

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 private Transparency Reports, which are produced using signatories' reported information, support signatories to have internal discussions about their practices. Signatories can also choose to make these available to clients, beneficiaries, and other stakeholders.

This private Transparency Report is an export of your responses to the PRI Reporting Framework during the 2023 reporting period. It includes all responses (public and private) to core and plus indicators.

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

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

Disclaimers

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 2023 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 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. 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.

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 addition, Amundi took several engagements at entity level. The most recent are the following:

- In October 2018, we announced a three-year action plan with the ambition of integrating ESG into all our open-ended actively managed funds and all our voting practices. This plan was achieved in 2021.
- Today Amundi integrates ESG in 100% of its open-ended actively managed funds and voting practices, and has increased the scope of its ESG analysis to over 18,000 issuers (from 3,000 issuers in 2018).
- 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 related to our investments and saving solutions, to our engagement with companies, and to our actions as a corporate. Amongst these objectives, we announced we will engage with 1000 additional companies on their climate strategy. We also aim at increasing our allocation towards impact funds, reaching €20 billion. We will also introduce a new energy transition rating that assesses companies' efforts in decarbonizing their operations and developing sustainable activities, covering €400 billion of actively managed funds.

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

Amundi is deeply committed to the fight against climate change, and in particular to ensure that the transition to a low carbon economy is socially acceptable. 2022 has once again demonstrated why tackling climate change and biodiversity loss while limiting its social impact is key for our economy. Despite commitments made by governments and companies, our economy is still not aligned with a global warming scenario limited to 1.5°C by 2050. Successfully decarbonising our economy requires a real industrial revolution that can only be achieved if the key players – governments, businesses and the wider financial system – are aligned.

Governments must redefine public, industrial and fiscal policies and coherent regulations, while businesses must develop the necessary

technological solutions, and the financial system must support companies by allocating the capital required to achieve these objectives.

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.



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 2022, 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 18,000 issuers rated with an ESG score.
- From 2022, Amundi's sector policy has expanded to exclude companies that generate over 30% of their activity from unconventional hydrocarbons (oil sand, shale oil and gas).

The scope of this policy is defined in Amundi's Responsible Investment Policy.

- We engaged with 1104 companies on the transition to a low-carbon economy in 2022, compared to 547 companies in 2021. Moreover, in 2022 Amundi supported 87% of climate-related shareholder resolutions presented at General Meetings in which it participated.
- Amundi's climate strategy (Say on Climate) was presented to shareholders at the Annual General Meeting on May 18th 2022. The resolution was approved by 97,72% shareholders.
- From 2022, ESG objectives (weighting 20%) were incorporated in the KPI calculation of performance shares for our 200 senior executives, and all portfolio managers and sales representatives.
- In 2022, Amundi has joined the European Commission's High-Level Expert Group on Scaling up Sustainable Finance in Low and Middle-income countries, as well as the United Nations' Global Investors for Sustainable Development Alliance, among other initiatives.
- In 2022, Amundi has won numerous awards, amongst which 'Investor of the Year (asset manager)' at Environmental Finance Bond Awards, 'ESG ETF Issuer of the Year' at ETF Stream Awards, and 'ESG/SRI investor of the Year' at GlobalCapital European Securitization Awards.

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 when an ESG methodology is applicable. In order to encourage companies to make this transformation, portfolios will overweight the companies that have made the most efforts in their environmental transition.

2. Offer open funds in the main asset classes (real estate, multi-asset, developed market bonds, developed market equities) with a Net Zero 2050 investment objective.

3

Reach €20bn of assets under management in impact funds. These funds will invest in companies that pursue positive environmental or social performance. The impact will be measured and reported annually.

- 4. Ensure that 40% of our ETF range is made up of ESG funds.
- 5. Develop Amundi Technology's ALTO* Sustainability offer, a technology analysis solution designed to support investors in decision-making regarding the environmental and social impact of their portfolio.
- B) Amplify our outreach to companies

6.

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.

- 7. From 2022, exclude from our portfolios companies that generate over 30% of their activity from unconventional hydrocarbons (oil sands, shale oil and gas).
- C) Set internal alignment goals that match the commitment

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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. We will also set ESG targets for all portfolio managers and sales representatives.

- 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 resolution) at the Annual General Meeting in 2022, and present a progress report the Annual General Meeting every year after that.

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
00 1	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	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 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?

(A) Yes

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
- o o
- 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	OO 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

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 2,031,800,000,000.00

US\$ 2,031,800,000,000.00

US\$ 0.000

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

Additional information on the exchange rate used: (Voluntary)

1.0671

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5	CORE	OO 3	Multiple indicators	PRIVATE	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
(A) Listed equity	24.3%	0.4%
(B) Fixed income	41%	0.7%
(C) Private equity	0.7%	0.1%
(D) Real estate	2.4%	0%
(E) Infrastructure	0.1%	0%



(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	29.5%	0.8%
(J) Off-balance sheet	0%	0%

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

Multi asset, monetary, structured, and other alternative assets.

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

Multi asset, monetary, structured, and other alternative assets.

ASSET BREAKDOWN: EXTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple	PRIVATE	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	96%	52%	46%	1%	1%
(B) Passive	4%	0%	0%		



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2	CORE	00 5, 00 5.1	SAM 3, SAM 8	PRIVATE	Asset breakdown: Externally managed assets	GENERAL

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

	(1) Segregated mandate(s)	(2) Pooled fund(s) or pooled investment(s)
(A) Listed equity - active	36%	64%
(B) Listed equity - passive	26%	74%
(C) Fixed income - active	84%	16%
(E) Private equity	17%	83%

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 LE	CORE	OO 5	Multiple	PRIVATE	Asset breakdown: Internally managed listed equity	GENERAL

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

(A) Passive equity	13.98%
(B) Active – quantitative	0.1%
(C) Active – fundamental	74.35%
(D) Other strategies	11.57%

(D) Other strategies - Specify:



ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of inc	dicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 FI	CORE		OO 5	Multiple	PRIVATE	Asset breakdown: Internally managed fixed income	GENERAL
Provide a f	Provide a further breakdown of your internally managed fixed income AUM.						
(A) Passi	ive – SSA	4%					
(B) Passi	ive – corporate	2%					
(C) Active	e – SSA	41%					
(D) Active	e – corporate	50%					
(E) Secu	ritised	2%					
(F) Privat	te debt	1%					

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	PRIVATE	Asset breakdown: Internally managed private equity	GENERAL		
Provide a furthe	Provide a further breakdown of your internally managed private equity AUM.							
(A) Venture ca	apital	0%						
(B) Growth ca	pital	30%						
(C) (Leverage	d) buy-out	70%						



(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	OO 5	N/A	PRIVATE	Asset breakdown: Internally managed real estate	GENERAL

Provide a further breakdown of your internally managed real estate AUM.

(A) Retail	17%
(B) Office	59.7%
(C) Industrial	0.9%
(D) Residential	3.1%
(E) Hotel	3.4%
(F) Lodging, leisure and recreation	0%
(G) Education	0%
(H) Technology or science	0%
(I) Healthcare	4.9%
(J) Mixed use	0%
(K) Other	11%

(K) Other - Specify:



ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 5.3 INF	CORE	OO 5	N/A	PRIVATE	Asset breakdown: Internally managed infrastructure	GENERAL
Provide a furth	er breakdown of your	internally manage	d infrastructure	e AUM.		
(A) Data infra	astructure	0%				
(B) Diversified	d	0%				
(C) Energy a	nd water resources	0%				
(D) Environm	ental services	0%				
(E) Network ι	utilities	0%				
(F) Power ge renewables)	neration (excl.	100%				
(G) Renewab	le power	0%				
(H) Social infi	rastructure	0%				
(I) Transport		0%				
(J) Other		0%				



MANAGEMENT BY PRI SIGNATORIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 6	CORE	OO 5	N/A	PRIVATE	Management by PRI signatories	GENERAL

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

98%

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%



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
(A) Yes, through internal staff	Ø	Ø	Ø	Ø
(B) Yes, through service providers				
(C) Yes, through external managers				
(D) We do not conduct stewardship	0	0	0	0
	(5) Private equity	(6) Real estate	(7) Infrastructure	(11) Other
(A) Yes, through internal staff	Ø	V	Ø	Ø
(B) Yes, through service providers				



(C) Yes, through external managers				
(D) We do not conduct stewardship	0	0	0	0

STEWARDSHIP: (PROXY) VOTING

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
(A) Yes, through internal staff	☑	☑
(B) Yes, through service providers		
(C) Yes, through external managers		
(D) We do not conduct (proxy) voting	0	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 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%

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 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
(D) Listed equity - other strategies	•	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: Multi asset, monetary, structured, and other alternative assets.		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 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
(K) Other: Multi asset, monetary, structured, and other alternative assets.	0	•
assets.		



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 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
(K) Other: Multi asset, monetary, structured, and other alternative assets.	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 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	•	0
(C) Fixed income - active	•	•
(E) Private equity	•	0
(K) Other: Multi asset, monetary, structured, and other alternative assets.	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.

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	PRIVATE	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	10%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	45%
(E) Thematic and integration	0%
(F) Screening and thematic	5%
(G) All three approaches combined	0%



(H) None 40%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 LE	CORE	00 17 LE	LE 9	PRIVATE	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

	approach to approa
(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	100%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PRIVATE	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	10%	10%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	0%	0%	0%



(D) Screening and integration	55%	55%	99%
(E) Thematic and integration	0%	0%	1%
(F) Screening and thematic	0%	0%	0%
(G) All three approaches combined	0%	0%	0%
(H) None	35%	35%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 17.1 FI	CORE	00 17 FI	N/A	PRIVATE	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	100%	100%	100%



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	PRIVATE	Labelling and marketing	1

Do you explicitly market any of your 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:

45%

- o (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	PRIVATE	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:

15%

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?

\Box (A)	Commodity	/ tvne	lahel	(e a	BCI)	١
-	-	Communication	Lypu	iabci	C.y.	DC1)	1

☑ (B) GRESB

☑ (C) Austrian Ecolabel (UZ49)

☐ (D) B Corporation

☐ (E) BREEAM

☐ (F) CBI Climate Bonds Standard

☐ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie

☐ (H) DDV-Nachhaltigkeitskodex-ESG-Impact



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

Nummus Ethics

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	PRIVATE	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?

Percentage of AUM that utilise an ESG index or benchmark

(A) Listed equity - passive	40%
(B) Fixed income - passive	30%



THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	00 17 FI	FI 15, FI 17	PRIVATE	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	72.9%
(B) Social bonds	14.85%
(C) Sustainability bonds	12.23%
(D) Sustainability-linked bonds	0.02%
(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.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	•	0	0
Confidence Building Measures	•	0	0
(A) Listed equity – passive	•	0	0
(B) Listed equity – active – quantitative	•	0	0
(C) Listed equity – active – fundamental	•	0	0
(D) Listed equity – other strategies	•	0	0
(E) Fixed income – SSA	•	0	0
(F) Fixed income – corporate	•	0	0
(G) Fixed income – securitised	•	0	0
(H) Fixed income – private debt	•	0	0
(I) Private equity	•	0	0



(J) Real estate		0	0
(K) Infrastructure	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	o		0
(V) External manager selection, appointment and monitoring (SAM) – fixed income - active	•	O	0
(X) External manager selection, appointment and monitoring (SAM) – private equity	0	•	0

OTHER ASSET BREAKDOWNS

PRIVATE EQUITY: SECTORS

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

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

- ☐ (A) Energy
- ☑ (B) Materials
- ☑ (C) Industrials
- $\ \square$ (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	OO 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%
- o (3) >50 to 75%
- **(4)** >75%
- \square (B) A significant minority stake (between 10–50%)
- \square (C) A limited minority stake (less than 10%)

REAL ESTATE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	00 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
- \Box (D) Tenant(s) with operational control



INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 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?

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

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
- \square (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	OO 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	OO 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
- \square (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	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

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

- o (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
- $\ \square$ (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, Internal reporting and verification 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:



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/2993c4c9-e658-437d-8a6b-5d731d5d396b

☑ (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

(L) Stewardship: Guidelines on engagement with investees Add link:

https://about.amundi.com/files/nuxeo/dl/5994803c-6af1-4d7e-89e0-f1134f6374a7

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

https://about.amundi.com/files/nuxeo/dl/2993c4c9-e658-437d-8a6b-5d731d5d396b

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

https://about.amundi.com/files/nuxeo/dl/2993c4c9-e658-437d-8a6b-5d731d5d396b

(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 2022 Global Responsible Investment Policy. Examples include:

- Page 4: 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.
- Page 6: 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.

- Page 12: 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 15: As part of its fiduciary responsibility, Amundi applies a targeted exclusion policy across its portfolios. 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.

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%
 - (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)



☑ (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%
 - (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%
 - o (8) >70% to 80%
 - o (9) >80% to 90%
 - \circ (10) >90% to <100%
 - **(11) 100%**
- \square (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)



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

(B) Senior executive-level staff, or equivalent Specify:

The Responsible Investment Supervisor, reporting directly to Amundi CEO, is also a member of the General Management Committee

☑ (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

(2) Senior executive-level staff, investment committee, head of department, or equivalent

(A) Overall approach to responsible investment	☑	Ø
(B) Guidelines on environmental, social and/or governance factors		Ø
(C) Guidelines on sustainability outcomes		Ø
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	☑	Ø
(E) Specific guidelines on human rights (may be part of guidelines on social factors)		Z
(F) Specific guidelines on other systematic sustainability issues		Ø
(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		Z
(J) Stewardship: Guidelines on engagement with investees		Ø
(K) Stewardship: Guidelines on overall political engagement		Ø
(L) Stewardship: Guidelines on engagement with other key stakeholders		Z



(M) Stewardship: Guidelines on (proxy) voting		
(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?



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 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: AMF (Association des Marchés Financiers), Paris Europlace, 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
- meetings with decision makers; Our activities and meetings are disclosed (when applicable) on public registers (e:g: European Commission transparency register, HATVP).
- 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?

