

# 2024 RESPONSIBLE INVESTMENT REPORT

ARTICLE 29 FRENCH ENERGY-CLIMATE LAW,  
TCFD AND SUSTAINABILITY RISKS



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This report is designed to address three regulatory expectations: the implementing decree for Article 29 of the French Energy-Climate Act, the Rixain Law and the Sustainable Finance Disclosure Regulation (SFDR), which covers sustainability risks. It also meets the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD). To make this report easier to understand, below are four cross-reference tables to help you find what you are looking for.

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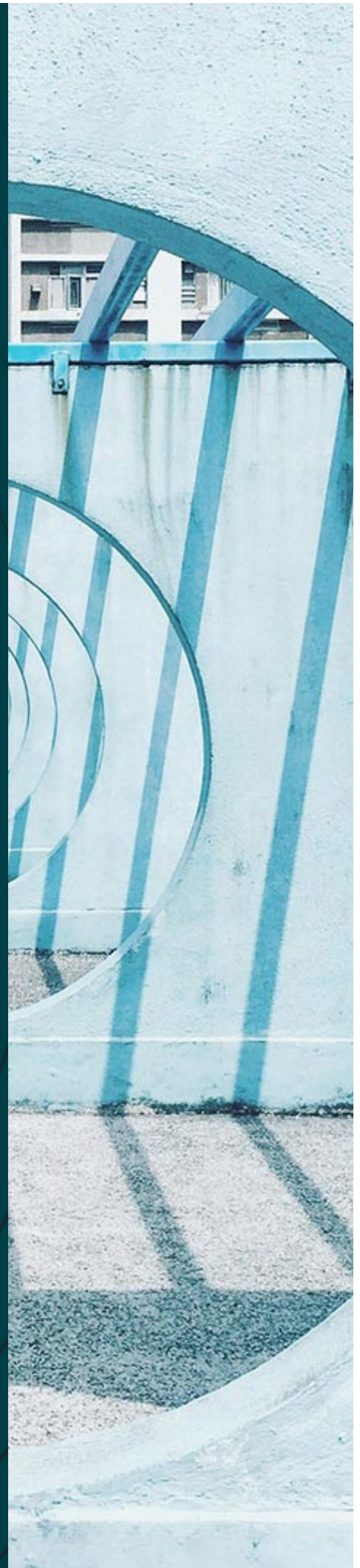
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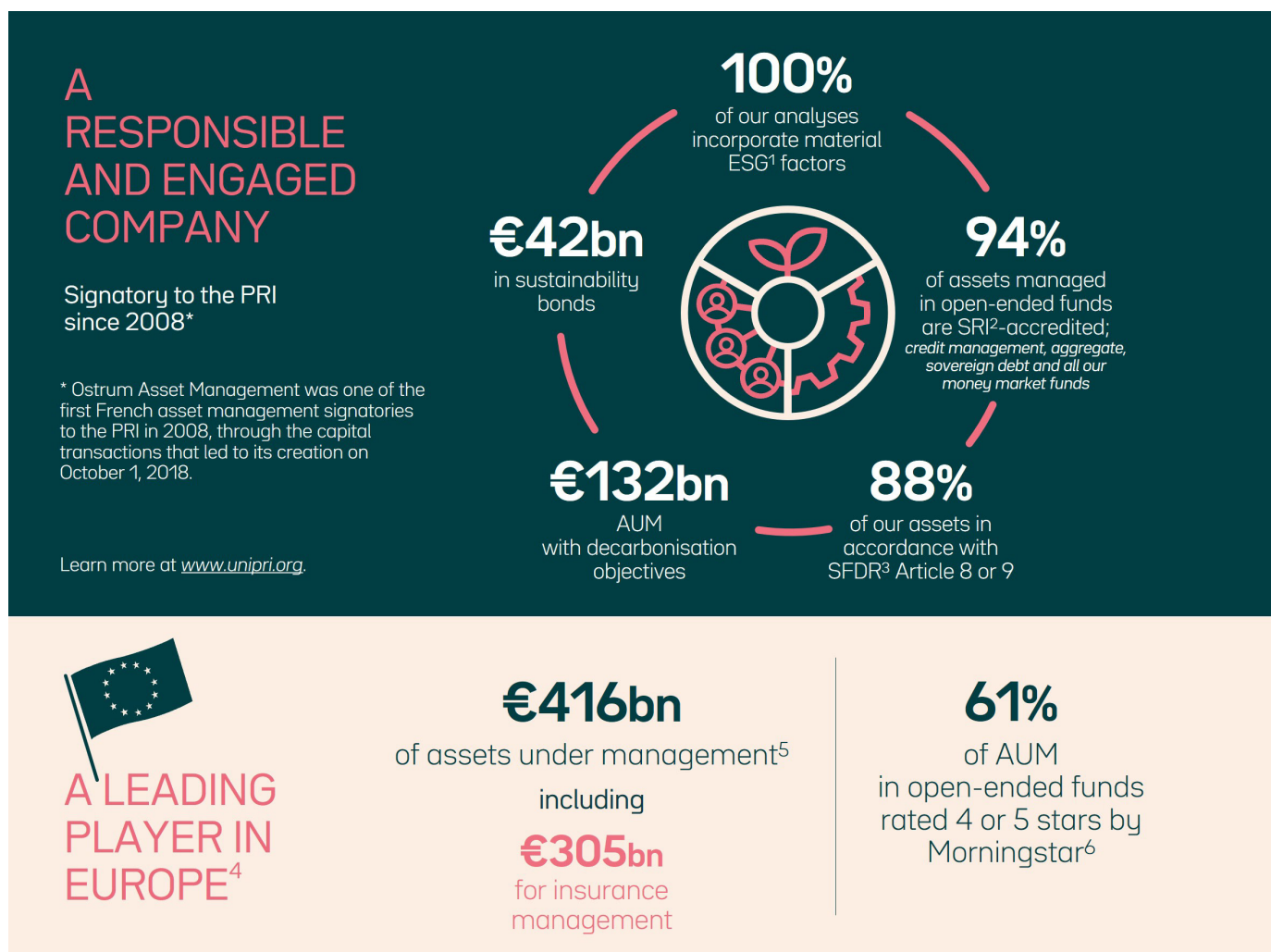
# 1

# INTRODUCTION



## 1. INTRODUCTION

### 1.1. Ostrum Asset Management in a nutshell



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

<sup>1</sup> Excluding RTO. ESG integration refers to the inclusion of ESG issues in investment analysis and decisions. The approach to ESG integration varies based on the funds. ESG integration does not necessarily imply that investment vehicles also seek to generate a positive ESG impact.

<sup>2</sup> Information on SRI accreditation: <https://www.llelabelisr.fr/>.

<sup>3</sup> SFDR Article 8 funds promote environmental, social or governance (ESG) criteria but do not have a sustainable investment objective. They may invest partly in assets with a sustainable objective, for example as defined by the EU classification. SFDR Article 9 funds have a sustainable investment objective. For further information, please refer to the fund prospectus and [www.amf-france.org/fr/actualites-publications/actualites/entree-en-application-au-10-mars-2021-du-reglement-sfdr-pour-les-societes-de-gestion-de-portefeuille](http://www.amf-france.org/fr/actualites-publications/actualites/entree-en-application-au-10-mars-2021-du-reglement-sfdr-pour-les-societes-de-gestion-de-portefeuille)

<sup>4</sup> IPE Top 500 Asset Managers (Investment & Pensions Europe) 2023 ranked Ostrum AM as the ninth largest asset manager at 31/12/2023. References to a ranking are no guarantee of the future performance of the management company.

<sup>5</sup> Administered assets include Ostrum AM's assets. The services provided for a client may concern certain services only.

<sup>6</sup> Source: Morningstar, 31/12/2024. More information is available at [www.morningstar.com](http://www.morningstar.com).



## THE PREFERRED PARTNER OF EUROPEAN INVESTORS



**> 250**

**employees in France**  
and a global distribution network<sup>7</sup>



**> 140**

**Investment**  
professionals



**> 90**

**institutional clients in Europe,**  
with dedicated funds and mandates



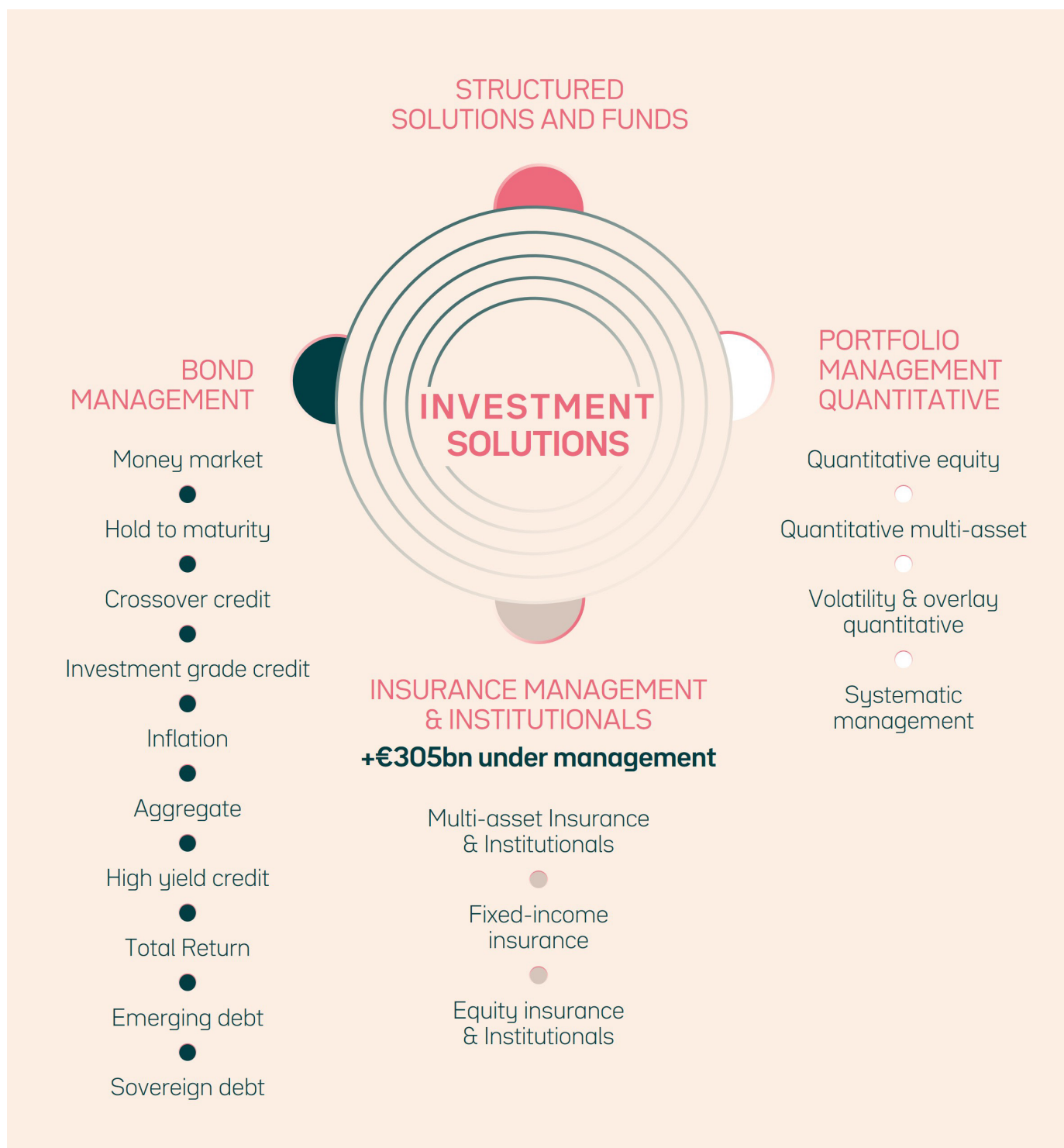
**> 40 years**

**relationship of trust**  
with our clients

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

<sup>7</sup> Employees under permanent contract only. Natixis Investment Managers International network

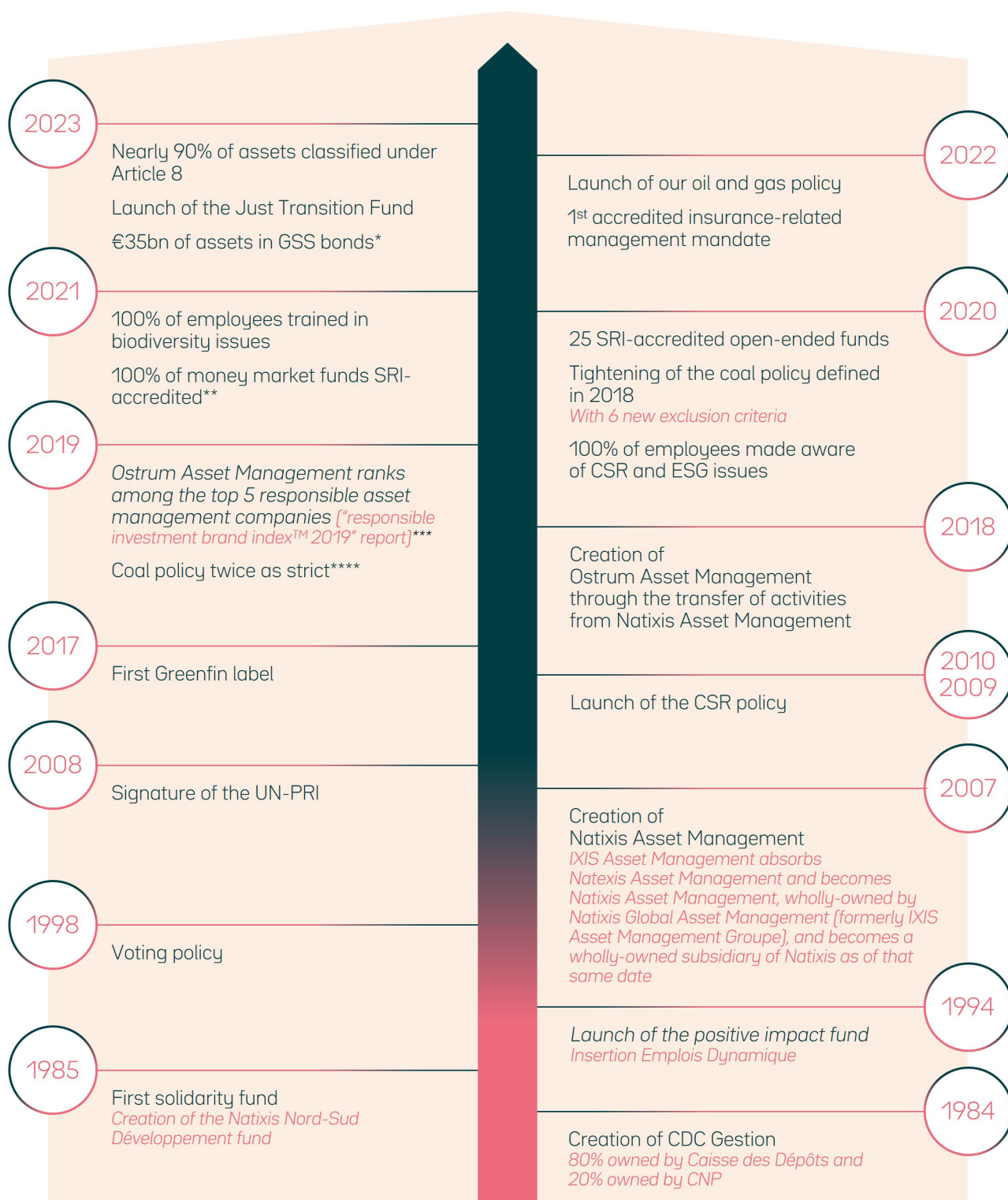
## A WIDE RANGE OF STRATEGIES FOR INSURANCE AND INSTITUTIONAL MANAGEMENT



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



## LONG-STANDING ENGAGEMENT



\*SOURCE: OSTRUM ASSET MANAGEMENT, CONSOLIDATED DATA AT 31/12/2023.

\*\*SOURCE: OSTRUM ASSET MANAGEMENT, CONSOLIDATED DATA AT 31/12/2021.

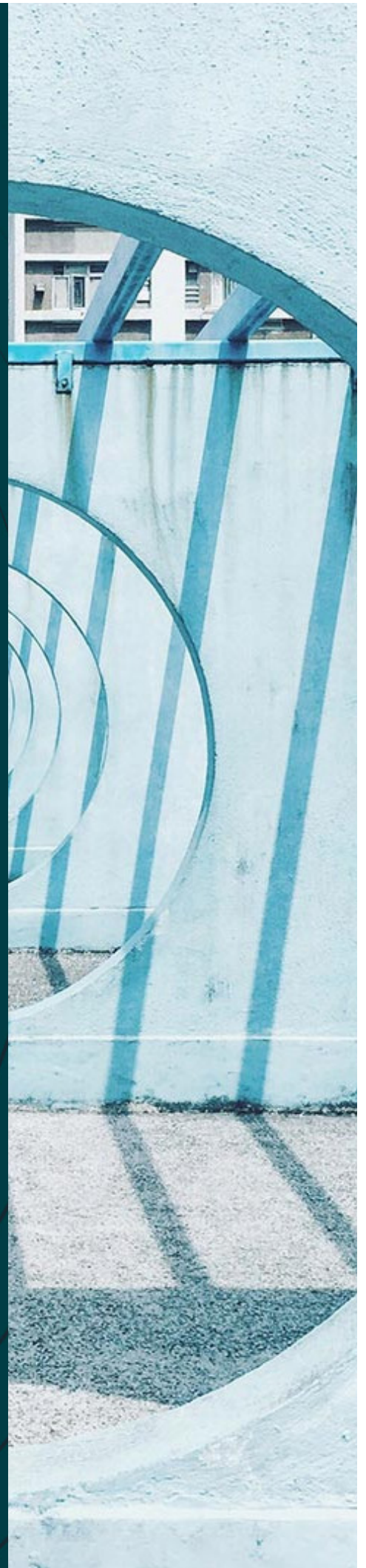
\*\*\*ANY REFERENCE TO A RANKING, CERTIFICATION, AWARD AND/OR RATING PROVIDES NO GUARANTEE OF FUTURE PERFORMANCES FOR THE FUND OR FUND MANAGER. RANKING METHODOLOGY: [HTTPS://WWW.RI-BRANDINDEX.ORG/#METHOD](https://www.ri-brandindex.org/#method)

\*\*\*\*EXCLUSION OF ISSUERS THAT DERIVE 26% OF REVENUE FROM COAL, COMPARED TO 50% PREVIOUSLY.



# 2

## THE ENTITY'S GENERAL APPROACH



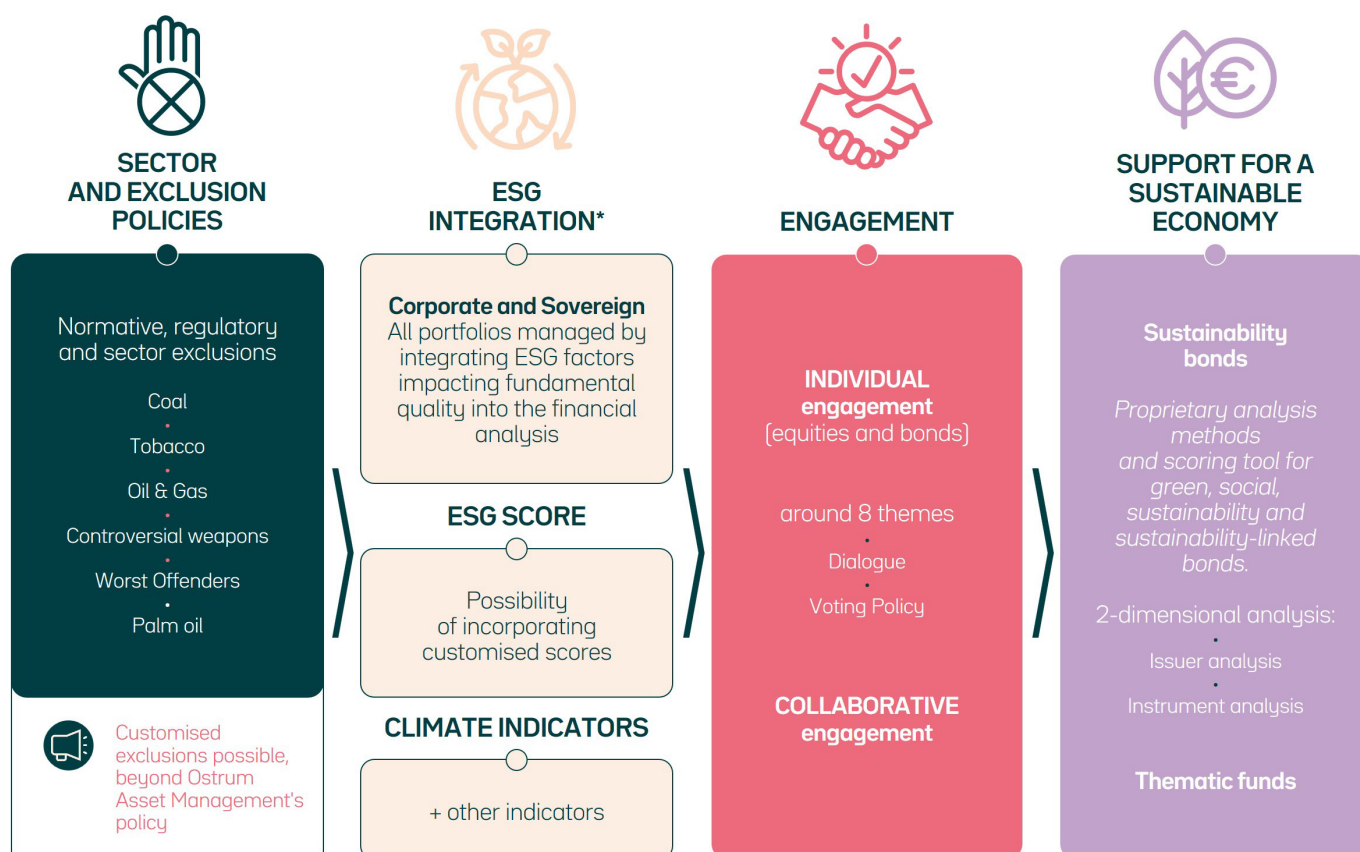
## 2. THE ENTITY'S GENERAL APPROACH

### 2.1. The pillars of our ESG strategy

Ostrum Asset Management's purpose is to draw on its investment expertise to enhance the impact of its clients' commitments as they act together to support European citizens' life plans, health and retirement. With this goal in mind, we have been committed to sustainable development and responsible finance for more than 35 years<sup>8</sup>, supporting our clients and informing their decisions, guiding issuers and contributing to work across the financial market.

Here at Ostrum Asset Management, we therefore involve an increasing number of staff – with varying degrees of responsibility and across our different businesses – in rolling out our responsible investment policy goals.

#### A global ESG strategy built on four pillars



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

\*ESG INTEGRATION REFERS TO THE INCLUSION OF ESG ISSUES IN INVESTMENT ANALYSIS AND DECISIONS. THE APPROACH TO ESG INTEGRATION VARIES BASED ON THE FUNDS. ESG INTEGRATION DOES NOT NECESSARILY IMPLY THAT INVESTMENT VEHICLES ALSO SEEK TO GENERATE A POSITIVE ESG IMPACT. EXCLUDING ABS AND RTO STRATEGIES.

<sup>8</sup> Through the capitalistic combination that led to the creation of Ostrum Asset Management on 1 October 2018.

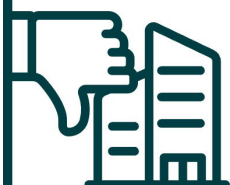
### 2.1.1. Our sector and exclusion policies<sup>9</sup>

Ostrum Asset Management has put in place sector exclusion policies, enabling its teams to engage actively.



## SECTOR AND EXCLUSION POLICIES

### WORST OFFENDERS



Ostrum Asset Management excludes all companies, whether listed or unlisted, that have serious and proven violations of the principles defended by international standards (United Nations Global Compact, OECD Guiding Principles), particularly in terms of **human rights, labour rights, environmental protection** and **business ethics**.

### TOBACCO



Ostrum Asset Management is committed to **no longer supporting the tobacco** sector, whose social, societal and environmental impacts are particularly negative and contrary to the Sustainable Development Goals (SDGs).

<sup>9</sup> For some quantitative management funds, indexed management and structured products existing as of 1 January 2023, the policies do not apply uniformly. As each policy is different, please refer to each one on the website.



## COAL

Ostrum Asset Management excludes companies that develop new coal capacities, as well as those that have not defined an exit from coal in accordance with the Paris Agreement. Ostrum Asset Management also excludes companies exceeding the following thresholds:



**10%**

of revenue streams derived from coal-fired energy generation or coal production

**10 million**

tons of thermal coal production on an annual basis

**5 GW**

in installed capacity

**10%**

of energy production generated by coal

## OIL & GAS\*

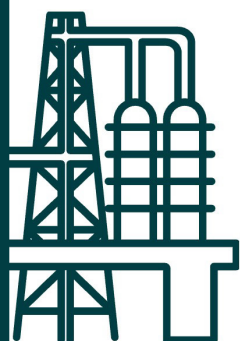
In 2022, Ostrum Asset Management began its **full exit**, by 2030, from unconventional and/or controversial oil and gas exploration and production activities.

We no **longer invest** in companies whose **production volume in these categories** is or exceeds 10%.

This policy not only covers the company in question but also extends to all companies involved in the value chain: exploration, development and, in effect, a significant portion of the downstream chain.

We also implement a **voting and engagement policy** for unconventional and/or controversial activities and for conventional activities.

This policy will be updated over time.



\* In accordance with the recommendations of the reference institutions, based on scientific studies, non-conventional and controversial activities are defined as those that use hydraulic fracturing processes to obtain shale oil and gas and tight oil and gas, or are based on ultra-deep offshore drilling, drilling in the Arctic, and the extraction of oil sands, coal-bed methane or heavy crude oil.

## CONTROVERSIAL WEAPONS

Our controversial weapons policy excludes issuers involved in the use, development, production, marketing, distribution, storage or transport of the following weapons:

- **cluster bombs**
- **anti-personnel mines**
- **chemical weapons**
- **biological weapons**
- **nuclear weapons** (outside the Non-Proliferation Treaty)
- **depleted uranium weapons**



Ostrum Asset Management also reserves the right to exclude issuers in the Defence sector or subcontractors from other sectors that are not covered in the categories mentioned above, when weapons they manufacture "are considered to cause unnecessary or unjustifiable suffering to combatants or to affect civilians indiscriminately", in line with the United Nations' principles.

This includes for example white phosphorus and incendiary bombs.

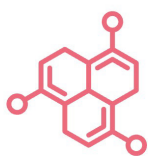


## PALM OIL\*

Ostrum Asset Management excludes from its investment universe companies that generate at least 5% of their **revenue from the production and/or distribution of palm oil**.

