESG score is translated in an ESG rating ranging from A to G.

<b>E</b> Environment	Climate Change - Natural Capital
<b>S</b> Social	Human Rights - Social Cohesion - Human Capital - Civil Rights
<b>G</b> Governance	Government Effectiveness - Economic Environment

### 3 Other types of instruments or issuers

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 securitized products). To expand its coverage, Amundi has developed specific methodologies that apply to private equity, private debt issuers, impact investing, real estate<sup>19</sup> 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.

### 4 Integrating ESG into our analysis and investment processes

We firmly believe that ESG analysis consolidates value creation as it provides a holistic understanding of the overall company. This view has led us to integrate ESG criteria across our active management processes, and to implement an engagement policy, where applicable. Underlying ESG integration is the conviction that a strong sustainable development perspective enables issuers to

manage their regulatory and reputational risks better as well as improve their operational efficiency.

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.

Our ESG analysis aims to assign issuers an ESG (Environmental, Social, Governance) rating but also to raise awareness and encourage companies to do business with a sustainable development approach. Our analysis enables Amundi to take into account specific risks related to the companies' activities and manage these risks across our investment portfolios.

We therefore constantly monitor our investee companies, across all E, S and G factors as well as more traditional financial metrics. We seek to identify problems and concerns early before they damage company performance and affect our clients' investment performance.

Our proprietary rating derives from the aggregation of E, S, and G ratings and analysis of a range of sources, and it is now available for 13,800 issuers<sup>20</sup>. Amundi funds may invest in a variety of instruments, issuers or projects, with different ESG objectives and constraints. However, ESG ratings, the 38 criteria produced by Amundi ESG research, and additional sustainability-related indicators, are made available to all our fund managers' on their portfolio management system. This enables them to integrate sustainability issues into their investment decisions and apply any constraints relevant for their portfolios.

19. For more information: <https://www.amundi.com/institutional/real-estate>, <https://amundi.oneheart.fr>  
 20. Data as of April 2022.

# Sector Policy

## 1 Thermal Coal Policy

Coal combustion is the single largest contributor to human-induced climate change<sup>21</sup>. 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. (see Exclusion 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 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.

### Objective of the policy

"Achieving a state of net-zero emissions at the planetary level requires real world cuts in greenhouse gas (GHG) emissions from companies' value chains, and not simply a reduction in exposure to emissions within portfolios"<sup>22</sup>. *Science Based Targets initiative (SBTi)*.

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.

### Scope of the policy

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<sup>23</sup>.

### Using our role as investors to influence issuers to phase out thermal coal

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 (see Exclusion 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.

### Exclusions as a tool to deal with unsustainable exposures

Where applicable<sup>23</sup>, 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<sup>24</sup>.

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.

21. IPCC, 2022: Summary for Policymakers. In: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khouradji, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001.

22. SBTi-Finance-Net-Zero-Foundations-paper.pdf

23. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For more detailed information on the scope of application of the exclusion policy, please refer to the Appendix at page 22.

24. Amundi is performing an analysis to assess the quality of their phase out plan.

## Implementation

Exclusions are integrated in our front office tools, preventing fund managers, where applicable, from investing in these issuers. The Risk Business Line is in charge of carrying out second level controls.

To assess companies' carbon exposure, Amundi utilizes carbon metrics from data providers (Trucost and MSCI). This allows us to have a large data coverage from a range of sources to integrate into our ESG analysis and rating methodology. This also allows us to gain a fuller understanding of companies' carbon emissions and provide our investment teams with unique and valuable insights on the topic. When both providers have carbon data for the same issuer, we apply a conservative approach, which consists in retaining the data with the highest coal exposure between the two providers. In case of large discrepancies between information provided by the data providers, Amundi also performs its own due diligence.

To assess the development of new thermal coal capacities, Amundi uses the official exclusion list from Crédit Agricole Group based on information from Trucost. Due diligence could also be performed to enrich or challenge the information received by the provider.

## 2 Tobacco Policy

Tobacco not only has a negative impact on public health, but its value chain faces human rights abuses, has an impact on poverty, has environmental consequences, and bears substantial economic costs, believed to be more than USD 1 trillion a year globally, according to World Health Organisation estimates<sup>25</sup>.