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

Explain why: (Voluntary)



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

- (1) 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)

The implementation of the climate strategy can only be achieved by raising awareness among all Amundi's stakeholders and by aligning the employee compensation policy with Amundi's ESG and climate strategy.

Thus, the integration of ESG and climate criteria into the remuneration policy is done in two stages:

- As of 2022, the performance evaluation and remuneration of the Chief Executive Officer takes into account ESG and CSR objectives up to 20%. In addition, the implementation of the ESG Ambitions 2025 plan will account for 20% of the criteria supporting the performance share plan for Amundi's 200 senior managers;
- From 2022 onwards, Amundi will progressively integrate ESG objectives into the performance evaluation of sales representatives and portfolio managers, so that the determination of their variable remuneration includes this dimension.
- 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	Ø	
(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

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

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:

Art. 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://about.amundi.com/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/2993c4c9-e658-437d-8a6b-5d731d5d396b 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?

☑ (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
- 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
- o (F) Not applicable; we do not have a strategic asset allocation process

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
(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.	0	0	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 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.

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 the level of exposure to the engagement subject (often known as engagement triggers).

The environmental, social, and governance issues that companies face could have a major impact on them. Thus, we consider that we need to assess the ESG quality of an issuer regardless of our position in the balance sheet (as a shareholder or a bondholder). If ESG issues have financial consequences for businesses, those issues will be considered by our investment professionals (equity or credit analysts, fund managers) in their valuation models and investment processes.

Subsequently, we engage on ESG issues at issuer level. Investment professionals at Amundi may also engage with issuers on ESG subjects that have financial materiality for the value of the instrument they are invested in, in addition to their holistic ESG-related active dialogues with issuers. Amundi engages also at instrument level (for example for Green, Social, Sustainable bonds (GSS bonds) to promote better practices and transparency.

Amundi engagement spans across different continents and takes into account local realities. The aim is to have the same level of ambition globally but adapt questions and intermediate milestones across the different geographies.

We also wish our engagement activities to be impactful and additive to the global effort of the financial community.

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.

While the area of engagements or the themes considered are the same, there are two different triggers for our engagements: thematic trigger and contextual trigger.

- Thematic Trigger: Engagement is triggered by specific key sustainability topics such as the energy transition, social cohesion, natural capital preservation, social responsibility and governance's accountability.

Based on the theme, companies are selected according to how material or salient the theme is to the company's business model and the company's exposure to relevant risks/opportunities

- Contextual Trigger: Engagement is triggered by specific contexts, situations of an issuer that lead Amundi to seek improvements and/or remediation. It is a contextual engagement that is triggered by a bottom-up, issuer related, approach.



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, which could favour a collaborative method.

Amundi might 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 a mean to have a positive impact on sustainable outcomes, and will only be active in a collaborative engagement when it is in line with its own policy.

Amundi is an active participant in working groups conducted by market bodies aimed at moving responsible finance, sustainable development and corporate governance forward. Specifically, Amundi is a member of (non-exhaustive list): AFG, EFAMA, IFA, ORSE, SFAF, EUROSIF and the French, Spanish and Swiss Sustainable Investment Forums.



Amundi is also a member and director of FAIR (formerly Finansol), and a member of the French association "Entreprises pour l'Environnement".

More generally, Amundi has contributed to the regulatory work carried out by the AFG, France Invest, ASPIM and AMAFI and Paris Europlace for France, as well as that of the EFAMA in Brussels and the ICMA in London. Amundi's subsidiaries in Europe also belong to the professional associations of their respective countries. Furthermore, Amundi has made a direct contribution to European and French regulatory work.

Amundi is a member or signatory of numerous international initiatives aimed at addressing environmental, social and good governance issues.

The main aim of these investor coalitions is to urge governments to adopt incentives and encourage companies to improve their ESG practices. These initiatives contribute in particular to the development of tools and methodologies that facilitate the integration of ESG issues within corporate governance and asset management.

Amundi contributes to this collaborative commitment by providing expertise on responsible investment and, where applicable, logistical support. These initiatives also give Amundi employees the opportunity to broaden their knowledge of existing ESG matters and to acquire new knowledge on emerging ESG issues.

List of collaborative stewardship initiatives that Amundi is part of:

RESPONSIBLE INVESTMENT

- UN Global Compact
- PRI Principles for Responsible Investment
- Institut de la Finance Durable (formerly Finance for Tomorrow)
- IFC Operating Principles for Impact Management
- WBA World Benchmarking Alliance
- GISD Global Investors for Sustainable Development Alliance
- · European Commission High-Level Expert Group on Scaling up Sustainable Finance in Low and Middle-income countries

ENVIRONMENT

- IIGCC Institutional Investors Group on Climate Change
- CDP Disclosure Insight Action
- Water Disclosure Project
- CBI Climate Bonds Initiative
- Climate Action 100+
- ICMA Green Bonds Principles
- TCFD Task Force on Climate-related Financial Disclosures
- CDP Non-Disclosure Campaign
- Initiative Climat International (iCi) Private Equity Action on Climate Change
- One Planet Sovereign Wealth Fund Asset Manager Initiative
- The Japan TCFD Consortium
- CDP Science-Based Targets (SBTs) Campaign
- AIGCC Asia Investor Group On Climate Change
- PPCA Powering Past Coal Alliance
- FAIRR Farm Animal Investment Risk & Return
- · Finance for Biodiversity Pledge
- NZAM Net Zero Asset Managers

SOCIAL

- Access to Medicine Index
- FAIR Financer Accompagner Impacter Rassembler
- Access to Nutrition Index



- PRI Human Rights Engagement
- ICMA Social Bond Principles
- WDI Workforce Disclosure Initiative
- PLWF Platform for Living Wage Financials
- · Investor Action on AMR initiative (lead by both the FAIRR Initiative and Access to Medicine Foundation)
- The 30% Club France Investor Group
- Tobacco-Free Finance Pledge
- Coalition Finance for Tomorrow's "Investors for a Just Transition"

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:



☑ (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:

a 3

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

Select from the list:

2

 $\circ\hspace{0.2cm}$ (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?

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.

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 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\propto 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 ESG Ambitions 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. Apart from issuer-level engagement, we do engage on specific asset classes, such as green bonds, social bonds, sustainability bonds. Engagements are performed by either the ESG analysts, the corporate governance analysts, the financial analysts (both equity and credit) as well as fund managers. The latters can therefore focus their engagement efforts on specific sustainability characteristics or objectives depending of the objective of the fund.

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
- o (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
- \square (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
- \circ (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	00 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	(3) for a minority 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	٥	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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	00 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	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 (A) Joining or broadening an **√** existing collaborative engagement or creating a new one (B) Filing, co-filing, and/or submitting a shareholder resolution \checkmark or proposal (C) Publicly engaging the entity, $\sqrt{}$ e.g. signing an open letter (D) Voting against the re-election \checkmark of one or more board directors (E) Voting against the chair of the \checkmark board of directors, or equivalent, e.g. lead independent director \checkmark (F) Divesting (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

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	OO 8, OO 5.3 FI	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your internally managed 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 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 Real Assets 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 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 engage lead or 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 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 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:

Amundi has joined the High-Level Expert Group (HLEG) on scaling up sustainable finance in low- and middle-income countries set by the European Commission in 2022. Links:

https://international-partnerships.ec.europa.eu/scaling-sustainable-finance-low-and-middle-income-countries-high-level-expert-group_en#group-members

https://ec.europa.eu/commission/presscorner/detail/en/IP_22_5724

(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 Commission transparency registers where Commissioners, members of the Cabinet or Director General disclose meetings with Amundi: https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?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: 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://www.esma.europa.eu/press-news/consultations https://ec.europa.eu/info/law/better-regulation/have-your-say https://theinvestoragenda.org/wp-content/uploads/2022/08/2022-Global-Investor-Statement-.pdf

(B) We publicly disclosed details of our engagements with policy makers Add link(s):

https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=94607479886-02 https://www.hatvp.fr/fiche-organisation/?organisation=437574452##

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

☐ (8) Farmland

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.

a	t contributed to desired changes in the investees, policy makers of other entities with which you interacted.
	(A) Example 1: Title of stewardship activity:
	Engagement with J-Power, one of the largest electricity utility companies in Japan
	(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
	☑ (1) Environmental factors
	\square (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

 \Box (9) Other (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

J-Power is one of the largest electricity utility companies in Japan and has extensive power business operations including coal power generation in domestic and foreign markets. Amundi had longstanding concerns with J-Power's climate strategy, continued development of thermal coal generation, lack of ambitious commitment related to green investments, and the overall ESG transparency, particularly given the high emissions from J-Power's coal-fired power generation and the over-reliance on the relatively high cost and nascent advanced coal technologies such as ammonia co-firing and carbon capture and storage (CCS) that currently plays a critical part of J-Power's decarbonization strategy under its "Blue Mission 2050" plan that was announced in early 2021.

J-Power is one of the focused companies selected under Asia Investor Group on Climate Change (AIGCC)'s Asian Utilities Engagement Program, and Amundi is the lead investor engaging with J-Power since 2021.



As the lead investor of AIGCC's engagement program, we have actively engaged with J-Power and its relevant teams on a number of occasions.

The key objectives of our engagement includes:

- Paris Agreement Alignment: take action to reduce greenhouse gas emissions in a way that is aligned with the Paris
 Agreement. Companies should have clear de-carbonisation strategies with short-, medium-, and long-term action plans including a
 timetable to phase out coal-based emissions by 2030 in advanced economy (OECD & EU) and by 2040 in the rest of the word.
 The IEA different scenario specifies that unabated coal power is phased out in advanced economies by 2030 and at the latest by
 2040 in all other regions. Generation using natural gas without carbon capture starts falling by 2030 and is 90 per cent lower by
 2040 compared with 2020.
- Renewable energy ambition and priority: prioritize renewable energy and set more ambitious commitments on green investments and less reliance on nascent technologies.
- Transparency: Provide enhanced corporate disclosure in line with the final recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

Outline physical risks to the company and relevant adaptation strategies to mitigate these risks. Implement a strong governance framework that clearly articulates the board's accountability and oversight of climate change risks and opportunities.

Paris Agreement Alignment

Following our engagement to push for more granular with short and medium term targets towards carbon neutrality target by 2050, J-Power updated in 2022 a short-term target to reduce GHG by 7 million tCO2e from domestic power generation business by 2025 and by 40% (19 million tons) by 2030, as compared to 2017-2019 three-year average.

However, these targets are still not fully Paris Agreement aligned with no commitment on overall coal exit and emission reductions (not cover overseas operations), and shown resistance to adopt SBTi commitments or validation.

Renewable energy ambition and priority

We have asked extensively for J-Power to focus and set more ambitious targets on established renewable technologies and green investments, and in return in 2022's integrated report, they shows some progress and commits to a total of JPY 300 billion investment towards renewable developments to bring renewable power generation capacity to at least 1.5 GW by 2025, increased from previous 1 GW under the Blue Mission 2050 plan. Nevertheless, they continue to rely heavily on advanced coal technologies, which are at risk of stranding.

We remain cautious and recommend J-Power to prioritize renewable energy such as offshore wind and other established green technologies over nascent coal technologies.

Transparency

Through our engagement with J-Power to improve transparency in these areas, they have disclosed in 2022's integrated report to include internal carbon pricing assumptions used under various climate scenarios, measures of physical risk with estimated negative impact in profit and asset exposure impacts. We continue to engage enhancement on disclosure related to physical risk mitigation and resilience, and how performance metrics take into account climate-related considerations such as links to remuneration policies.

Shareholder proposals at AGM

The three shareholder proposals received between 18% and 26% support, rather exceptional level for climate proposals in Japan. This significant support should push J-Power to more actively engage with and listen to its investor base. The group of co-filers has written to the Board to continue engaging with the company.

(B) Example 2:

Title of stewardship activity:

Engagement with Banco de Credito e Inversiones (BCI), one of the leading banks in Latin America with an international presence

(1) Led by

- 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
☑ (1) Environmental factors
☐ (2) Social factors
☐ (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
\square (8) Farmland
☐ (9) Other
(1) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution

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

To support Chile's national sustainability agenda and its transition to a low-carbon economy, BCI has developed a climate strategy to promote sustainable finance and solutions, and was one of the first banks in Chile to join the Task Force on Climate-Related Financial Disclosures (TCFD).

Amundi has played an instrumental role in facilitating the development of green bond capital market for new issuers from emerging markets, and BCI is one example.

Since 2021, Amundi has been engaging with BCI in support of its debut green bond issuance via private placement with the commitments to adopt green bond practices.

Therefore, Amundi initiated the engagement to share and exchange with BCI on certain market standards and investor expectations for green bond issuance across several key scopes: a) the way Amundi assesses green bonds on how the funding rationale supports its overall ESG strategy, b) compliance of industry standards such as ICMA Green Bond Principles for its Sustainability Financing Framework, c) clear definition and selection for eligible projects, and d) recommendations of allocation and impact reporting guidelines. From Amundi's perspective as a green bond investor, alignment of its framework to industry standards such as ICMA's Green Bond Principles is a must, but we also review project level details, funding rationale, green asset size and investment plans, as well as the transparency and reporting details of the allocated projects on an ongoing basis. We do this to gauge how the potential green bond issuance should help to contribute to the overall sustainability strategy.

While we understood the difficulties of accessing the green bond market as a new entrant, we took a proactive stance in communicating with BCI on specific market practices of green bond issuance from compliance of ICMA Principles, shared our feedback on project selections, and actively recommended to BCI on the areas of improvements including Harmonized Framework for Impact Reporting for them to work on way before the impact report is released. The first allocation and impact report was released in 2022 to investors. For example, we advised greater transparency with disclosure of specific case studies and impact level data such as carbon emission avoided per annum on the green projects in scope. We brought to their attention the recommendations under Harmonized Framework for Impact Reporting followed by green bond issuers as best practice. Upon review of selected green projects, we also encouraged BCI to supplement relevant policies and guidelines surrounding biodiversity for disclosure purpose.