\* Policy approved in 2024 for implementation in 2025

The **palm oil** policy is the first step in a more comprehensive deforestation policy that is being considered. Furthermore, 2024 was marked by the implementation of a new analysis methodology for the main **PFAS producers**. It generated several exclusions in our investment universe and **two companies** were excluded from our portfolios.



**PFAS**



**2**

**Companies excluded from our portfolios**

For further information see <https://www.ostrum.com/fr/notre-documentation-rse-et-esg>

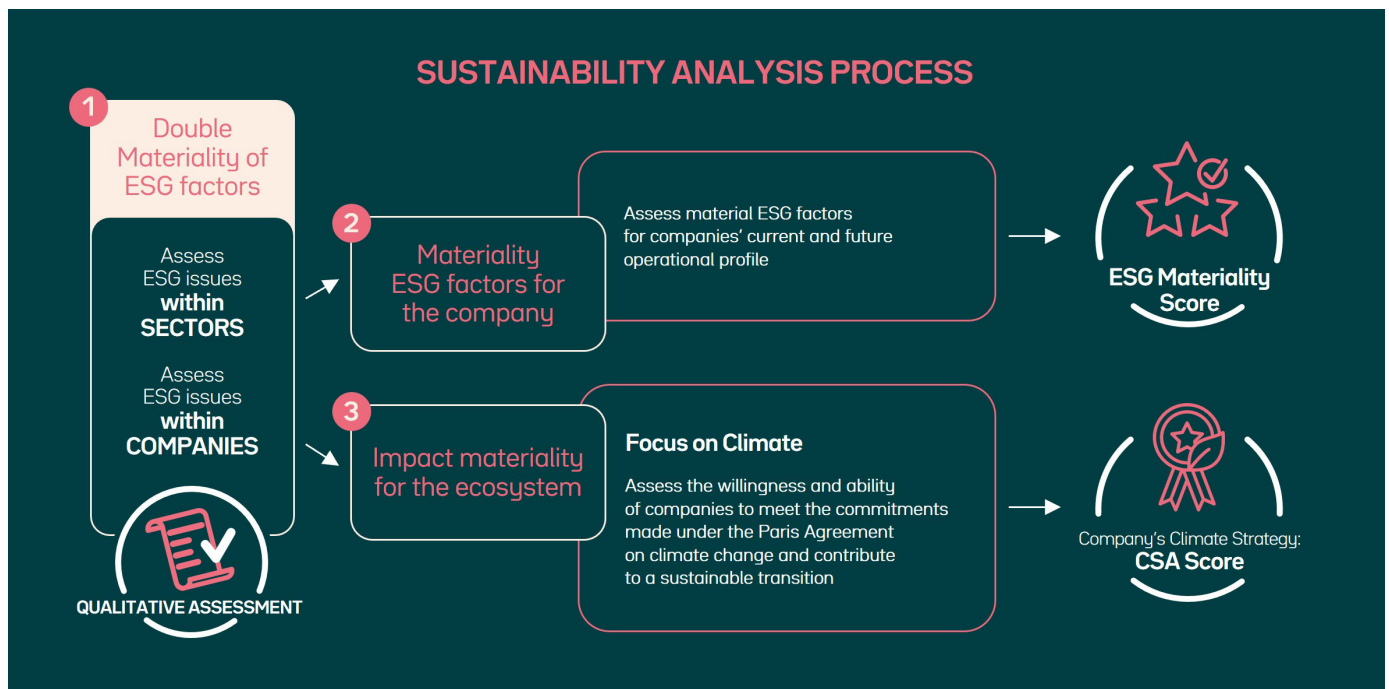
## 2.1.2. ESG integration



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

### QUALITATIVE ESG INTEGRATION INTO MANAGEMENT FOR COMPANIES

In 2024, Ostrum Asset Management strengthened its sustainability analysis process for companies to incorporate the double materiality of non-financial issues.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

### 1 • DOUBLE MATERIALITY OF ESG FACTORS

The analysis begins with an assessment of the dynamics of each sector's non-financial factors, which makes it possible to position each company in view of the related issues. This results in the creation of a double materiality matrix for each sector.



Example of a materiality matrix applied to the banking sector:

## BANKING SECTOR

### Governance

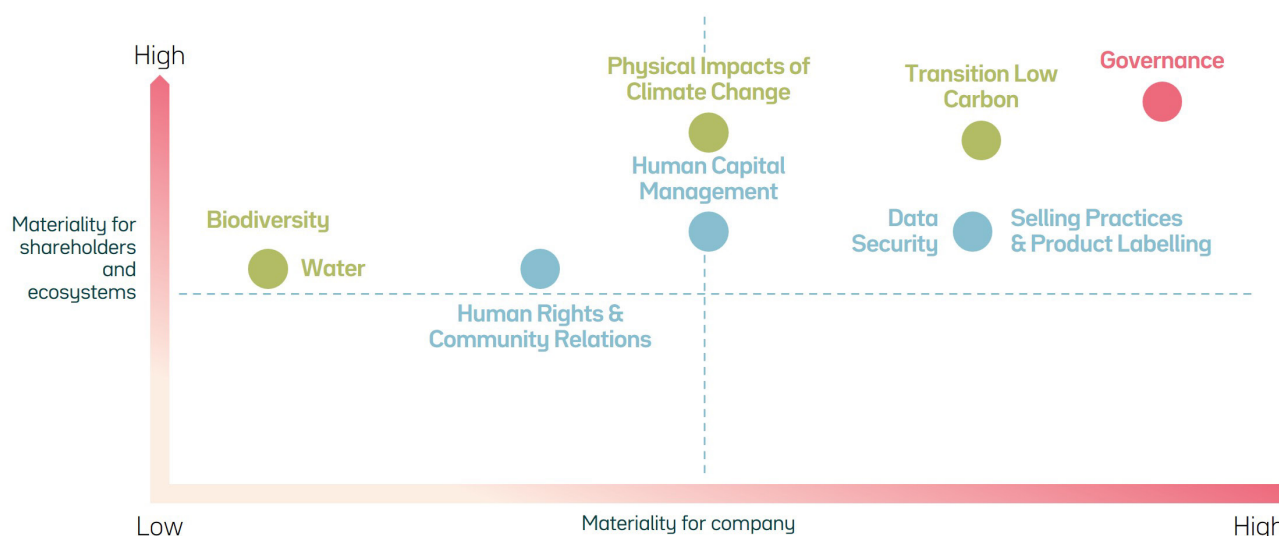
Good governance is crucial for banks and their stakeholders, with several key issues to consider, including risk management, financial transparency, IT system governance, etc.

### Environment

Emphasis is placed on banks' climate strategies. We consider transition risk to be high for banks and all their stakeholders, particularly as regards climate change and financing the energy transition. Banks are exposed to transition risk in their loan and investment portfolios. They must align their transition pathways with the Paris Agreement to reduce financed emissions. Failure to manage transition risks could result in lost assets, reputational risk and image risk. The transition can also offer new opportunities, such as GSS bonds.

### Social

There are many relevant social criteria for banks and their stakeholders. Among them are the risk of abusive practices or conflicts of interest which can damage the bank's reputation and lead to litigation risks. Data security is also crucial and vulnerable to IT infrastructure failures and cyber attacks, which can lead to leaks or theft of client data, fines and clients' loss of trust.



SOURCE: OSTRUM ASSET MANAGEMENT CR DOUBLE MATERIALITY MAP

For a more in-depth analysis, we assume that all companies depend on – and at the same time affect – the environment (natural capital), as well as society (human and social capital) and the economy (including suppliers, customers, communities etc.). As a result, we focus first on an analysis of material ESG factors for the company, and secondly on impact materiality.

## 2 • MATERIALITY OF ESG FACTORS FOR THE COMPANY - ESG materiality scores

We assess ESG factors that are already material for companies or that could become material in the future, along with indirect causes that could result in a negative impact for the company. There are many indirect causes, which are non-exclusive, unforeseeable and non-linear over time (e.g., regulations, public opinion, negative press that can become controversies for the company, etc.).

We also assess the materiality of ESG factors for companies based on Management's willingness and ability to detect, adapt or cope with change, and the time that it has to do so. The materiality of ESG factors is assessed via our proprietary ESG materiality scores.

The definition of proprietary ESG Materiality Scores takes the following into account:

- we recognise that there are risks (-) or opportunities (+) with respect to ESG factors that are important for a company's operational profile;
- the extent of their impact may vary from minor (ESG1) to major (ESG3); and
- we will assess the extent of the impact based on Management's willingness and ability to detect change, adapt to or cope with it, and the time that it has to do so.

		Magnitude of the impact of E, S or G factors on robustness		
		High	Moderate	Low
Impact	Opportunity	ESG3+	ESG2+	ESG1+
	Risk	ESG3-	ESG2-	ESG1-

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

*Details of materiality scores are provided in the appendix.*

Our portfolio managers pay close attention to these analyses, particularly when the issuer has an ESG materiality score of level 3, i.e. when the ESG factors can be a key element of the fundamental score, or when they are combined with other factors.

## 3 • IMPACT MATERIALITY FOR THE ECOSYSTEM – Climate Strategy Assessment (CSA)

In 2024, Ostrum Asset Management developed a proprietary analysis methodology, the CSA (Climate Strategy Assessment) score. This methodology measures the impact that the company has on the environment and, more specifically, on the climate by assessing the company's ability to reduce its greenhouse gas emissions. It is structured around three pillars: ambition, implementation and governance. By putting the company in its context, analysts assess the climate objectives set by the company, the means by which it intends to achieve them and the way in which it is organised (alignment of interests).



### SECTOR ASSESSMENT

Expert opinion on the industry's ability to comply with the Paris Agreement, taking into account the geographic and political environment, available technologies, regulatory changes, etc.



### COMPANY ASSESSMENT

Starting point: identify scopes 1, 2 and 3 GHG\* emissions and the objectives integrated into the operating model

### OBJECTIVE

Assessment of GHG reduction targets\* / GHG reduction pathway\* vs. targets/financial resources and decisions announced to reach the targets

### IMPLEMENTATION

Assessment of execution: what has been done and what remains to be done given the technical feasibility, financial and operational resources to achieve the targets

### GOVERNANCE

Integration of climate goals into the decision-making process



The company's Climate Strategy  
**CSA Score**

#### IMPROVEMENT PLAN IN 2025:

This methodology was developed in 2024 and will be implemented in 2025.

## ESG INTEGRATION FOR SOVEREIGN AND QUASI-SOVEREIGN ISSUERS

Material non-financial factors are systematically taken into account and directly included in portfolio construction via the assessment of country risk. This assessment involves two stages:



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024  
S&P MACROECONOMIC DATA AND WORLD BANK, UNITED NATIONS AND ND GAIN NON-FINANCIAL DATA.

### SOVEREIGN RISK ASSESSMENT MODEL

Our quantitative engineers have developed a proprietary assessment model to provide medium-term projections with a one- to two-year timeframe, which are then updated every quarter if necessary.

This model identifies possible changes in the risk assessment for both developed and emerging countries using an internal rating scale. Projected changes in the risk assessment are monitored for each country (+/- rating category).

This innovative machine learning model, an additional information source for portfolio managers, is used to build sovereign portfolios, making it central to the investment process. It is based on the following aspects:

- **Economy:** internal vulnerability variables, such as unemployment, and external vulnerability variables, such as primary balance. Source: Standard & Poor's (<https://www.spglobal.com/ratings/en/>);
- **Non-financial information:** ESG variables, such as corruption control, political stability, CO<sub>2</sub> emissions, etc. Sources: the World Bank and the United Nations Development Programme.

## SOVEREIGN DEBT SELECTION (SDS) SECTOR TEAM

Our sovereign investment experts have longstanding expertise on ESG factors and their impact on risk assessments for eurozone countries.

The SDS team produces bottom-up views on the relative value of government bonds for each eurozone country. The objective is to identify the sovereign debts to which the managers wish to be exposed over a defined investment horizon.

Members of the SDS team assess performance factors (views on spreads and flows) as well as risk factors (financial, such as macroeconomic and regulatory, and non-financial risks).

The sovereign risk model is based on fundamental views on sovereign issuers.

Non-financial aspects are reviewed with the investment timeframe in mind and can undergo further specific analysis if the country is set to be downgraded soon.

## ESG INTEGRATION INTO FUNDAMENTAL EQUITY MANAGEMENT

ESG practices are considered an integral part of a company's overall quality. Analysts and portfolios managers therefore analyse both the risks and the opportunities that ESG aspects represent for a company or sector. The teams engage with companies to discuss these aspects.

The Equity management team thus seeks to ward off any potential risks via ESG considerations. In particular, ESG analysis provides the ability to identify long-term trends that are likely to disrupt certain business sectors. Incorporating ESG aspects into traditional financial analysis allows better insight into the quality of issuers over the longer term. These considerations also enable the equity investment management team to identify opportunities (new markets, new technologies, etc.) and companies with growth potential.

The various methods used:

- **Non-financial quantitative screening (ESG) to generate ideas**

We use the GREaT<sup>10</sup> non-financial assessment method to incorporate ESG factors into our fundamental analysis. This method awards companies a score on a scale from 1 (best) to 10 (worst). In practical terms, this screening excludes all companies with an overall score of more than 7.

- **Integration of ESG issues into the fundamental qualitative analysis process**

Portfolio managers-analysts use a materiality scale to score each eligible company when assessing its ESG profile. This results from identifying and quantifying the ESG factors that impact the sustainability of its business model in the short or long term, either positively or negatively.

The teams begin by identifying the sustainability issues impacting the company's sector or business model which then point to the inherent risks and opportunities for the company and reflect how it is positioned to take advantage of opportunities and avoid/mitigate risks, via the existing procedures and organisation and the practical steps that have been set out and applied.

<sup>10</sup> GREaT: non-financial proprietary rating from La Banque Postale Asset Management. Analysis based on four pillars: Responsible Governance, sustainable management of natural & human Resources, Energy transition, Territorial development.

- **Use of the GREaT quantitative score to determine the discount rate used to value the company (see appendix)**

This rate takes into account its non-financial score. A high-quality non-financial score will reduce the discount rate, while a poor score will increase it.

- **Integration of the qualitative score resulting from the fundamental analysis of the company, i.e. the ESG materiality score (see section 2.1.2), into the weighting of securities in the portfolio**

The methodology to determine the calibration of positions will support portfolio construction and management. This methodology encapsulates the degree of conviction, the intrinsic risks and the non-financial quality for each eligible company.

Additionally, at the request of our clients for certain investment mandates with specific ESG constraints, we ensure high non-financial quality of the portfolio. For example, this can mean achieving a significantly higher ESG score for the portfolio than the benchmark. A minimum degree of ESG quality is also required on some portfolios to include a company in the investment universe.

Lastly, some equity portfolios have an additional objective, namely to obtain an average ESG score that surpasses that of an index for which 20% of the securities with the worst ESG scores have been excluded, a goal included in the French SRI accreditation guidelines.

## ESG INTEGRATION INTO QUANTITATIVE MANAGEMENT

Ostrum Asset Management's quantitative management offers quantitative strategies that seek an optimal return on risk by measuring overall risk. Thus, it takes into account both financial and non-financial risks in order to cover all potential risks that could impact the risk/return profiles of the managed portfolios. In line with their quantitative management and risk-based approach, the portfolio management teams favour securities that are least exposed to the material issues (non-financial risks) they face and that incorporate good environmental, social and governance practices.

The Quantitative Management teams have developed responsible investment approaches that reflect the specific nature of their active quantitative management strategies, using proprietary mathematical and statistical tools.

ESG criteria may be reflected in the following ways:

- exclusions applied as part of fund management: these exclusions entail filtering issuers from a benchmark universe based on normative and sectoral criteria.
- the selection or weighting of securities in the portfolio: aggregated scores of securities based on environmental, social/societal and governance criteria.

These responsible approaches are used for a number of open-ended and dedicated funds. The adaptable quantitative infrastructure also allows for the development of customised responsible investment strategies or the incorporation of specific exclusion principles or ESG criteria.

In addition to its in-house resources, the Quantitative Management department is focused on the accessibility of raw non-financial data, so that it can be integrated as effectively as possible into its investment approach. It has therefore selected suppliers specialising in non-financial analysis in order to gain direct access to their methodologies, ratings and various metrics. It relies on several external service providers to form the eligible investment universe, from which it selects securities using a management process that incorporates ESG criteria.



## ESG SCORES

### THE GREaT METHODOLOGY FOR MEASURING THE RESPONSIBILITY OF OUR INVESTMENTS IN COMPANIES

Ostrum Asset Management uses the GREaT methodology to score corporate issuers in most of its portfolios.

The GREaT method not only takes into account environmental, social and governance (ESG) criteria, it also measures engagement, responsibility, opportunities and risks for companies.

This ESG score for private issuers is based on several pillars:



SOURCE: OSTRUM ASSET MANAGEMENT, LBPAM

Details of this methodology are provided in the appendix.

## OUR ESG SCORE FOR SOVEREIGN SECURITIES

For our ESG analysis of sovereign issuers, we rely on the SDG Index published by SDSN (Sustainable Development Solutions Network), a global initiative of the United Nations and Bertelsmann Stiftung.

The SDGs, or Sustainable Development Goals, are 17 goals adopted by all UN member states to guide international collaboration towards sustainable development. They are a call to action to all countries – poor, rich and middle-income – to promote prosperity while protecting the planet. They recognise that ending poverty must go hand-in-hand with strategies to develop economic growth and address a range of social needs, including education, health, social protection and employment opportunities, while also combating climate change and protecting the environment.

The SDG Index aggregates available data for all 17 SDGs and provides an assessment of how countries are performing compared to their peers. It computes a numerical score between 0 and 100 that is available to all portfolio management teams and tracks countries' progress in achieving the 17 UN SDGs.

Its primary role is to help each country identify sustainable development priorities and implement an action plan, understand their challenges and identify gaps that must be closed in order to achieve the SDGs by 2030. The index also allows each country to compare itself to the region as a whole, or to other similar countries that have similar scores. The SDG index has developed different measurements for each SDG so as to immediately indicate a country's position on a scale of 0 to 100 from "worst" (score 0) to "best" (score 100). The report produced by the SDG Index also presents the SDG dashboards for each country assessed. Each goal is coloured green, yellow or red, indicating whether the country has already achieved the goal (green), is in a "caution lane" (yellow) or is far from achieving the goal (red).

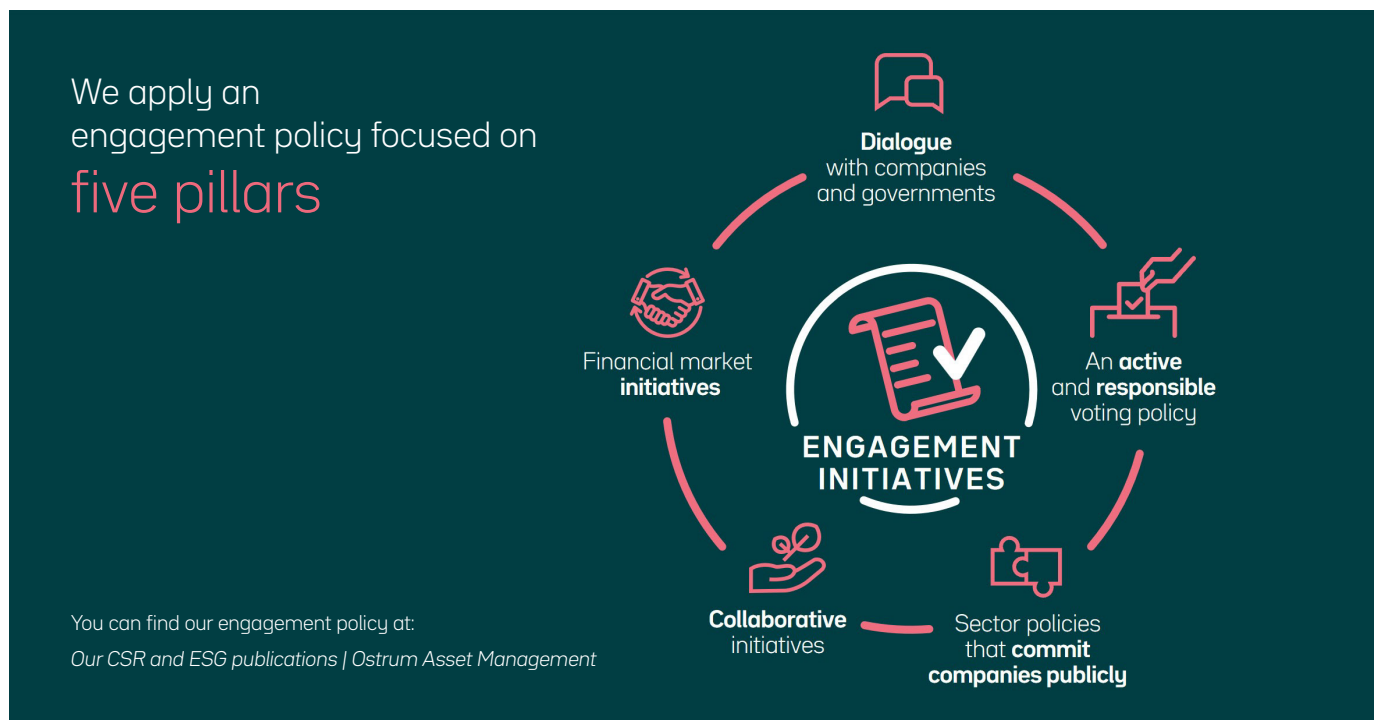
To assess each of these objectives, the SDG index draws on official data (communicated by national governments and international organisations) and unofficial data (collected by non-governmental bodies, such as research institutes, universities, NGOs and the private sector). It should be noted that half of the official data used is from three organisations: the OECD, WHO and UNICEF. Some examples of the main indicators analysed by the SDG index are maternal mortality rates, life expectancy, people with access to basic health services, access to electricity [% of the population], people using the Internet, perception of corruption, etc.

## CLIMATE INDICATORS

Details of our Climate indicators are provided in section 7 "Strategy to align with the Paris Agreement".

### 2.1.3. Our engagement initiatives

Engagement and voting are at the very centre of Ostrum Asset Management's responsible investment approach.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

Details of our engagement initiatives are provided in section 5 "Our engagement strategy".

### 2.1.4. Our support for a sustainable economy

#### ENHANCING OUR GREEN/SOCIAL/SUSTAINABILITY BONDS STRATEGY<sup>12</sup>

In 2024, Ostrum Asset Management significantly ramped up its sustainability bond exposure and expertise, i.e. green, social, sustainability and sustainability-linked bonds.

Assets under management for sustainability bonds came to €42bn at end-2024 across our entire scope via 1,284 issues:

- 844 green bonds (€30.3bn)
- 191 sustainability bonds (€6.1bn)
- 146 social bonds (€4.5bn)
- 103 sustainability-linked bonds (€1.5bn)<sup>13</sup>

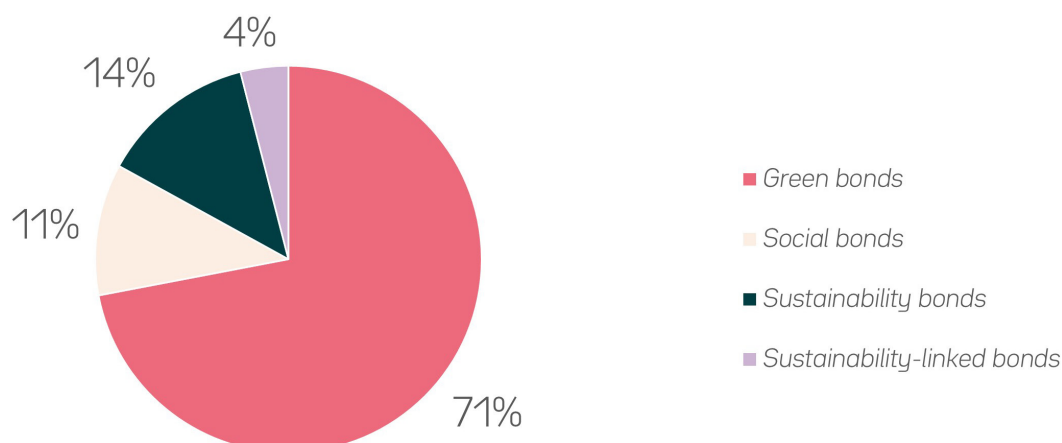
<sup>12</sup> Green bonds raise funds to invest in projects – both new and existing – that support the energy and green transition.

The funds raised through sustainability bonds are used to finance or refinance a combination of green and social projects.

Social bonds use fixed-income products to raise funds for projects – both new and existing – to solve or mitigate social issues.

<sup>13</sup> Sustainability-linked bonds are used to finance a company's general needs while promoting its CSR objectives.

## Thematic breakdown of sustainability bonds



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

As there is no single accreditation standard for the sustainability bond market, a proprietary analysis approach is crucial to ward off greenwashing or socialwashing risks and monitor any potential controversies.

The proprietary methodology for sustainability bonds relies on an understanding of the issuer's sustainability issues, and on an analysis of the issue framework of the instrument and the precise allocation over time of the funds raised. The cornerstone of the analysis is understanding how projects financed by the sustainability bond tie in with the issuing company's operational strategy: their weight in the current operational mix, their rate of growth in the future and, most importantly, their relevance to the issuing company's business as a whole.