In May 2020, Amundi became a signatory of the Tobacco-Free Finance Pledge.

### Objective of the policy

Amundi caps the ESG score of issuers exposed to the tobacco value chain and has set an exclusion policy for companies producing cigarettes.

### Scope of the policy

This policy is applicable to the tobacco sector in its entirety, including suppliers, cigarette manufacturers and retailers. This policy is applicable across all actively managed strategies and passively managed ESG strategies over which Amundi has full discretion.

### Using our role as investors to influence issuers

Concerning the remaining exposure to companies falling within the scope of our exclusion policy (see Exclusion Policy), our policy consists of voting against the discharge of the board or management, or the re-election of the Chairman and certain Directors.

### ESG rating of companies exposed to tobacco

The ESG rating (ranging from A to G) of the tobacco sector is capped to E. This policy applies to companies involved in the production, the supply and retailing of tobacco (thresholds for application: revenues above 10%). This applies to active investments.

### Exclusions as a tool to deal with unsustainable exposures

This policy is applicable across all actively managed strategies and passively managed ESG strategies over which Amundi has full discretion.

Amundi excludes:

- Companies that manufacture complete tobacco products (thresholds for application: revenues above 5%), including cigarette manufacturers, as no product could be deemed to be child labour free.

### Implementation

Exclusions are integrated in our front office tools, preventing fund managers from investing in these issuers. The Risk Business Line is in charge of carrying out second level controls.

To assess companies, Amundi uses MSCI as a data provider.

25. <https://www.hrw.org/report/2014/05/13/tobaccos-hidden-children/hazardous-child-labor-united-states-tobacco-farming>

# A targeted exclusion policy

As part of its fiduciary responsibility, Amundi applies a targeted exclusion policy across its portfolios<sup>26</sup>. Issuers exposed to the exclusionary rules and thresholds set out in our sector policy or do not comply with internationally recognized conventions and/or frameworks, and national regulations are excluded.

This exclusion policy is implemented in our portfolios, unless otherwise requested by our clients and always subject to applicable laws and regulations prohibiting their implementation.

The ESG and Climate Strategic Committee sets out the rules of the exclusion policy and the ESG Rating Committee validates the rules for implementation. Excluded issuers<sup>27</sup> are flagged in fund managers' front office tools and trades on those names are blocked on a pre-trading basis. Amundi's Risk Business Line is in charge of second level controls.

For any new mandate or dedicated fund, Amundi's exclusion policy shall be implemented in accordance with our pre-contractual documentation, unless otherwise requested by the client.

For passive funds, the application of the exclusion policy differs between ESG products and non-ESG products<sup>28</sup>:

- For ESG passive funds: All ESG ETFs and index funds apply Amundi's exclusion policy<sup>29</sup>.
- For non-ESG passive funds: The fiduciary duty in passive management is to replicate as closely as possible an

index. The portfolio manager has thus limited leeway and has to meet the contractual objectives to get passive exposure fully in line with requested benchmark. Amundi index funds/ETFs replicating standard (non-ESG) benchmarks cannot apply systematic sector exclusions. However, for securities that are excluded due to the rules in the Thermal Coal Policy<sup>30</sup> applicable to Amundi's active investment universe, but that could be present in non-ESG passive funds, Amundi has strengthened its engagement and voting actions that could end-up with a vote against the discharge of the board or management, or the re-election of the Chairman and of some Directors.

## 1 Normative exclusions

### Amundi excludes the following issuers:

- Issuers involved in the production, sale, storage or services for and of anti-personnel mines and cluster bombs, prohibited by the Ottawa and Oslo treaties;
- Issuers involved in the production, sale or storage of chemical, biological and depleted uranium weapons;
- Issuers that violate, repeatedly and seriously, one or more of the ten principles of the UN Global Compact<sup>31</sup>, without credible corrective action.

By the end of 2022<sup>32</sup>, Amundi also excludes:

- Issuers involved in the production, sale, storage of nuclear weapons of States that are non-parties to the Treaty on the Non-Proliferation of Nuclear Weapons;
- Issuers that produce nuclear warheads and/or whole nuclear missiles; or that
- Issuers that derive over 5% of their total revenue from the production or sale of nuclear weapons.

26. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. For more detailed information on the scope of application of the exclusion policy, please refer to the Appendix at page 22.