Key Objectives for our engagement were as follows:

- · Facilitate emerging market green bond issuance by assisting an inaugural name to access the market
- Adopt market standards for green bond issuance, including compliance with ICMA Principles, the release of its Sustainability
 Finance Framework, and impact reporting
- Promote best practices and improve transparency on the level of details on green projects, including display of case study and reference to Harmonized Framework for Impact Reporting

In 2022, we observed key developments at the company including:

- We assisted to review their selected projects and following our recommendations and exchanges, BCI released the first allocation and impact report in 2022 to investors.



- BCI's impact report presented 3 case studies of green projects with basic details in the allocation and impact report. Certain environmental impact data and metrics are described but greater alignment with Harmonized Framework for Impact Reporting is still desired, including reporting of additional metrics such as carbon emission avoided per annum
- BCI has successfully accessed green bond market with its 3 green bond issuances and became the first public issuer from Chile in 2022.
- Amundi has facilitated the development of emerging market green bond via working closely with BCI on its inaugural green bond and helped to enhance the issuance's integrity in reviewing and assessing selected projects in 2022.
- Throughout our engagement we noted that the company was very open to discussions and welcomed our feedback.

(C) Example 3:

(9) Other

Title of stewardship activity:

Engagement with Eiken Chemical, a full-service manufacturer of clinically-integrated drugs

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	
\square (1) Environmental factors	
☑ (2) Social factors	
☑ (3) Governance factors	
3) Asset class(es)	
☑ (1) Listed equity	
☐ (2) Fixed income	
☐ (3) Private equity	
\square (4) Real estate	
\square (5) Infrastructure	
☐ (6) Hedge funds	
☐ (7) Forestry	
\square (8) Farmland	

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

As a full-service manufacturer of clinically integrated drugs, Eiken Chemical benefits people's health and medical care in Japan and around the world. We highly rated the company's governance, which ensured the Board of Directors' independence (6 out of 9 directors were independent outside directors). On the other hand, there was only one woman and zero non-Japanese members on the Board of Directors, which we felt was a key trigger for us to engage with the company on the topic of diversity.

Our initial engagement with Eiken Chemical was in July 2021, when we spoke to a company director about improving the board's diversity.



The company responded positively, stating that having a foreigner on the board was especially important given the company's growing overseas sales. We were therefore keen to follow up again in 2022 to understand what progress had been made. Key Objectives for our engagement were as follows:

Increase the Board diversity (in particular for gender and nationality perspectives)

During a meeting with the same director in September 2022, we learned that the company had set 2030 targets to promote board diversity.

The targets are simple and ambitious: by 2030, there should be 30% women and 20% foreign nationals on the board. While many Japanese companies are hesitant to set numerical targets for board diversity, the company's attempt to instill a healthy sense of tension in management by making its targets public should be commended.

We were pleased to observe that targets have been set, particularly given the context of the company. The next step for us is to continue to communicate with the company to ensure that there is progress towards achieving these targets.

We hope to see concrete actions and a public roadmap on how they will achieve these targets including potentially. This could include commitments around succession planning including commitments to consider one female or one male for every position (or alternatively one Japanese or one non-Japanese). We look forward to see hopefully further positive developments in the future.

(D) Example 4:

Title of stewardship activity:

Promote a CO2 footprint evaluation and a reduction of GHG decrease roadmap for a digital company

(1)	Le	d	by
		/1	۱ Ii

- 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 ☑ (1) Environmental factors

 - ☐ (2) Social factors
 - \square (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.

The Private Equity team has invested in a company in the TMT sector and more specifically in the Digital sector. Amongst several engagement actions, we have managed for 2023 that the company implements 3 ESG KPIs in the remuneration of the Management Committee members (Climate strategy, Equality score above 85/100, CSR materiality matrix) and performs a CO2 assessment in order to define a CO2 emissions reduction in a near future. We also started to discuss the opportunity to get a SBTi certification for the CO2 reduction strategy in order to ensure that the reduction path is aligned with a 1.5°C degree scenario as required by the Paris Agreement.

(E) Example 5:



Title of stewardship activity:

Collaborative Engagement with US Food Processing Company through FAIRR

- (1) Led by

 - 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
 - \square (3) Governance factors
- (3) Asset class(es)
 - ☑ (1) Listed equity
 - ☐ (2) Fixed income
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☐ (5) Infrastructure
 - \square (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.

For collaborative activities, provide detail on your individual contribution.

In July 2019, Amundi became a signatory of FAIRR. FAIRR is an innovative peer network for institutional investors, who use their influence to help global livestock, fish & dairy companies change their behavior and build a more sustainable global food system. One of FAIRR's major engagement campaigns is on Working Conditions across the sector. The industry has a heavy reliance on human capital meaning that labour practices are an extremely relevant consideration. FAIRR's campaign seeks to address a range of labour related issues including the adoption of automation to improve worker safety and food security, compliant with international labour standards, and the enforcement of these policies.

Given our ongoing work into wages, labour conditions and human rights, FAIRR's collective engagement campaign aligns well with our broader thematics in this area.

In 2022, we collaborated with other investors to jointly lead an engagement with an American food processing company to ensure that the company has the right policy structure and enforcement mechanisms in place to empower workers, regardless of contract type or geography. Amundi led a specific portion of the engagement call.

Key Objectives for our engagement were as follows:

- Better disclosure on grievances reported, disaggregated by category
- Disclosure of the distribution of workers across employment contract types for all operating markets
- Get clear information on the company approach to worker representation at the Board level
- The company's strategy should assess the impact of climate change and automation on the workforce to supporting a Just Transition in meat production

We noted some positive developments at the company during 2022.

This includes the launch of an automation program to de-risk some jobs and an update to the ethics hotline at the company to become completely anonymous and available in multiple languages and is available 24/7. Alongside this the company launched a campaign to advocate for use of the ethics line and for individuals to speak up when they observe concerning behaviours.



However, since then, the company has faced serious allegations of forced and child labour, and poor working conditions at a number of facilities. With this in mind, we will be monitoring developments at the company extremely closely.

As part of the collaborative engagement campaign, we will be looking to follow up again in 2023. In particular, we will be looking for more information on the company's assessment of the social impact of automation and climate change on their specific workforce and other stakeholders. This will be an important piece of analysis in conjunction with our own thematic campaign on a Just Transition. Amundi will also be pushing to get more disclosure from the company on employee metrics by contract type, and reported grievances by category.

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 implemented a company-wide Responsible Investment Policy that considers in the investment process not only financial criteria, but also criteria in the general interest, namely ESG criteria.

Amundi believes that this approach, which provides a 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.

ESG analysis, overseen by the Responsible Investment team, is integrated into Amundi's portfolio management systems and is available in real time as part of managers' toolset to provide them with seamless access to ESG scores of companies and sovereign issuers in addition to financial ratings.

Since 2020, Amundi has been working to diversify the indicators used to integrate climate-related risks and opportunities. These include portfolio temperature scores and Paris Agreement alignment indicators, physical risk indicators, as well as green- and brown-share indicators. As tools for calculating transition 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 investment portfolio's performance.

Amundi has developed its own ESG rating methodologies to measure issuers' non-financial performance, including climate-related performance indicators, which are assigned based on the sector under consideration and the materiality of their impact. Since 2021, all actively managed open-ended funds have included an ESG rating target higher than that of their corresponding investment universe where technically feasible.

As part of its "Ambition 2025" 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 working on a rating system – using a "best-in-class" approach – 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.



By 2025, all portfolios to which the methodology applies will have the stated goal of achieving a better "environmental transition" profile than their investment universe.

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.

☑ (B) Yes, beyond our standard planning horizon

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

At portfolio level, Amundi has set internal Net Zero target that goes beyond our standard planning horizon and that is based on the 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 commits to support the global objective of carbon neutrality by 2050 or sooner, with an intermediate target of 18% of our total AUM to be composed of funds and mandates with explicit net zero alignment objectives by 2025.

Moreover, experts of the Amundi Research Center study the impact of climate change scenarios on long-term estimated asset class returns. Examples include:

- Keeping up with climate change https://research-center.amundi.com/article/asset-classes-views-keeping-climate-change (published in March 2022)
- A rocky net zero pathway https://research-center.amundi.com/article/rocky-net-zero-pathway (published in March 2023).
- 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 pave the way towards carbon neutrality in 2050 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 2022, we actively engaged with an additional 418 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 defined by the Amundi Responsible Investment Policy.

Moreover, 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 2022 Say on Climate approach.

Amundi adopted a demanding approach to the analysis of Say on Climate resolutions in the 2022 season, a practice it had encouraged in 2021 by voting mainly in favor 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 analyzing each strategy in its entirety in order to assess its soundness and alignment with the Paris Agreement. This approach led to a differentiated and case-by-case exercise of our vote on the climate strategies submitted to the shareholders. Out of 36 Say on Climate resolutions tabled by companies this year, Amundi voted for less than 40%.

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, we announced our initial target of 18% of our total AUM to be composed of funds and mandates with explicit net zero alignment objectives by 2025. As part of this commitment, we have launched a Net Zero Ambition range of funds across the main 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.

• (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.

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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 2022, 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 second year.

In 2022, 201 Companies were engaged on thermal coal exit. Out of total companies engaged in 2022, ~35% were companies excluded from Amundi active funds and ESG ETFs (but held in other ETFs or Passive Strategies).

In 2022, Amundi took voting actions against 29 issuers due to lack of engagement momentum concerning thermal coal. Based on engagement performance by 2022 year end, we submitted 76 companies for voting escalation due to lack of reply to our engagements or lack of timely phase out for the voting campaign 2023.

☑ (B) Gas

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 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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 2022, oil & gas companies represented 35% of Amundi's 390 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 2022 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 390 companies in 2022, operating primarily in four highly emitting sectors: Oil and gas companies, utilities, light and heavy-duty vehicles manufacturers and steel producers.

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In 2022, oil & gas companies represented 35% of Amundi's 390 engagements on net zero.

☑ (D) Utilities

Describe your strategy:

In 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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 2022, utility companies represented 26% of Amundi's 390 engagements on net zero.

☑ (E) Cement

Describe your strategy:

Climate Action 100+ (CA100+) is an investor led initiative designed to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change. Since 2020, Amundi has been a lead investor within the initiative for a cement and aggregates company based and operating in the United States. This company has been identified as a climate laggard in the CA100+ Net Zero Company Benchmark as they lack critical climate-related information such as Scope 3 emissions. It discloses carbon emissions reduction targets that cover only part of its activities and material scopes. These targets present poor climate ambition that is not aligned with the Paris Agreement.

Amundi initially struggled to get a meeting with the company but finally obtained a meeting in 2021. Based on our initial engagement the key objectives were as follows:



- Strengthen climate-related disclosure
- Establish additional climate reduction targets on all material scopes and activities
- Seek external certification for targets such as by the SBTi (Science-Based Targets initiative)

Over the course of 2021, we saw a lack of progress on our engagement objectives.

The company has notably questioned the comparison with cement producers, due to limited revenue generated by cement, as opposed to aggregates. Nevertheless, the production of cement is responsible for the major part of their carbon emissions. Given the lack of expressed interest in accelerating climate topics, as well as the company's rating in the CA100+ Net Zero Company Benchmark, we triggered an escalation by voting down all but one item at the company's 2022 AGM. During our 2022 discussion with the company's representatives, we reiterated our requests and expressed our concerns about the company's lack of progress.

Our Updated Objectives for the company were as follows in 2022:

- Raise the ambition of interim targets related to the direct GHG intensity of cement production in order to align with the Paris Agreement
- Seek external validation of targets, such as by the SBTi
- Include Scope 1 in the net zero commitment, the most important scope in the company's carbon footprint
- Report on the main physical indicators that are driving the company's greenhouse gas emissions
- Set quantitative targets on the main mitigation levers and disclose the planned contribution to the achievement of emissions reduction targets
- Disclose the alignment of the company's annual and planned capital expenditures
- Prohibit the use of offsets to achieve the Scope 2 interim target

In 2022, we sent a letter to the Board of Directors detailing the above expectations.

We informed the company that Amundi was considering several escalation methods if elements of the letter remain unanswered.

Unfortunately, several elements we consider critical remain unaddressed and we have not received a reply from the company in response to our letter to the Board of Directors. Furthermore, the company's performance is still far below industry peers. Despite this, we have observed the following positive developments in 2022:

- Reporting of direct lobbying activities in the next report
- Inclusion of scope 1 in the net zero commitment in the next report

We welcome the developments recently announced by the company. However, issues mentioned above on the company's climate disclosure and ambition – that we consider critical – remain unaddressed. We plan to keep pushing for those much-needed additional efforts that would better align the company's strategy with investor interests. Amundi has filled a climate-related shareholder proposal for the company's 2023 Annual General Meeting.

☑ (F) Steel

Describe your strategy:

In 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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 2022, mining and metals companies represented 12% of Amundi's 390 engagements on net zero.

☐ (G) Aviation

☑ (H) Heavy duty road

Describe your strategy:

In 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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

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 2022, automobiles companies (including heavy-duty road and light-duty road) represented 8% of Amundi's 390 Net Zero engagements.

☑ (I) Light duty road

Describe your strategy:

In 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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 2022, automobiles companies (including heavy-duty road and light-duty road) represented 8% of Amundi's 390 Net Zero engagements.

☐ (J) Shipping
., •
☐ (K) Aluminium
☐ (L) Agriculture, forestry, fisher
☐ (M) Chemicals
\square (N) Construction and buildings
\square (O) Textile and leather
☑ (P) Water



Describe your strategy:

Water underpins the survival of all living things on this planet. However, supply of unpolluted freshwater is increasingly scarce in the face of climate change, population growth and urbanisation trends. At Amundi, we believe that companies are 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, benefitting ecosystems and society.