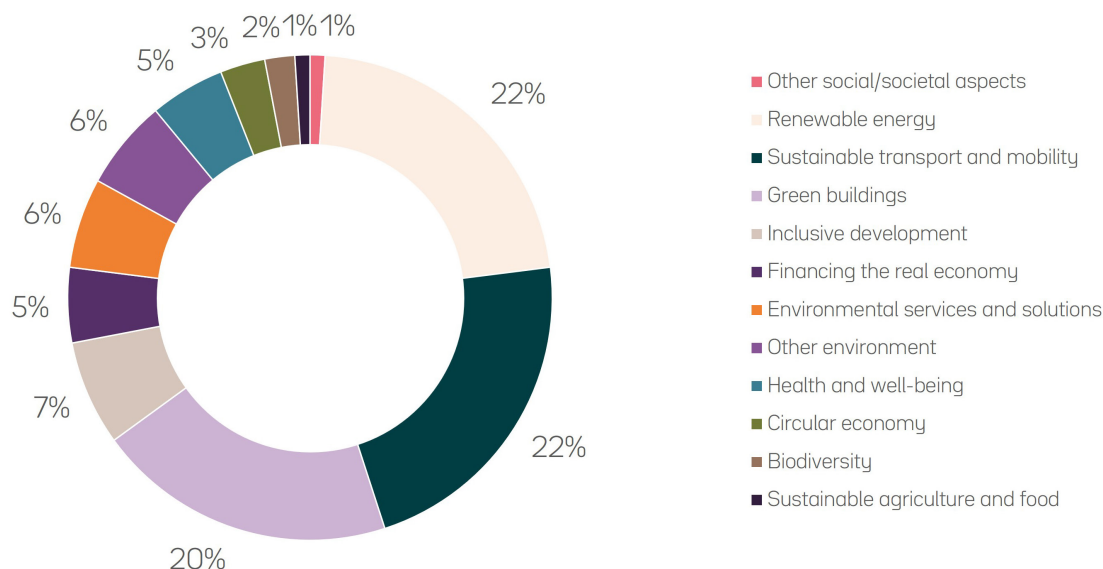
## PROPRIETARY METHODOLOGY FOR SUSTAINABILITY BONDS

Type of instrument	Issuer	Instrument
Green bonds	<b>Assessment of the climate strategy</b> <ul style="list-style-type: none"> <li>Built on three pillars: Ambition/Implementation/Governance</li> <li>How do the projects/activities fit into the company's climate strategy?</li> </ul>	<b>Assessment of the issue framework of the instrument</b> <ul style="list-style-type: none"> <li>Types of projects/activities: assessment of the green/social nature (materiality assessment)</li> <li>Consistency of eligible projects with the company's overall strategy</li> <li>Green/social assets selection process</li> <li>Consistency between the bond and the company's overall financing mix</li> <li>Impact reporting: relevance of proposed KPIs in view of the issuer's business model and its climate strategy/social objectives, as well as the level of transparency</li> </ul>
Social bonds	<b>Assessment of the social strategy</b> <ul style="list-style-type: none"> <li>Assessment of the company's social objectives in the context of its business model and operational strategy</li> <li>How do social projects financed by social bonds contribute to the company's social objectives?</li> </ul>	
Sustainability bonds	Mix of green and social bonds	

Eligible projects, which correspond to funds raised during a sustainability bond issue, are mapped on the basis of our 12 sustainability themes, the UN Sustainable Development Goals and the Greenfin label guidelines (for green bonds and the green portion of sustainability bonds).

The projects financed are mostly renewable energy projects, sustainable transport and mobility projects and green building projects (see graph below).

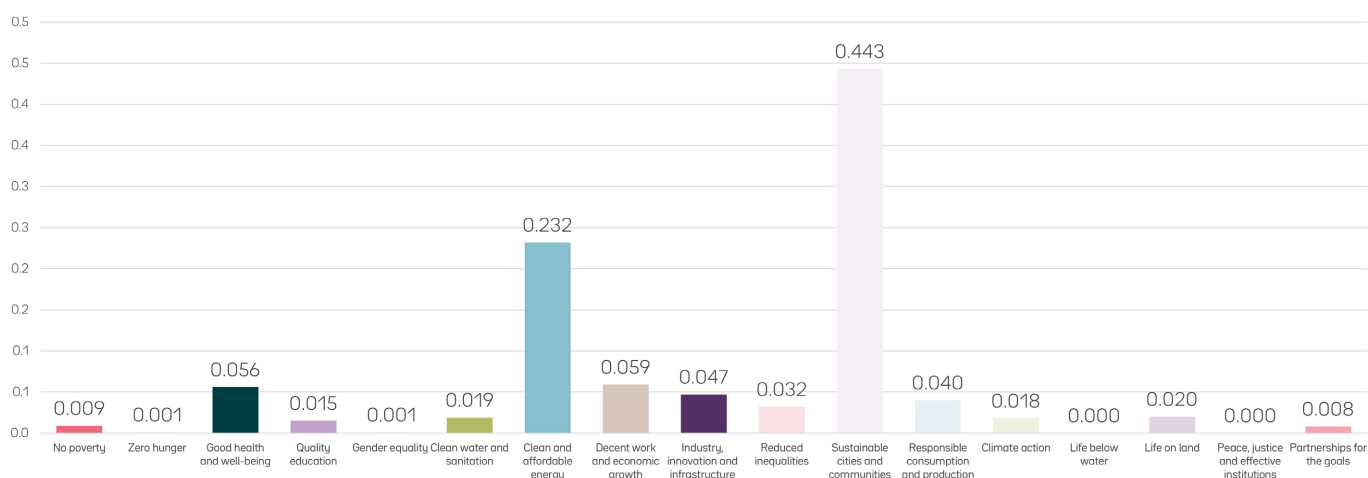
Breakdown of the use of funds **by sustainability theme** (Ostrum Asset Management classification) for all sustainability bonds invested by Ostrum Asset Management and subject to a comprehensive analysis:



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

By funding these sustainability bonds, we are able to contribute to several UN Sustainable Development Goals and particularly SDG 11 (Sustainable cities and communities), SDG 7 (Clean and affordable energy), and SDG 9 (Industry, innovation and infrastructure).

### Contribution of **sustainability bond financing to the SDGs**



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## JUST TRANSITION

Convinced that the green transition is not possible without giving consideration to social issues, in 2022 Ostrum Asset Management launched the first bond fund invested in a universe of assets dedicated to the Just Transition. Aside from the portion invested in cash, the fund, classified as Article 9 and compliant with the Greenfin<sup>14</sup> label guidelines, is fully invested in international sustainability bonds (green, social, sustainability and SLB). The Ostrum Climate and Social Impact Bond fund seeks to integrate the Just Transition in terms of both the issuer and the instruments in which it invests. It has a threefold objective:

1. Reduce the carbon footprint: financing renewable energies, green buildings, clean mobility, solutions for decarbonising industry, energy efficiency, etc.;
2. Promote social impact: promotion of accessibility to basic infrastructure, health, education and training, decent housing and financial services, etc.;
3. Preserve ecosystems and local economies: development of the local economic fabric, sustainable use of resources, preservation of biodiversity.

Since 2023, Ostrum Asset Management has published a use of proceeds and impact report for this fund.

### IMPROVEMENT PLAN IN 2025:

In 2025, Ostrum Asset Management aims to develop "Transition Brown to Green" funds to promote the transition of the entire economy, including the most carbon-emitting sectors.

## 2.2. Transparency and information

DOCUMENT	PUBLICATION FREQUENCY	MEDIA USED
ESG policy	Whenever updated	Website
CSR report	Annually	Website
Sector and exclusions policies	Whenever updated	Website
Engagement policy	Whenever updated	Website
Engagement report	Annually	Website
Voting policy	Whenever updated	Website
Exercising of voting rights report	Annually	Website

<sup>14</sup> All instruments in which the fund invests must comply with the exclusions specified for the Greenfin label related to the entire fossil fuel value chain and the entire nuclear sector, which are available on the website of the Ministry of Ecological Transition (<https://www.ecologie.gouv.fr/>). Created by the Ministry of Ecological Transition, the Greenfin label guarantees the green quality of investment funds and is aimed at financial players committed to serving the common good through transparent and sustainable practices. What's different about this accreditation is that it excludes funds that invest in companies operating in the nuclear sector and fossil fuels.



DOCUMENT	PUBLICATION FREQUENCY	MEDIA USED
Responsible investment report	Annually	Website
PRI reporting	At the request of the PRI	Website
Sustainability risk management policy (SFDR) and adverse impacts	Whenever updated	Website
Statement on PAI	Annually	Website
Other ESG regulatory publications	Based on regulations	Website
MySustainableCorner	Monthly	Website
Prospectus and KIID	Whenever updated	Email, website and social networks
ECL report for open-ended funds	Annually	Email, website and social networks
ECL report for dedicated funds	Based on clients	Email, website and social networks
ESG thematic publication	Occasionally	Email, website and social networks
Sustainability bonds publications	Occasionally	Email, website and social networks

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## 2.3. Main ESG figures and fund classification



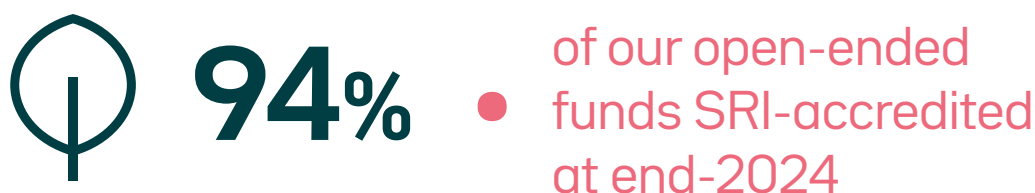
SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

\*THE EUROPEAN "SUSTAINABLE FINANCE DISCLOSURE REGULATION" (SFDR) AIMS TO PROVIDE MORE TRANSPARENCY REGARDING ENVIRONMENTAL AND SOCIAL RESPONSIBILITY, PARTICULARLY THROUGH THE PROVISION OF SUSTAINABILITY INFORMATION RELATED TO FINANCIAL PRODUCTS. THIS REGULATION CATEGORIZES FUNDS INTO THREE CATEGORIES.

## FOCUS ON ACCREDITED FUNDS

Funds that obtain SRI<sup>15</sup> accreditation must transparently disclose certain aspects of their environmental performance, particularly in terms of the portfolio's carbon assessment. This requires the development of an indicator on greenhouse gas emissions, covering both direct emissions (scope 1) resulting from the company's operations and indirect emissions (scope 2) resulting from energy use required by its portfolio, in metric tons of CO<sub>2</sub> equivalent.

Other relevant indicators may also be added, in particular the WACI – or weighted average carbon intensity – which compares average emissions with a company's revenues.



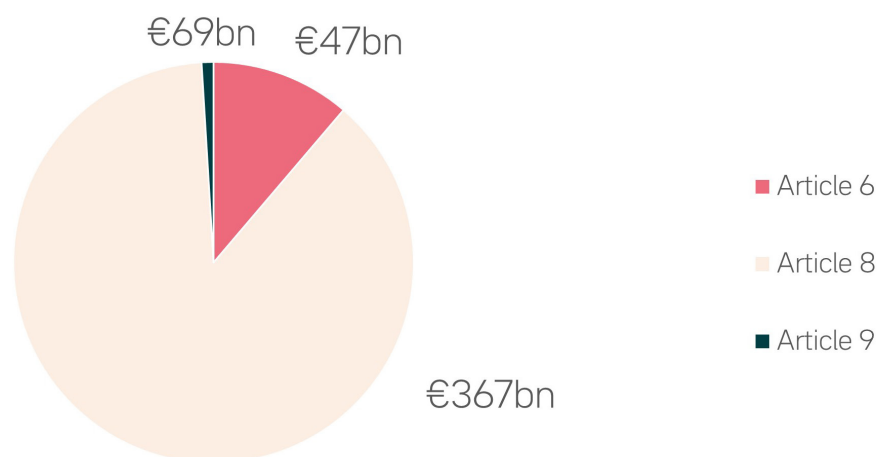
SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

Since 2020, we have pursued an ambitious SRI accreditation policy, which in 2024 resulted in 94% of our open-ended funds being accredited and 100% of our clients' requests for accreditation of funds and mandates being met. In 2024, Ostrum Asset Management conducted an in-depth analysis of version 3 of the SRI label to determine the relevance of the funds to be targeted. It also accredited its first V3 SRI fund at the end of the year.

## BREAKDOWN OF AUM UNDER SFDR CLASSIFICATION

Ostrum Asset Management has classified its portfolios in accordance with Articles 6, 8 and 9 of the SFDR.

Breakdown of AUM **under SFDR classification**



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

<sup>15</sup> This public accreditation was developed by the French Finance Ministry and is designed to increase the visibility of Socially Responsible Investment (SRI) funds for investors. To award SRI accreditation, the certification body conducts an audit to ensure that funds meet all accreditation criteria. For more details on the methodology, visit [www.lelabelisr.fr](http://www.lelabelisr.fr) (in French only). References to a ranking, accreditation, award and/or rating are no guarantee of the future performance of the fund or management company.

All these portfolios' characteristics are outlined in their pre-contractual documentation.

Portfolios classified under Article 6 are separated into two categories:

- portfolios where the investment process does not incorporate an ESG approach;
- portfolios where there is no ESG objective in the portfolio's management but where the investment process applied by the portfolio manager complies with all ESG policies defined by Ostrum Asset Management and benefits from the integration of sustainability risks in the analysis of the investment universe.

Portfolios classified under Article 8<sup>16</sup> have an investment process that includes ESG characteristics (average score, minimum quality required, CO<sub>2</sub> targets, etc.).

The portfolio classified under Article 9 has a clearly defined environmental or social objective.

The list of financial products in our open-ended funds classified as Article 8 and 9 according to SFDR is provided in the appendix at the end of the report:

Visit our [website](#) for more details on our funds.

## 2.4. Ostrum Asset Management's commitment

Ostrum Asset Management is also committed to applying and constantly honing its responsible investment policy by contributing to the development of ESG standards and ensuring their promotion. The company plays an active role in sector initiatives aimed at improving and standardising responsible investment practices.



### INITIATIVES TO WHICH OSTRUM ASSET MANAGEMENT WAS A SIGNATORY IN 2024



Ostrum Asset Management has been a signatory to the six UN Principles for Responsible Investment since 2008. These guidelines seek to promote responsible investment practices internationally. Signatory organizations must complete an annual questionnaire on their responsible investment practices and publish a follow-up report. Ostrum Asset Management is also involved in collaborative engagement initiatives as part of the PRI.

<https://www.unpri.org/>

<sup>16</sup> These funds promote environmental, social or governance criteria (ESG), but do not have a sustainable investment goal. They may invest partly in assets with a sustainable goal, for example as defined by the EU classification.



## CDP

CDP is an international non-profit organisation that was known as the Carbon Disclosure Project until the end of 2012. It maintains one of the world's largest global databases on the environmental performance of cities and companies. It focuses investors, companies and cities on taking urgent action to build a truly sustainable economy by measuring and understanding their environmental impact.

Ostrum Asset Management has been a direct signatory since 2018 and has taken part in the CDP survey since 2010 via its parent company, Natixis.

<https://www.cdp.net/fr>



## FIR

The French responsible investment forum (*Forum pour l'Investissement Responsable*), was set up in 2001 by fund managers, specialists in environmental and social analysis, consultants, trade unions, academics and citizens. Investors later joined in the initiative. The FIR aims to promote socially responsible investment and best practices.

Ostrum Asset Management has been directly involved in the FIR since 2019.

<https://www.frenchsif.org/isr-esg/>



## IIGCC

The IIGCC has more than 400 members, primarily pension funds and asset managers spanning 27 countries, and with assets under management of more than €65 billion.

Ostrum Asset Management is an active member of the Institutional Investors Group on Climate Change, a European body for investor collaboration on climate change, and the voice for investors who take steps to bring about a prosperous and low-carbon future.

Ostrum Asset Management joined in order to contribute to various programmes, such as policy, corporate, investor strategies, real estate, as well as initiatives and collaboration. The IIGCC plays a key role in the delivery of global investor initiatives and works closely with other investor networks.

<https://www.iigcc.org/>



## United Nations Global Compact

The United Nations Global Compact is an initiative launched in 2000 to encourage companies to adopt responsible practices in the areas of human rights, labour standards, the environment and the fight against corruption. Participating companies are committed to integrating these principles into their strategies and operations, thus contributing to the sustainable development goals. The initiative is the largest of its kind, with approximately 25,000 members in 167 different countries. Ostrum Asset Management supports this initiative through Natixis, which is a signatory.

<https://www.unglobalcompact.org/>



### ***Climate Action 100+***

The Climate Action 100+ initiative was set up to encourage and motivate the 100 companies with the highest greenhouse gas emissions in the global economy to seize their opportunity to transition to clean energy and comply with the Paris Agreement. Launched in December 2017 during the One Planet Summit, it is considered one of the 12 most relevant initiatives to address climate change issues. To date, more than 600 global investors have joined the initiative.

<https://www.climateaction100.org/>



### **TCFD**

The Task Force on Climate-related Financial Disclosures (TCFD) is a working group that aims to propose recommendations on how risks and opportunities related to climate change should be disclosed.

Since 2020, Ostrum Asset Management has published its TCFD report to disclose the integration of climate risks into its overall strategy.

<https://www.fsb-tcfd.org/>



### **EFAMA**

EFAMA is the voice of the European investment management industry, representing 29 member associations, 54 corporate members and 25 associate members.

Ostrum Asset Management has been a member of several committees (including the Stewardship, Market Integrity & ESG Investment standing committee) and has been involved in working groups on responsible investment and corporate governance.

<https://www.efama.org/about/SitePages/Home.aspx>



### **AFG**

The Association Française de la Gestion Financière (AFG) brings together French asset management industry professionals and promotes their interests. The AFG promotes responsible investment through a Responsible Investment Commission of which Ostrum Asset Management is a member. This Commission has several working groups with the aim of promoting sustainable finance best practices.

<https://www.afg.asso.fr/>



### **FAIRR**

Created in 2015 by the Jeremy Collier Foundation, the FAIRR Initiative is a collaborative investor network that raises awareness of the environmental, social and governance (ESG) risks and opportunities in the global food sector.

It now has more than 400 investor members representing some \$75 billion in assets. FAIRR provides research and ESG data on the food sector and focuses on the intensive animal production industry to encourage the development of a sustainable food system.

<https://www.fairr.org/>



## ICMA

The International Capital Market Association (ICMA) is an international body headquartered in Switzerland, with more than 620 members based in nearly 68 different jurisdictions. The mission of ICMA is to promote resilient and well-functioning international debt capital markets.

Working actively with its members in all segments of markets, ICMA focuses on a comprehensive range of regulatory, market and other relevant issues which impact market practices and the functioning of the international debt capital markets.

<https://www.icmagroup.org/>



## GBP and SBP

The Green Bond Principles (GBP) and the Social Bond Principles (SBP) are an initiative of the International Capital Market Association (ICMA) whose aim is to establish recommendations on transparency and disclosure and promote integrity in the development of the green and social bonds market.

<https://www.icmagroup.org/>



## WORKING GROUPS

FINANCIAL MARKET BODIES	COMMITTEES/WORKING GROUPS
	<ul style="list-style-type: none"> <li>Responsible Investment Plenary</li> <li>Responsible Investment Commission</li> <li>Working Group: bringing transition plans into operation</li> <li>SFDR Working Group</li> <li>CSRD Working Group - biodiversity</li> </ul>
	<ul style="list-style-type: none"> <li>Dialogue &amp; Engagement Committee</li> <li>Working Group: Social indicators &amp; taxonomy</li> </ul>
	<ul style="list-style-type: none"> <li>Impact reporting on environmental and social projects financed by funds raised through sustainable bonds</li> <li>Sustainability-linked bond issuance practices</li> <li>Green enabling activities, insofar as they facilitate the achievement of environmental objectives in certain sectors</li> </ul>

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

Additionally, Ostrum Asset Management is involved in various events relating to responsible finance in general as well as more specific themes such as the Taxonomy and Biodiversity.



# 3

## INTERNAL AND EXTERNAL RESOURCES TO SUPPORT ESG



### 3. INTERNAL AND EXTERNAL RESOURCES TO SUPPORT ESG

#### 3.1. Internal and external resources deployed by the entity

##### HUMAN RESOURCES TASKED WITH INTEGRATING ESG CRITERIA

##### GROWING INVOLVEMENT OF THE VARIOUS BUSINESS LINES

The rise in ESG issues, particularly over the last 10 years, has transformed the roadmap for a number of companies' businesses. In addition to strengthening its governance [see below], all Ostrum Asset Management's departments have taken on more responsibilities.

Summary table of full-time **equivalents working on ESG issues**:

BUSINESS LINE	INTERNAL FTE
Risk department	4 FTE
Operations and Transformation department	3.25 FTE
Portfolio Management department	26.4 FTE
Communications department	0.7 FTE
Sustainable Transitions department	7 FTE
Development department	5 FTE
Permanent Control department	1.25 FTE
<b>Total</b>	<b>47.6 FTE</b>
FTEs as a % of the total workforce	18.4%

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## FINANCIAL RESOURCES TO SUPPORT INTEGRATION OF ESG CRITERIA

In 2024, we allocated **financial** resources to the integration of ESG criteria. These resources, shown in a summary table that also includes external full-time equivalents, provide a more in-depth view of the use of the various modules taken into account this year.

Summary table **of ESG-related expenses**

BUSINESS LINE	EXPENSES	THEME
Transformation department	€45,600	Support assignment
Development department	€160,000	Improvements to ESG reporting for clients and accreditation
Communications department	€143,000	Participation in ESG forums, publications, internal communications, reports, etc.
Portfolio management	€2,400,123	Total amount of data providers
Operations & Technology department	€1,664,000	External resources for Portfolio Management and Service Platform activities
<b>Total</b>	<b>€4,412,123</b>	
ESG expenses as a % of Ostrum Asset Management's total budget <sup>17</sup>	5.8%	
ESG expenses as a % of total AUM	0.00106%	

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## EXTERNAL TECHNICAL RESOURCES TO SUPPORT INTEGRATION OF ESG CRITERIA

Ostrum Asset Management's teams draw on qualitative and quantitative data that are selected for their relevance, wide coverage and complementarity to derive an integrated useful ESG analysis, incorporating climate and biodiversity. These various sources, as well as details on direct and frequent discussions with companies' management, are available to our Portfolio Management teams.

<sup>17</sup> Ostrum Asset Management's total expenses at 31/12/2024, excluding Payroll and excluding Platform billing representing expenses outside Ostrum Asset Management Gestion.

## Summary table of the main sources of external data

LIST OF DATA PROVIDERS		
Database providers	Scope	Description
Trucost S&P	1. Corporate carbon 2. Corporate 2DA 3. Corporate green/social/sustainability bond	<ul style="list-style-type: none"> <li>Enterprise Value/Market Cap</li> <li>CO<sub>2</sub> equivalent data for corporates and sovereigns</li> <li>Climate change scenario alignment [1.5°C, 2°C, etc.]</li> <li>Projected emissions</li> <li>Assessment of the green/social/sustainable nature of a bond issued by a corporate and updating of the <i>flag</i> with certain data on <i>green bonds</i> and their issuer</li> <li>Information on coal issuers</li> <li>Physical and transition risks</li> </ul>
LBPAM	Corporate ESG indicators	<ul style="list-style-type: none"> <li>GREaT score for corporate issuers</li> </ul>
MSCI	ESG indicators	<ul style="list-style-type: none"> <li>Indicators used in the GREaT methodology</li> <li>PAI</li> <li>SDG for Corporates</li> <li>Taxonomy</li> <li>Qualitative ESG analyses of issuers</li> </ul>
Sustainalytics	Corporate ESG Worst Offenders exclusion	<ul style="list-style-type: none"> <li>ESG indicators for Corporates</li> <li>Qualitative ESG analyses of issuers</li> <li>Alert on issuers with a controversy based on our Worst Offenders exclusion policy</li> </ul>
ISS OEKOM	Voting ESG indicators	<ul style="list-style-type: none"> <li>Provision of the voting platform (platform to submit votes to account holders)</li> <li>Analysis of so-called "<i>non-core</i>" securities: determination of the outcome of the vote based on the scope and in accordance with the voting policy provided to it</li> <li>Voting on so-called "<i>non-core</i>" securities (excluding blocking markets)</li> <li>"Core" and "<i>non-core</i>" votes sent to account holder</li> <li>Analysis of Corporates based on our controversial weapons exclusion policy</li> </ul>
Bloomberg	Green Bonds flag	<ul style="list-style-type: none"> <li>Information on the GSS nature of a bond</li> </ul>
Iceberg DataLab	Biodiversity footprint	<ul style="list-style-type: none"> <li>Biodiversity indicators for Corporates</li> </ul>
Carbon4	Climate alignment	<ul style="list-style-type: none"> <li>Corporates and Sovereigns</li> </ul>

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

In addition to the data providers we have selected, we regularly use data collected by organisations that work specifically on Climate or Biodiversity.

SPECIFIC EXTERNAL DATABASES FOR CLIMATE AND BIODIVERSITY ASPECTS		
Database providers	Scope	Description
Sustainable Development Goals (SDG)	ESG sovereign	<ul style="list-style-type: none"> <li>Overall SDG score + 17 SDG</li> <li>Gross indicators for Sovereigns + SSA ESG HR for the SRI accreditation</li> </ul>
CDP	Corporate carbon	<ul style="list-style-type: none"> <li>Carbon emissions reported by companies</li> <li>Climate/Biodiversity database to provide input for the internal database</li> </ul>
Urgewald	Corporate	<ul style="list-style-type: none"> <li>List of companies involved in the coal (GCEL) and oil &amp; gas (GOGEL) value chain</li> </ul>
Climate Action 100+	Corporate Carbon	<ul style="list-style-type: none"> <li>ESG indicators to track the progress of climate commitments by companies that emit the most gas</li> </ul>
Science-Based Targets initiative (SBTi)	Corporate 2DA	<ul style="list-style-type: none"> <li>Database of companies that have issued a science-backed climate goal</li> </ul>
Carbon Tracker	Corporate Carbon	<ul style="list-style-type: none"> <li>ESG indicators on the effects of climate change on financial markets</li> <li>ESG indicators on the climate alignment of issuers involved in the oil &amp; gas, electricity and utilities sectors</li> </ul>

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



## 3.2. Training and awareness

### TRAINING

Sustainable finance lies at the heart of our strategy here at Ostrum Asset Management, and we have ensured that all our staff – regardless of their business line – can develop their awareness of these key challenges and clearly understand the motivating factors behind our commitment and our ambition to bolster our expertise in this area in the current regulatory, environmental and social environment.

### OVERVIEW OF 2020-2024 TRAINING

Increased training and awareness

2020	2021	2022	2023	2024
<ul style="list-style-type: none"> <li>• Training: ESG issues and competitive &amp; regulatory context 100% of employees</li> <li>• Training on responsible investment + Ostrum AM vision 100% of managers, analysts, and the Client Relations department</li> <li>• 4 training sessions on exclusion policies, ESG integration (equity + credit research), collaborative engagement Product specialists and analysts</li> <li>• 1 meeting on the Taxonomy Managers, analysts and product specialists</li> </ul>	<ul style="list-style-type: none"> <li>• Training: Biodiversity issues and regulatory context 100% of employees</li> <li>• Training: ESG and biodiversity 100% of managers and analysts</li> <li>• Awareness-raising session on various topics: SFDR, climate alignment, GSS bonds market outlook, SDG Index Mainly managers, analysts and product specialists</li> </ul>	<ul style="list-style-type: none"> <li>• 7-hour training: Disclosure, Taxonomy, CSRD 100% of Risk department employees</li> <li>• Training in 6 workshops: Sector ESG analysis Analysts</li> <li>• CFA ESG: 11 employees</li> <li>• Step up academy ESG: 2 employees Managers</li> <li>• Pilot session: Fresque du Climat Employees</li> <li>• Provision of a Sustainability training page All employees</li> <li>• Workshops on Engagement, Biodiversity, Oil and Gas Mainly managers, analysts</li> <li>• Session on regulations Mainly managers, analysts</li> </ul>	<ul style="list-style-type: none"> <li>• Training on Taxonomy and its consequences 100% of managers, analysts (mandatory) + risk, control, compliance, strategy, transformation, IT ESG correspondent recommended]</li> <li>• CFA ESG: 12 employees Managers</li> <li>• Fresque du Climat sessions and Fresque de la Biodiversité pilot session Employees</li> <li>• Sessions on engagement, biodiversity footprint, engagement database, Mainly managers, analysts</li> </ul>	<ul style="list-style-type: none"> <li>• Training on the Taxonomy (last 4 chapters) 100% of managers, analysts (mandatory) + risk, control, compliance, strategy, transformation, IT ESG correspondent recommended]</li> <li>• Training on the CSRD and its impacts on management 2 pilot sessions</li> <li>• Fresque du Climat et de la Biodiversité sessions Employees</li> <li>• Sessions on V3 accreditation, exclusion and engagement policies, internal non-financial scores Development department</li> </ul>

EXTERNAL TRAINING

INTERNAL TRAINING

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## FOCUS ON CLIMATE SCHOOL

Since 2022, comprehensive climate training has been offered to Ostrum Asset Management employees by BPCE Group in the form of 30 videos explaining the consequences of climate change. These courses address topics such as biodiversity, interactions within ecosystems, and the impacts of overuse of resources and pollution on the economy.