27. Please refer to Exclusion Policy Scope of Application in the Appendix.

28. See Appendix for an exhaustive view of the scope of application of Amundi Exclusion Policy.

29. Following the acquisition of Lyxor, Amundi's Responsible Investment Policy has been progressively applied to the vast majority of Lyxor's ESG passive funds with the exception of a limited number of funds for which it will be effective as soon as possible and in all cases by June 2023 the latest.

30. See Thermal Coal Policy in earlier sections of this document.

31. United Nations Global Compact (UN Global Compact): "A call to companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals."

32. Policy to be implemented before 31 Dec. 2022.

## 2 Sector exclusions

### Thermal Coal Policy

Please refer to the Thermal Coal Policy in previous sections of this document and to Amundi's 2022 Voting Policy for detailed information on how this policy applies to our voting activities.

### Unconventional Fossil Fuel Exclusion Policy

By the end of 2022, Amundi also excludes companies whose activity is exposed to exploration and production of unconventional oil & gas extraction (covering "shale oil and gas" and "oil sands") by over 30%<sup>33</sup>.

### Tobacco Policy

Please refer to the Tobacco Policy in earlier sections of this document.

## 3 Sovereign issuers exclusions

Countries on the European Union (EU) sanction list with a sanction consisting of asset freezing, and a sanction index at the highest level (considering both United States and EU sanctions) are excluded, after formal review and validation from Amundi's Rating Committee.

# Engagement Policy

Stewardship activity is an integral part of Amundi's Global Responsible Investment strategy. 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 paramount to the sustainability of our society and our economy,
  - Support the investees in their own transition towards a more sustainable, inclusive and low carbon business model, and
  - Push investees to increase their level of investment in capex/R&D in highly needed areas for this transition.
- A voting policy emphasizing the need for corporates' governance and boards to grasp environmental and social risks and opportunities, and ensure that corporates are appropriately positioned and prepared to handle the transition towards a sustainable, inclusive and low carbon economy.

Engagement and voting will continue to play an even greater role going forward. In 2021, Amundi announced its new Ambition 2025 plan. As environmental and societal issues are considered in the dialogue with companies across all Amundi investment platforms (beyond the ESG Research, Engagement, and Voting team), our investment professionals jointly collaborate with our ESG analysts to achieve Amundi's engagement ambitions together.

Our voting activity is an integrated arm of our stewardship activities<sup>34</sup>. If insufficient improvements are made following an active engagement with a company, the voting team can decide to vote negatively on the company's resolutions. 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.

At Amundi, engagement is a continuous and purpose-driven process aimed at influencing the activities or behaviour of investee companies. It therefore must be result-driven, proactive and integrated into our global ESG process. The aim of engagement activities can fall into two categories:

- To engage an issuer to improve the way it integrates the environmental and social dimension in its processes and in the quality of its governance in order to limit its sustainability risks,
- To 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, even though the financial materiality to the issuer might not be clear or directly impacted.

Engagement differs from corporate access and traditional

33. Policy to be implemented before 31 Dec. 2022.

34. KBI, Amundi US or Joint venture voting policies are not under the remit of Amundi's supervision.

dialogue with a corporate as it has the aim of influencing the activities or behaviour of investee companies to improve ESG practices or its impact on key sustainability-linked topics. More specifically, engaging implies having a specific agenda and targets that focus on real-life outcomes in a specific timeframe.

#### Amundi engages with issuers around six main areas:

- Transition towards a low carbon economy;
- Natural capital preservation (ecosystem protection & fight against biodiversity loss);
- Social cohesion through the protection of direct & indirect employees, promotion of human rights;
- Client, product & societal responsibilities;
- Strong governance practices that strengthen sustainable development;
- Dialogue to foster a stronger voting exercise & a sounder corporate governance.

Amundi engages with investees or potential investees at the issuer level regardless of the type of holdings held. Issuers engaged are primarily chosen based on their level of exposure to the focus area of engagement. Amundi engagement spans across different continents and takes into account local realities. The aim is to have the same level of ambition globally but with gradual expectations across different geographies.