For a long time Amundi has engaged with corporates on water related issues but in 2022 we formally launched our water engagement campaign, engaging with a range of companies from different geographies and sectors.

We have selected sectors which we believe are some of the most exposed to water risk from an operational, reputational and regulatory standpoint.

The aim of the engagement is to:

- 1. Raise awareness and encourage ambition around water stewardship
- 2. Incite action to tackle water scarcity and pollution challenges across sectors and geographies

So far, our campaign has taught us that water stewardship progress varies by sector.

In general, we have learnt that the scale and severity of water risks is not represented in business resilience planning or sustainability strategies. Water pollution is a frequently overlooked issue, too, and often associated with very poor disclosure.

The end goal of this campaign is for companies to have time-bound, quantitative targets to reduce water use in their operations and to submit annually to the CDP Water Framework. High risk sectors will also need to consider water stewardship as part of business resilience planning, to minimise operational risks.

Across all sectors, we hope for water pollution risks to be better addressed in the long run via more water discharge KPIs and standards.

Eventually, we would like to see companies better integrating water stewardship policies into sustainability policies, and demonstrating a clear understanding of the role that water plays in achieving biodiversity and emissions ambitions. Looking beyond company's own operations, we seek to encourage all corporates to engage with other stakeholders in broader watershed management projects to the benefit of society and ecosystems. In 2023 we wish to double the number of companies with which we engage individually, and expand into at least two new sectors.

Alongside this we will increase our commitment by participating in the Valuing Water Finance Initiative.

The Valuing Water Finance Initiative was launched by Ceres in 2022, and Amundi will be a part of this initiative from 2023 onwards. This 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. We are excited to play a role in this investor-led effort for change.

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

Provide a link(s) to your strategy(ies), if available

https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b https://about.amundi.com/files/nuxeo/dl/5994803c-6af1-4d7e-89e0-f1134f6374a7



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 In	evitable Policy	y Response	Forecast Polic	y Scenario ((FPS) or Rec	uired Polic	y Scenario ((RPS)
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 \square (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 the 2022 edition of our annual Medium and long-term forecasts "Keeping up with climate change", we explicitly accounted for both the near-term post-Covid landscape and the possible long-term repercussions of climate change. As a starting point, we relied on the reference scenarios established by a consortium of climate scientists, economists and central banks (Network of Central Banks and Supervisors for Greening the Financial System or NGFS), representing a milestone effort offering a flexible framework exploring risks present in a number of distinct possible futures.

Integrating these scenarios with our current methodology allowed us to offer a coherent picture of how each possible climate scenario and mitigating factors result in different "what-if" consequences for Amundi's multi-asset universe. The findings enabled us to understand and get a clearer view of the scale of the challenges that will unfold, identifying factors that allow us to pave a path forward.

Amundi used three scenarios:

Old World: No specific climate policies.

"Business as usual" along the horizon considered

- Central: Slow introduction of climate policies starting from 2025 but proceeding in a muddling fashion 1.5 C°. Climate goal not reached, more chance to limit at 2 C°. Net Zero CO2 emissions are not met in 2050 Insufficient policies to meet 2 C°.
- Alternative: Divergent schemes introduced to a more efficient and quicker phase out of oil, but higher cost. Lack of global coordination among institutions. Insufficient policies to meet 2 C°.
- (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: 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 70 of the Climate and Sustainability Report 2022 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, data provider, and the methodologies used for the metrics are presented in the chapter 8.2.3 of the Climate and Sustainability Report 2022.

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



	The exclusion policy, which deals with the most significant ESG risks, The ESG risk assessment and the integration of these assessments into the investment process 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.
	Sustainability risks are integrated into Amundi's internal control and risk management system. The table at page 75 of the Climate and Sustainability Report 2022 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 2022 in part 5.2
	s, we have a process to manage climate-related risks scribe 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 the Climate and Sustainability Report 2022; 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 2022; 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) De	scribe 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 75 of the Climate and Sustainability Report 2022 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 2022 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 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://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

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

 \square (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
 - (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://about.amundi.com/files/nuxeo/dl/2993c4c9-e658-437d-8a6b-5d731d5d396b

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

☑ (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.environmental-finance.com/content/focus/creating-green-bond-markets/publications/amundi-planet-emerging-green-one-2022-annual-impact-report.html

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

- ☐ (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
 - o (1) Metric or variable used

 - 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



- \square (J) Other metrics or variables
- o (K) Our organisation did not use or 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 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) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://about.amundi.com/files/nuxeo/dl/2993c4c9-e658-437d-8a6b-5d731d5d396b https://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

☑ (B) Scope 2 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/2993c4c9-e658-437d-8a6b-5d731d5d396b https://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

☑ (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/2993c4c9-e658-437d-8a6b-5d731d5d396b https://legroupe.amundi.com/files/nuxeo/dl/d6fd8dd5-8429-4fab-a9bb-c74cef76004e

o (D) Our organisation did not 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 Development Goals (SDGs) and targets
- **☑** (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
- ☐ (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)
- o (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
- ☐ (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
\Box (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)
(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:

Amundi monitors controversies with the aim to:

- Identify emerging controversies (in terms of sectors, issuers, geographical areas...)
- · Establish a dialogue with the most controversial issuers, exclusion being the last resort option
- Safeguard our clients from reputational risk (linked to securities held in the portfolio)

The first step is a screening combining the signals of RepRisk, Sustainalytics and MSCI. This allows ESG analysts to identify major controversies within a wide universe of issuers, sectors and geographical areas. This is a quarterly screening and it is accessible to all ESG analysts.

Signals include a global test on UN Global Compact compliance from MSCI and RepRisk, as well as more specific tests on PAIs from MSCI and Sustainalytics.

This quantitative approach is completed by a qualitative review of the flagged issuers by the ESG analysts, which is structured around the following key points (each rated by the analyst from 1 to 3):

Multiple controversies and associated ESG challenges
Frequency and gravity of controversy(s)
Company response and possible corrective actions taken by the company
Potential Business Impact / Potential Impact on Stakeholders
Source (quality and visibility)
Duration / Relevance

Following this quantitative and qualitative analysis, each controversy is rated on a scale from 0 to 5.

Controversies with a score rated above 3,5 are deemed as material and trigger a reinforced follow-up from the ESG analyst.

Finally, after this internal assessment, our exclusion list will include "Issuers that violate, repeatedly and seriously, one or more of the ten principles of the UN Global Compact, without credible corrective action", as defined by our RI policy.

Amundi keeps a database of controversies, which summarizes the qualitative assessments of controversies by ESG analysts.



A final report is published every three months on the internal research portal. This enables other users like financial managers and ESG analysts, to access to it.

□ (B) W€	e assessed	whether ii	ndividuals a	t risk c	r already	affected	might be	at heighten	ed risk of	f harn
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 \Box (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

• (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?

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- ☐ (1) Energy
- \square (2) Materials
- ☐ (3) Industrials
- ☑ (4) Consumer discretionary
- \Box (5) Consumer staples
- \Box (6) Healthcare
- \Box (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:

To assess companies' human rights policies and performance and identify opportunities for improvement in policy and reporting.

☑ (B) Media reports



 $[\]Box$ (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

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

To identify controversies and supplement other information sources.

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

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

To identify controversies, ongoing and emerging risks, identify best practices and inform recommendations for issuers where relevant.

☑ (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 high-risk areas and inform issuer expectations.

☑ (E) Data provider scores or benchmarks

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

To compare human rights performance across companies and sectors, triangulate against other sources of information, and/or as a starting point for further research.

☑ (F) Human rights violation alerts

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

As a starting point for further research and/or engagement.

☑ (G) Sell-side research

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

To identify ongoing and emerging risks in the sector, country or for a given issuer, as a supplement for other information sources.

☑ (H) Investor networks or other investors

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

To identify ongoing and emerging risks in the sector, country or for a given issuer, as a supplement for other information sources. As a starting point for further research and/or engagement.

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

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

To inform analysis of controversies and expectations for issuers; to identify appropriate remediation strategies for stakeholders.

 \square (J) Social media analysis

☑ (K) Other

Specify:

Industry and thematic conferences

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

To inform research and engagement with issuers and supplement information from other data 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?

 \Box (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

 \square (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:

As part of our engagement in response to human rights controversies, we seek to encourage issuers to provide remediation to affected stakeholders. In 2022, we engaged with a number of issuers to enable or improve remediation and improve access to grievance procedures and remedy. This included, for instance, engagements to encourage remediation of community rights infringements with five companies in the mining sector, engaging with a retailer to develop a policy on access to remedy following severe discrimination allegations, and engaging with sponsors of a large sports event on remedy for migrant workers.

o (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	00 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	Z	Z	Ø
(B) Responsible investment policy(ies)	Ø	V	V	Ø



(C) Governance structure and senior-level oversight and accountability	V	Ø	Ø	Ø
People and Culture				
(D) Adequate resourcing and incentives	V	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	V	Ø	Ø	Ø
(G) Incorporation of risks connected to systematic sustainability issues in the investment process	Ø	Ø	Ø	Ø
(H) Incorporation of material ESG factors and ESG risks connected to systematic sustainability issues in portfolio risk assessment				Ø
Stewardship				
(I) Policy(ies) or guidelines on stewardship	Ø			Ø
(J) Policy(ies) or guidelines on (proxy) voting	V		Ø	
(K) Use of stewardship tools and activities	V	Ø	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	Ø
(N) Engagement with policy makers and other non-investee stakeholders	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	V	Ø	Ø	
(R) We do not consider any of the above responsible investment aspects important in the assessment of external investment managers	0	٥	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 tŀ

that advise you in the selection, appointment and/or monitoring of external investment managers?	
☐ (A) Incorporation of their responsible investment policy into advisory services	

 \square (B) Ability to accommodate our responsible investment policy

 \square (C) Level of staff's responsible investment expertise

 \Box (D) Use of data and analytical tools to assess the external investment manager's responsible investment performance

☐ (E) Other

o (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	OO 12, OO 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
- o (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

- 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

- (1) for all of our mandates
- 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

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

☐ (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

- 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



APPOINTMENT

SEGREGATED MANDATES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 8	CORE	OO 5.2, OO 13	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
- 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
- o (3) for a minority of our segregated mandates
- □ (D) Their commitment to incorporating risks connected to systematic sustainability issues into their investment activities
- \square (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
- ☑ (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

 $\ \square$ (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

- 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

☑ (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**
- \circ (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?

	(1) Listed equity (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)	Z	Ø	Z	Ø



☑			Ø
☑	☑		☑
			Ø
☑			Ø
☑	Ø	Ø	 ✓



✓	Ø		☑
			Ø
Z	Ø	Ø	Ø
Ø	Ø	Ø	Ø
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	00 14, 00 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	Ø
(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	Ø	
(D) Termination of the contract if failings persist over a (notified) period, including an explanation of the reasons for termination	Ø	Ø	Ø	
(E) Holding off selecting the external investment managers for new mandates or allocating additional capital until any concerns have been rectified				☑
(F) Other				
(G) Our organisation does not have a formal escalation process to address concerns raised during monitoring	0	0	0	0



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				Ø
(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	•	•	•	0



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	(4) Other strategies
(A) Yes, our investment process incorporates material governance factors	(2) for a majority	(1) for all of our	(1) for all of our	(2) for a majority
	of our AUM	AUM	AUM	of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(2) for a majority	(1) for all of our	(1) for all of our	(2) for a majority
	of our AUM	AUM	AUM	of our AUM
(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period	(2) for a majority	(2) for a majority	(2) for a majority	(2) for a majority
	of our AUM	of our AUM	of our AUM	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	0
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	0	0	0	0



MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 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 listed equity strategies?

	(1) Passive equity	(2) Active - quantitative	(3) Active - fundamental	(4) Other strategies
(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			
(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	0
(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies	0	0	0	o

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

Amundi has developed its own ESG analysis framework and scoring methodology, through which it monitors and reviews changing ESG trends

Amundi has developed two main ESG scoring methodologies, one for corporates issuing listed instruments and one for sovereign entities. Our approach is based on texts that are universal in scope, like the UNGC, OECD guiding principles on corporate governance, 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. Our ESG analysis framework is comprised of 38 criteria, of which 17 are cross-sector and 21 are 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.

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.

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. The output of each the scores for the 38 criteria are translated into an ESG rating from A to G.

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. We seek to identify problems and concerns early before they damage company performance and affect our clients' investment performance.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	00 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	(3) Other strategies
(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	(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	(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	(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	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	(4) Other strategies
(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	(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	(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	(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	(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	O	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 ecarbonization; 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	00 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	(4) Other strategies
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(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	(2) for a majority of our AUM	(2) for a majority of our AUM	(3) for a minority of our AUM	(3) for a minority 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	(2) for a majority of our AUM
(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process	(2) for a majority of our AUM	(2) for a majority of our AUM	(2) for a majority of our AUM	
(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors	0	O	O	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 the Paris Aligned Benchmark, carbon footprint reduction targets, etc.

Active equity: 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.

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.

On passive management, ESG factors are embedded into 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 all companies involved in severe controversies, or operating in controversial activities likecontroversial Weapons and Nuclear weapons. It also excludes companies which earned 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 Best-in-Class selection process to companies in the regional indexes that make up MSCI World Index.

The methodology aims to include securities of companies with the

highest ESG ratings representing 50% of the market capitalization in each sector and region of the parent Index. The ESG Leaders range covers 11 different regional indexations.

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 for 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 a Climate Solutions focus, a third example relates to the MSCI ACWI IMI New Energy ESG Filtered index, used as underlying index of a thematic ETF pursuing a sustainable 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 policy in terms of new thermal coal developments. The resulting index is often customised, but not exclusive as required for UCITS ETF.

(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 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	(3) Other strategies
(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	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 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	0



(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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.

Example of ESG Integration Impacting Valuation Analysis from a Belgian multinational chemical company. The company is a global leader in materials, chemicals, and solutions serving many different end markets including automotive, aeronautical, medical, water, and air treatment.