Participants can measure the growing impact of climate change on society and understand the behaviours to adopt in this context.



**A clause was added to our incentive agreement to encourage a shift towards a CSR and ESG culture.**

This clause stipulates that at least one CSR e-learning training course be taken by at least 30% of the workforce.

**At 65.3%, in 2024,** we easily exceeded this percentage.

## COMMUNICATION

An internal and external communication plan was developed to raise our employees' awareness of ESG matters and shed further light on our engagement efforts.

Internally, Ostrum Asset Management employees have received ESG training via articles on our social network, focuses in the newsletter and meetings on our vision of sustainable finance.

Outside the company, our experts gave numerous interviews, wrote press articles and took part in round table discussions and conferences, including:

- At the "Time to Change" Climate, Energy and Sustainable Finance Forum, which addressed reconciling biodiversity and energy;
- At the ESG & Impact Investing Forum, which focused on the Just Transition;
- At the "Assurer pour le climat" conference, on the decarbonisation of portfolios.

These events enabled Ostrum Asset Management to share its expertise on a range of topics and affirm its commitment to ESG principles and the promotion of sustainable finance.

# 4

## ESG APPROACH AND GOVERNANCE

Integrating ESG  
at the governance level



## 4. INTEGRATING ESG AT THE GOVERNANCE LEVEL

### 4.1. Supervision of ESG and climate matters by the management bodies

The Board of Directors approves strategic decisions, particularly regarding our fiduciary duty to our various stakeholders in our capacity as a responsible investment manager. In 2024, each Board meeting included a presentation of past and forthcoming changes in our CSR and ESG strategy.

At this stage, Ostrum Asset Management does not incorporate environmental, social and governance quality criteria into the Board of Directors' internal rules. Work is under way to consider rolling out these objectives in its supervisory body.

The CSR policies and ESG strategy regarding investment decisions are implemented at the highest level within Ostrum Asset Management by the Executive Committee.

They are set out in an action plan approved either by the Executive Committee or by the Sustainable Finance Committee, with progress towards our goals monitored by the Executive Committee on a six-monthly basis. Decisions on corrective action are taken at meetings when necessary.

### COMPOSITION OF THE BOARD OF DIRECTORS



**Stéphanie Paix**  
Chairwoman of the Board of Directors,  
Senior Advisor, BPCE Group

**Cédric Glorieux**  
Head of Products and Solutions,  
Retail Banking and Insurance,  
BPCE Group

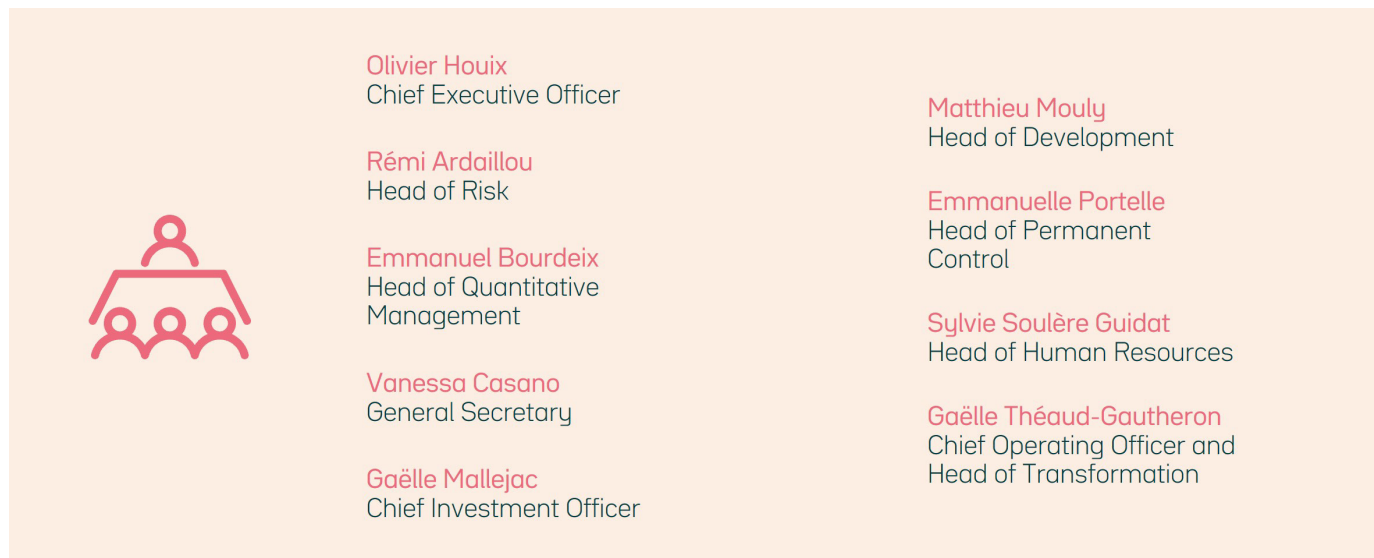
**Christophe Lanne**  
Head of HR and Transformation at  
Natixis IM, Executive President  
of Natixis IM OS and Chairman of Natixis  
IM OS Board of Directors

**Jennifer Baert**  
General Counsel  
of Global Financial Services

**Nathalie Bricker**  
Deputy CEO  
of Natixis IM



## COMPOSITION OF THE EXECUTIVE COMMITTEE



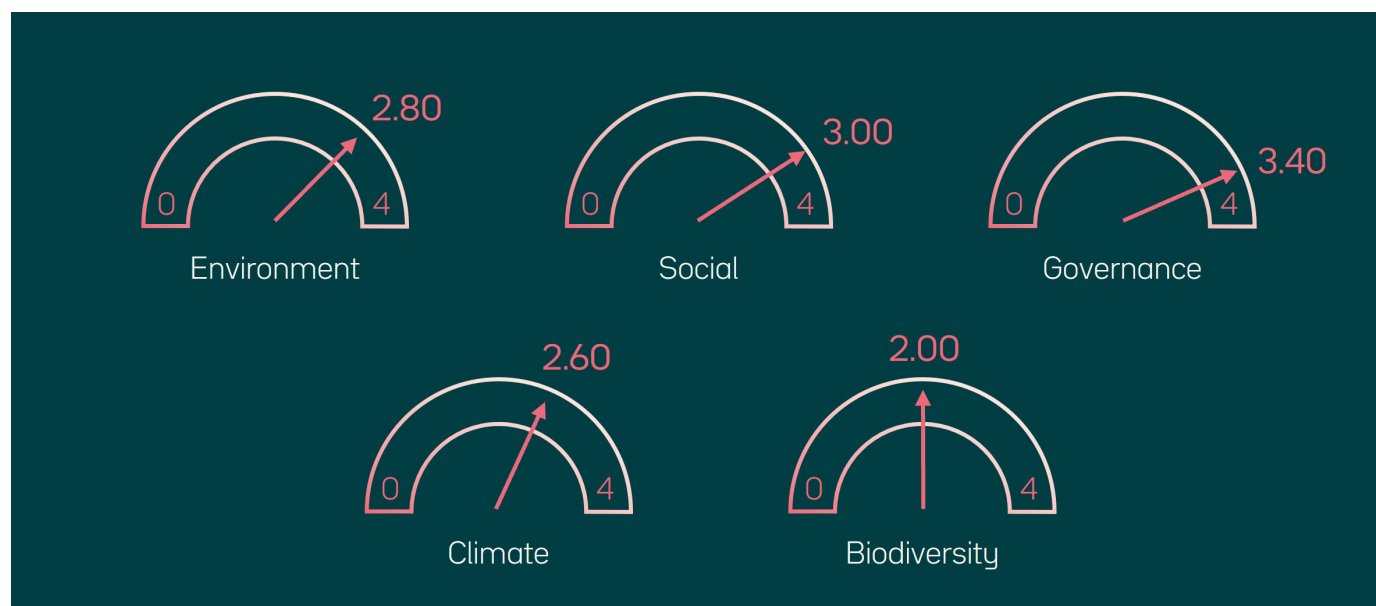
Ostrum Asset Management conducts an annual survey with all members of the Board of Directors and the Executive Committee, comprising questions on their knowledge of and expertise in environmental, social, governance, climate and biodiversity themes.

The score ranges from 1 for a basic degree of insight to 4 for an extremely high degree of expertise.

These scores have improved year after year as a result of campaigns to train and raise awareness on these dimensions.

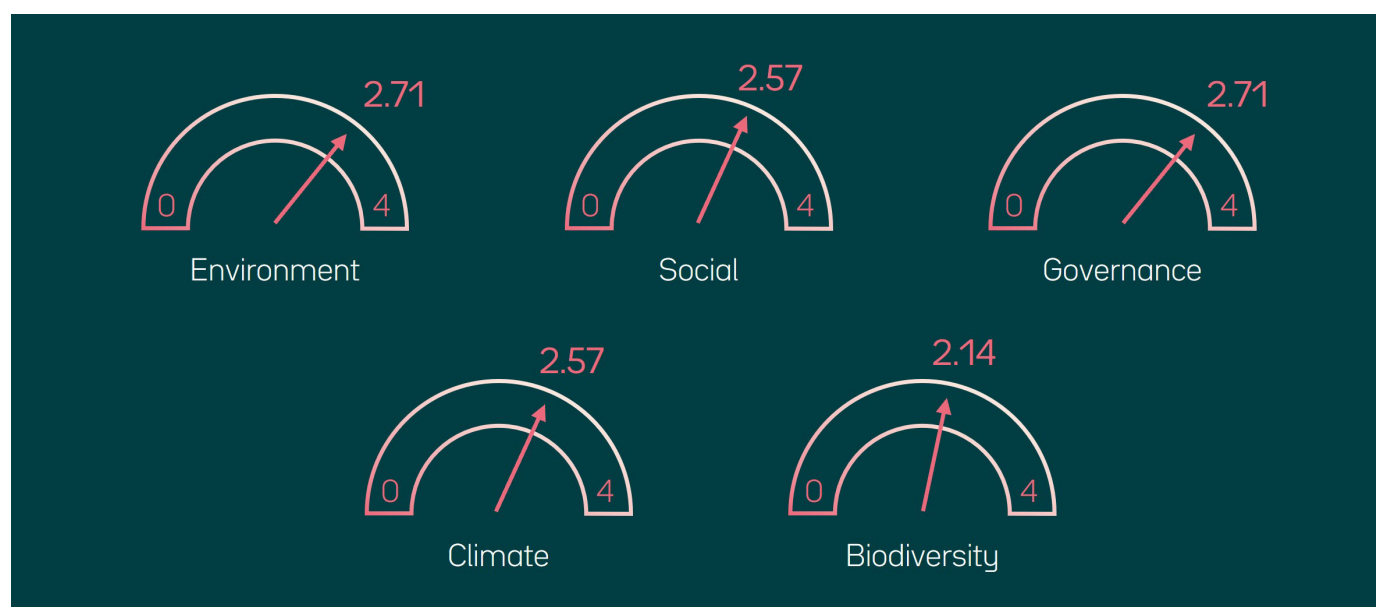


## SURVEY OF ESG KNOWLEDGE WITH BOARD MEMBERS



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## SURVEY OF ESG KNOWLEDGE WITH EXECUTIVE COMMITTEE MEMBERS



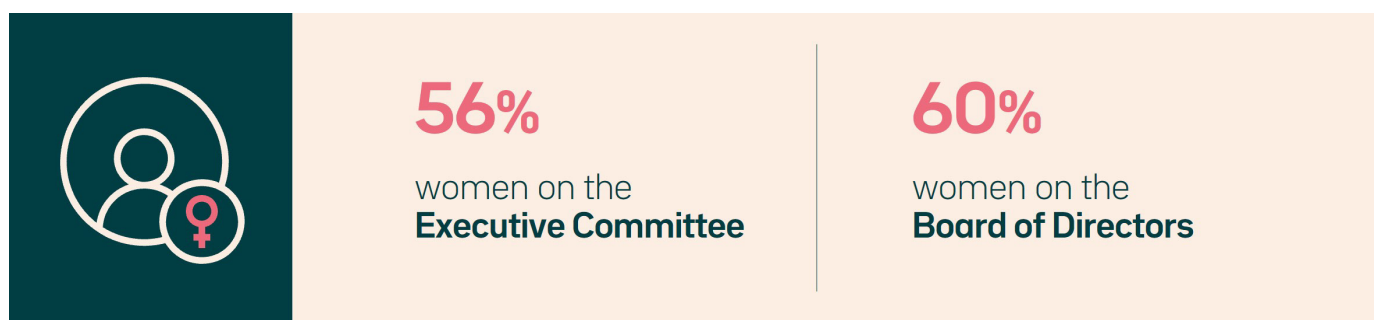
SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## GENDER EQUALITY

Ostrum Asset Management's policy on gender equality and anti-gender bias is fully in line with the Rixain Law, which aims to accelerate economic and professional equality between men and women.

31% of the members of the management teams responsible for investment decisions are women and 69% are men. The entire Portfolio Management department is headed by a woman.

In 2024, Ostrum Asset Management maintained its approach, with women representing more than 40% of new hires at the company. The initial target of 30% women on the Executive Committee was exceeded as of 2021 and this proportion continued to grow to 56% in 2024. Gender equality was also exceeded on the Board of Directors, where 60% of members are women and 40% are men.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## 4.2. ESG governance at Ostrum Asset Management

### ROLES AND RESPONSIBILITIES OF THE VARIOUS COMMITTEES AND BUSINESS LINES



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

### 4.2.1. Business lines' ESG and Climate organisation

#### SUSTAINABLE TRANSITIONS DEPARTMENT

In 2024, Ostrum Asset Management created a Sustainable Transitions department, which reports directly to the Chief Executive Officer. This new department is tasked with developing one of Ostrum Asset Management's strategic priorities: its value proposition in terms of ESG (Environment, Social and Governance) and CSR (Corporate Social Responsibility).

Both the ESG and CSR teams work together in this department and share a common mission: to mobilise and engage all Ostrum Asset Management's business lines around environmental and social issues. They play a crucial role in encouraging collaboration and cross-functionality among all the company's departments.

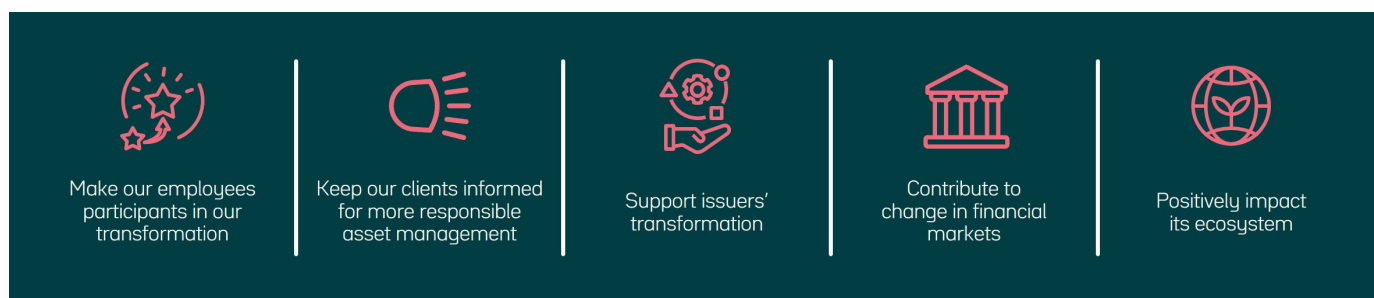
#### CSR

The role of CSR is to identify all impacts of the company's activity on its stakeholders and oversee the management of these impacts with the relevant business lines.

Ostrum Asset Management has a responsibility to its staff, its clients, issuers, the financial market and civil society, and our CSR policy sets out the various priorities it pursues in this arena. This policy also includes an action plan as well as a set of targets.

Our impact on the environment and climate change is a crucial aspect for the company and is addressed on the one hand in our day-to-day running as a company and on the other hand in our business operations as an asset manager.

Our CSR strategy has been defined as follows:



#### ESG STRATEGY

Working closely with all the business lines and more specifically with the Portfolio Management department, this team defines and steers the ESG strategy. It develops:

- the Climate and Biodiversity strategy;
- the sector and exclusion policies;
- the engagement policy;
- The thematic ranges to be implemented to achieve our objectives.

Through **three missions – train, equip and advise** – this team also acts as a real catalyst for ESG within Ostrum Asset Management.

To achieve this, the team interacts on a daily basis with its entire ecosystem: shareholders, employees, clients, data providers, financial market bodies and task forces.

## PORTFOLIO MANAGEMENT DEPARTMENT

In 2024, the Portfolio Management department updated its organisation.

- The Credit Research and Sustainability department: this department is responsible for systematically integrating ESG criteria into analysis based on double materiality. It has a cross-functional role for all portfolio management.
- Portfolio management (insurance and institutional, quantitative, other, etc.): all portfolio managers and analysts have a role in implementing our ESG strategy. Examples include integrating our clients' objectives in terms of ESG management and accreditation (SRI, GREENFIN)/categorisation (SFDR), integrating ESG issues into the voting policy and integrating Biodiversity into investment decisions.

## PERMANENT CONTROL

The Permanent Control system is built on an organisation that includes the Internal Control and Compliance departments, within the Permanent Control department.

Within this set-up, Internal Control is tasked with ensuring the effectiveness and consistency of the entire control, risk monitoring and regulation compliance system, particularly through the development of an annual control plan, the content of which is approved by the Executive Committee and which includes controls related to "Sustainable Finance".

As part of its assistance and advisory role, the Compliance department supports staff at Ostrum Asset Management in understanding applicable regulation and approves documents designed for clients or third parties as regards Ostrum Asset Management's products, solutions and expertise in Sustainable Finance.

## RISK DEPARTMENT

The Risk department comprises Operational Risk, Market Risk, Credit Risk and Investment Risk.

### 1. Operational risks

The Risk department updates senior management on Ostrum Asset Management's operational risk management system as a whole.

Operational risk mapping is presented and approved once a year. The aim of this mapping is to present and qualify areas of risk. Climate/social and environmental aspects are also incorporated into these various risks mapped.

In the current mapping, climate risks are taken into account in a cross-dimensional way and affect various sectors. They are naturally included in the “Business interruption (information system, building, staff)” category in the event of a flood or storm. They are included in more than on a third of the risks identified in the mapping that includes ESG-related risk. They are therefore included in risks such as:

- failure in the process for developing/publishing marketing documents or prospectuses;
- failure in implementing a portfolio’s investment strategy;
- failure in the process for managing contractual or regulatory constraints of portfolios;
- failure in defining or implementing the voting policy;
- failure in the process for developing and/or publishing client reporting;
- failure in the process for developing or publishing regulatory reporting.

Any incidents reported by the business lines are analysed and monitored through to resolution and may lead to recommendations by the Operational Risk department for implementation by the business lines with a view to reducing the impacts and/or frequency of occurrence of these risks.

## 2. Investment, Credit and Market Risks

The Risk department, through its Investment, Credit and Market Risk departments, ensures compliance with non-financial criteria for portfolio management.

For example, its teams are involved in drawing up lists of sectors whose securities and issuers are to be excluded or monitored. Once validated, these lists are updated in the control systems and controls are performed on investments and divestments in accordance with Ostrum Asset Management’s policies and those of our clients. The teams are also responsible for validating the ESG criteria integrated into the management processes, confirming the methods used to calculate indicators, their proper integration into the information system, and implementing related level two controls. Lastly, the Risk department takes part in preliminary analysis for the selection of data providers and helps define and roll out our ESG risk framework.

### 4.2.2. Committees and working groups on ESG

Ostrum Asset Management has set up a number of committees and working groups to tackle ESG matters:




- Sector exclusion committees;
- Worst Offenders Committee;
- TCFD and ECL (Energy-Climate Law) working group;
- Sustainable Finance Committee;
- Financial Risks, ESG and Performance Committee;
- Operational Risk Committee.






## SECTORAL EXCLUSIONS COMMITTEES

 Mission	<p>These committees deal with sector policies such as coal, controversial weapons and oil and gas.</p> <p>They deliberate on and approve exclusion lists for the various sectors concerned, and are also involved in approving any exceptions to these lists.</p>
 Participants	<p>These committees include the Investment Officers and the Heads of the Sustainable Transitions, Risk and Compliance departments (or their representatives). A report of these committee meetings is drafted.</p>
 Frequency	<p>Sector committee meetings are held at least once a year.</p>

## WORST OFFENDERS COMMITTEE

 Mission	<p>As set out in its Worst Offenders Policy, Ostrum Asset Management is committed to excluding from its investment scope all issuers whose business is proven to contravene the main principles of internationally established standards (United Nations, OECD) as regards Human Rights, Labour Rights, environmental protection and business ethics.</p> <p>All alerts raised must be reviewed and analysed by the Worst Offenders working group, using a proprietary methodology, which then presents its recommendations to the Worst Offenders Committee for approval.</p>
 Participants	<p>The Worst Offenders Working Group comprises members of Portfolio Management, the Risk department, Credit Research and Sustainability and the Sustainable Transitions department.</p> <p>The Worst Offenders Committee comprises, through a specific governance structure, Investment Officers and the Heads of the Sustainable Transitions, Risk and Compliance departments (or their representatives).</p>
 Frequency	<p>The Worst Offenders Committee must meet at least once a year. Ostrum Asset Management may hold exceptional committee meetings in case of a major development involving an issuer.</p>




## RESPONSIBLE INVESTMENT REPORT WORKING GROUP [ECL and TCFD]

 Mission	<p>This working group is tasked with analysing Ostrum Asset Management's policies and organisation in light of the recommendations of the TCFD and the rules of Article 29 of the Energy Climate Law (entity level), and setting out the situation in a formal report. It is also in charge of launching initiatives to best address the reference framework set by the TCFD and the ECL. The results are presented at the Sustainable Finance committee meeting.</p>
 Participants	<p>The working group includes a member of the ESG Strategy team, the Head of CSR, and a representative from the Risk department.</p>
 Frequency	<p>This group was set up in 2020 and meets five times a year.</p>




## SUSTAINABLE FINANCE COMMITTEE

 Mission	<p>The main role of the Sustainable Finance Committee is to ensure consistency between the CSR Corporate strategy and the way it is applied in our investment policies, pre-emptively identify CSR and ESG topics, prioritise and monitor CSR and ESG projects, share the company's guidelines and priorities with as many as possible and approve key decisions regarding the ESG strategy.</p>
 Participants	<p>This committee includes members of the Sustainable Transitions department, the Portfolio Management department, the Development, Risk and Compliance departments and the Operations and Transformation department; it is chaired by the Chief Executive Officer.</p>
 Frequency	<p>This committee meets five times a year.</p>

## FINANCIAL RISK, ESG AND PERFORMANCE COMMITTEE

 Mission	<p>The Risk department updates senior management on Ostrum Asset Management's financial and non-financial risk management system as a whole. It presents specific risk indicators for each major group of financial risks (market, credit and counterparty, liquidity, model) and non-financial risks (regulatory and internal constraints, exclusion policy, ESG risk control system) and an explanation of the performance of the various portfolios and management processes, while also highlighting any exceedances or anomalies observed over the period.</p>
 Participants	<p>This committee comprises the Chief Executive Officer, the General Secretary, the Head of Risk, the Head of Permanent Control, the Chief Investment Officers, the Head of Sustainable Transitions, the Head of Development, the Head of Investment Risk and the Head of Market Risk.</p>
 Frequency	<p>It meets on a quarterly basis.</p>

## OPERATIONAL RISK COMMITTEE

 Mission	<p>The Operational Risk Committee updates senior management on Ostrum Asset Management's operational risk management system as a whole. Its purpose is to:</p> <ul style="list-style-type: none"> <li>• present a summary of incidents and losses;</li> <li>• approve the action plans presented by the team, appoint those in charge and the related timeframes;</li> <li>• present an update of progress on past action plans and risk indicators.</li> </ul>
 Participants	<p>It comprises members of the Executive Committee, heads of the various departments at Ostrum Asset Management and the Head of IT Systems Security and is chaired by the Head of Operational Risk.</p>
 Frequency	<p>It meets on a quarterly basis.</p>

### 4.3. Integrating ESG into remuneration practices

#### INCENTIVES

On average, 10% of the variable remuneration of the Executive Committee members is indexed to indicators set out in the CSR and/or ESG policy.

In terms of the portfolio management teams, the variable remuneration of the Credit Research and Sustainability teams is indexed to ESG integration goals.

Specific criteria are taken into account when reviewing portfolio managers and analysts, depending on their department.

For analysts and portfolio managers, the criteria are, depending on their business line and the asset class:

- the number of companies analysed with ESG integration;
- the number of specific non-financial analyses;
- the number of controversies where they coordinated with ESG strategy;
- the number of ESG engagement initiatives carried out;
- the success of fund accreditation based on the timetable;
- the ability to make changes to the portfolios with a view to their Article 8 classification;
- the integration of investors' ESG policies for dedicated fund management, i.e. scores, exclusion, etc.

5

OUR  
ENGAGEMENT  
STRATEGY



## 5. OUR ENGAGEMENT STRATEGY

Our engagement strategy is built on five pillars:

- dialogue with companies and governments;
- our voting policy;
- sector and exclusion policies (described in section 2.1.1);
- collaborative engagement;
- financial market engagement (described in section 2.4).

We target the fulfilment of certain Sustainable Development Goals via our full range of individual and collaborative engagement initiatives. Drawing on the SDG relating to Climate and Biodiversity, we are also able to identify sustainability risks, as required by European (SFDR) and French (Energy-Climate Act) regulations.

Our sector and exclusion policies (coal, oil & gas, tobacco, controversial weapons, etc.) are also strong areas for engagement.

For more details on our voting and engagement policies, please visit our [website](#).