We wish our engagement activities to be impactful and additive to the global effort of the financial community. Companies' engagement timeline varies depending on the agenda, but the average engagement period is approximately 3 years. Amundi defines different milestones and engagement developments that are shared internally via our research platform, available to all investment platforms. Formal assessments are carried out, at minimum, on a yearly basis.

We also 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 but also all its stakeholders. We truly believe that dialogue is the cornerstone of a sound, strong development towards a sustainable and inclusive low carbon economy. Amundi also engages at the "security level" (for example Green, Social, Sustainable bonds), funds, European asset-backed securities (ABSs)... to promote better practices and transparency.

## 1

### Measuring and monitoring 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.

## 2

### 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.

# Product policies

## 1 Product policies

### a) ESG mainstream

Amundi’s ESG Mainstream investment process is applied by default to Amundi’s active open-ended funds<sup>35</sup>. For each fund, a benchmark representative of the investment universe is defined for that purpose (the ESG benchmark). Where applicable, the fund needs to have a better weighted average ESG score than its ESG benchmark. Many individual products, family of funds, etc. also have deeper ESG integration, through higher selectivity, rating or non-financial indicator upgrade, thematic selection, etc.

### b) Impact products

Amundi offers impact products. Impact refers to the positive social and/or environmental externalities expected from investments. Impact investments are investments made with the intention to generate positive, measurable, social and environmental impact alongside a financial return. Impact is measured in relation to specific impact goals that have been defined ex-ante and are based on the intentionality of investors or, where applicable, of the companies in which they invest. To qualify impact products, Amundi has developed an internal Impact

Fund Scorecard, assessing funds alongside the three critical dimensions of impact investing: Intentionality, Measurability, and Additionality. Funds must have a minimum score across all three dimensions and minimum requirements met in the Intentionality dimension to be categorized as Impact products.

### c) Net Zero Target products

Amundi recognizes that only scenario compatible with the objective to limit global warming to 1.5°C above pre-industrial temperatures, with no or low overshoot (i.e. with limited necessary capture of atmospheric carbon to bring the temperature back to below 1.5°C) is compatible with the objectives of the Paris Agreement. Amundi has decided to develop Net Zero Target products. In order to ensure these products are managed in a way that their carbon footprint follows a trajectory aligned with carbon neutrality by 2050, Amundi has set minimum standards for these solutions, including:

- Carbon footprint reduction targets at intermediary dates vs. representative investment universe in relevant base year,
- Minimum exposure to high climate impact sector to incentivize transition in these key sectors.

## 2 Responsible external managers selection and monitoring

In cases where Amundi sub-contracts the management of assets to external fund managers, as part of our routine investment due diligence, a specific due diligence is conducted to evaluate the ESG profile of external funds through a two-pronged approach.

In the first instance, we perform a qualitative evaluation based on the Responsible Investment policy of the organization (25%), its responsible investment approaches (best in class, ESG integration, impact, etc.), including their exclusion policy (25%) and finally on the fund/delegation itself (50%). As a second step, we calculate a quantitative ESG score using Amundi’s proprietary ESG methodology to verify what we have learned from the qualitative evaluation.

35. Refer to “Purpose and Scope” for out or partially out of scope affiliates and associated entities of the Amundi Group. For in scope entities, wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Please review a Fund’s offering documents for complete information on ESG integration.

Our qualitative and quantitative evaluation of a manager's approach to ESG are part of a broader due diligence process of the fund/mandate and the company (operational due diligence, quality of investment process, quality of teams, performances, etc.). When we delegate funds and portfolios to managers, we also send them a list of stocks to be excluded on a monthly basis.

When Amundi solely performs a fund hosting function, then the exclusion list does not necessarily apply.

## Reporting & transparency

1

### Responsible investment assets under management reporting

Usually referred to as Amundi Responsible Investment assets under management (RI AUM), this reporting refers to investment products incorporating responsible criteria into their investment process. The responsible criteria relate to specific Environmental, Social or Governance issues, Ethical or Sustainable themes<sup>36</sup>, or to a combination thereof. Depending on the investment thesis of the product, ESG characteristics could be assessed through a best-in-class approach (relative ESG rating / scoring approach in relation with issuers' peers), or in absolute terms (ESG KPI)<sup>37</sup>. The responsible characteristics can be incorporated through the exclusion of issuers or activities from an investable universe, the incorporation of ESG criteria in investment analysis and decisions to better manage risks and returns, or through the positive screening of best ESG issuers<sup>38</sup>.