Fundamental investment case (the financials)

The company has a high-quality portfolio with market leading positions across most of its product portfolio. For example, the company is #1 in high performance polymers, adhesives, peroxides, and silica.

The portfolio is well tilted towards ESG related growth drivers (e.g. electrification). Messaging from the management when we made the case was clear, they wanted to refocus on the company's core Solutions (more specialised) business giving some optionality to divest non-core assets – an overall improvement in the shape of the group that could enable a re-rating. Furthermore, we expected improving cash flow generation to enable deleveraging. At the time of this analysis, we estimated that the company was trading at an attractive valuation (25% discount to the market).

ESG Analysis

There has been concern about the company's exposure to PFAS (per-and polyfluorinated substances). These are a group of chemicals used to make products that resist heat, oil, stains, grease, and water. They have been found to lead to health problems including thyroid disease and cancer. We consulted with environmental and legal experts in regard to the Solvay PFAS liability to create a framework and quantify for future liability.

Solvay used these substances as processing aids at a plant in New Jersey for producing specialty polymers. Their usage was fully phased out in 2010 and 2013. Based on our analysis of the different litigation routes and outcomes, we have included a potential €390m negative impact in our valuation modelling. This impact reduced price target (intrinsic value assessment) by c.4%. Since this analysis was completed, the company have announced a further provision of €320m in relation to this issue. This further validates our initial assessment.



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
- \square (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) ((2) Corporate	(3) Securitised	(4) Private deb	
(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			
(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion	0	0	0	0
(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors	0	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 rends vary over time at their discretion	0	0	0



0

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	00 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	\square	Ø	V	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)	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM	
(B) Yes, we have a framework that differentiates ESG risks by sector	(1) for all of our 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	0	0	o	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	00 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

☑ (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

 \square (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

 \square (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:

- 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
- \Box (G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process
- 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	(1) for all of our AUM	(1) for all of our AUM	
(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	0	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
- o (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	00 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	0

(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 ETF/Index funds.

Amundi has a number of funds tracking the Bloomberg Barclays MSCI Euro Corporate ESG Sustainability SRI indices, which exclude companies with a negative social or environmental impact (ratings & research from MSCI ESG Research) such as: red flags, controversial weapons, military weapons, civilian firearms, tobacco, alcohol, adult entertainment, gambling, genetically modified organisms, nuclear power, oil sands or thermal coal. In addition to these exclusions, a filtering process is also implemented: a minimum ESG rating of "BBB" for existing holdings and a minimum ESG controversy score of 1.

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 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 the most relevant ones 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.

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 policy in terms of new thermal coal developments. The resulting index is often customised, but not exclusive as required for UCITS ETF.

(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 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 ability to provide ex-ante and ex-post analysis of indices, its ability to contribute to market education and its ability to 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
Fl 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	☑
(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
(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	0	o	0	O
(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process	0	0	O	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
- \square (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available
- \square (D) We used industry body guidelines
- ☐ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments
- 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 a robust credit research framework to help identify both short- and long-term risks to prevent any security impairment in the portfolio while pursuing 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:

- Maturity: the credit risk materialisation cycle linked to ESG may take some time to come to the fore and, as such, may not always be relevant to short-term securities, as opposed to longer-term ones issued by the same issuer.
- Credit 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 four steps:

- 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's business or financial metric profile irrespective of ESG issues;
- 3. We analyse the issuer's 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 the 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 a threat 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 weigh 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 (5-10%), 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.

An elevated impact should decrease or increase the business profile rating by at least one notch. A combination of ESG and fundamental credit analysis 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 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
- ☑ (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?

- ☑ (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
- (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	OO 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
- $\circ\,$ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- (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
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
 - o (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?

- $\hfill\square$ (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
- ☐ (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
- ☑ (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	OO 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:
 - **◎ (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
- ☑ (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:

- (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

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

☑ (B) We send detailed ESG questionnaires to target properties

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) 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
- (2) for a majority 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

- o (1) for all of our potential real estate investments
- o (2) for a majority of our potential real estate investments
- (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 (1) for all of our potential real estate investments
- (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

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

☑ (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
- 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 21, 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
- \Box (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
- (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 21, 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?

- \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:

- (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 (C) We set clear targets on material ESG factors
- \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
- (2) for a majority 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.

- **(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 21, 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
- $\ \square$ (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 21, OO 24	N/A	PUBLIC	Construction requirements	1

What ESG requirements do you currently have in place for all development projects and major renovations?

- \square (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
- \Box (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	00 21, 00 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:
 - 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
- ☑ (B) We require the building to be able to obtain a recognised green and/or healthy building certification for new buildings

- (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



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

☑ (D) We require the installation of renewable energy technologies where feasible

Select from dropdown list:

- (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
- \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
- o (2) for a majority of our development projects and major renovations
- (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

- (F) ESG KPI #6
- (G) ESG KPI #7
- (H) ESG KPI #8
- (I) ESG KPI #9
- (J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	00 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
- o (3) for a minority of our real estate assets
- ☑ (B) Water consumption

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
- ☑ (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
- (3) for a minority 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	OO 21, OO 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
- o (3) for a minority of our real estate assets
- (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

 - o (3) for a minority of our real estate assets
- ☑ (D) We hire external verification services to audit performance, systems, and procedures

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
- ☑ (E) We collaborate and engage with our third-party property managers and/or tenants to develop action plans

- (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
- \Box (F) We develop minimum health and safety standards
- ☐ (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 assessment 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?

 \square (A) We develop property-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list:

- o (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 (2) for a majority of our real estate investments
- (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. Our ESG methodology.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	PLUS	OO 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	OO 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:

- 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
- ☑ (B) They engage with real estate tenants by organising tenant events focused on increasing sustainability awareness, ESG training and guidance

Select from dropdown list:

- o (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
- o (2) for a majority of our buildings or properties
- (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

Select from dropdown list:

- 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	00 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 (OID) of which it is one of the members founders by assuming the function of secretary General on the Board of Directors 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. 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 Impulsion Biodiversity 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
- $\ensuremath{\square}$ (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
- (2) for a majority 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:
 - **(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
- ☑ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

- **(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
- ☐ (E) The outcome of our latest ESG risk assessment of the property(s)
- \Box (F) Key ESG performance data on the property(s) being sold
- ☐ (G) Other
- o (H) No responsible investment information was shared with potential buyers of real estate investments during the reporting vear
- \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
RE 21	CORE	OO 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
- $\ \square$ (B) We reported in aggregate through formal reporting to investors
- \square (C) We reported at the property level through formal reporting to investors
- $\hfill\Box$ (D) We reported through a limited partners advisory committee (or equivalent)
- ☑ (E) We reported at digital or physical events or meetings with investors
- $\hfill\Box$ (F) We had a process in place to ensure that serious ESG incidents were reported
- ☐ (G) Other
- (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
- ☐ (H) Guidelines on our engagement approach related to the workforce
- ☑ (I) Guidelines on our engagement approach related to third-party operators
- \Box (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	OO 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
- $\circ\,$ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- (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	OO 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)

- (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)
- \square (D) Material ESG factors were used to identify opportunities for value creation
- \square (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
- ☐ (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

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) 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
- \circ (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

- (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 21, 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
- \Box (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 21, 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?

 \square (A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management

Select from dropdown list

- 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

- (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
- \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 21, 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
 - o (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

- 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

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
- ☑ (E) We have discussions about material ESG factors with all relevant stakeholders at least yearly

- (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
- ☐ (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
- \Box (G) We have internal or external parties conduct site visits at least yearly
- ☐ (H) Other
- (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

Scope of GHG emissions

(B) ESG KPI #2

Carbon footprint

- (C) ESG KPI #3
- (D) ESG KPI #4
- (E) ESG KPI #5
- (F) ESG KPI #6

(G) ESG KPI #7

(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
☐ (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
\Box (D) We make sufficient budget available to ensure that the systems and procedures needed are established
\Box (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
o (1) for all of our infrastructure investments
(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

 \qed (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



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

- 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
- \Box (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 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?

- \square (A) We assign our board responsibility for ESG matters
- $\ensuremath{\square}$ (B) We ensure that material ESG matters are discussed by our board at least yearly

- 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
- \Box (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)
- \square (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors
- ☐ (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems
- \square (G) We apply penalties or incentives to improve ESG performance in management remuneration schemes
- ☐ (H) Other
- o (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

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
 - (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) 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

- (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

- **(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) Other
- (H) No responsible investment information was shared with potential buyers of infrastructure 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
INF 17	CORE	OO 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
- $\ oxdot$ (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)?

- $\ \square$ (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	OO 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
- $\circ~$ (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- o (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 priva equity investments?	ıte
\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	

 \Box (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

☐ (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

- 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?

☑ (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
- (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
- o (2) for a majority of our potential private equity investments
- (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

$\ \square$ (E) We conduct in-depth interviews with management and/or personnel

- (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
- \square (F) We conduct detailed external stakeholder analyses and/or engagement
- ☑ (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

- (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
- ☐ (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	00 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 CSR (Corporate Social Responsibility) 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% 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
- $\ \square$ (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.

risk companies. The ESG roadmaps are realised in order to meet upcoming and past legislations, material ESG factors, etc.

(A) Process one

For direct Private Equity, the decision has been taken that 100% of our investees should have an ESG roadmap by 2025. Consequently, we have decided that all new investees should develop an ESG roadmap 6 months after the investment, at the latest.

For the investees previous to 2022, we have planned on a 18 month-basis how to implement ESG roadmaps, identifying first the most at

(B) Process two



For direct Private Equity, ESG roadmaps are followed 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 questionnaires 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	00 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 that are integrated into the 100 day-plan depends on the material issues and level of maturity evaluated during the ESG due diligence. For each issue where we consider there is 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 actions 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.

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

- 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 be 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. The partnership with the other investors allow us to be more powerful. The ESG risks are discussed with the company Board of Directors, at least annually and quite often more regularly, through the implementation of the ESG roadmaps 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 direct Private Equity, 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 with the companies 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 get out.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12	CORE	OO 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

- (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

- (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
- ☑ (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
- (2) for a majority of our private equity investments
- o (3) for a minority of our private equity investments
- \Box (D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)
- $\ensuremath{\square}$ (E) We support the portfolio company in developing and implementing its ESG strategy

Select from dropdown list

- 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 is coming up for most of our companies, we are introducing it to the main ESG and C-suite people for most of our companies and we update them regularly on the latest developments. We also help them to do an ESG materiality matrix in order to identify which ESG KPIs they will need to report. Besides, we help them identify and select the best suppliers in terms of softwares to choose in order to meet their needs and the regulation requirements.

(B) Initiative 2

We also train our investment team so that they get the right skills in order to speak of ESG without the ESG analysts, especially in the frequent interactions they have with companies.

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?

- $\ensuremath{\square}$ (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

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
- ☑ (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
- (2) for a majority of our private equity investments
- o (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

- \circ (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) Other



- (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	OO 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 used a publicly disclosed sustainability report
- ☑ (B) We reported in aggregate through formal reporting to investors
- ☐ (C) We reported at the portfolio company level through formal reporting to investors
- ☐ (D) We reported through a limited partners advisory committee (or equivalent)
- \square (E) We reported back at digital or physical events or meetings with investors
- \square (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?

7	A) Sustainability outo	ome #1

- (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)
 - \square (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - ☐ (5) The EU Taxonomy
 - \Box (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
NZAM AUM commitment
(4) Number of targets set for this outcome
o (1) No target
One 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 Conduct
for Institutional Investors
☐ (5) The EU Taxonomy
☐ (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
(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
o (1) No target
o (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
\square (7) The International Bill of Human Rights



\sqcup (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight
core conventions
\square (9) The Convention on Biological Diversity
\Box (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
o (1) No target
(2) One target
(3) Two or more targets
☑ (D) Sustainability outcome #4
(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
☑ (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
\square (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the
eight core conventions
\square (9) The Convention on Biological Diversity
\Box (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 engagement
(4) Number of targets set for this outcome
• (1) No target
(2) One target
o (3) Two or more targets
☑ (E) Sustainability outcome #5
(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)
(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
\square (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
\square (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
Biodiversity engagement
(4) Number of targets set for this outcome
o (1) No target
(2) One target
(3) Two or more targets
☑ (F) 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
☐ (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
(2) Classification of Sustainability Succome ☑ (1) Environmental
☑ (2) Social
☑ (2) Governance-related
☑ (4) Other
(3) Sustainability outcome name
Supporting SDGs financing through the development of sustainable capital markets
(4) Number of targets set for this outcome
(1) No target
(1) No target
 (2) One target (3) Two or more targets
☐ (G) Sustainability outcome #7
☐ (G) Sustainability outcome #7 ☐ (H) Sustainability outcome #8
☐ (I) Sustainability outcome #9
☐ (1) Sustainability outcome #3 ☐ (3) Sustainability outcome #10
\Box (0) Odotamasmity outcome $\pi \pm 0$



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: 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 has used to set this target 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

as for its group level ambition.

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



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/€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 or v3 of the UN Asset
 Owner Alliance Target Setting Protocol (including < 5 year and 2030 targets)
- For real estate portfolio targets compatible with CREEM net zero trajectories set at asset levels

Moreover, Amundi has established a dedicated Net Zero Ambition range of actively managed open-ended funds across all asset classes (real estate, multi-asset, developed market bonds, developed market equities, etc.). All of Amundi's actively managed Net Zero Ambition strategies shall be aligned with Amundi Net Zero framework. However, we believe there is no "one size fits all" when it comes to Net Zero portfolio construction. As such we are proposing a suite of strategies that integrate ESG considerations with a Net Zero ambition pathway, using differing approaches with a common philosophy: assessing the credibility and feasibility of Net Zero by moving away from pledges towards action, and selecting companies best equipped to transition to Net Zero by 2050 with regards to their carbon reduction pathway.

(5) Metric used (if relevant)

% 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?	