### 5.1. Individual engagement

#### 5.1.1. Priority themes and areas of engagement

Ostrum Asset Management has identified eight priority themes of engagement in environmental, social and governance matters that cross-cut our equity and fixed-income investment activities. Each analyst (equity and/or fixed-income) draws on these shared themes to undertake specific initiatives while also complying with our engagement policy.



Our priority themes and areas of engagement:

OUR THEMES AND AREAS OF ENGAGEMENT		
<b>1. Support mitigation and adapt to climate change</b>	<p>By reducing CO<sub>2</sub> emissions to achieve carbon neutrality by 2050</p> <p>By managing physical and transition risks</p>	 
<b>2. Limit impact on environmental ecosystem</b>	<p>By optimizing resource management</p> <p>By safeguarding biodiversity</p>	 
<b>3. Promote human capital</b>	<p>By maintaining strong relationships with staff</p> <p>By ensuring staff's and subcontractors' health and safety</p>	  
<b>4. Enhance relationships with stakeholders</b>	<p>By guaranteeing human rights in supply chains</p> <p>By maintaining strong relationships with local communities</p>	 
<b>5. Ensure consumer security and protect their data</b>	<p>By ensuring consumers' security and health</p> <p>By ensuring their data security</p>	
<b>6. Safeguard business ethics</b>	<p>By rolling out an anti-corruption policy</p> <p>By ensuring a transparent tax policy</p>	
<b>7. Balance powers and compensation</b>	<p>By implementing balanced governance</p> <p>By making the compensation policy transparent</p>	 
<b>8. Improve data transparency</b>	<p>By facilitating access to financial and non-financial data</p>	

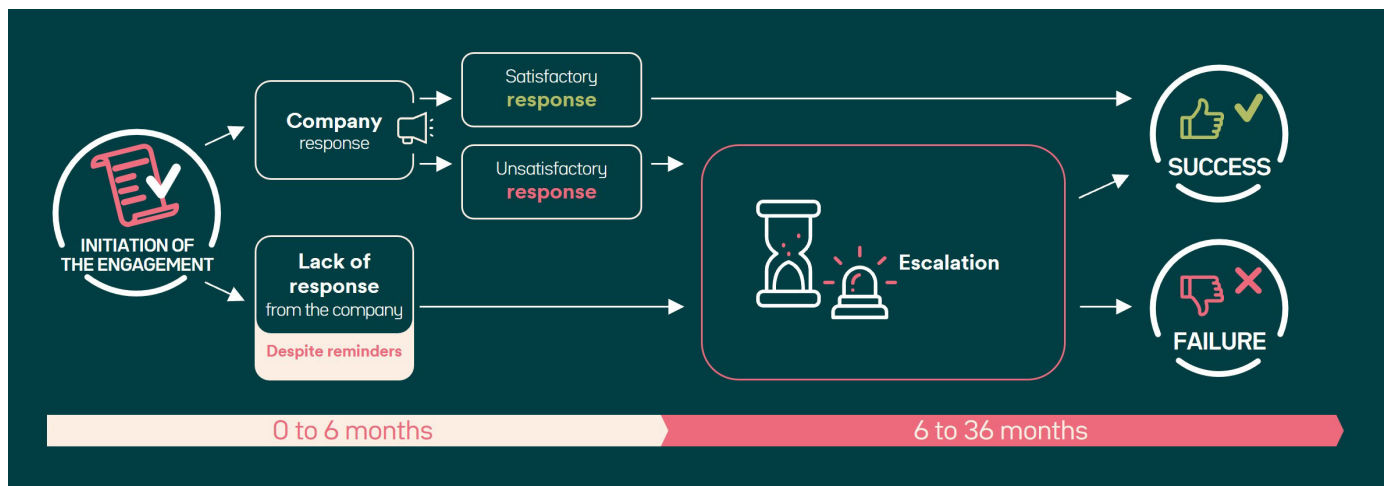
SOURCE: OSTRUM ASSET MANAGEMENT

These themes of engagement are shared across all of Ostrum Asset Management's portfolio management teams. **Some are emphasised more by the fixed-income portfolio management teams and our credit analysts while others are prioritised by our equity portfolio management teams.**

Some themes are not the subject of specific engagement efforts by our portfolio management teams. Certain themes are deemed essential and are the subject of ongoing dialogue while for others there is insufficient data at this stage to be able to engage with companies on them. Nonetheless, these themes can be highly significant in our assessment of companies' CSR policies. As such, we pay close attention to them as part of our **controversy management policy (Worst Offenders)**. Ostrum Asset Management is careful in particular to ensure that issuers that are the subject of a controversy are monitored closely in accordance with our procedures.

### 5.1.2. Escalation principle

Ostrum Asset Management has established an escalation process to ensure rigorous monitoring of its engagement initiatives.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

When the engagement process does not lead to a satisfactory response, the escalation strategy may take the form of various actions, grouped into several categories:



For SRI-labelled products, the escalation strategy is also applied, with additional actions planned in two specific cases:

- **Score Improvement Approach:** exclude from the portfolio issuers that are among the 30% with the lowest scores in the initial investment universe if no improvement is observed after three years.
- **Enhanced Vigilance:** exclude issuers that do not publish a credible transition plan within three years.

The escalation process takes effect on the policy review date.

### 5.1.3. Key figures

**153** engagement initiatives were conducted with **97** different companies.

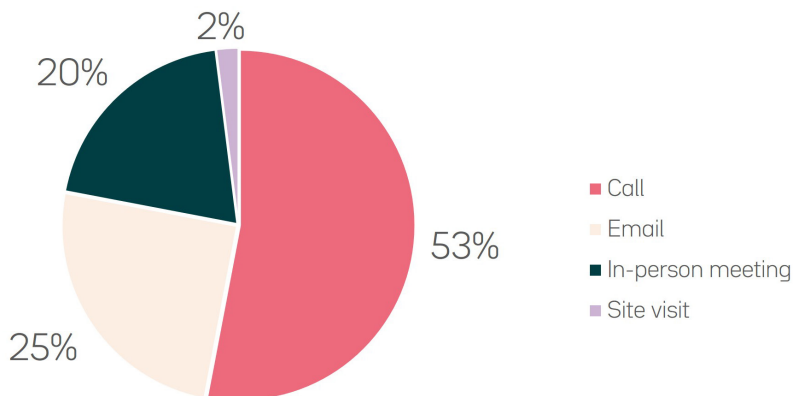
**112** meetings and contacts on financial and non-financial topics were organised with companies

including **65** with fixed-income issuers (excl. GSSS)

#### MAIN THEMES FOR DIALOGUE IN 2024

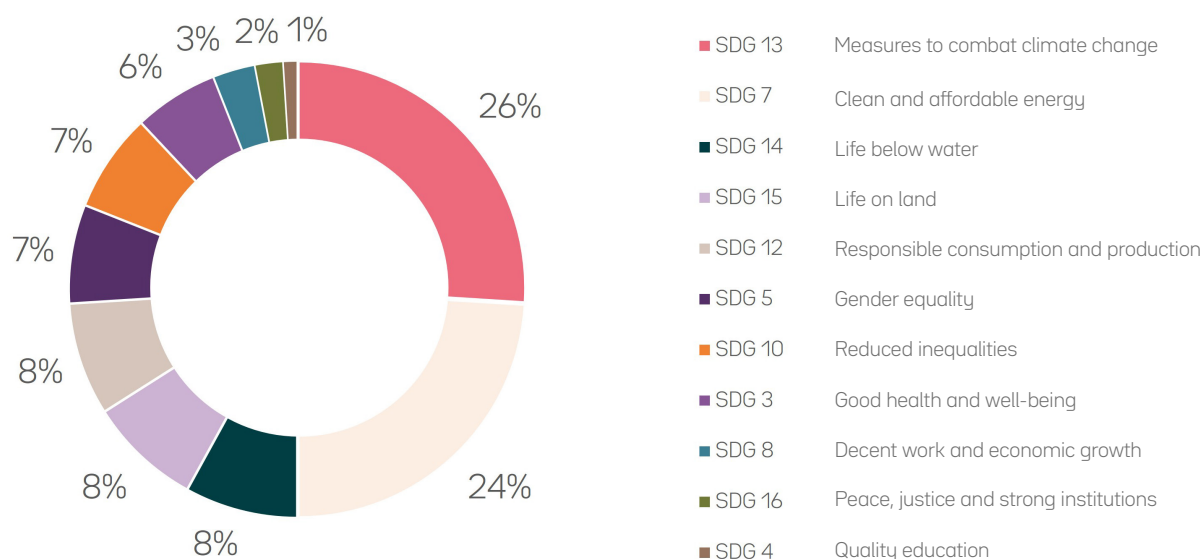
- Support mitigation and adapt to climate change
- Limit impact on environmental ecosystem
- Balance powers and compensation

#### Main meeting formats



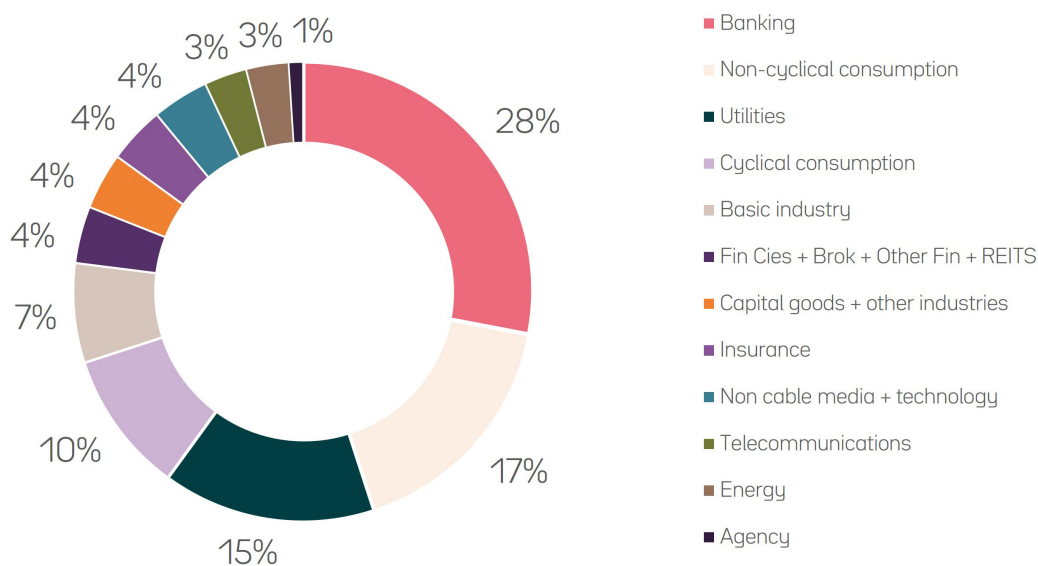
SOURCE: OSTRUM AM

## Breakdown of engagement initiatives **by SDG**



SOURCE: OSTRUM AM

## Breakdown **by sector**



SOURCE: OSTRUM AM

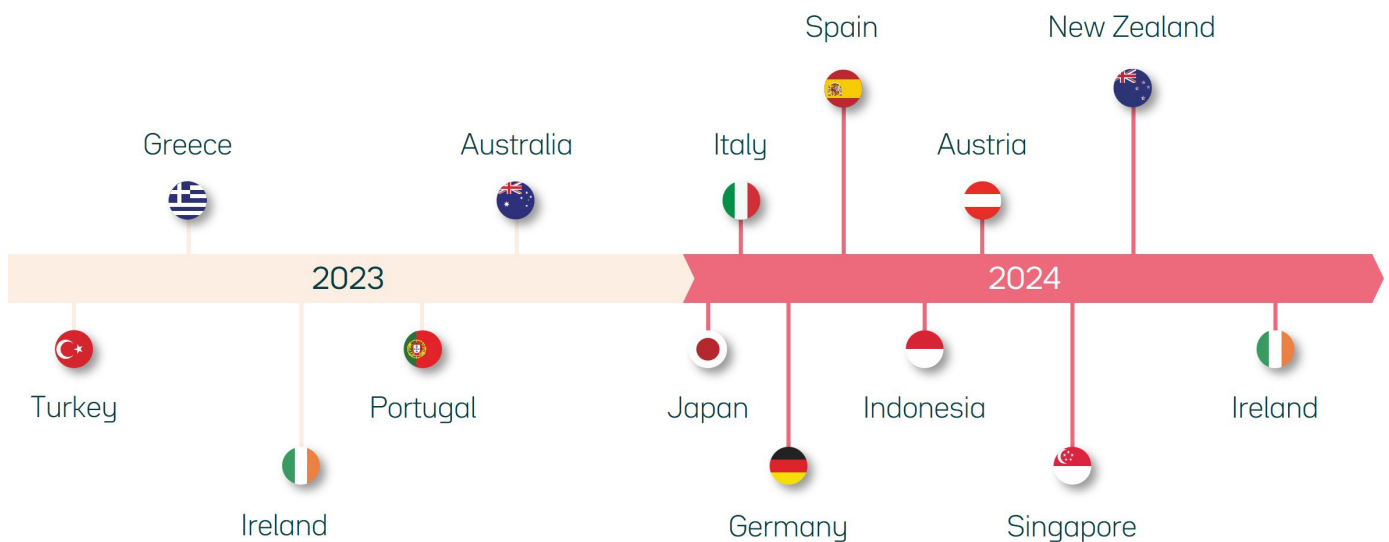
#### IMPROVEMENT PLAN IN 2025:

To strengthen its engagement policy and processes, Ostrum Asset Management will develop sector-specific engagement frameworks, redefine a transparent escalation process and develop a tool for monitoring our engagement initiatives.

#### 5.1.4. Focus on engagement with sovereign issuers

Through dialogue with sovereign issuers, investors can work collaboratively with policy makers to incentivise governments to take all necessary measures to ensure compliance with the principles of the UN, align themselves with the Paris Agreement and respond to the challenges of biodiversity.

Since 2023, Ostrum Asset Management has engaged in dialogue with 15 sovereign issuers:



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



## DIALOGUE WITH SOVEREIGN ISSUERS IN 2024

Engagement with sovereign issuers			
Issuer country	Score SDG Index	SDGs being worked on	Topics covered
<b>Japan</b> 17/01/2024	79.4/100	 	Transition obligation Carbon neutrality goal
<b>Italy</b> 26/01/2024	78.8/100	 	Climate strategy Phasing-out of coal
<b>Germany</b> 01/02/2024	83.4/100	 	Climate strategy Phasing-out of coal CO <sub>2</sub> emissions linked to imports
<b>Spain</b> 08/02/2024	80.4/100	 	Circular economy Climate strategy
<b>Indonesia</b> 19/03/2024	70.2/100	 	Climate strategy Net sink targets for 2030 The impacts on biodiversity and the social protection of nickel mine workers
<b>Austria</b> 20/03/2024	82.3/100	 	Dependence on Russian gas Climate strategy Circular economy
<b>Singapore</b> 25/04/2024	71.8/100	 	Green Bond Framework Just transition Climate issues Zero Waste target for 2030
<b>New Zealand</b> 06/06/2024	78.4/100	  	Green Bond Framework Climate strategy Emissions from the agricultural sector
<b>Ireland</b> 15/10/2024	78.7/100	  	Company taxation Climate transition Circular economy Spending of the budget surplus Biodiversity and housing

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## 5.2. Active and responsible voting policy

Ostrum Asset Management applies a **stringent and demanding voting policy** when exercising its voting rights at shareholder meetings across a comprehensive voting universe, addressing social and environmental matters, as well as corporate governance guidelines. We publicly disclose all votes that we take part in at shareholder meetings.

Key figures for all portfolios held:



**97%**



**Rate of participation in shareholder meetings**

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



Out of the  
**21,033**  
resolutions for vote



Ostrum Asset Management:

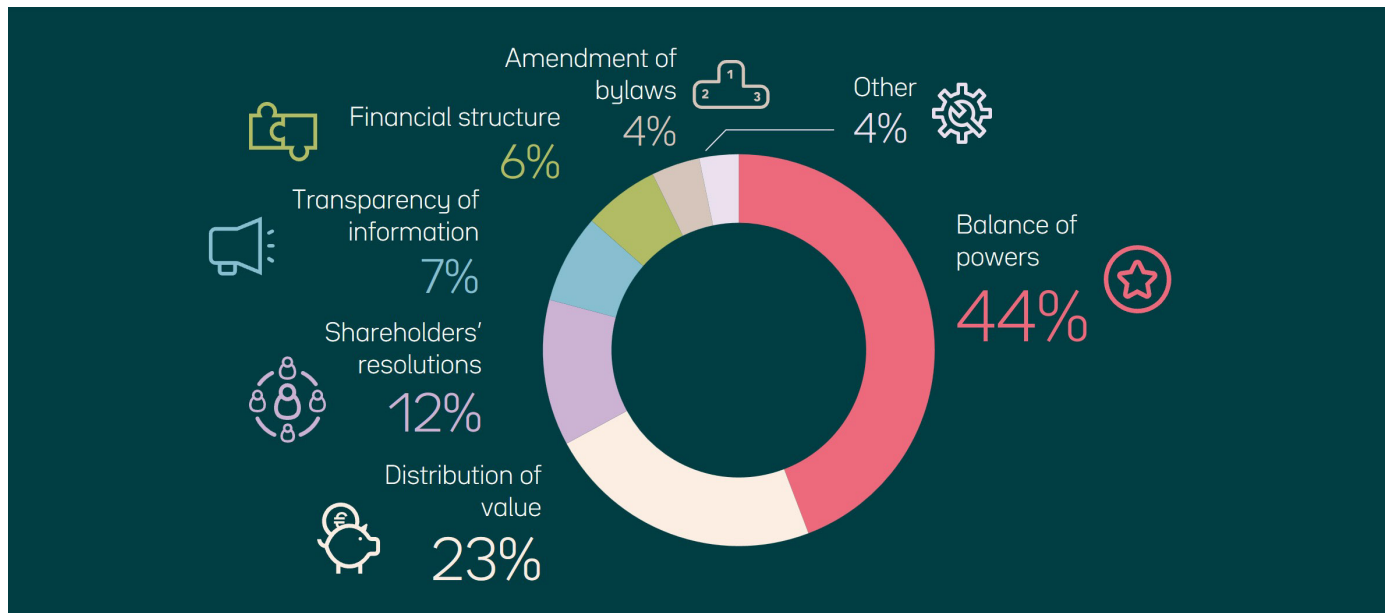
approved 90%

rejected 8%

abstained on 2% of the resolutions

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

Breakdown of votes cast against all resolutions put to shareholder vote:



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

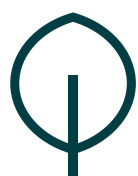
## FOCUS ON CLIMATE RESOLUTIONS (*Say on Climate* and shareholder resolutions)

A detailed consistency analysis was carried out on the climate resolutions, in particular on the following elements:

- The presence of short-, medium- and long-term objectives for relevant scopes;
- A clear strategy to achieve these objectives with, where possible, a quantified action plan (CapEx);
- Transparency of information needed to understand the company's challenges and progress;
- Governance designed to achieve these climate goals: competence of the board of directors, dialogue with the company's stakeholders, executive accountability and incentives.

### *Say on Climate*

In 2024, the number of **Say on Climate** resolutions was 26 proposals worldwide (including 16 within Ostrum Asset Management's voting scope), compared with 23 last year. It is interesting to note that no **Say on Climate** resolution was proposed by North American companies, in a context of rejection of certain climate themes, and more broadly ESG. The overall support rate for this type of resolution remained stable at 87%. Ostrum Asset Management supported 81%.



**19%**



**Votes against  
Say on Climate resolutions**

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

SAY ON CLIMATE			
Shareholder meeting	Sector	Outcome of the vote	Comment
<b>EDP</b>	Utilities	In favour	Ostrum Asset Management supports EDP in its climate transition plan, as no particular concerns have been identified regarding its implementation by the company.
<b>Unilever</b>	Food	In favour	Support for Unilever's Say on Climate is an incentive for the company, even though there seems to be considerable room for improvement of its climate policy and strategy.
<b>Icade</b>	Real estate	In favour	Climate issues are fully integrated into Icade's strategy. The company is currently on track with the targets it has set itself and has also made progress on its climate reporting methodology.
<b>TotalEnergies</b>	Energy	Abstention	TotalEnergies is committed to improving its emissions impact, as illustrated by its high score with most non-financial agencies. However, the company does not currently meet all our key oil and gas policy objectives.

### 5.3. Active engagement in collective initiatives

Ostrum Asset Management signed a number of new climate pledges in 2024.

#### **Non-Disclosure Campaign 2024 (initiated by the CDP)**

Since 2017, the CDP has led the Non-Disclosure Campaign (NDC), a worldwide investor engagement campaign aimed at improving companies' environmental transparency. Each year, the CDP contacts thousands of companies that have not yet disclosed information about their impact on climate, forests and water, encouraging them to respond to its questionnaires. Participating investors can either conduct targeted engagement initiatives or co-sign letters requesting better disclosure. In 2024, the CDP campaign was supported by 288 financial institutions representing \$29 trillion in assets under management.

#### **Statement from the private financial sector to the Member States negotiating the international legally binding instrument (ILBI) to end plastic pollution**

In support of the ILBI negotiations, this statement from the private financial sector calls for ambitious measures to combat plastic pollution. This initiative aims to encourage governments to establish clear and binding regulations for a circular economy and a drastic reduction in plastic waste. Investor signatories call on companies to be more transparent about their plastic-related risks and dependencies, and to incorporate reduction and substitution strategies. In 2024, this statement was supported by 180 financial institutions representing more than \$17.2 trillion in assets under management.

#### **2024 Global Investor Statement to Governments on the Climate Crisis (initiated by The Investor Agenda)**

Each year, The Investor Agenda coordinates a global investor statement urging governments to adopt ambitious climate policies aligned with the Paris Agreement. This initiative calls for concrete measures to accelerate the transition to a net-zero economy, including the implementation of carbon pricing, the phase-out of fossil fuel subsidies, and improved financial transparency regarding climate risks. This year, the statement was signed by 650 investors representing \$33 trillion in assets under management.

#### **Investor Initiative on Hazardous Chemicals (initiated by ChemSec)**

The Investor Initiative on Hazardous Chemicals (IIHC) aims to raise companies' awareness of the financial and environmental risks associated with hazardous chemicals, including PFAS and other persistent pollutants. Participating investors call on chemical companies to increase their transparency, phase out toxic substances and develop safer alternatives. In 2024, this initiative was supported by more than 70 investors representing \$18 trillion in assets under management.

### Investors Letter on PFAS to Ursula von der Leyen (initiated by ChemSec)

In light of the environmental and health risks associated with PFAS, also known as “forever chemicals”, ChemSec coordinated an open letter to Ursula von der Leyen, President of the European Commission. This initiative brings together investors demanding strict regulations and a gradual ban on these substances within the European Union. The letter calls for swift legislative action to protect public health, limit financial risks for companies and promote the development of safe alternatives. In 2024, this initiative was supported by 60 investors representing \$20 trillion in assets under management.

These engagement efforts come in addition to those of previous years, which are still ongoing:

- SPRING - PRI
- Climate Transition Plan Resolution Letter – CCLA Investment Management, LAPFF
- Support Retailer Tobacco – Pella Funds Management
- Tobacco Free Finance Pledge – Tobacco Free Portfolios
- Investor Coalition for Responsible Care – UNI Global Union
- Investor statement on job standards and community impacts – ICCR
- The 30% Club Investor Group for the promotion of better gender diversity within the SBF 120's executive management teams – The 30% Club Investor Group
- Investor initiative for sustainable forests (IISF) – PRI, Ceres

For more information, click on this link to view the engagement report:

<https://www.ostrum.com/fr/notre-documentation-rse-et-esg#vote-et-engagement>

# 6

## EUROPEAN TAXONOMY & FOSSIL FUEL





## 6. EUROPEAN TAXONOMY AND FOSSIL FUEL

### Share of Taxonomy-aligned and -eligible assets

AT 31 DECEMBER 2024

The share of Ostrum Asset Management's assets intended to finance Taxonomy-aligned activities:

- based on turnover was **4.02%**
- based on capital expenditure was **5.95%**

The share of Ostrum Asset Management's assets intended to finance Taxonomy-eligible activities:

- based on turnover was **14.07%**
- based on capital expenditure was **16.39%**

These calculations cover all the products [funds and mandates] managed by Ostrum Asset Management.

The concept of Taxonomy-eligible activity corresponds to an economic activity described in the delegated acts (present in the summary of the Taxonomy), whether or not this economic activity meets some or all of the technical screening criteria set out in these delegated acts. If the company carries out one of the activities listed in the Taxonomy, it is Taxonomy-eligible.

On the other hand, a Taxonomy-aligned activity is an activity for which full compliance with the technical screening criteria described in the delegated acts for the environmental objective in question has been verified.

Several steps must be taken to verify alignment:

1. Verify that the activity or activities are listed (eligibility);
2. Verify compliance with the corresponding technical criteria;
3. Ensure that the activity complies with the "Do No Significant Harm" (DNSH) principle – that it does not cause collateral damage to one or more of the other five objectives;
4. Ensure compliance with minimum social safeguards.

We use the data provided by MSCI to calculate Taxonomy eligibility and alignment.

## Share of assets invested in companies active in the fossil fuel sector

FROM 1 JANUARY TO 31 DECEMBER 2024

The share of Ostrum Asset Management's assets invested in companies active in the fossil fuel sector was **4.1%**.

This calculation covers all products (funds and mandates) managed by Ostrum Asset Management.

The methodology used for this calculation is taken from the MSCI Data Provider.

MSCI ESG Research collects data provided by companies:

- Direct company communication: sustainability reports, annual reports, regulatory filings and company websites;
- Indirect company communication: data published by government agencies, industry and trade associations and financial data providers;
- Direct communication with companies: where communication about the company is not available, investors may choose to use a subset of suggested estimated metrics (if any) based on other MSCI ESG Research datasets. These datasets are built using exclusive proprietary methodologies and contain data from companies, market and industry peers, media, NGOs, multilateral institutions and other credible institutions.

The dataset includes MSCI ESG Research's ratings, measurements, climate solutions and controversies. The components of the MSCI ACWI Index are reviewed within four months of their annual filing. All other companies in the coverage universe are reviewed on an ongoing basis within 12 months of their annual filing. Datasets whose sources are updated dynamically independent of annual filings, such as carbon emissions, Board composition and controversies, are reviewed.

MSCI ESG Research maintains robust, transparent communications with all issuers in their coverage universe. This engagement includes:

- a data review process that allows companies to comment on the accuracy of the company's data for all MSCI ESG Research reports;
- issuers' free access to published versions of all their MSCI ESG Research company reports;
- direct communication with a company concerning the company's specific ESG performance;
- a prompt response to requests made by companies to discuss their MSCI ESG Research reports.