The investment product may promote responsible characteristics as a key aspect of its investment process, or among other characteristics.

Ultimately, the responsible investment universe gathers investment solutions with various responsible approaches in order to address the broad range of investors' preferences, amongst which some of them could be labelled.

An investment product reported in the RI AUM scope is an investment product applying one of those multiple approaches, provided that:

1. it has a responsible investment objective, either as primary objective or combined with financial objectives

or

2. it includes responsible characteristics by integrating them into the investment decision / selection process

or

3. it includes responsible characteristics in order to exclude issuers from eligible investment universe

and

4. for products pertaining to the Amundi RI policy, the implemented responsible characteristics are not limited to the Amundi firm wide RI policy, as far as Exclusion, Engagement and Voting policies are concerned.

2

### Labels and transparency of information

#### Labels

Our offer is locally adapted for retail customers, distributors and other professional and non-professional investors. Among our responsible solutions, we offer a range of products that have received the following labels:

- SRI Label, Greenfin Label and Finansol Label in France,
- FNG in Germany,
- Towards Sustainability (ex-Febelfin) in Belgium,
- LuxFlag in Luxembourg,
- Austrian Eco-Label in Austria.

#### Transparency of information at fund level

Amundi ambitions to publish ESG reports on RI open-ended funds every month. These reports include a comparison of the portfolio's ESG rating with that of its benchmark index or investment universe, as well as comments on the portfolio's issuers' ESG performance.

36. For instance related to the Sustainable Development Goals developed by the UN Sustainable Development Goals (<https://sdgs.un.org/goals>).

37. Usually known as Best-in-class approach or Absolute approach.

38. Usually known as Negative screening, Inclusion, Positive screening.

Amundi also complies with the European Transparency code. This code is designed and approved by AFG, FIR and EUROSIF<sup>39</sup> and provides transparent and precise information on RI portfolio management from asset managers to clients.

Specific reportings are published on certain thematic funds from our climate and solidarity range to ensure accurate impact monitoring.

To reinforce its transparency towards investors, Amundi periodically sends comprehensive commented reports to its institutional clients.

At the same time, Amundi conducts responsible finance trainings for its employees, for the financial advisors of its partner distribution networks and at the request of its clients.

### Transparency of information at asset management company level

Amundi reports on its corporate responsible investment activities on a yearly basis through:

- A stewardship report
- A voting report complemented by online access to proxy voting records
- An engagement report
- A climate and sustainability report

# Advancing the asset management industry

## 1 Active participation in market bodies

Amundi actively participates in working groups led by market organisations aimed at developing responsible finance, sustainable development and corporate governance. Amundi is a member of (non-exhaustive list): the French Asset Management Association (AFG); EFAMA (European Fund and Asset Management Association); the French Institute of Administrators (IFA); the Observatory for Societal Responsibility (ORSE); the French Association of Financial Analysts (SFAF); the European Sustainable Investment Forums (SIF) in France, Spain, Italy, Sweden; the Canadian, Japanese and Australian SIFs; and the

## 3 EU regulatory information

Information related to the implementation in Amundi of REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability-related disclosures (“SFDR”) and Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (‘Taxonomy Regulation’) may be found in Amundi’s EU Sustainable Finance Regulations Statement available [here](#).

For information on how Amundi considers, monitors and reports on entity and/or product level requirements deriving from SFDR and the Taxonomy Regulation please refer to the Amundi’s EU Sustainable Finance Regulations Statement available [here](#).

For product-level sustainability-related disclosures please refer to the relevant Amundi website or prospectus.

French association Companies for the Environment. Amundi is also a member and director of Finansol.

In addition, Amundi supports the academic chair “Sustainable Finance and Responsible Investment”, created in 2007, sponsored by the AFG and led by Ecole Polytechnique and the Institut d’Economie Industrielle “IDEI” of Toulouse.

In July 2021, Amundi joined the Net Zero Asset Managers initiative, committing to achieve carbon neutrality by 2050 or sooner.

39. Forum pour l’Investissement Responsable (FIR), Association française de la gestion financière (AFG), Forum national européen de l’investissement durable (EUROSIF).