(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4:	Human rights engagement
(1) Target name	Human rights engagement campaign 2022
(2) Baseline year	2021
(3) Target to be met by	2023
(4) Methodology	Promoting human rights helps to address societal inequalities and supports a stable and robust society. In the last 10 years, many countries have seen a decline in human rights observance. With increasingly stringent regulation and material risks of litigation and reputational losses evident from many recent controversies, evidencing and safeguarding respect for human rights has become increasingly important for businesses.
	In addition to a dedicated campaign on forced labour, we therefore also engage with

In addition to a dedicated campaign on forced labour, we therefore also engage with companies to develop a more robust human rights strategy and mitigate against a broad range of salient human rights risks in their operations and supply chains. The goal of this campaign, launched in 2021, is to raise awareness and encourage acknowledgement of human rights issues, alongside advocating the adoption of strong practices to foster better respect of human rights considerations across our investee companies.

In particular, we advocate for companies to adopt a Human Rights policy, which implicates the entire value chain of the company, and is monitored by the top management. Any company in any sector can be exposed to human rights risks. The nature of human rights risks in the value chain will vary by sector or activity, but ultimately, human rights risks must be mapped at the activity level since exposure to risks can vary depending on the company based on its own unique strategy and operations.

For these reasons, our engagement pool covered a wide range of sectors.

In 2022, we grew our engagement pool to 103 companies across a variety of sectors.



We also conducted dedicated engagements with food products, semiconductors and communications equipment companies who have been specifically linked to human rights violations or faced novel or complex human rights risks. The main objectives of our engagement campaign included encouraging companies to:

- Put in place formal board-level and managerial oversight and policy on human rights
- Undertake risk assessments of human rights indicators in their operations and value chains and disclose the most salient risks in their reporting
- Ensure there is a grievance mechanism available to all workers in their operations to raise human rights related concerns without retaliation
- Measure human rights performance through specific KPIs
- Have in place mechanisms for dialogue with stakeholders, including local communities, and demonstrate evidence of its effectiveness
- Conduct human rights risk assessment as part of the broader company enterprise risk management process

Two illustrative cases of engagement outcomes in 2022 are presented in the table at page 126 of Amundi's 2022 Engagement Report, providing examples from industries and issuers facing different types of human rights risks., .

Participating in the protection of human rights is a must, especially against a backdrop of deepening inequalities around the world and a decline in respect for human rights. For companies, accountability is key.

In other words, they need to view their operations through the perspective of double materiality and go beyond regulatory minimum requirements. This means not only managing most material risks to the business but also human rights risks that are material to all stakeholders. Thus, if companies want to measure their social impact, highlighted by the double materiality, they need to start considering human rights as a risk to people and not just to business. We expect to see companies setting up Human Rights Due Diligence Processes and disclosing dedicated KPIs that demonstrate the use and efficacy of the grievance mechanism, among others.

(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if elevant)	



(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-
term target for this?

term target for this:	
	(E1) Sustainability Outcome #5: Target details
(E1) Sustainability Outcome #5:	Biodiversity engagement
(1) Target name	Biodiversity engagement campaign 2022
(2) Baseline year	2021
(3) Target to be met by	2023
(4) Methodology	Biodiversity, a term used to describe the variability of ecosystems, is essential to the existence of life on earth, and economic stability. Society and the private sector are only in the early stages of understanding how essential a healthy and biodiverse environment is to a stable and well-functioning society. The rapid rate of biodiversity loss that we are currently observing poses significant risks for society and in turn for

Corporates both impact and depend on biodiversity and yet they are only in the early days of understanding how to measure, address, and report on biodiversity related metrics. There are some emerging targets and frameworks, such as Taskforce on Nature-related Financial Disclosures (TNFD) and the Post 2020 Global Biodiversity Framework, which seek to provide corporates with more guidance on how to accelerate action to address biodiversity loss. However the process is still evolving, and there is a long road ahead. To accelerate action, Amundi launched an engagement campaign in 2021 to help companies address biodiversity risks.

the corporates we invest in, via risks to food security, human health, and the severity of

The engagement objectives are as follows:

physical events.

1. Raise awareness of the growing topic of biodiversity loss to accelerate corporate action



2. Identify current industry best practice and disseminate these recommendations to corporates

The initial pool included 56 companies across 8 sectors and 18 countries, including sectors such as restaurants, mining \square metals, chemicals, and insurance. In 2022, we grew our engagement pool, expanding to 92 issuers. The expansive nature of the initial engagement sample meant that Amundi could identify best practices within and across sectors and geographies, and use this as guidance for companies. Details on these practices can be seen in our standalone report. In 2022, we followed up with corporates to reemphasize Amundi's recommendations. Beyond our initial engagement pool, biodiversity was a topic of engagement for additional companies in 2022. The best practices identified in 2021 were given as a reference guide to new companies.

In 2022, we observed a few examples of companies who have already made improvements to their biodiversity strategy (elaborated on in the table at page 58 of our 2022 Engagement Report). In order to allow companies sufficient time to take our recommendations into account, a formal follow up will occur in 2023. We will reassess company performance using our proprietary methodology (described in the standalone report here https://research-center.amundi.com/article/biodiversity-it-s-time-protect-our-only-home). Furthermore, we will continue to widen our engagement pool on this topic.

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longerterm target for this?



(F1) Sustainability Outcome #6: Target details

(F1) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Target name	Public-private partnerships with IFC and AIIB
(2) Baseline year	
(3) Target to be met by	

(4) Methodology

Through its public-private partnerships with the International Finance Corporation (IFC) and the Asian Infrastructure Investment Bank (AIIB), Amundi seeks to give investor an opportunity to invest at scale, with exposure to Emerging Markets (EM) yields while contributing to a positive impact on the energy transition in countries where financing is needed.

IFC partnership

In response to IFC's Green Cornerstone Bond Program (GCBP) and following a competitive international tender offer in 2017, Amundi was selected by IFC as its partner for implementing a first ever comprehensive sustainable capital markets program.

The solution was designed to stimulate not just the global demand for green bonds via the fund Amundi Planet Emerging Green One (AP EGO), but also the supply of green bonds in Emerging Markets, via a targeted technical assistance (TA) programme for emerging markets financial institutions - IFC's Green Bond Technical Assistance Program (GB-TAP).

Based on the belief that institutional investors have both the capacity and appetite to deploy significant amounts of capital in EM, the Amundi-IFC partnership aims to provide investors the tools to do so.

AP EGO is a layered fund with a credit enhancement mechanism. Amundi launched the Fund in March 2018 closing at US\$1.4 billion, with the aim of deepening local capital markets and expanding financing for climate investments. Three features highlight the Fund as a landmark for green finance

- Size: The largest green bond fund seeking to deploy US\$2 billion into EM green bonds over its lifetime
- Focus: The first green bond fund solely focused on EM financial institution green bonds
- Mechanism: The first comprehensive sustainable capital markets program combining a demand and a supply mechanism

The Fund stands as a sign of confidence in the green bond market, especially in EMs, and encourages more investors to gain exposure.



On the one hand, the Fund's strict criteria for green bond selection challenges issuers to uphold best practices. On the other, IFC's GB-TAP encourages local financial institutions issue green bonds. The partnership drives EMs to build functioning and sustainable debt capital markets as part of a wider ecosystem involving regulators and stock exchanges, as well as investment banks.

AIIB partnership

In 2019, Amundi and AIIB developed a first-of-its-kind Climate Change Investment framework (CCIF), aims to provide investors with a benchmark tool for assessing an investment, at the issuer-level, in relation to climate change-related financial risks and opportunities.

The approach translates the three objectives of the Paris Agreement into fundamental metrics that investors can use to assess an investment's level of progress towards achieving climate change mitigation, adaptation, and low-carbon transition objectives.

The practical application of this framework was implemented in 2021 via AIIB's Asia Climate Bond Portfolio (USD 300 million), which aims to

- Accelerate climate finance flows for sustainable infrastructure in Asian Emerging Markets through the debt capital markets by identifying and investing in Climate Champions.
- Select climate bond issuers that rate high under the proprietary Climate Change Investment Framework (CCIF) to assess climate change investment risk and opportunity and fulfil the objectives of Paris Agreement
- Catalyse and mobilize investment from one or more climate change-focused institutional investors, which will further validate the Climate Change Investment Framework.
- Provide market education and engage with climate bond issuers to support their transformation to become Climate Champions.

5) Metric used (if relevant)	
6) Absolute or intensity-based (if elevant)	
7) Baseline level or amount (if elevant):	
3) Target level or amount (if elevant)	
9) Percentage of total AUM overed in your baseline year for arget setting	



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
- ☐ (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- \Box (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- o (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



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
NZAM 1	PLUS	NZAM, SO 3	SO 3.1, SO 3.2	PUBLIC	Focus: Setting net- zero targets	General

Select the relevant asset class breakdown for your organisation to report on your net-zero targets.

- **◎** (A) PRI's standard asset class breakdown
- $\circ~$ (B) Asset class breakdown as per the NZAOA's Target Setting Protocol

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3.1	PLUS	SO 3	N/A	PUBLIC	Focus: Setting net- zero targets	General

Provide details of your nearest-term net-zero targets per asset class.

- (A) PRI asset class breakdown ☑ Listed equity

Target details

(A) PRI asset class breakdown:	Listed equity
(1) Baseline year	2019
(2) Target to be met by	2025
	(1) Scope 1
(3) Emissions included in target	(2) Scope 2
	(3) Scope 3
	The Net-Zero Emissions by 2050 Scenario (NZE) set by the International Energy Agency (IEA) is designed to show what is needed across the main sectors by variou
(4) Methodology	actors, and by when, for the world to achieve net-zero energy- related and industrial process CO2 emissions by 2050.



The absolute objectives of the NZE scenario have been translated into intensity by relating them in units of real growth by 2025 and 2030. In this way, the reduction targets for the portfolios covered by Amundi's internal Net Zero methodological framework are as follows*:

- -16% absolute emission reduction target in 2025 vs. 2019, and -41% vs. 2030
- -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

For NZAO investment mandates, targets in line with the v1, v2 or v3 of the UN Asset Owner Alliance Target Setting Protocol (including \leq 5 year and 2030 targets)

*Credit and equity strategies have the option to align portfolio carbon intensity with the one of either the Climate Transition Benchmark (CTB) or the Paris Aligned Benchmark (PAB) carbon intensity trajectory

(5) Metric used	(5) Intensity-based: tCO2e/Mn USD Sales
(6) Baseline amount	149.1 tCO2e/€M invested (for corporate) or 254.2 tCO2e/€M turnover
(7) Current amount (if different from baseline amount)	92,54 tCO2e/€M invested (for corporate) or 220,49 tCO2e/€M turnover
(8) Targeted reduction with respect to baseline	30%
(9) Percentage of total AUM covered in your baseline year for target setting	18%
(10) If coverage is below 100% for this asset class, explain why	Targeted reduction with respect to baseline is -30% by 2025 and -60% by 2030. The numerator is consisting of the sum of AUM of 'products' (whole funds or mandates) with net zero alignment targets reflected in the legal documentation in line with Amundi NZ framework.



At this stage, only asset classes with recognized NZ standards are considered: Equity, Corporate Bonds, and Real estate.

We have also excluded from the numerator asset classes where credible methodologies and sufficient data coverage are lacking (Sovereign bonds in particular).

Amundi plans to develop frameworks in the near future, as credible methodologies develop and reliable data become accessible. The proportion of aligned assets committed to be managed in line with net zero has been estimated using a reference scenario of stable financial markets from 2022 to 2025, pro-forma of potential nonorganic growth stemming from external acquisition(s).

The denominator is consisting of Amundi total AUM, deducting Joint-Ventures' AUM, fund hosting and advisory (as of 31/12/2021).

☑ Fixed income

Target details

(A) PRI asset class breakdown: Fixed income					
(1) Baseline year	2019				
(2) Target to be met by	2025				
		(1) Scope 1			
(3) Emissions included in target		(2) Scope 2			
•		(3) Scope 3			
	The Net-Zero Emissions by	2050 Scenario (NZE) set by the International Energy			

(4) Methodology

The Net-Zero Emissions by 2050 Scenario (NZE) set by the International Energy Agency (IEA) is designed to show what is needed across the main sectors by various actors, and by when, for the world to achieve net-zero energy- related and industrial process CO2 emissions by 2050.

The absolute objectives of the NZE scenario have been translated into intensity by relating them in units of real growth by 2025 and 2030. In this way, the reduction targets for the portfolios covered by Amundi's internal Net Zero methodological framework are as follows*:

• -16% absolute emission reduction target in 2025 vs. 2019, and -41% vs. 2030



• -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

For NZAO investment mandates, targets in line with the v1, v2 or v3 of the UN Asset Owner Alliance Target Setting Protocol (including < 5 year and 2030 targets)

*Credit and equity strategies have the option to align portfolio carbon intensity with the one of either the Climate Transition Benchmark (CTB) or the Paris Aligned Benchmark (PAB) carbon intensity trajectory

(5) Metric used	(5) Intensity-based: tCO2e/Mn USD Sales			
(6) Baseline amount	149.1 tCO2e/€M invested (for corporate) or 254.2 tCO2e/€M turnover			
(7) Current amount (if different from baseline amount)	92,54 tCO2e/€M invested (for corporate) or 220,49 tCO2e/€M turnover			
(8) Targeted reduction with respect to baseline	30%			
(9) Percentage of total AUM covered in your baseline year for target setting	18%			
(10) If coverage is below 100% for	Targeted reduction with respect to baseline is -30% by 2025 and -60% by 2030. The numerator is consisting of the sum of AUM of 'products' (whole funds or			

this asset class, explain why

The numerator is consisting of the sum of AUM of 'products' (whole funds or mandates) with net zero alignment targets reflected in the legal documentation in line with Amundi NZ framework.

At this stage, only asset classes with recognized NZ standards are considered: Equity, Corporate Bonds, and Real estate.

We have also excluded from the numerator asset classes where credible methodologies and sufficient data coverage are lacking (Sovereign bonds in particular).