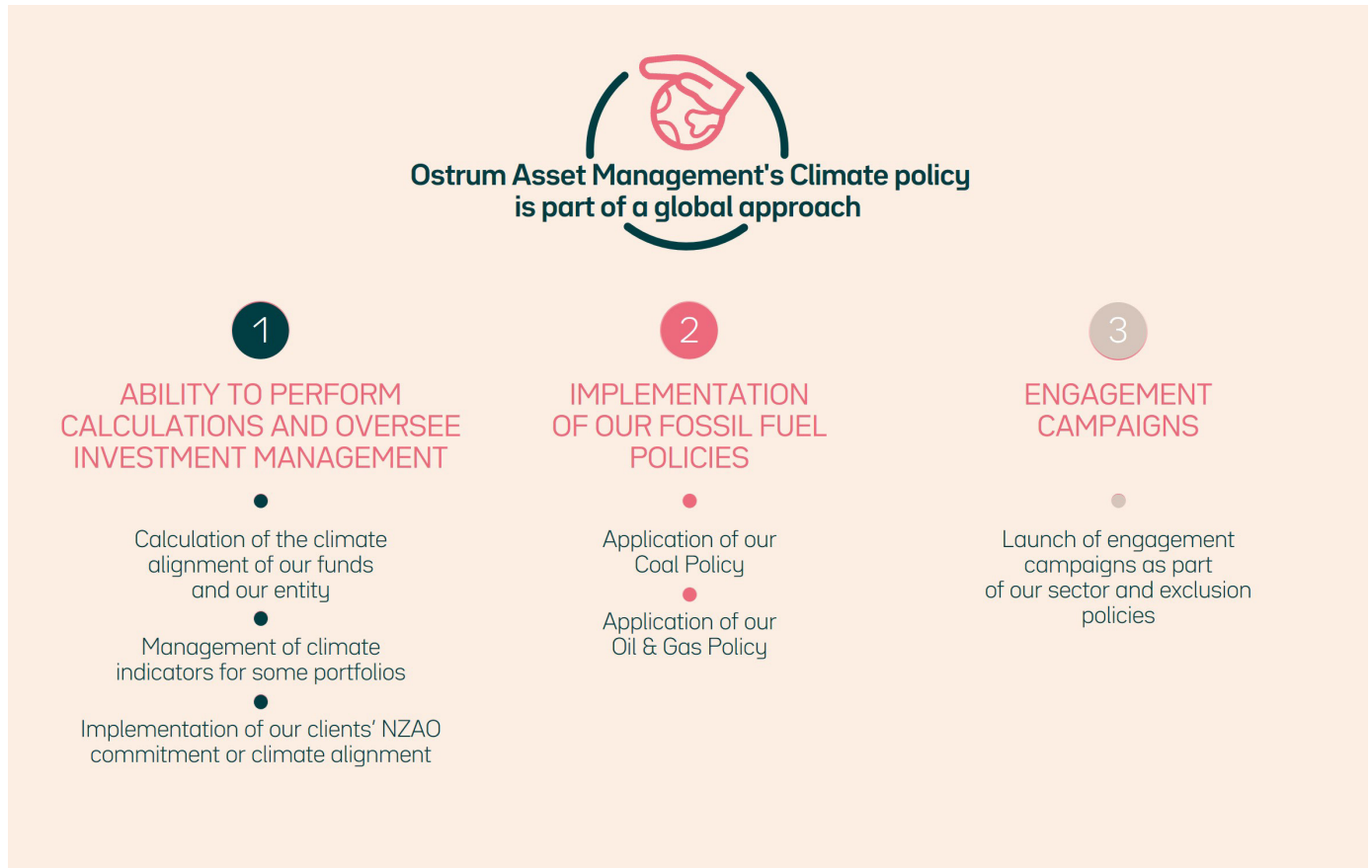
MSCI proactively contacts companies as part of its standardised and systematic review process. It does not issue surveys or questionnaires, does not conduct general interviews with companies, and does not accept or take into account in its analysis data provided by issuers that are not publicly available to other stakeholders. Given the dynamic nature of the research, companies may access and review data collected to date at any time via the issuer communications portal (ICP). They are invited to ask questions and provide feedback at any time during the year.

# 7

## STRATEGY TO ALIGN WITH THE PARIS AGREEMENT



## 7. STRATEGY TO ALIGN WITH THE PARIS AGREEMENT



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

### 7.1. Ability to perform calculations and oversee investment management

#### CLIMATE ALIGNMENT

Ostrum Asset Management draws on the expertise of Trucost S&P (<https://www.spglobal.com/esg/trucost>) to estimate an issuer's carbon emission pathways. Trucost provides an estimate of carbon emission pathways for each issuer over the past six years as well as a projection for the next six years. The company's climate impact is then assessed depending on how its trajectory aligns with the various climate change scenarios. Trucost uses two approaches recognised by the Science Based Targets Initiative (SBTi),

covering the following:

- **The SDA approach**, which applies to homogeneous and high-carbon intensity sectors for which the IEA (International Energy Agency) produces a decarbonisation pathway. These include eight sectors: electricity generation, coal production, oil production, natural gas production, steel and aluminium, cement, cars and airlines. For these issuers, past output is the reported figure, while future figures are estimated on the basis of the company's projections. The intensity pathway obtained is compared to the pathway calculated by the IEA for the sector in question. A scale is then applied based on the company's share of the sector's total production. Trucost then calculates the differences between the company's emissions and figures provided by the IEA for the various temperature trajectories (1.75°C, 2°C and 2.7°C).
- **The GEVA approach** applies to all non-SDA sectors, i.e. companies with low-emitting or heterogeneous activities. These companies therefore do not have an identified decarbonisation pathway. This approach is based on the principle that companies must make carbon emission reductions in line with the pace needed for the global economy as a whole. In other words, a company's transition trajectory equates to its contribution to total world emissions and emission intensity. It is measured in terms of greenhouse gas emissions by unit of inflation-adjusted gross margin. Trucost calculates companies' alignment with the IPCC AR5 scenario (1.5°C, 2°C, 3°C, 4°C and 5°C) where intensity is expressed in tons CO<sub>2</sub>/Mn\$ before adjusting to the value-added scale (inflation-adjusted gross margin).

Once the best approach has been identified and applied to an issuer, Trucost calculates the gap between the company's emissions and those required by the chosen scenario across the trajectory's 12-year duration. The resulting gap can be positive or negative. If it is positive, the company is not in line with the chosen scenario. Conversely, if it is negative, the company is aligned with the scenario. In conclusion, the lower the negative emissions gap in absolute terms, the more the company is deemed to be aligned with the climate scenario. Once these data are collected, we can gauge the temperature of a portfolio by calculating the average gaps of the portfolio components with a given scenario weighted by their quantity in the portfolio and in relation to the enterprise value. This approach is based on the underlying assumption that holding 1% of a company's value is equivalent to holding 1% of the emissions and 1% of the gap. The portfolio will be considered aligned with the first scenario with which it has a negative gap.

Based on this methodology, we are able to measure the climate alignment of the portfolios we manage, as well as Ostrum Asset Management's overall climate alignment.

At 31 December 2024, all our portfolios were aligned with a **2 degrees scenario** (scope 1 and 2).

## CLIMATE INDICATORS

Some portfolios have quantitative climate indicators such as carbon footprint or carbon intensity.

### Total carbon emissions

Ostrum Asset Management uses Trucost S&P for all carbon emission data on scopes 1 and 2 for corporates, sponsored agencies and non-guaranteed agencies in our portfolios. These data are then used to ascertain total carbon emissions.

Total carbon emissions measure absolute tonnes of CO<sub>2</sub>e [scope 1 + 2] for which Ostrum Asset Management is responsible as an investor. If our holding in a company equates to 1% of the company's market capitalisation, then we own 1% of the company and are therefore responsible for 1% of the company's carbon emissions (tonnes of CO<sub>2</sub>e). By calculating the emissions for which Ostrum Asset Management is "responsible" for each position in our portfolio and combining them, we can calculate the total carbon emissions of any given portfolio.

### Carbon footprint

Once carbon emissions are calculated, Ostrum Asset Management can assess carbon emissions per million euros invested by dividing carbon emissions in absolute value terms by the portfolio's value, providing a standard figure for carbon emissions for every €1,000,000 invested. This measure is applied to an increasing number of portfolios and is a way for Ostrum Asset Management to precisely compare all portfolios without taking account of their size.

### Carbon intensity

- **For companies, sponsored agencies and non-guaranteed agencies**

Ostrum Asset Management also uses Trucost S&P(\*) for all carbon intensity data on scopes 1 and 2 for corporates, sponsored agencies and non-guaranteed agencies in our portfolios.

Once each issuer's intensity is collected, the carbon intensity of each portfolio is calculated by combining the intensity of each issuer and re-weighting on the basis of each company's percentage of the portfolio.

Carbon intensity figures achieved are a way for portfolio managers to measure carbon emissions per dollar of revenues generated by these issuers in their portfolios over a given period. (\*) with the exception of quantitative management, which uses Sustainalytics for most managed funds.

- **For sovereigns, guaranteed agencies, local governments and supranationals**

We can also access data from Trucost Sovereign for sovereigns' carbon intensity. The intensity figure is defined by the volume of CO<sub>2</sub>e emitted for 1 million euros of GDP.

Intensity figures obtained are defined as follows:

- if the issuer is a supranational, carbon intensity is defined as the sum of the sovereign values adjusted for their weighting in the supranational's "shareholding" (capital);
- if the issuer is a guaranteed agency, carbon intensity is that of the sovereign to which the agency is linked;
- if the issuer is a local government, carbon intensity is that of the sovereign to which the local government is linked.



## IMPLEMENTATION OF OUR CLIENTS' COMMITMENTS

Some of our institutional clients are signatories to the UN Net-Zero Asset Owner Alliance (NZAOA).

Launched in September 2019 at the UN Climate Action Summit, the NZAO Alliance brings together institutional investors committed to transitioning their investment portfolios to net zero greenhouse gas emissions by 2050. The Alliance's work is built on a commitment to implement the Paris Agreement, the main objective of which is to limit the rise in the average global temperature to 1.5°C.

The Alliance members are the first in the financial sector to set intermediate targets, which include CO<sub>2</sub> reduction ranges for 2025 (22%–32%) and 2030 (40%–60%).

Other clients have also set ambitious climate targets which Ostrum Asset Management is committed to meeting.

### 7.2. Implementation of our fossil energy policies (Coal + Oil and Gas)

Ostrum Asset Management has developed demanding sector and exclusion policies enabling it to exclude from its portfolios companies that have major climate risks. Ostrum Asset Management refuses to support sectors or issuers that do not comply with certain fundamental principles of responsibility. What is at stake is the credibility of our approach and our fiduciary responsibility towards our clients. We have therefore set out a range of exclusion policies that we apply first and foremost to develop an initial scope for our investment universe.

See section 2.1.1 for more details on our sector policies.

### 7.3. Engagement campaigns

According to the principles of our coal policy, we engage in dialogue with around 10 issuers, several of which have already been excluded.

We also engage with around 10 issuers based on the principles of our Oil and Gas Policy.

We have developed a climate engagement framework consistent with Climate Action 100+ which is centred around four areas:

- Alignment with a 1.5°C scenario: short-, medium- and long-term targets;
- GHG emissions offsetting;
- Internal governance of the climate strategy;
- Integration of the European Union Taxonomy for sustainable activities.

## 7.4. Analysis of climate transition plans in connection with SRI accreditation

In accordance with the new SRI accreditation requirements<sup>18</sup>, Ostrum Asset Management has put in place a method for assessing the climate transition strategies of issuers analysed with respect to ESG. This method aims to demonstrate the consistency of issuers' transition plans with the climate targets set by the Paris Agreement.

It is divided into two sub-methods (simplified method and proprietary method) with a more in-depth qualitative analysis for issuers belonging to a "high climate impact sector" (HCIS) as described by Delegated Regulation (EU) 2022/1288 and for which version 3 of the SRI Label guidelines requires enhanced vigilance.

For issuers that do not belong to an HCIS, the assessment of climate transition strategies is based on the *Carbon Impact Analytics* (CIA) score provided by Carbon4, which takes into account quantitative and qualitative elements in order to measure an issuer's contribution to the transition to a low-carbon economy.

For issuers that belong to an HCIS, the assessment of climate transition strategies is based on Ostrum Asset Management's proprietary method called "CSA - *Climate Strategy assessment*". This was designed on the basis of recognised methodological frameworks. Its starting point is the composition of the issuer's carbon footprint and its main emission factors.

The assessment of the climate transition plan is based on three pillars: Ambition, Deployment and Governance. The analysis of these three pillars is based on a proprietary grid (the "*Climate Card*") that uses around 10 quantitative and qualitative indicators. The assessment takes the form of a score on four levels: *Advanced*, *Robust*, *Moderate* and *Weak*. The transition plans of issuers whose CSA results in an "Advanced" or "Robust" score are considered credible.

### IMPROVEMENT PLAN IN 2025:

To strengthen its climate engagement, in late 2024 Ostrum Asset Management undertook an analysis of its portfolios to begin a climate alignment process with a target implementation date in 2025. To do so, it decided to refer to the NZIF (*Net Zero Investment Framework*) of the IIGCC<sup>19</sup> - one of the three methodological approaches supported by the "Net Zero Asset Management initiative" (NZAMi) - and developed a proprietary quantitative scoring methodology to rank corporate issuers in one of the five categories of the climate maturity scale defined by the NZIF (categories ranging from companies that are not transparent in terms of climate transition to those that are already net zero).

<sup>18</sup> SRI accreditation guidelines that came into force on 1 March 2024.

<sup>19</sup> Institutional Investors group on Climate Change - <https://www.iigcc.org/>.

# 8

## STRATEGY TO ALIGN WITH BIODIVERSITY TARGETS



## 8. STRATEGY TO ALIGN WITH BIODIVERSITY TARGETS

Since 2021, Ostrum Asset Management has implemented a biodiversity strategy that entails taking the necessary steps to comply with the three main goals of the Convention on Biological Diversity of 5 June 1992 by 2030:

- conservation of biological diversity,
- sustainable use of its components,
- fair and equitable sharing of the benefits arising out of the utilisation of genetic resources.

Additionally, when analysing issuers, we also assess our contribution to reducing the main pressures and impacts on biodiversity defined by the Intergovernmental Science Policy Platform on Biodiversity and Ecosystem Services (IPBES).

### We pledge to achieve the following by 2030:

- bolster our expertise in identifying and monitoring the components of biodiversity that are crucial for its conservation and sustainable use as required by the Convention. This approach applies to our assessment of issuers;
- measure and monitor our biodiversity footprint;
- increase our investment in sustainability bonds linked to biodiversity issues based on the market;
- continue to exclude issuers with the most damaging effects on ecosystems;
- increase our engagement with issuers in sectors that are most dependent and have the greatest impact.

### 8.1. Incorporating biodiversity into our issuer analysis

Non-financial dimensions are systematically taken into account in our issuer analysis when they are deemed to be material, i.e. they affect the issuer's risk or opportunity.

Failure to take action would lead to an operational risk for companies – any risk related to dependency on resources used – as well as legal risks, such as failure to comply with new regulation, along with controversies and increased tax (polluting business operations, water, etc.).

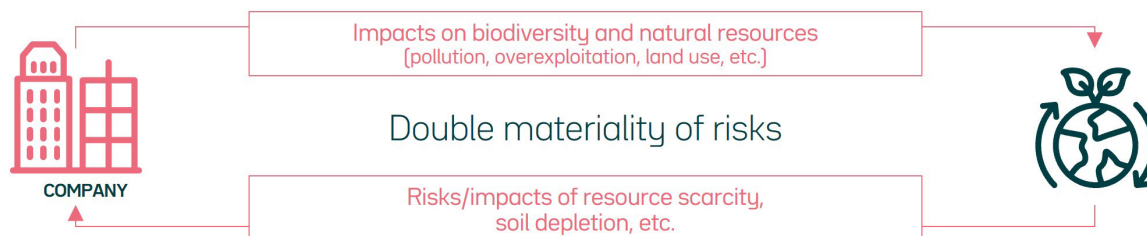
There is also a major reputational dimension as these aspects would tarnish the company's image.

Other risks can also develop, such as market risk due to pressure from shareholders and financial risks resulting from difficulties in obtaining funding on the markets in a context where investors are increasingly taking biodiversity into account.

Broadly speaking, we incorporate groups' involvement in rolling out adaptation steps into our scores.

While financial materiality is easily identifiable in some sectors, such as agri-food and infrastructure, it is still difficult to grasp in some other industries.

Materiality must therefore not only be considered from just one standpoint; we must also take account of our impact on biodiversity and natural resources (pollution, overuse, land use, etc.). This double materiality concept is extremely meaningful when it comes to biodiversity.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

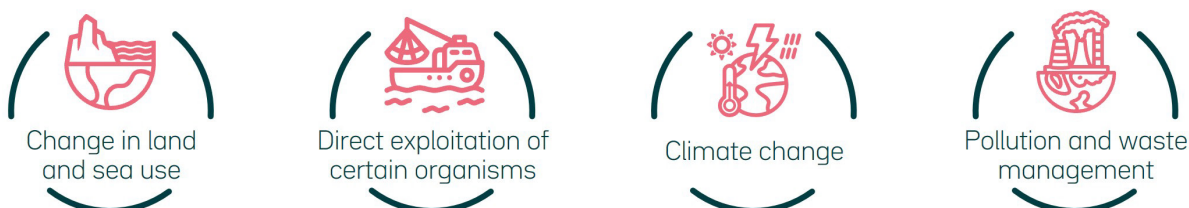
We take multiple aspects into account in our analysts' materiality assessment in order to curb our impact on the loss of biodiversity.

At the global level, several causes of biodiversity erosion have been clearly identified, including five major ones by the IPBES<sup>20</sup>:

- Changing use of sea and land: destruction and fragmentation of natural environments, resulting in particular from urbanisation and the development of transport infrastructure;
- direct exploitation of certain organisms: overexploitation of wild species (overfishing, deforestation, trade in ornamental species);
- climate change: this can combine with other causes and exacerbate them. It contributes to changes in living conditions for species, and forces them to migrate or adapt the way they live;
- water, land and air pollution;
- the spread of invasive alien species.

Some of these pressures are particularly applicable to our investment business and are taken into consideration by analysts and portfolio managers in several sectors. Companies contributing to the development of natural capital are large companies in the following sectors (this list is not extensive): agri-food, infrastructure, transport, waste, energy, luxury goods and pharmaceuticals. These industries have an impact on biodiversity, while natural capital is a crucial resource for their businesses.

We focus on the following pressures in the main sectors affecting biodiversity:



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

<sup>20</sup> IPBES: The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services



## 8.2. Calculating and monitoring our biodiversity footprint

We have chosen to use Iceberg DataLab (IDL) to measure our biodiversity footprint, which is measured in MSA per km<sup>2</sup>.

MSA or Mean Species Abundance is the unit used to measure the impact or footprint of companies or investments on biodiversity. This measurement is expressed as a percentage of the integrity of ecosystems and reflects the average abundance of indigenous species in a specific area as compared to undisturbed ecosystems (%). It is the benchmark used by the IPCC, the Convention on Biological Diversity (CBD) and the United Nations (IPBES). The figure can range from 0% to 100%, where 100% indicates an intact and undisturbed ecosystem.

The IDL methodology takes into account four different pressures on biodiversity:

- **changing land use:** assessment of land occupation (maintaining land in a disrupted state) and land transformation (conversion of undisrupted land);
- **air pollution** (NO<sub>x</sub> emissions, which lead to eutrophication (excessive nutrient inputs into the aquatic environment resulting in a proliferation of plants) and soil acidification): acidification and eutrophication disturb the living conditions of flora and fauna, leading to changes in ecosystems;
- **climate change:** multiple species are highly sensitive to changes in temperature. Species will not be able to adapt or are in danger of dying out as a result of the current pace of climate change;
- **ecotoxicity:** some pollutants are particularly dangerous for water and species that live in fresh water. Pollutants can be directly toxic for species or they can bioaccumulate in water organisms and hence possibly affect regeneration.

The biodiversity footprint includes past, present and future impacts.

The value chain covered by this methodology can be broken down into three scopes:

- **Scope 1** covers operations directly related to the company's business, i.e. land occupation relating to the company's buildings, water use, CO<sub>2</sub> emissions due to gas combustion in power stations;
- **Scope 2** refers to impacts on biodiversity due to the generation of electricity, steam, heating and cooling bought by the company (company's electricity purchase, electricity generation from fossil energy, other than fuel);
- **Scope 3 Upstream** corresponds to the purchase and transport of raw materials, waste generated during operations, business travel, staff commuting, company's use of leased assets /**Downstream** corresponds to the operation or end of life of a product: distribution (transport of finished products), use, waste (managing waste resulting from the product used).

We therefore gather details on the direct and indirect impacts on biodiversity for scopes 1, 2 and 3 for the majority of companies, sponsored agencies and non-guaranteed agencies in our portfolios.

These data are then used by Ostrum Asset Management to calculate the total impact of pressure on biodiversity. The total impacts are expressed as MSA.km<sup>2</sup> and measure the impacts for which Ostrum Asset Management is responsible as an investor.



If our holding in a company equates to 1% of the company's total value, then we own 1% of the company and are therefore responsible for 1% of the impacts [MSA.km<sup>2</sup>]. By calculating the impact for which Ostrum Asset Management is "responsible" for each position in our portfolio and combining them, we can calculate the total impacts of a given portfolio on biodiversity.

Once impacts on biodiversity for a portfolio have been calculated, our teams are able to assess the impacts on biodiversity per million euros invested by dividing the amount of impacts on biodiversity by the value of the portfolio for which the impact was measured. This new result provides a standard measurement of impacts on biodiversity per €1,000,000 invested.

Ostrum Asset Management uses the following formula to calculate the biodiversity footprint of its investments:

#### Biodiversity footprint (MSA.KM<sup>2</sup>/€M invested)

$$= \frac{\sum_i^n \left( \frac{\text{Position value}_i \text{ (M€)}}{\text{Enterprise value of the issuer (M€)}} * \text{CBF Value}_i \text{ Scope 1, 2 \& 3 (MSA.Km}^2\text{)} \right)}{\sum \text{Position value}_i \text{ (M€)}}$$

In concrete terms, Ostrum Asset Management's biodiversity footprint is estimated at around **-0.11 MSA.KM<sup>2</sup>/€M invested at 31 December 2024.**

At this stage, the calculation covers scopes 1, 2 and 3, which means that there is a risk of double counting overlap in the portfolio.

### 8.3. Integration of biodiversity into our portfolio management process

#### SUSTAINABILITY BONDS LINKED TO BIODIVERSITY CHALLENGES:

When our Sustainability Bond analyst team assesses an instrument, they systematically map the projects financed (*Use of Proceeds*) on the basis of sustainability themes, including biodiversity. This mapping covers eligible project categories such as sustainable forestry, river and marine environment restoration (including coral reefs).

Sustainable agriculture projects that also incorporate challenges related to biodiversity and ecosystem protection are mapped according to the sustainability theme: "sustainable agriculture and food". This systematic mapping process allows us to assess the percentage of our investments in sustainability bonds linked to biodiversity aspects.

Additionally and aligning with the "do no significant harm" (DNSH) approach outlined in the European Taxonomy, our analysts who assess sustainability bonds endeavour to check the potential effects of eligible projects on biodiversity and their management, where data are available.

For example for green buildings, we check that the location where they are built is not a protected area or a site with major environmental value. Similarly, we rely on second party opinions to ensure that renewable energy projects incorporate an analysis of the environmental effects and that the mitigation steps required to protect biodiversity and ecosystems have been taken.

## SOME EXAMPLES OF INVESTMENTS

- Ostrum Asset Management helped finance the Esteros y Algarrobales del Rio Uruguay (EARU) reserve by investing in a company that actively promotes the protection of wild species living in this area, particularly through its biodiversity programme. This reserve, located in the province of Rio Negro, is home to various groups of unique species, generating a considerable wealth of biodiversity in grasslands, virgin forests, marshland and other natural ecosystems.
- Through its investments in green bonds, Ostrum Asset Management is also involved in financing the biodiversity conservation project in Kahuzi-Biega National Park in the Democratic Republic of Congo. The main objectives of this project include the conservation of endangered species, such as mountain gorillas, as well as the restoration of degraded ecosystems. The project also includes awareness and training initiatives for local populations aimed at reducing pressure on natural resources and encouraging sustainable economic alternatives.
- Lastly, Ostrum Asset Management also contributes to regional financing in France that helps farmers convert to organic farming, to wildlife shelters and breeding centres and, in the same region, to renaturing the Tasdon marsh by reconnecting it to the river system, to the creation of ponds and islands and to the restoration of ecological continuity.

## SECTOR AND EXCLUSION POLICIES

The sector and exclusion policies (see section 2.1.1) take biodiversity into account, where applicable. It factors into our controversy management (Worst Offenders policy) and our coal and tobacco sector policies.

The Oil and Gas policy was implemented in 2022. By adopting a thorough approach to the issue, we have been able to target techniques with the most severe environmental impact, i.e. unconventional and/or controversial extraction techniques.

All types of infrastructure related to the oil & gas industry can have major impacts on biodiversity, but particularly those that use unconventional and/or controversial techniques such as ultra-deep offshore drilling, drilling in the Arctic, heavy and extra-heavy oil, oil sands and similar, coalbed methane, and shale gas/oil.

Techniques such as horizontal drilling, hydraulic fracturing with chemical products, exploration involving pumping of large volumes of water, steam injection, open-cast mining, in situ extraction, and conventional drilling that requires specific equipment suited to Arctic weather conditions must be prohibited.

These techniques lead to high CO<sub>2</sub> and methane emissions, produce toxic sludge and oil spills, increase the risk of earthquakes, harmful long-term chemical or physical effects on the land structure and methane leaks, and require intensive water use and the use of chemicals that can contaminate groundwater and surface waters and damage ecosystems.

These various extraction techniques have serious and irreversible environmental impacts on land and marine ecosystems already under pressure from climate change. Here at Ostrum Asset Management, we therefore decided to focus in particular on these methods in our Oil and Gas Policy.

## INTEGRATION OF THE BIODIVERSITY FOOTPRINT INTO INSURANCE MANAGEMENT

In terms of insurance management, the team has access to the biodiversity footprint in the portfolio analysis systems, which can help guide their investments and choices.

## INDICATORS INTEGRATED INTO THE GREaT METHODOLOGY

The GREaT methodology offers a pragmatic issuer/company analysis framework for tackling sustainable development issues. The GREaT method not only takes into account environmental, social and governance (ESG) criteria, it also measures engagement, responsibility, opportunities and risks for companies. As part of the Sustainable Management of Resources pillar, Biodiversity/Water and Pollution/Waste criteria are examined. Several indicators define these two criteria:

BIODIVERSITY AND WATER	<ul style="list-style-type: none"> <li>• Impact on ecosystems and biodiversity</li> <li>• Appropriate land use</li> <li>• Impact of potential water shortages on the company's business; water management</li> </ul>
POLLUTION AND WASTE	<ul style="list-style-type: none"> <li>• Air and soil pollution</li> <li>• Waste management</li> <li>• Toxic emissions; Electronic or packaging waste</li> </ul>

## ENGAGEMENT POLICY

Ostrum Asset Management has developed an engagement policy that focuses on a number of priority themes [cf. section 5.1].