**Responsible Investment Initiatives**

- UN PRI - Principles For Responsible Investment
- UN GLOBAL COMPACT
- Finance for Tomorrow
- IFC Operating Principles for Impact Management
- WBA - World Benchmarking Alliance



**Environmental Initiatives**

- NZAM - Net Zero Asset Managers
- IIGCC - Institutional Investors Group on Climate Change
- AIGCC - Asia Investor Group on Climate Change
- CDP - Disclosure Insight Action
- Water Disclosure Project
- 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
- Tobacco-Free Finance Pledge
- CDP Science-Based Targets (SBTs) Campaign
- CDP Non-Disclosure Campaign (NDC)
- Finance for Biodiversity Pledge
- PPCA - Powering Past Coal Alliance



**Social Initiatives**

- Access to Medicine Index
- Access to Nutrition Index
- ICMA - Social Bonds Principles
- PRI Human Rights Engagement
- WDI - Workforce Disclosure Initiative
- FAIR - Financier Accompagner Impacter Rassembler
- PLWF - The Platform Living Wage Financials
- Investors for a Just Transition
- Investor Action on Antimicrobial Resistance
- The 30% Club France Investor Group



**Governance Initiatives**

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



**2 A think tank: the Medici Committee**

Amundi supports the development and organisation of this think tank dedicated to the responsibility of economic and financial actors.

The Medici Committee discusses the principles, techniques and impacts of responsible investment.

The Committee examines major social responsibility challenges that international and local businesses face which arise from economical, technological and political

transformations. It searches for the best ways to address them. It has a dual purpose:

- Accompanying Amundi in the definition of its investment policy;
- And more broadly, contributing to societal debate, enabling Amundi to regularly review what are the best ways to meet its objective to act as corporate sustainability leader.

# Appendix

## Exclusion Policy Scope of Application<sup>40</sup>

**TABLE 1: Exclusion Policy scope of application by asset class<sup>41</sup>**

		Anti-personnel mines and cluster bombs (Ottawa and Oslo treaties)	Chemical, biological and depleted uranium weapons	Global Compact's principles	Tobacco	Thermal Coal
ACTIVE FUNDS	Open-ended funds	Applied				
PASSIVE FUNDS	Non-ESG ETFs and index funds <sup>42</sup>	Applied			Not applied	
	ESG ETFs and index funds <sup>43</sup>	Applied				
FORMULA FUNDS	New funds (Since October 2021)	Applied				
	Former funds	Applied			Not applied	
MULTI MANAGEMENT	Funds of funds ("wrappers"), external funds	<i>See section External Funds' selection</i>				
FUND HOSTING	Amundi-controlled Funds	Applied				
	Other investment funds	Not applied				
SUB-ADVISORY	Fund Channel funds	Applied				

**TABLE 2: Exclusion Policy scope of application by instrument**

	Anti-personnel mines and cluster bombs (Ottawa and Oslo treaties)	Chemical, biological and depleted uranium weapons	Global Compact's principles	Tobacco	Thermal Coal
EQUITIES	Applied				
SECURITIES HELD DIRECTLY	Applied				
SINGLE NAME DERIVATIVES	Applied				
INDEX DERIVATIVES	Not applied				
SECURITIES RECEIVED AS COLLATERAL <sup>44</sup>	Applied				
CONVERTIBLES	Applied				
CASH INSTRUMENTS	Applied				

40. Refer to "Purpose and Scope" for out or partially out of scope affiliates and associated entities of the Amundi Group. Please review a Fund's offering documents for complete information on ESG integration.

41. For any new mandate or dedicated fund, Amundi's exclusion policy shall be implemented in accordance with our pre-contractual documentation, unless otherwise requested by a client.

42. For non-ESG passive funds: The fiduciary duty in passive management is to replicate as closely as possible an index. The portfolio manager has thus limited leeway and has to meet the contractual objectives to get passive exposure fully in line with requested benchmark. Amundi index funds/ETFs replicating standard (non- ESG) benchmarks cannot apply systematic sector exclusions.

43. Following the acquisition of Lyxor, Amundi's Responsible Investment Policy has been progressively applied to the vast majority of Lyxor's ESG passive funds with the exception of a limited number of funds for which it will be effective as soon as possible and in all cases by June 2023 the latest.