Amundi plans to develop frameworks in the near future, as credible methodologies develop and reliable data become accessible. The proportion of aligned assets committed to be managed in line with net zero has been estimated using a reference scenario of stable financial markets from 2022 to 2025, pro-forma of potential nonorganic growth stemming from external acquisition(s).

The denominator is consisting of Amundi total AUM, deducting Joint-Ventures' AUM, fund hosting and advisory (as of 31/12/2021).

☐ Private equity **☑** Real estate

	Target details					
(A) PRI asset class breakdown: Real estate						
(1) Baseline year	2019					
(2) Target to be met by	2025					
(3) Emissions included in target	(1) Scope 1 (2) Scope 2 (3) Scope 3					
(4) Methodology	Real estate portfolio targets shall be compatible with CRREM net zero trajectories set at asset levels and shall maintain the carbon footprint of the portfolio below the CRREM 1.5°C trajectory model at all times.					
(5) Metric used	(9) Other					
(6) Baseline amount						
(7) Current amount (if different from baseline amount)	Carbon intensity metric used: [kgCO2e/m²a]					
(8) Targeted reduction with respect to baseline	30%					
(9) Percentage of total AUM covered in your baseline year for target setting	18%					



Targeted reduction with respect to baseline is -30% by 2025 and -60% by 2030.

(10) If coverage is below 100% for this asset class, explain why

The numerator is consisting of the sum of AUM of 'products' (whole funds or mandates) with net zero alignment targets reflected in the legal documentation in line with Amundi NZ framework. At this stage, only asset classes with recognized NZ standards are considered: Equity, Corporate Bonds, and Real estate.

We have also excluded from the numerator asset classes where credible methodologies and sufficient data coverage are lacking (Sovereign bonds in particular). Amundi plans to develop frameworks in the near future, as credible methodologies develop and reliable data become accessible. The proportion of aligned assets committed to be managed in line with net zero has been estimated using a reference scenario of stable financial markets from 2022 to 2025, pro-forma of potential non-organic growth stemming from external acquisition(s).

The denominator is consisting of Amundi total AUM, deducting Joint-Ventures' AUM, fund hosting and advisory (as of 31/12/2021).

☐ Infrastructure
☐ Hedge funds
□ Forestry
\square Farmland
□ Other

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



	(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
	(D1) Sustainability outcome #4:
(D1) Sustainability outcome #4:	Human rights engagement
Target name:	Human rights engagement campaign 2022
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes



(E1) Sustainability outcome #5:

(E1) Sustainability outcome #5:	Biodiversity engagement
Target name:	Biodiversity engagement campaign 2022
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes
	(F1) Sustainability outcome #6:
(F1) Sustainability outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
Target name:	Public-private partnerships with IFC and AIIB
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)	% 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)	
(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 418 new companies (as of 31/12/2022).
(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 €8.7bn (as of 31/12/2022).
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	
	(D1) Sustainability Outcome #4: Target details
(D1) Sustainability Outcome #4:	Human rights engagement
(1) Target name	Human rights engagement campaign 2022
(2) Target to be met by	2023
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	In 2022, we grew our engagement pool to 103 companies across a variety of sectors. We also conducted dedicated engagements with food products, semiconductors and communications equipment companies who have been specifically linked to human rights violations or faced novel or complex human rights risks. A few companies have already made improvements to their human rights strategy (for examples, see the table on page 126 of Amundi 2022 Engagement Report).
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	
	(E1) Sustainability Outcome #5: Target details
(E1) Sustainability Outcome #5:	Biodiversity engagement
(1) Target name	Biodiversity engagement campaign 2022



(2) Target to be met by	2023
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	In 2022, Amundi expanded its engagement pool to 92 issuers (from 56 in 2021). A few companies have already made improvements to their biodiversity strategy (for examples, see the table on page 58 of Amundi 2022 Engagement Report).
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	
	(F1) Sustainability Outcome #6: Target details
(F1) Sustainability Outcome #6:	Supporting SDGs financing through the development of sustainable capital markets
(1) Target name	Public-private partnerships with IFC and AIIB
(2) Target to be met by	
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	2022 highlights from AP EGO fund portfolio in partnership with the IFC: - 39 green bonds in the portfolio, accounting for 80.9% of the asset allocation - 15 EMs with green projects financed - 263.7 tCO2e avoided emissions per €1 million invested per year based on the fund's total investments - 686.4 tCO2e avoided emissions per €1 million invested per year based on the fund's green bond investments - €1.1 billion invested by AP EGO fund in green bonds - 351,204 tCO2e annual avoided emissions 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:

- 1000+ trained market stakeholders from 285 financial institutions in 70 EM countries
- 29 trainings delivered
- 75+ green, social and sustainability bond issuances, representing \$5.5bn total face value

Launched in September 2020 by Amundi and the AIIB, the Climate Change Investment Framework (CCIF) was developed to provide investors with a benchmark tool for assessing an investment against climate change-related financial risks and opportunities.

It translates the three objectives of the Paris Agreement into fundamental metrics that investors can use to assess an investment's level of progress towards achieving climate change mitigation, adaptation and resilience, and low carbon transition objectives. The Market Development Program enhances issuer and investor knowledge on climate change investing. Its highlights include:

- A yearly publication on the state of the Climate Bonds Market in EMs
- Several events organized in collaboration with major financial institutions, such as issuer training to support with climate-related reporting, and investor-policymaker workshops to disseminate knowledge.
- (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
- ☐ (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, including to prevent and mitigate actual and potential negative outcomes?

	(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



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). For instance, 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 (2) Explain through an example decarbonisation of the real economy, including (but not limited to): Specific exclusion targeting the fossil fuels sector. Integration of forward looking / sector neutral climate KPI ,such as Temperature or SBTi metrics. (iii) Exposure constraint to high climate impact sectors. Moreover, as of 31/12/2022, Amundi offered a minimum of one Net Zero Ambition solution in four different asset classes. (C) Sustainability Outcome #2: (C) Sustainability Outcome #2: NZAM engagement threshold (1) Capital allocation activities (5) Other used (2) Explain through an example In 2022, Amundi engaged with 418 additional companies on their climate strategies. (D) Sustainability Outcome #3: (D) Sustainability Outcome #3: Supporting impact investing (1) Capital allocation activities (4) Divestment from assets or sectors used In 2022, Amundi has increased its impact investing assets under management to €8.7bn. These funds will invest in companies that pursue positive environmental or (2) Explain through an example social performance. The impact will be measured and reported annually.



(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:	Human rights engagement
(1) Capital allocation activities used	(1) Asset class allocation
(2) Explain through an example	In 2022, Amundi expanded its engagement pool to 103 issuers. A few companies have already made improvements to their human rights strategy (for examples, see the table on page 126 of Amundi 2022 Engagement Report).
	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity engagement
(1) Capital allocation activities used	(5) Other
(2) Explain through an example	In 2022, Amundi expanded its engagement pool to 92 issuers (from 56 in 2021). A few companies have already made improvements to their biodiversity strategy (for examples, see the table on page 58 of Amundi 2022 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	 2022 highlights from AP EGO fund portfolio in partnership with the IFC include: 39 green bonds in the portfolio throughout 2022, accounting for 80.9% of the asset allocation (surpassing 2022 target allocation of 50%)



- Of the 30 issuers in the AP EGO Fund Portfolio, there are 15 first-time issuers of green bonds across 10 countries. Eight of those first-time issuers' green bonds were invested through private placements (for example, Türkiye and Peru).
- 263.7 tCO2e avoided emissions per €1 million invested per year based on the fund's total investments
- 686.4 tCO2e avoided emissions per €1 million invested per year based on the fund's green bond investments
- €1.1 billion invested by AP EGO fund in green bonds
- 351,204 tCO2e annual avoided emissions

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 AllB'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).

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?



Thematic bond(s) label

(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(D) Sustainability-linked bonds
(D) Sustainability Outcome #4: Human rights engagement	
(E) Sustainability Outcome #5: Biodiversity engagement	
(F) Sustainability Outcome #6: Supporting SDGs financing through the development of sustainable capital markets	(A) Green/climate bonds (B) Social bonds

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
- $-\,\text{A}$ 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

In 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...).

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.

Another example is Amundi's 2022 biodiversity engagement campaign. The engagement objectives are as follows:

- 1. Raise awareness of the growing topic of biodiversity loss to accelerate corporate action
- Identify current industry best practice and disseminate these recommendations to corporates

The initial pool included 56 companies across 8 sectors and 18 countries, including sectors such as restaurants, mining & metals, chemicals, and insurance. In 2022, we grew our engagement pool, expanding to 92 issuers. The expansive nature of the initial engagement sample meant that Amundi could identify best practices within and across sectors and geographies, and use this as guidance for companies. Details on these practices can be seen in our standalone report. In 2022, we followed up with corporates to reemphasize Amundi's recommendations. Beyond our initial engagement pool, biodiversity was a topic of engagement for additional companies in 2022. The best practices identified in 2021 were given as a reference guide to new companies.



In 2022, we observed a few examples of companies who have already made improvements to their biodiversity strategy (elaborated on in the table at page 58 of our 2022 Engagement Report). In order to allow companies sufficient time to take our recommendations into account, a formal follow up will occur in 2023. We will reassess company performance using our proprietary methodology (described in the standalone report here https://research-center.amundi.com/article/biodiversity-it-s-time-protect-our-only-home). Furthermore, we will continue to widen our engagement pool on this topic.

The human rights engagement campaign is yet another example. In 2022, we grew our engagement pool to 103 companies across a variety of sectors. We also conducted dedicated engagements with food products, semiconductors and communications equipment companies who have been specifically linked to human rights violations or faced novel or complex human rights risks. The main objectives of our engagement campaign included encouraging companies to:

- Put in place formal board-level and managerial oversight and policy on human rights
- Undertake risk assessments of human rights indicators in their operations and value chains and disclose the most salient risks in their reporting
- Ensure there is a grievance mechanism available to all workers in their operations to raise human rights related concerns without retaliation
- Measure human rights performance through specific KPIs
- Have in place mechanisms for dialogue with stakeholders, including local communities, and demonstrate evidence of its effectiveness
- Conduct human rights risk assessment as part of the broader company enterprise risk management process

Two illustrative cases of engagement outcomes in 2022 are presented in the table at page 126 of Amundi's 2022 Engagement Report, providing examples from industries and issuers facing different types of human rights risks.

Participating in the protection of human rights is a must, especially against a backdrop of deepening inequalities around the world and a decline in respect for human rights. For companies, accountability is key. In other words, they need to view their operations through the perspective of double materiality and go beyond regulatory minimum requirements. This means not only managing most material risks to the business but also human rights risks that are material to all stakeholders. Thus, if companies want to measure their social impact, highlighted by the double materiality, they need to start considering human rights as a risk to people and not just to business. We expect to see companies setting up Human Rights Due Diligence Processes and disclosing dedicated KPIs that demonstrate the use and efficacy of the grievance mechanism, among others.



(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 engagement
(1) Describe your approach	



(2) Stewardship tools or activities used	
(3) Example	
	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity 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:



The environmental, social, and governance issues that companies face could have a major impact on them. Thus, we consider that we need to assess the ESG quality of an issuer regardless of our position in the balance sheet (as a shareholder or a bondholder). If ESG issues have financial consequences for businesses, those issues will be considered by our investment professionals (equity or credit analysts, fund managers) in their valuation models and investment processes. Subsequently, we engage on ESG issues at issuer level. Investment professionals at Amundi may also engage with issuers on ESG subjects that have financial materiality for the value of the instrument they are invested in, in addition to their holistic ESG-related active dialogues with issuers. Amundi engages also at instrument level (for example for Green, Social, Sustainable bonds (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 engagement spans across different continents and takes into account local realities. The aim is to have the same level of ambition globally but adapt questions and intermediate milestones across the different geographies. We also wish our engagement activities to be impactful and additive to the global effort of the financial community.

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 the level of exposure to the engagement subject (often known as engagement triggers). While the area of engagements or the themes considered are the same, there are two different triggers for our engagements: thematic trigger and contextual trigger.

- Thematic Trigger: Engagement is triggered by specific key sustainability topics such as the energy transition, social cohesion, natural capital preservation, social responsibility and governance's accountability. Based on the theme, companies are selected according to how material or salient the theme is to the company's business model and the company's exposure to relevant risks/opportunities
- Contextual Trigger: Engagement is triggered by specific contexts, situations of an issuer that lead Amundi to seek improvements and/or remediation. It is a contextual engagement that is triggered by a bottom-up, issuer related, approach.

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 2022 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 390 companies in 2022, operating primarily in four 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 availability, costs, purchasing power...). 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.

Select from the list:

2

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.

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: AMF (Association des Marchés Financiers), Paris Europlace, 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
- meetings with decision makers;

Our activities and meetings are disclosed (when applicable) on public registers (e:g: European Commission transparency register, HATVP).

(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



At issuer level, one example of engagement in October 2022 was a one-to-one call with officials from Hungary's Ministry of Finance, Debt Management Agency, and Ministry of Energy to review and discuss the country's Green bond framework and its transition towards a low carbon economy. Amundi raised two main issues:

- The EU Taxonomy alignment of the framework is not yet fully assessed;
- The transportation sector is lagging behind the country's 2030 emissions reduction target.

There was no case of bond restructuring in which Amundi was involved in 2022. In 2021 however, Amundi was one of the 10 bondholders in the discussion for the restructuring of a Latin American sub-sovereign issuer. Amundi proposed the restructured bond coupon to be linked to SDG 4 (quality education) or SDG 6 (Clean water and sanitation) via a Sustainability linked bond format.