The preservation of biodiversity is one of our priority areas for engagement (theme 2/sub-theme 4) and is addressed at a company-wide level at Ostrum Asset Management.

We work with our credit analysts and equity analysts/portfolio managers to organize the dialogue we wish to pursue with issuers: this will depend on the sector in question as we develop our areas for engagement as well as possible questions to raise with them.

We have already identified several sectors where biodiversity is crucial. We have also started to identify issues where more in-depth questions and discussions would be relevant. Since 2022, work has been carried out in the agri-food sector, which has a particularly strong impact on biodiversity. Numerous issues were addressed in terms of land, water and waste management. We then focused on other sectors such as oil and gas, utilities and packaging.

## IMPLEMENTATION OF A PALM OIL POLICY

Palm oil is one of the most widely used vegetable oils in the world and is found in many products ranging from food to cosmetics and biofuels. Its production is constantly expanding, at the expense of dense tropical forests, especially in wet regions. However, this production has serious consequences for the environment, biodiversity and the rights of local communities.

The impact on biodiversity is a major issue. Indeed, the transformation of tropical forests into oil palm plantations threatens local fauna and flora. Many species, some of which are at risk of extinction, lose their natural habitat. Palm oil cultivation often relies on monoculture practices, which reduces the diversity of plant and animal species in cultivated areas and increases vulnerability to diseases and parasites.

Mindful of these issues, and as part of its biodiversity approach aimed at protecting nature and reversing the trend towards ecosystem degradation, Ostrum Asset Management approved its palm oil policy in 2024 for implementation in 2025.

Ostrum Asset Management decided to exclude from its investment universe companies that generate at least **5% of their revenue from the production and/or distribution of palm oil**.

### IMPROVEMENT PLAN IN 2025:

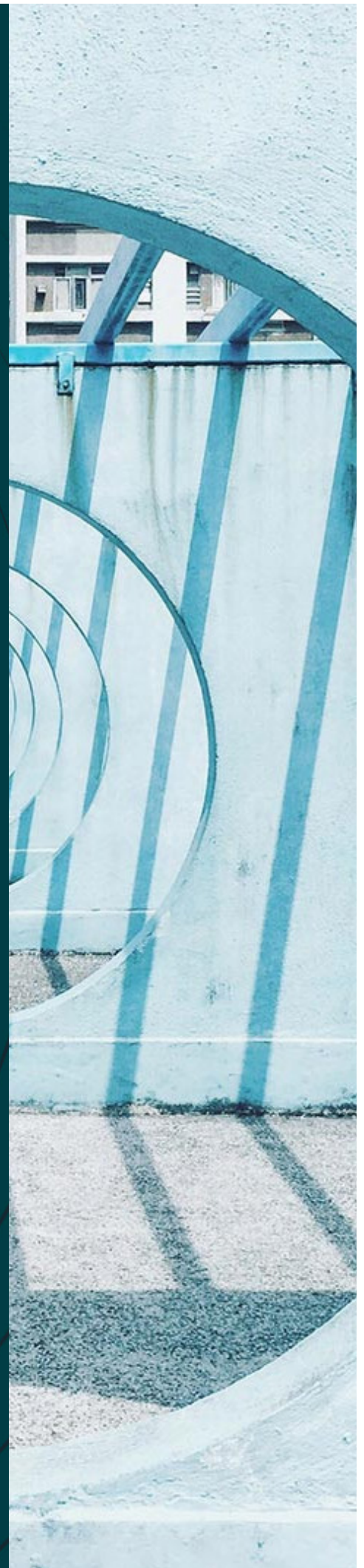
Building on the implementation of its palm oil policy, Ostrum Asset Management will give further thought to expanding its deforestation efforts to include other commodities that have a significant impact on forests.

Ostrum Asset Management will also continue its work on pesticides in order to implement a policy in 2025.

# 9

## INTEGRATION OF ESG CRITERIA

into Ostrum Asset Management's  
risk management



## 9. INTEGRATION OF ESG CRITERIA INTO OSTRUM ASSET MANAGEMENT'S RISK MANAGEMENT

### POLICY ON MANAGING SUSTAINABILITY RISKS AND ADVERSE IMPACTS

ESG risks and opportunities are factored into our assessment of business sectors as well as companies via our quality and risk analysis.

These risks are taken into consideration in several ways, including through our sector and exclusion policies; our controversy management policy (Worst Offenders); integration of ESG criteria; systematic inclusion of ESG dimensions in our issuer analysis when they are considered material, i.e. have an impact on the issuer's risk; and our comprehensive engagement policy that applies to all Ostrum Asset Management's portfolio management activities.

We combine these various actions to single out any environmental – and climate-related in particular – event or condition that, if it occurs, could have an actual or potential material adverse impact on the value of the investment.

For further information, please refer to our Policy on managing sustainability risks and adverse impacts:

<https://www.ostrum.com/fr/publications-reglementaires#politique-de-gestion-des-risques-de-durabilite-et-des-incidences-negatives>

### DESCRIPTION OF THE PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

Article 4 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector provides for transparency on adverse sustainability impacts on sustainable investment objectives or on the promotion of environmental or social characteristics in investment decision-making on products concerning us.

Ostrum Asset Management fully takes into consideration the main adverse impacts of its investment decisions on sustainability factors.



Adverse sustainability indicator		Metric	Impact Year N	Impact Year N-1	Impact Year N-2	Explanation	Actions taken, and actions planned and targets set for the next reference period
INDICATORS APPLICABLE TO INVESTMENTS IN INVESTEE COMPANIES							
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	7,510,154.09 tCO <sub>2</sub> e	4,326,106.07 tCO <sub>2</sub> e	7,360,289.36 tCO <sub>2</sub> e	To calculate PAIs, we include all investments in the denominator	These indicators are taken into account through our sector and exclusion policies: Oil & Gas policy Coal policy Worst Offenders policy  They are integrated into our climate approach.  Some are used in connection with SRI accreditation and taken into account in the management of the funds concerned.  Some are also considered via the GREaT score when companies are analysed and are included in the issuer's overall score at the time of the investment decision.
		Scope 2 GHG emissions	1,888,668.63 tCO <sub>2</sub> e	1,330,066.23 tCO <sub>2</sub> e	1,592,595.71 tCO <sub>2</sub> e	To calculate PAIs, we include all investments in the denominator	
		Scope 3 GHG emissions	10,284,138.86 tCO <sub>2</sub> e	6,718,969.26 tCO <sub>2</sub> e	16,218,807.85 tCO <sub>2</sub> e	To calculate PAIs, we include all investments in the denominator	
		Total GHG emissions	19,682,959.59 tCO <sub>2</sub> e	12,375,141.57 tCO <sub>2</sub> e	25,171,692.92 tCO <sub>2</sub> e	To calculate PAIs, we include all investments in the denominator	
	2. Carbon footprint	Scope 1+2+3	54.28 tCO <sub>2</sub> e / mEUR invested	38.62 tCO <sub>2</sub> e / mEUR invested	65.10 tCO <sub>2</sub> e / mEUR invested	To calculate PAIs, we include all investments in the denominator	They are also part of the climate engagement aimed at effectively supporting companies' transition and their shift towards low-carbon models.  Finally, via Sub-theme 1: "Reduce CO <sub>2</sub> emissions and achieve carbon neutrality by 2050" of our Engagement Policy, we try to influence companies in order to limit the adverse impacts of our investment decisions on environmental matters  As of 1 January 2024, the thresholds of the coal policy were lowered, which enabled us to exclude new issuers that do not comply with the thresholds for the following reference period.  In 2024, Ostrum AM developed a proprietary analysis methodology, the CSA [Climate Strategy Assessment] score. This methodology measures the impact that the company has on the environment and, more specifically, on the climate by assessing the company's ability to reduce its greenhouse gas emissions. This methodology will be implemented in 2025.  To strengthen its climate engagement, in late 2024 Ostrum AM undertook an analysis of its portfolios to begin a climate alignment process with a target implementation date in 2025.
	3. GHG intensity of investee companies	Scope 1+2+3	81 tCO <sub>2</sub> e / mEUR revenues	66.06 tCO <sub>2</sub> e / mEUR revenues	91.73 tCO <sub>2</sub> e / mEUR revenues	To calculate PAIs, we include all investments in the denominator	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	4.1%	6.41%	4.53%	To calculate PAIs, we include all investments in the denominator  Definition of active companies: companies exposed to fossil fuel-related activities, including exploration, extraction, mining, storage, distribution and trade of oil and gas, thermal coal production and distribution, and the production, distribution, storage and reserves of metallurgical coal	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	36.6%	91.86%	29.18%	To calculate PAIs, we include all investments in the denominator	

	<b>6. Energy consumption intensity per high impact climate sector</b>	<b>Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector</b>	<b>See breakdown by sector</b>	<b>0.88 GWh / mEUR revenues</b>	<b>0.27 GWh / mEUR revenues</b>	<b>To calculate PAIs, we include all investments in the denominator</b>	
		NACE A sector	0.00000002220597 GWh / mEUR revenues	NA	NA		
		NACE B sector	0.00108725766711 GWh / mEUR revenues	NA	NA		
		NACE C sector	0.04877918901712 GWh / mEUR revenues	NA	NA		
		NACE D sector	0.07258203198844 GWh / mEUR revenues	NA	NA		
		NACE E sector	0.02082837093988 GWh / mEUR revenues	NA	NA		
		NACE F sector	0.00116431575792 GWh / mEUR revenues	NA	NA		
		NACE G sector	0.00035831587461 GWh / mEUR revenues	NA	NA		
		NACE H sector	0.01214245783882 GWh / mEUR revenues	NA	NA		
		NACE L sector	0.00864506157805 GWh / mEUR revenues	NA	NA		
<b>Biodiversity</b>	<b>7. Activities negatively affecting biodiversity-sensitive areas</b>	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	4.7%	3.96%	0.17%	To calculate PAIs, we include all investments in the denominator	<p>These indicators are taken into account through our sector and exclusion policies and are integrated into our biodiversity approach.</p> <p>They are also considered via the GREaT score when companies are analysed and are included in the issuer's overall score at the time of the investment decision.</p>
<b>Water</b>	<b>8. Emissions to water</b>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00 tCO <sub>2</sub> e / mEUR invested	0.00 tCO <sub>2</sub> e / mEUR invested	0.00 tCO <sub>2</sub> e / mEUR invested	To calculate PAIs, we include all investments in the denominator	<p>Via Sub-theme 3: "Manage resources" and Sub-theme 4: "Safeguard health and biodiversity" of our Engagement Policy, we try to influence companies in order to limit the adverse impacts of our investment decisions on environmental matters.</p>
<b>Waste</b>	<b>9. Hazardous waste ratio</b>	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	0.26 tCO <sub>2</sub> e / mEUR invested	0.17 tCO <sub>2</sub> e / mEUR invested	0.12 tCO <sub>2</sub> e / mEUR invested	To calculate PAIs, we include all investments in the denominator	<p>In 2024, Ostrum AM approved its palm oil policy for implementation in 2025.</p> <p>The year 2024 was also marked by the implementation of a new analysis methodology for the main PFAS producers. It generated several exclusions in our investment universe and two companies were excluded from our portfolios.</p> <p>In 2025, Ostrum AM will expand its deforestation approach and continue to work on a pesticides policy.</p>

### INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.01%	0.01%	0.47%	To calculate PAIs, we include all investments in the denominator	<p>These indicators are taken into account through our Worst Offenders Policy, which allows us to exclude issuers that do not comply with them.</p> <p>They are also considered via the GREaT score when companies are analysed and are included in the issuer's overall score at the time of the investment decision.</p>
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.32%	0.46%	35.65%	To calculate PAIs, we include all investments in the denominator	<p>In 2025, we will continue to focus on these matters, which we consider very important. We will also continue to give greater consideration to controversy management.</p>
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap at investee companies	7.6%	7.11%	2.52%	To calculate PAIs, we include all investments in the denominator	<p>This indicator is taken into account through our Worst Offenders Policy.</p> <p>It is related to the 30% Club France Investor Group engagement campaign.</p> <p>Via Sub-theme 14: "Standardise the remuneration policy and make it transparent" of our Engagement Policy, we try to influence companies in order to limit the adverse impacts of our investment decisions on social matters.</p> <p>It is also considered through the GREaT rating at the time of the analysis of the companies and is included in the overall rating of the issuer at the time of the investment decision.</p> <p>In 2025, we will strengthen this indicator via our engagement policy and as part of the 30% Club France Investor Group campaign.</p>
	13. Board gender diversity	Average ratio of female to male board members in investee companies	23%	21.97%	17.80%	To calculate PAIs, we include all investments in the denominator	<p>This indicator is taken into account through our Worst Offenders Policy.</p> <p>It is related to the 30% Club France Investor Group engagement campaign.</p> <p>It is used in connection with SRI accreditation and taken into account in the management of the funds concerned.</p> <p>Via Sub-theme 13: "Balance powers" of our Engagement Policy, we try to influence companies in order to limit the adverse impacts of our investment decisions on governance matters.</p> <p>It is also considered through the GREaT rating at the time of the analysis of the companies and is included in the overall rating of the issuer at the time of the investment decision.</p> <p>In 2025, we will strengthen this indicator via our engagement policy and as part of the 30% Club France Investor Group campaign.</p>

	<b>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</b>	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	0%	To calculate PAIs, we include all investments in the denominator	This indicator is taken into account through our Controversial Weapons Policy.
<b>INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS</b>							
<b>Environment</b>	<b>15. GHG intensity</b>	GHG intensity of investee countries	65 tCO <sub>2</sub> e / mEUR GDP	28.64 tCO <sub>2</sub> e / mEUR GDP	103.60 tCO <sub>2</sub> e / mEUR GDP	To calculate PAIs, we include all investments in the denominator	This indicator is used in connection with SRI accreditation and taken into account in the management of the funds concerned.  In 2025, we will strengthen our climate approach and continue our dialogue with countries.
<b>Social</b>	<b>16. Investee countries subject to social violations</b>	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	5 countries 8%	0.01%	0.01%	To calculate PAIs, we include all investments in the denominator	This indicator is taken into account through our Blacklisted States Policy.  In 2025, we will continue our dialogue with countries.

The full statement containing a description of the principal adverse impacts on sustainability factors is available on the website.

## 9.1. Identification of risks and opportunities

### 9.1.1. Climate risks and opportunities identified

Ostrum Asset Management conducts ESG risk analyses on all its portfolio companies to identify risks that could have a material impact. This approach, based on the double materiality of risks, not only allows it to focus on short-term risks, which are more visible as they affect its investments today, but also to prepare for long-term risks, which are sometimes more difficult to grasp.

## A. Identification of Risks

Below are the risks to which Ostrum Asset Management is exposed as an asset management company and through its investments.

### FINANCIAL RISKS:

#### CREDIT AND COUNTERPARTY RISK

##### Risk Description

The counterparty to a transaction or contract may fail to fulfil its obligations before the transaction has been definitively settled in the form of a financial flow. These failures can be exacerbated by the occurrence of a major climate event or by changes made for a transition to a low-carbon economy.

##### Integration into Risk Management

Ostrum Asset Management ensures overall credit risk management. The Risk department reports all regular monitoring information and one-off analyses to the Credit Risk Committee that, in its opinion, the Committee needs in order to make appropriate decisions. Materiality analyses relating to climate risk and, more generally, to ESG risks, are conducted when assessing issuers' credit risk. The Credit Risk team participates in all ESG committees and impacts decisions relating to risk management at both the geographical and sectoral levels or for a particular issuer. In case of serious doubt, the team has the ability to block, and therefore exclude, a country, a business sector or an issuer from the investable universe, for portfolios subject directly to issuer limits defined by the Risk department (money market funds in particular).

#### MARKET, MODEL AND ASSET VALUATION RISK

##### Risk Description

The issuers in Ostrum Asset Management's portfolios are exposed to market risks resulting from a fluctuation in the valuation of the portfolio positions caused by a change in market variables such as interest rates, foreign exchange rates, the value of equities and commodities and a change in an issuer's credit quality. By integrating physical and transition risks into our portfolio management processes, we can anticipate potential losses on portfolios due to the climate alignment of investments and carbon price expectations.

##### Integration into Risk Management

Ostrum Asset Management's Risk department includes a market risk management team. Among other things, this team is responsible for defining Ostrum Asset Management's valuation policy and its proper implementation, particularly for illiquid or complex instruments traded over the counter which are held in the portfolios, by implementing valuation and/or counter-valuation control systems when necessary. The team is also responsible for approving all the models developed at Ostrum Asset Management, particularly those related to ESG, based on the documentation provided by the model owners (management teams for the most part).

## LIQUIDITY RISK

### Risk Description

The risk that a portfolio position cannot be sold, liquidated or closed for a limited cost and within a sufficiently short period of time is managed by Ostrum Asset Management's Portfolio Management teams and Risk department working closely together. The liquidity of a position can deteriorate very quickly in case of a climate event affecting the company's activities.

### Integration into Risk Management

Liquidity risk management is fully integrated into Ostrum Asset Management's management processes. Liquidity monitoring by the portfolio management teams requires ongoing, appropriate monitoring of the financial markets as a whole to prevent any liquidity risk that may arise at a given time. The liquidity of planned investments is one of the criteria analysed by the Portfolio Management teams, prior to the investments, to determine their impact on the portfolio. This liquidity monitoring also requires control of the structural liquidity positions that result from the maturity of all the portfolio's balance sheet and off-balance sheet flows, resulting in a net cash balance.

At a second level of control, liquidity monitoring is fully integrated into the management process monitored by the Risk department.

The Market Risks team calculates various liquidity indicators relating to the assets of the portfolios, their liability profile and asset-liability matching on a daily, weekly or monthly basis. Liquidity stress tests are carried out via simulations of redemptions under normal or adverse market conditions.

## INVESTMENT RISK

### Risk Description

Investment risk corresponds to all financial and non-financial risks carried by the portfolios under management. At Ostrum Asset Management, investment risk is managed through investment constraints under the supervision of the Risk department.

By integrating physical and transition risks into our portfolio management processes, we can anticipate potential losses on portfolios due to the climate alignment of investments and carbon price expectations.

### Integration into Risk Management

At Ostrum Asset Management, Investment Risk is managed at the first level by the portfolio management teams, which systematically take ESG criteria into account when selecting portfolio securities. At the second level, the Investment Risk department, which is responsible for verifying the ESG constraints, ensures that the portfolio management teams comply with the internal and external ESG framework associated with the portfolios under management using the appropriate tools. ESG constraints are subject to specific monitoring based on data provided by providers and internal analyses. The production of periodic reports provides both a granular and consolidated view of the non-financial risks to which the portfolios are exposed.

Climate criteria are tightly integrated into Ostrum Asset Management's management processes and are gradually being enhanced. Climate risk materiality analyses are also conducted when assessing issuer risk.



## COMMERCIAL AND INFLOW RISK

### Risk Description

Risk of a reduction in the client portfolio or inflows as a result of climate risks impacting its clients.

### Integration into Risk Management

Ostrum Asset Management's clients are primarily insurers and institutional investors that implement significant resources to monitor and mitigate their exposure to climate risk. In addition, insurers, the majority of clients in terms of assets under management, are covered by their reinsurance contracts.

## NON-FINANCIAL RISKS:

### OPERATIONAL RISK

#### Risk Description

Operational risk refers to potential causes of direct or indirect losses due to internal control failures, human error, internal system failures, other business-related risks or external events. These risks may arise directly during the course of Ostrum Asset Management's activities, or at the time of delegation to third parties.

Physical risks for Ostrum Asset Management as a company are generally limited in light of our infrastructure and current geographical location.

#### Integration into Risk Management

Operational risk monitoring is based on two approaches: firstly, an ex ante assessment of the risk related to each operational process via risk mapping updated on an operational basis and, secondly, the handling and recording of operational incidents. The operational risk monitoring team coordinates the operational risk assessment programmes for all Ostrum Asset Management's activities. These assessments are carried out based on Natixis' methodology and consolidated at Group level.

Ostrum Asset Management has the appropriate means to address climate issues; in particular, we have strengthened the due diligence process for ESG data providers and implemented centralised tools and processes for ESG purposes. Physical risks related to Ostrum Asset Management's business are integrated into our Business Continuity Plan.

## LEGAL, COMPLIANCE AND REGULATORY RISK

### Risk Description

Risk of non-compliance with regulations or risk of lawsuits with clients for failure to meet climate commitments. Stricter climate regulations for asset management companies and institutional clients are placing added pressure on these types of risks.

Ostrum Asset Management gives careful consideration to regulatory risks and opportunities, which can have major short-term impacts both for the companies in which it invests and for itself. Depending on their sectors and regions, companies are exposed to numerous regulations related to carbon, energy and climate change. These risks even more significant for sectors that emit the most greenhouse gases.

### Integration into Risk Management

Ostrum Asset Management actively contributes to market-wide initiatives aimed at combating climate change and closely monitors ESG regulations, including through monitoring carried out by BPCE Group. Ostrum Asset Management also draws up an annual ESG control plan to verify that regulations are actually implemented.

## REPUTATIONAL RISK

### Risk Description

Reputational risk is the risk to a company's image resulting from inadequate consideration of climate risk. It applies to Ostrum Asset Management as an entity and its investments. For any company, reputational risks are mainly linked to changes in consumer preferences, stigmatisation of sectors with the heaviest impact on the climate, or heightened concerns of stakeholders, all of which can have a major impact on its reputation. Trust on the part of clients, suppliers, employees, shareholders, etc. is essential to keeping the company in business.

### Integration into Risk Management

This risk is mitigated through:

- A controversy risk management policy resulting in monitoring and handling by the Sustainable Transitions department;
- An engagement policy in case of a controversy that could lead to a decrease in its materiality score and potentially its exclusion from Ostrum Asset Management's investment universe aimed at ensuring that permanent remediation measures are taken by the company;
- Implementation of sector and exclusion policies, including strengthening the coal exit policy in 2020 and setting out an oil and gas policy in 2022.

In addition, regular dialogue with companies enables us to raise their awareness of the risks and opportunities of climate change. Finally, first- and second-level controls are performed to ensure compliance with all the SRI/ESG management constraints of portfolios.

## TECHNOLOGY RISK

### Risk Description

Emergence of new products and services produced by alternative vehicles estimated to have lower greenhouse gas emissions.

### Integration into Risk Management

This risk is mitigated through the expertise of the research department's analysts regarding investee issuers in all business sectors. The department has developed an ESG materiality score that is used to identify ESG issues that are material, directly or indirectly, for companies and to assess their impact on their operational profile, and ultimately on the financial profile.

The ESG materiality score identifies risks (-) or opportunities (+) and the magnitude of this impact on companies (1, 2 or 3). The magnitude itself depends on the time period up to materialisation of the risks/opportunities and the willingness and ability of companies' management to adapt to them.

## STRATEGIC, BUSINESS AND ECOSYSTEM RISKS

### Risk Description

Investors are increasingly committed to combating climate change and therefore have expectations along these lines regarding their investments. A company's failure to take climate risk into account can have a significant impact on its competitiveness and market share. Indeed, climate is now a major concern for institutional clients and the increasingly important duty of transparency requires them to work with a management company that manages climate risk.

### Integration into Risk Management

Ostrum Asset Management actively contributes to market-wide initiatives aimed at combating climate change and closely monitors ESG regulations in an effort to implement best practices.

## B. ESG Risk Assessment

The table below shows the risks to which Ostrum Asset Management is exposed as an asset management company and through its investments.

	PHYSICAL RISKS				TRANSITION RISKS				
Risk category	Short Time Period [2028]		Long Time Period [>4 years]		Short Time Period [2028]		Long Time Period [>4 years]		Type of risk
	Acute Risk	Chronic Risk	Acute Risk	Chronic Risk	Acute Risk	Chronic Risk	Acute Risk	Chronic Risk	
Financial risks									
Credit and counterparty risk	Low	Low	Medium	Low	Low	Low	Low	Medium	Current/Exogenous/ Recurrent
Market, model and asset valuation risk	Low	Low	Low	Low	Low	Low	Low	Low	Current/Exogenous/ Recurrent
Liquidity risk	Low	Low	Low	Low	Low	Low	Low	Low	Emerging/Exogenous/ One-off
Investment risk	Low	Low	Low	Low	Low	Low	Low	Low	Emerging/Exogenous/ One-off
Commercial and inflow risk	Low	Low	Low	Low	Low	Low	Low	Low	Emerging/Exogenous/ Recurrent
Non-financial risks									
Operational risk	Low	Low	Low	Low	Low	Low	Low	Low	Current/Endogenous/ One-off
Legal, compliance and regulatory risk	Low	Low	Low	Low	Low	Low	Medium	Medium	Current/Endogenous/ One-off
Reputational risk	Low	Low	Low	Low	Low	Low	Medium	Medium	Emerging/Endogenous/ s/Recurrent
Technology risks	Low	Low	Low	Low	Low	Low	Medium	Medium	Current/Endogenous/ One-off
Strategic, business and ecosystem risks	Low	Low	Low	Low	Low	Low	Medium	Medium	Emerging/Exogenous/ One-off

This matrix shows a trend towards an increase in the materiality of climate risks related to transition risks, in line with reputational, strategic and regulatory risks. The materiality of these risk categories was assessed by an expert: each risk was scored based on the degree of severity and the probability of occurrence by Ostrum Asset Management's internal stakeholders. The risk classification is based on a four-level rating scale: low, medium, high, critical.

## PHYSICAL AND TRANSITION RISKS

Ostrum Asset Management has chosen Trucost S&P to identify and measure physical and transition risks to which the companies in which we invest as an asset manager are exposed.

### A. Physical risks

Physical risks correspond to losses and damage caused by the effects of climate change impacting economic players and asset portfolios.

The purpose of the data is to give investors, companies and decision-makers important information to help them better understand and manage climate-related physical risks. They are the result of a robust approach based on public, private and proprietary Trucost data aimed at scientifically characterising the various physical hazards associated with climate change. More specifically, the Trucost methodology considers seven risk situations – water stress, heat waves, cold waves, hurricanes, river and coastal floods and wildfires – across three possible climate change scenarios and different time periods, thereby allowing an in-depth understanding of potential short-, medium- and long-term impacts.

The methodology comprises five key steps:

1. Climate hazard mapping, which provides a view of climate risks on a global scale based on different scenarios and time periods.
2. Physical asset geolocation and corporate ownership mapping to identify companies exposed to climate risks based on their assets and location.
3. Asset- and company-level physical risk scoring to calculate risk scores for each company based on its sensitivity to different climate hazards.
4. Revenue exposure-based physical risk estimation for companies where asset-level data are not available.
5. Calculation of the sensitivity-adjusted composite physical risk score, which takes into account the specific impacts of each climate hazard on companies' activities.