44. This includes securities received in the context of securities lending transactions or over-the counter (OTC) transactions, as well as repurchase agreements in exchange for cash placed on the other hand. Securities received that rated G by Amundi are sent back to the counterparty (ex post).

# Appendix

## A long-standing player in ESG integration

**In 2010**, Amundi chose commitment to social responsibility as one of its four founding pillars, meaning that we take increasingly into account sustainable development and socially responsible criteria as well as financial criteria in our investment policies.

**In 2011**, Amundi incorporated its subsidiary IDEAM in its Institutional Investments division in order to streamline its organisation and better serve its growth ambitions in the field of socially responsible investment (SRI).

**In 2013**, Amundi was the first asset management company to obtain Afnor certification for its SRI approach. This certification, delivered by a recognised independent organisation, proves our commitment to our clients (governance method, guaranteed expertise, data traceability, information, responsiveness, etc.) while ensuring that our operations are controlled by an internal steering process.

**In 2014**, Amundi published its first Engagement Report.

**In 2015**, Amundi ranked first in the SRI & Sustainability study published by WeConvene Extel and the UKSIF (UK Sustainable Investment and Finance Association), in the category Asset Management best firms for SRI/ESG.

In the same year, Amundi was very active in financing the energy and environment transition beyond its participation in the main Green Bonds Initiative and its signature of the Paris Green Bonds Statement.

**In 2016**, Amundi became the first asset management company to obtain the SRI label created by the Ministry of Finance and Public Accounts for its four presented funds. This SRI label aims to provide better visibility of SRI fund offerings to investors, particularly individual customers who are showing a growing interest in SRI.

In the same year, Amundi was once again ranked N°1 in SRI & Sustainability study published by Extel and UKSIF in the category Asset Management best firms for SRI/ESG.

**In 2017**, the PRI awarded Amundi an A+ score for the 3<sup>rd</sup> consecutive year. This score reflects the quality of Amundi's ESG analysis and its ability to integrate ESG criteria into its various investment strategies.

Amundi launched the largest green bond fund dedicated to emerging markets (\$2 billion) in partnership with the International Finance Corporation (IFC), to accelerate the development of the green bond market in emerging markets development economies.

**In 2018**, Amundi expanded its commitment to responsible investment and announced, in October, a three-year action plan with the ambition of integrating ESG into 100% of its open-ended funds and in all its voting practices. Amundi also aimed to develop its advisory services and to strengthen specific environmental, social and solidarity initiatives.

In December, Amundi Energy Transition (AET), a subsidiary of Amundi (60%) and EDF (40%) and Dalkia (EDF group) signed a partnership agreement to finance energy transition projects.

Amundi expanded its range of responsible solutions with the launch of new innovative products through its subsidiary CPR AM and via its range of ETFs dedicated to responsible investment.

**In 2019**, Amundi continued to implement its active policy by developing responsible investment, illustrated by innovations such as the launch of a new climate bond fund to finance infrastructure in emerging countries, in partnership with the Asian Infrastructure Investment Bank (AIIB), and the launch of the Green Credit Continuum programme with the European Investment Bank (EIB) aimed at promoting the development of the green debt market in Europe, particularly by financing SMEs.

This engagement was also reflected in Amundi's participation in the One Planet Sovereign Wealth Fund Asset Manager initiative, designed to support sovereign wealth funds in integrating climate change into the management of their investments; and participation in the TCFD Consortium initiative in Japan under the aegis of the Japanese Ministries of the Economy and the Environment, designed to improve the information provided to issuers on environmental issues.

**In 2020**, after having supported the expansion of green bonds in emerging markets, Amundi also committed to support the development of Social Bonds and launched in December its first Social Bond Strategy. Additionally, Amundi announced the launch of the Objectif Climat Actions strategy, replicating the "Euro iSTOXX Ambition Climate PAB" index. In parallel, our ETF department expanded its Responsible Investing ETF range, proposing a comprehensive set of equity and fixed income ESG and Climate ETFs, spanning across key investors' geographies and proposing different levels of sustainability integration.

**In 2021**, Amundi joined the Net Zero Asset Managers Initiative, committing to achieve carbon neutrality by 2050 or sooner, and announced its Ambition 2025 plan, outlining 10 key measures to accelerate Amundi's transformation.

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