(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



(3) Example(s) of policies engaged

on

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:	Supporting impact investing
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	
	(E) Sustainability Outcome #4:
(E) Sustainability Outcome #4:	Human rights engagement
(1) Describe your approach	
(2) Engagement tools or activities used	
(3) Example(s) of policies engaged on	
	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity 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				
(1) Kay atakahaldara angagad					
(1) Key stakeholders engaged	providers)				
	(7) Academia				
	(8) NGOs				
	(9) Other key stakeholders				
	Amundi engages with a variety of stakeholders besides investees and policymakers,				
(2) Provide further detail on your	both individually and collaboratively.				
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 project is currently in its testing and consultation/feedback phase and should be launched in late 2023.

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. For this reason, Amundi thinks it is important to support key initiatives on climate mitigation and adaptation, such as EDHEC-Risk Climate Impact Institute. Amundi has been a partner of EDHEC-Risk since 2009, and through time EDHEC-Risk has become the premier academic centre for industry-related financial research on risk and investment management, especially on ETF.

In October 2022, the institute changed its focus and thus its name to EDHEC-Risk Climate Impact Institute (EDHEC-Risk Climate), reinforcing EDHEC's commitment to helping organisations integrate sustainability risk and impact considerations. Amundi sponsors the new research chair on "Measuring and Managing Climate Risks in Investment Portfolios". EDHEC-Risk Climate aims to become a leading academic reference point helping long-term investors manage the asset-pricing implications of climate change as well as mitigation and adaptation efforts.

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Finally, Amundi engaged with data and index providers, and with NGOs. Examples are the TNFD pilot group headed by CDC Biodiversité, and our membership to the Global Investors for Sustainable Development (GISD) Alliance, which is a group of global business giants worth \$16 trillion are convened by the United Nations Secretary-General to step up to the challenge of financing the Sustainable Development Goals (SDGs).

	(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:	NZAM engagement threshold
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(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 engagement
(1) Key stakeholders engaged	



(2) Provide further detail on your engagement

	(F) Sustainability Outcome #5:
(F) Sustainability Outcome #5:	Biodiversity engagement
(1) Key stakeholders engaged	
(2) Provide further detail on your engagement	
	(G) Sustainability Outcome #6:
(G) Sustainability Outcome #6:	Landmark public private pertuarabine for quetainable conital market development
(G) Sustamability Gutcome #0.	Landmark public-private partnerships for sustainable capital market development
(1) Key stakeholders engaged	Landmark public-private partnerships for Sustamable capital market development

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

(1) Name of the initiative	Climate Action 100+
(2) Indicate how your organisation contributed to this collaborative	(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

Climate Action 100+ (CA100+) is an investor led initiative designed to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change. Since 2020, Amundi has been a lead investor within the initiative for a cement and aggregates company based and operating in the United States. This company has been identified as a climate laggard in the CA100+ Net Zero Company Benchmark as they lack critical climate-related information such as Scope 3 emissions.

It discloses carbon emissions reduction targets that cover only part of its activities and material scopes. These targets present poor climate ambition that is not aligned with the Paris Agreement.

Amundi initially struggled to get a meeting with the company but finally obtained a meeting in 2021.

Based on our initial engagement the key objectives were as follows:

- Strengthen climate-related disclosure
- Establish additional climate reduction targets on all material scopes and activities
- Seek external certification for targets such as by the SBTi (Science-Based Targets initiative)

Over the course of 2021, we saw a lack of progress on our engagement objectives. The company has notably questioned the comparison with cement producers, due to limited revenue generated by cement, as opposed to aggregates. Nevertheless, the production of cement is responsible for the major part of their carbon emissions. Given the lack of expressed interest in accelerating climate topics, as well as the company's rating in the CA100+ Net Zero Company Benchmark, we triggered an escalation by voting down all but one item at the company's 2022 AGM.



During our 2022 discussion with the company's representatives, we reiterated our requests and expressed our concerns about the company's lack of progress. Our updated objectives for the company were as follows in 2022:

- Raise the ambition of interim targets related to the direct GHG intensity of cement production in order to align with the Paris Agreement
- Seek external validation of targets, such as by the SBTi
- Include Scope 1 in the net zero commitment, the most important scope in the company's carbon footprint
- Report on the main physical indicators that are driving the company's greenhouse gas emissions
- Set quantitative targets on the main mitigation levers and disclose the planned contribution to the achievement of emissions reduction targets
- Disclose the alignment of the company's annual and planned capital expenditures
- Prohibit the use of offsets to achieve the Scope 2 interim target

In 2022, we sent a letter to the Board of Directors detailing the above expectations., . We informed the company that Amundi was considering several escalation methods if elements of the letter remain unanswered.

Unfortunately, several elements we consider critical remain addressed and we have not received a reply from the company in response to our letter to the Board of Directors.

Furthermore, the company's performance is still far below industry peers. Despite this, we have observed the following positive developments in 2022.

- Reporting of direct lobbying activities in the next report
- Inclusion of scope 1 in the net zero commitment in the next report

We welcome the developments recently announced by the company. However, issues mentioned above on the company's climate disclosure and ambition – that we consider critical – remain unaddressed. We plan to keep pushing for those much-needed additional efforts that would better align the company's strategy with investor interests. Amundi has filled a climate-related shareholder proposal for the company's 2023 Annual General Meeting.



(B) Initiative #2

(1) Name of the initiative	Institutional Investors Group on Climate Change (IIGCC)
(2) Indicate how your organisation contributed to this collaborative initiative	(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies) (C) We publicly endorsed the initiative (G) We were part of an advisory committee or similar
(3) Provide further detail on your	Amundi is co-leading on a collective engagement campaign that focuses on Chinese banks (including the company mentioned above) and is being steered through the Institutional Investors Group on Climate Change (IIGCC).
participation in this collaborative initiative	IIGCC is a group of asset owners and asset managers with about 60 trillion euros under management. The objective of the IIGCC initiative "IIGCC Net Zero Investor expectations of Banks" is the development of a net zero assessment framework for the banking sector, done in collaboration with the Transition Pathway Initiative. This framework is to provide guidance on banks' alignment with a 1.5°C pathway.
	As part of this project, Amundi is co-leading engagement with Chinese banks. The aim of the engagement is to improve the transparency in disclosure and communication to investors by Chinese banks on their coal phase out policies, net zero commitments, and governance. Amundi, in its role as a co-lead engager, will continue to push for engagement with more Chinese banks, given the significant role they can play in the energy transition. As some of the world's largest banks, they have the capacity to fund sustainable energy projects, and to accelerate the phase out of fossil fuel energy.
	The IIGCC is working to finalise the framework in 2022 and it will likely be ready for use in 2023. We expect the framework to enhance engagement practices between investors and banks, and ultimately improve investors' engagement outcomes.
	(C) Initiative #3
(1) Name of the initiative	French Sustainable Investment Forum (French SIF)
(2) Indicate how your organisation contributed to this collaborative initiative	 (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

We are participating with other investors to a collaborative engagement – the Lab 8.7 Program - led by Ressources Humaines Sans Frontières (RHSF) / Human Rights Without Borders - within the French SIF for an 8-month period. The aim of this engagement called "experiment" by RHSF is to design and try an alternative method for evaluating companies on prevention of child labor and forced labor risks in their supply chain.

This alternative assessment of companies is based on the reference framework - dedicated to the prevention of forced labor and child labor – built up by RHSF. It is intended, amongst other objectives, to be actionable and easily appropriated by institutional and private investors and to support investors' decisions to contribute to the sustainable reduction of vulnerability to child and forced labour in supply chains.

RHSF is an NGO with 15 years' experience on the field on forced and child labor. The RHSF team has been experimenting pilot prevention solutions with stakeholders in various parts of the world and shares its expertise with all those (companies, investors, trade unions etc.) working for decent work throughout the supply chain.

In 2022, we progressed on the methodology with the RHSF described above. While this was not yet finalized in 2021 with initial engagement pool, we hope to combine our efforts to implement the methodology more broadly within our forced labor engagements.

(D) Initiative #4

(1) Name of the initiative

Platform for Living Wage Financials (PLWF)

(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



(3) Provide further detail on your participation in this collaborative initiative

The PLWF is a coalition of 19 financial institutions that engage and encourage investee companies to enable living wages and incomes in their global supply chains. The PLWF focuses on living wages for contracted workers in the garment and footwear sector, and for retail companies' own employees. Self-employed workers, such as cocoa and coffee farmers, are not paid a wage but earn an income from one or multiple income generating activities. As an investor coalition, the PLWF represents a total of €6.5 trillion of AUM. As recognized by, among others, the ILO and OECD, living wage is a fundamental human right and is instrumental in the battle for poverty reduction in the world. Sectors that strongly depend on manual labor such as garment, agriculture, food and retail have workers' wages that are often insufficient to cover basic living expenses. Wages in these sectors are often on or below the poverty line, even if there is a legal minimum wage and well-below national living wage estimates.

Amundi joined the PLWF in 2018 and has continued to play a key role in its annual engagement activities. Companies are scored using the PLWF developed methodology that was created in consultation with industry experts and an independent accountancy firm and is aligned with UN GPs. Based on company scores, companies are categorized into "embryonic", "developing", "maturing", "advanced", and "leading" categories.

Engagement objectives:

 Encourage companies to address the nonpayment of living wages in global supply chains through policies, data, targets, and timelines for living wage adoption
 Improve company adoption of internal best practices that support living wages including reporting, grievance mechanisms, promotion of freedom of association and collective bargaining and purchasing practices

Amundi is actively involved in the Garment & Footwear, Food & Agriculture, and Food Retail working groups. More specifically, Amundi was lead on 4 companies in Garment & Footwear, and 2 for Retail, as well as co-lead for many others. The full list of companies under engagement can be viewed on the PLWF website. In addition to the annual assessment and engagement campaign, Amundi has joined forces with other investors to actively engage on wage-related controversies identified by the investor group to put collective pressure on companies under engagement to push for full and effective remediation.

Amundi has participated in four assessment & engagement cycles with the PLWF. Outside the collective effort of the investor group, Amundi has used the PLWF's assessment results as an additional factor in its voting decisions. Companies who continue to demonstrate poor or no momentum on the topic have been subject to votes against the discharge of some board members.



Based on the PLWF's results, it is clear that companies are far from effectively addressing the nonpayment of living wages in global supply chains. There has been limited progress on this topic in the aftermath of the COVID-19 crisis and global struggles with inflation have exacerbated the need for living wage. Amundi will continue to participate in PLWF engagement and assessment activities in 2023. For companies more advanced on living wage, we will continue to push both individually and collectively with the PLWF to encourage advancement on living wage including demonstrating (and reporting on) the tangible impact of their efforts. For companies who continue to demonstrate low performance and little to no momentum on the topic, Amundi could consider escalation measures using our voting power.

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
- \Box (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 strategy Select from dropdown list: ○ (1) Data assured ○ (2) Processes assured
(3) Processes and data assured□ (B) Manager selection, appointment and monitoring
☐ (b) Manager selection, appointment and monitoring ☐ (c) Listed equity
Select from dropdown list:
o (1) Data assured
o (2) Processes assured
☑ (D) Fixed income
Select from dropdown list:
o (1) Data assured
o (2) Processes assured
(3) Processes and data assured
☐ (E) Private equity
☐ (F) Real estate
☐ (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

Pro

wide 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	
Certain responsible investment data and processes are verified by a third party, as well as certain reports as explained in the 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	
LI (TI) SOME 10 AIIU SOU 1	



☑ (I) Other national auditing/assurance standard with guidance on sustainability; specify:
IFC Performance Standard for the funds Amundi Planet Emerging Green One, French SRI Label.
☐ (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
\square (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
\square (R) NGER audit framework (National Greenhouse and Energy Reporting)
☑ (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/2993c4c9-e658-437d-8a6b-5d731d5d396b

https://about.amundi.com/files/nuxeo/dl/f3be00b2-5c1e-4a1a-96f0-d1454b28111a

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- \square (A) Policy, governance and strategy
- \square (B) Manager selection, appointment and monitoring
- ☐ (C) Listed equity
- ☑ (D) Fixed income

Select from dropdown list:

- o (1) Data internally audited
- o (2) Processes internally audited
- (3) Processes and data internally audited
- ☑ (E) Private equity

Select from dropdown list:

- o (1) Data internally audited
- o (2) Processes internally audited
- (3) Processes and data internally audited
- ☑ (F) Real estate

Select from dropdown list:

- o (1) Data internally audited
- o (2) Processes internally audited
- (3) Processes and data internally audited
- ☑ (G) Infrastructure



Select from dropdown list:

- o (1) Data internally audited
- o (2) Processes internally audited
- (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
СВМ 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

Internal Audit is one component of Amundi Group's Internal Control system, responsible for periodic control, as defined in article 12 of the French Decree of November 3rd 2014 and in article 16 of the French Decree of January 6th 2021. As a third-level control body, Amundi Internal Audit is responsible for conducting audits in all the entities within the Amundi Group's Consolidated Surveillance Perimeter. It is responsible for:

- providing an opinion on the control procedures referred to in article 12 a) & b) of the Decree of November 3rd, 2014 and in article 13 of the Decree of January 6th, 2021 and on the procedures set to verify the reliability and accuracy of the financial, management and operational information on audited business areas,
- the management and the level of risks incurred and mentioned in the aforesaid Decrees,
- verifying transactions' compliance with the regulations,
- verifying compliance with procedures,
- verifying the implementation of corrective action,
- assessing how well and effectively entities operate.

The Amundi Internal Audit assignments fit within an annual audit plan prepared following the next steps:

- preparation of a strategic risk assessment for the audit universe,
- consultation with Executive Management, the Heads of Permanent control functions, chairs of Risk and Audit Committees and other stakeholders.
- the study of new risks, new regulations, new projects, actual losses and incidents,
- the coordination with all Internal Audit Departments within Amundi and the AIBL to prioritize annual auditing work and allocate resources, After validation by the Head of Group Internal Audit, the Audit plans of the different Group entities are validated by the Internal Control Committees, Risk Committees and presented for approval to the Board of Directors. The Amundi Consolidated Surveillance Perimeter is fully covered at least on a cycle not exceeding 5 years. ESG topics are systematically covered in all Internal Audit assignments.



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
 - o (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