Thus, for each company covered by the methodology, Trucost provides exposure scores for each risk. In addition to these scores, Trucost provides a physical risk sensitivity score by linking each form of physical risk to a set of tangible business impacts and a metric that can be measured at the company level to reflect the relative sensitivity to each risk indicator and its impacts. For example, companies with high water dependency are assumed to be more severely affected by the physical consequences of water stress, which may result in disrupted production due to restricted water access or increased operating expenditure for water purchases.

By integrating a detailed analysis of climate risks with granular data on companies' assets and revenue, Trucost's methodology provides a holistic view of physical risks caused by climate change at a detailed or consolidated level. This enables us, as a management company, to better understand the physical risks to which companies are subject in an increasingly volatile and uncertain context due to climate change.

This report includes the results of physical risks related to our investments. The percentage of investments that are eligible for calculation and contributed to the overall scores at the Ostrum Asset Management entity level, based on their coverage in terms of physical risk indicators, is more than 75%. The indicators are as of 31/12/2024.

## 1. Presentation of parameters used

Time period: physical risk scores apply to all investments over three time periods: 2030, 2040 and 2050

### Climate scenarios

- **High climate change scenario (RCP 8.5)**  
Continuation of status quo with emissions at current rate. This scenario is expected to result in warming in excess of 4 degrees Celsius by 2100.
- **Moderate climate change scenario (RCP 4.5)**  
Strong mitigation actions to reduce emissions to half of current levels by 2080. This scenario is more likely than not to result in warming in excess of 2 degrees Celsius by 2100.
- **Low climate change scenario (RCP 2.6)**  
Aggressive mitigation measures to reduce emissions by half by 2050. This scenario is likely to result in warming of less than 2 degrees Celsius by 2100.

### Composite gross score and adjusted gross score

All companies covered by our investments are scored on a scale from 1 to 100 for each of the eight key risks listed below. A score of 100 indicates that the related risk is the highest possible. A score of 1, on the other hand, indicates that the related risk is the least likely in the chosen time period and scenario.

For the sake of simplicity, we assume that a score of 1 to 10 represents a very low risk, a score of 11 to 33 a low risk, a score of 34 to 66 a moderate risk and a score of 67 to 100 a high risk.



For exposure of Ostrum Asset Management's investments to physical risk, a simulation of the impacts of eight climate hazards on the investment portfolios was carried out: water stress, heat waves, cold waves, hurricanes, river and coastal flooding and wildfires. The results show very low to low overall exposure to these climatic hazards over a medium- and long-term period.

For example, based on the results of a cold wave scenario, virtually all issuers in Ostrum Asset Management's portfolios will be very slightly impacted if a cold wave event occurs in 2030 and 2050, regardless of the climate change scenario.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



SOURCE: TRUCOST AT 31/12/2024

## B. Transition risks

Transition risks stem from the economic and financial consequences of needing to adapt operations and the external environment in order to combat climate change. The inability to further exploit oil reserves, consumers turning away from high-carbon goods, and technological breakthroughs that support the fight against climate change illustrate this risk.

In the short term, the measures taken by Ostrum Asset Management for many years under the ESG policy aimed at mitigating climate change have enabled its exposure to transition risks to be classified as low.

Over a longer period, stakeholders' expectations in terms of climate commitments could increase. The failure to adequately take transition issues into account could result in a loss of market share if Ostrum Asset Management's reputation, through its carbon impact, engagement efforts, investments or products, especially in an increasingly competitive environment, does not meet the expectations of its clients, employees or *business partners*.

To measure transition risk, Ostrum Asset Management calculates the percentage of investment in high-risk issuers, i.e. for which 10% of EBIT and EBITDA is threatened by the effects of climate change over several time periods.

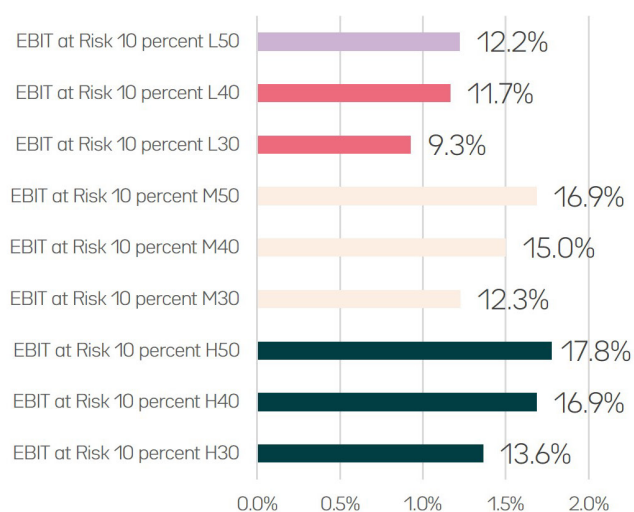
The EBIT at Risk 10 percent L50, EBIT at Risk 10 percent L40 and EBIT at Risk 10 percent L30 indicators represent the percentages of issuers for which 10% of EBIT (issuers at risk) is exposed to a small increase in carbon prices by 2050, 2040 and 2030, respectively.

The EBIT at Risk 10 percent M50, EBIT at Risk 10 percent M40 and EBIT at Risk 10 percent M30 indicators represent the percentages of issuers for which 10% of EBIT (issuers at risk) is exposed to a moderate increase in carbon prices by 2050, 2040 and 2030, respectively.

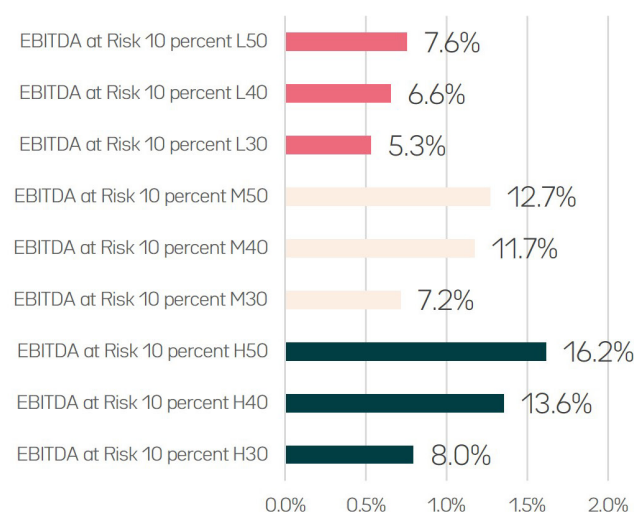
The EBIT at Risk 10 percent H50, EBIT at Risk 10 percent H40 and EBIT at Risk 10 percent H30 indicators represent the percentages of issuers for which 10% of EBIT (issuers at risk) is exposed to a significant increase in carbon prices by 2050, 2040 and 2030, respectively.

The following graphs show the percentage of issuers at risk for all Ostrum Asset Management's portfolios under scenarios with a low increase [L50, L40, L30], moderate increase [M50, M40, M30] and high increase [H50, H40, H30] in carbon prices by 2050, 2040 and 2030, respectively.

### Transition risk [1/2]

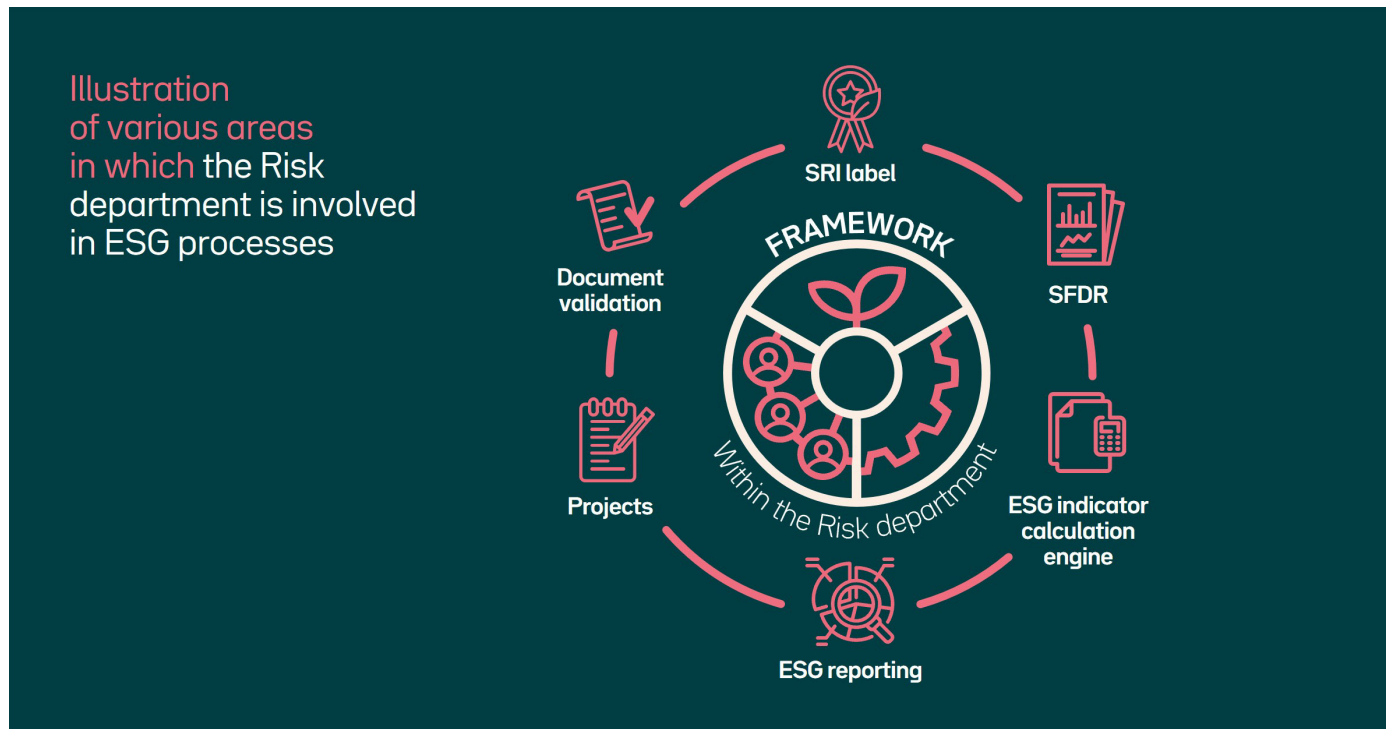


### Transition risk [2/2]



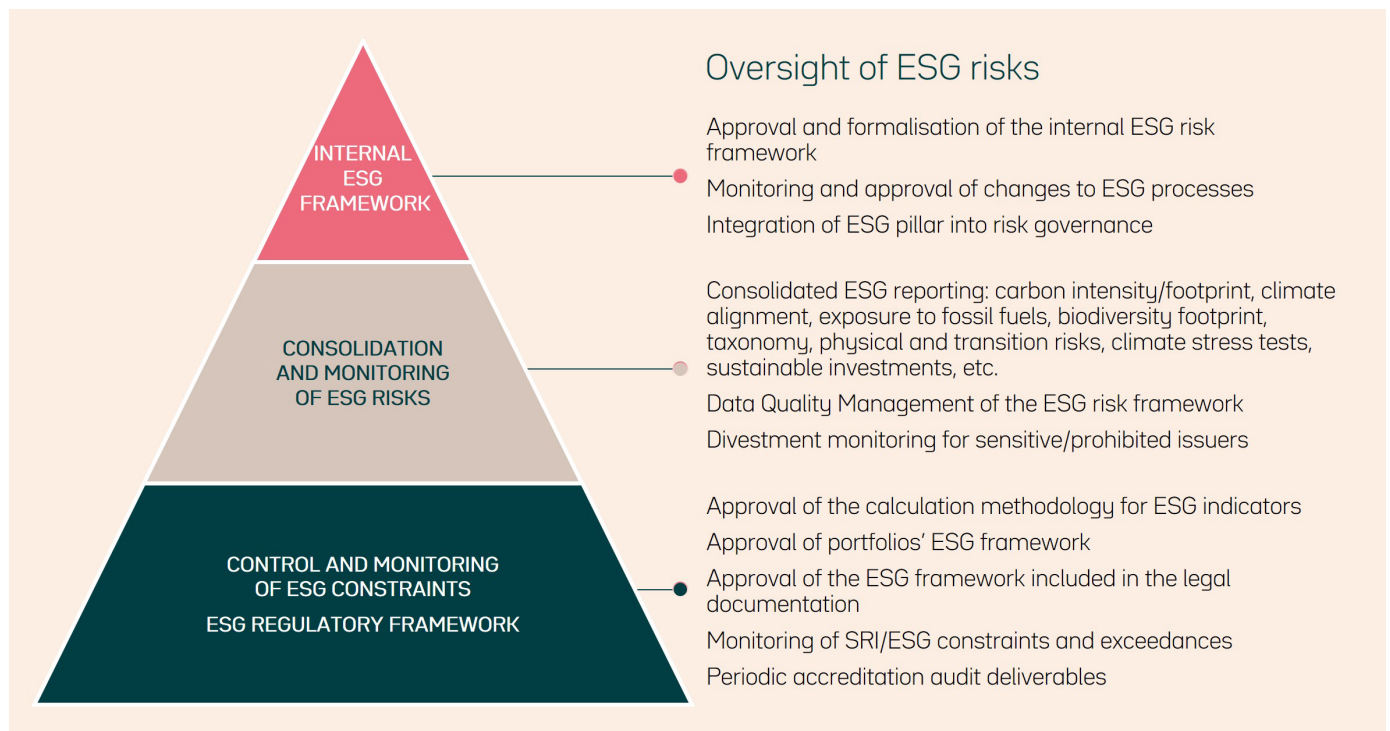
SOURCE: TRUCOST AT 31/12/2024

## 9.2. ESG/Climate risk management



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

### 9.2.1. Control and monitoring of ESG constraints, ESG regulatory framework



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## VALIDATION AND IMPLEMENTATION OF ESG CONSTRAINTS


The Risk department is responsible for ex-ante validation of the ESG constraints stipulated in the legal or contractual documentation of the portfolios. Pre-trade and post-trade controls are carried out for daily monitoring of these constraints. The Risk department is also involved in producing deliverables for accreditation audits of commercially open funds and ESG indicators for custodians.

## ESG CONTROLS FOR SRI-ACCREDITED FUNDS

For funds that have received SRI accreditation or are in the accreditation process, exceedances of ESG indicators are detected and reported to portfolio management on D+1. They are subject to the same escalation procedure used for other regulatory, statutory and contractual investment constraints. In particular, portfolio management is required to resolve any exceedances observed as quickly as possible, taking into account the best interests of investors. Exceedances considered active are reported to the regulator on a quarterly basis. In pre-trade, constraints relating to sector and normative exclusions are blocking.

For funds accredited using the average score method, control of ESG performance seeks to ensure that the SRI fund has a better average ESG score than the score of the filtered universe (i.e. after eliminating 20% of the worst scores in the universe. This threshold is increased to 25% and then 30% in version 3 of the accreditation). For funds accredited using the minimum score method, control of ESG performance seeks to ensure that each asset in the SRI-accredited fund has a better ESG score than the minimum score of the filtered universe (i.e. after eliminating 20% of the worst scores in the universe. This threshold is increased to 25% and then 30% in version 3 of the accreditation). Eligibility and ESG coverage ratios (minimum 90% coverage) are also subject to control. Lastly, under version 2 of SRI accreditation, four indicators of E, S, G and HR (Human Rights) impacts are also defined and subject to control (with outperformance and coverage constraints for two of the four indicators) depending on the constraints of the accreditation.

Examples of indicators for E, S, G and HR performance by issuer type (corporate, sovereign)



### FOR CORPORATE ISSUERS

- Percentage of Board members who meet the independence criteria defined by MSCI (Governance indicator – Source: MSCI)
- Existence and scope of an anti-corruption policy (Governance indicator – Source: MSCI).
- Relevance of employee satisfaction opinion polls (Social indicator – Source: MSCI).
- Average of incidents relating to business ethics (Social indicator – Source: Sustainability).
- Annual employee turnover (Social indicator – Source: MSCI).
- Existence of a whistleblower protection policy (Social indicator – Source: MSCI).
- Existence of collective bargaining agreements at the company (Human Rights indicator – Source: MSCI).



#### FOR SOVEREIGN ISSUERS

- Percentage of women in Parliament (Governance indicator – Source: SDG Index).
- Spending on health and education as a percentage of GDP (Social indicator – Source: SDG Index).
- Average number of years of education received by women aged 25 and older relative to the average number of years of education received (Human Rights indicator – Source: SDG Index).

Ostrum Asset Management uses carbon intensity as the default indicator for the Environment component for funds accredited under version 2 of SRI accreditation.

A *Positive Screening* discretionary analysis also reveals the most virtuous issuers and provides the ability to track changes in ESG score distributions compared to their weekly moving averages. The representativeness of the investment universe is also measured daily, making it possible to verify that the initial investment universe is in line with the fund's investment policy.

#### ESG CONTROLS FOR NON-ACCREDITED ARTICLE 8 FUNDS

The Risk department also performs daily controls on the ESG constraints of non-accredited funds classified under Article 8, a category that mainly includes dedicated funds and mandates. The indicators tracked relate to:

- the ESG score of the portfolio for each asset class – private sector, sovereign and quasi-sovereign bonds – which must be better than the ESG score of the investment universe;
- ESG coverage, which must be higher than the minimum indicated in the contractual document: 90% in general, but possibly as high as 95%.

As with ESG constraints resulting from SRI accreditation, any exceedances are reported to portfolio management on D+1 for resolution and are subject to the same escalation procedure. Exceedances considered active are reported to the regulator on a quarterly basis.

#### ADDITIONAL CONTROLS FOR ARTICLE 8 AND 9 FUNDS

The clarifications provided by the *Regulatory Technical Standard* under the SFDR involved the definition and performance of additional controls on Article 8 and 9 funds, whether or not they are SRI-accredited. Additional constraints, set out in the appendices to the legal documentation, relate to:

- the minimum shares of sustainable investments, Green and Social, based on the current definition for Ostrum Asset Management;
- the minimum share of assets aligned with environmental or social characteristics.

As with the above constraints, these ratios are monitored daily. In case of exceedance, portfolio management is alerted for resolution on D+1 in accordance with the alert and escalation procedure. Exceedances considered active are reported to the regulator on a quarterly basis.



## 9.2.2. Consolidation and monitoring of ESG risks

### DEVELOPMENT AND IMPLEMENTATION OF EXCLUSION LISTS

The Risk department participates in the various sector committees – Worst Offenders, coal, controversial weapons, oil & gas – and, prior to the Worst Offenders committee meeting, ensures that alerts on *Global Norms* provided by the data provider Sustainalytics are assessed during committee meetings.

If a consensus does not emerge on the issuers assessed during Worst Offenders committee meetings, details may then be passed on to the Executive Committee for a decision. Decisions by these various committees are reflected in our risk monitoring systems, particularly via a freeze on the issuers in question:

- for open-ended funds, pre-trade controls that block investments are implemented for regulatory lists (cluster bombs/anti-personnel mines) and normative exclusions (Worst Offenders, controversial weapons), as well as for sector exclusions (tobacco, coal, oil and gas). Post-trade controls are also applied for prohibited issuers, excluding oil and gas, for which transactions are permitted until 2030;
- for mandates and dedicated funds, regulatory lists (cluster bombs/anti-personnel mines) and normative exclusions (Worst Offenders, controversial weapons) apply to both pre-trade and post-trade controls. Ostrum Asset Management's sector exclusion lists (tobacco, coal, oil and gas) are offered to the client as an addition to or replacement of its own lists. Post-trade controls are also applied for prohibited issuers in order to manage their exit from our portfolios when necessary;
- we apply the same alert and escalation procedure used for other regulatory and contractual investment constraints to monitor and manage any exceedances.

### CALCULATION OF ESG INDICATORS AND MONITORING

The Risk department is involved in selecting data providers together with the Sustainable Transitions department. Once integrated, raw data are aggregated by portfolio. The Risk department then ensures that the calculation methodologies are correct and properly implemented in Ostrum Asset Management's information system. It is also involved in implementing quality controls on these data.

As part of risk consolidation and monitoring, the Risk department uses an internal tool that provides all non-financial risks, in addition to financial risks, for the various portfolio management areas of expertise each month. Consolidated non-financial reporting covers a wide range of indicators, particularly on the following topics:

- carbon and climate alignment indicators come from data provided by Trucost: CO<sub>2</sub> emissions, CO<sub>2</sub> intensity, CO<sub>2</sub> footprint, implied temperature of the portfolios based on various climate change scenarios [1.5°C/1.75°C, 2°C and 2.7/3°C], projected climate alignment trajectory based on a 2°C warming scenario;
- coal indicators come from data from Urgewald's GCEL (*Global Coal Exit List*): the residual coal exposure of the portfolios is measured by electricity production from coal in GWh, the proportion of electricity generated from coal or the revenue generated by electricity production from coal;
- Biodiversity risks are measured using the *Corporate Biodiversity Footprint* (CBF) provided by Iceberg Data Lab: biodiversity impact in MSA.km<sup>2</sup> (*Mean Species Abundance* per km<sup>2</sup> compared to species 'abundance in an undisturbed ecosystem), biodiversity intensity and biodiversity footprint in MSA.km<sup>2</sup>/MEUR;

- Taxonomy indicators, including the taxonomy-eligible share of revenue and the taxonomy-aligned share of revenue (as well as the share of revenue aligned with the climate change mitigation component, the share of revenue aligned with the climate change adaptation component, the share of revenue aligned with the transition to a circular economy component) are taken from data provided by MSCI for companies. Each month, the Risk department calculates the Taxonomy indicators at the portfolio level, at the management process level and at the Ostrum Asset Management management company level.

#### IMPROVEMENT MEASURES IN 2025:

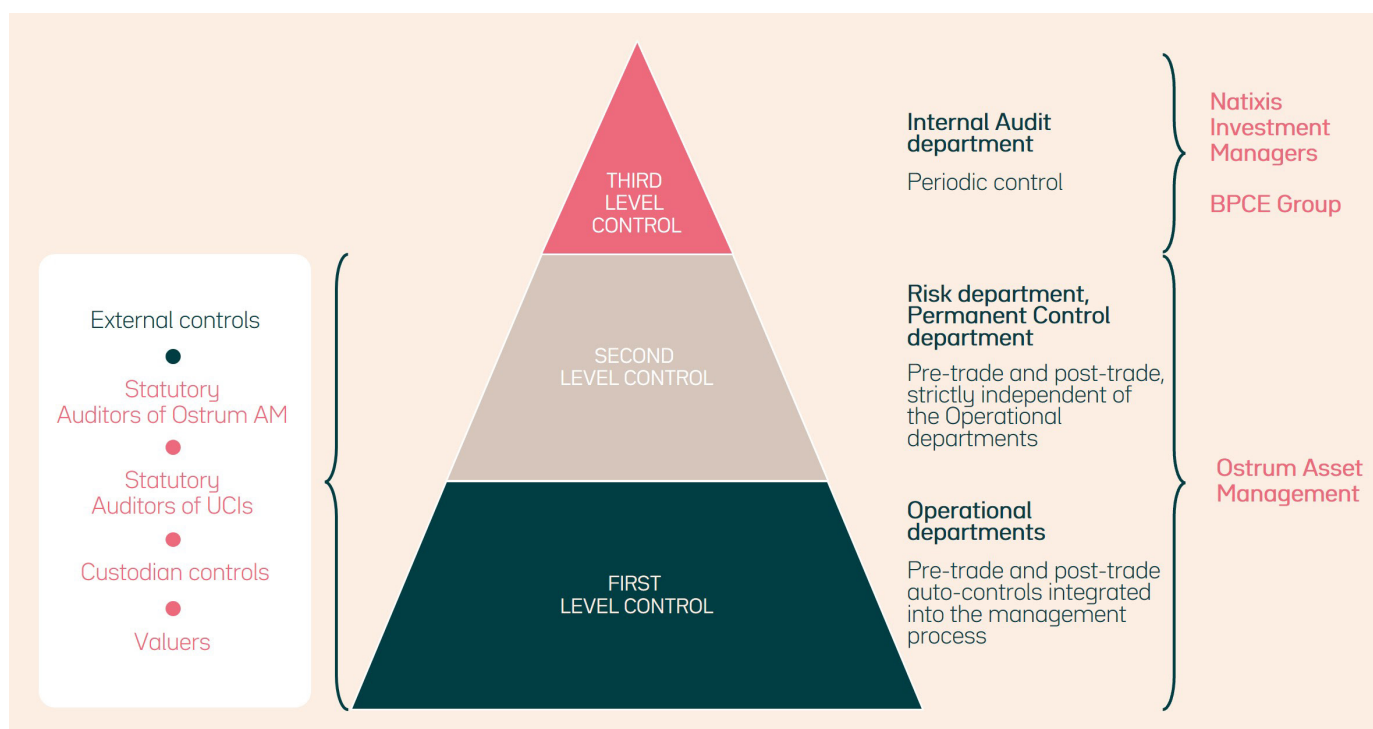
To further strengthen its Sustainable Finance policy and risk management, the Risk department has added Taxonomy indicators and exposure to fossil fuels to the funds' non-financial reports. There are also plans to add PAIs to these reports in 2025. Physical and transition risk indicators may also be added subsequently.

There are also plans to implement a more comprehensive ESG data control process.

The Risk department has also launched a study on the financial quantification of climate risk.

### 9.2.3. Internal control system

Each year, Ostrum Asset Management implements a major ESG management internal control system.



SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024



## OSTRUM ASSET MANAGEMENT'S GOALS AND OBJECTIVES FOR ITS OWN SCOPE

Beyond our investment goals, Ostrum Asset Management strives to reduce the carbon impact of our operations by focusing on **measuring, reducing** and **offsetting** our emissions.

We have conducted an annual carbon assessment since 2009 on scopes 1, 2 and 3 of the ADEME methodology. This process has enabled us to better understand our carbon emission sources and take the necessary steps to mitigate them.

In 2024, greenhouse gas emissions therefore came to 8.1 tonnes of CO<sub>2</sub>e per person. Ostrum Asset Management has been working on its office buildings, working methods and staff involvement to reduce the impact of our operations. Yet despite the efforts made, the numbers are up compared to 2019. The figures for energy and personal travel decreased [-69% for energy thanks mainly to the energy efficiency plan and the use of green electricity; -76% for personal travel due to the sharp increase in teleworking], but those for purchases and services increased.

Ostrum Asset Management pursued its reduction efforts by changing its travel policy in 2024 and by implementing an energy efficiency plan as part of a Group policy.

Though mindful that offsetting is not a climate solution in itself, we have nevertheless chosen to contribute to global emissions neutrality, while also prioritising measures aimed at reducing energy use. Every year since 2016, we have financed 100% of our direct carbon emissions, thereby avoiding GHG emissions. This initiative is proposed by our partner EcoAct, a European leader in climate consulting.

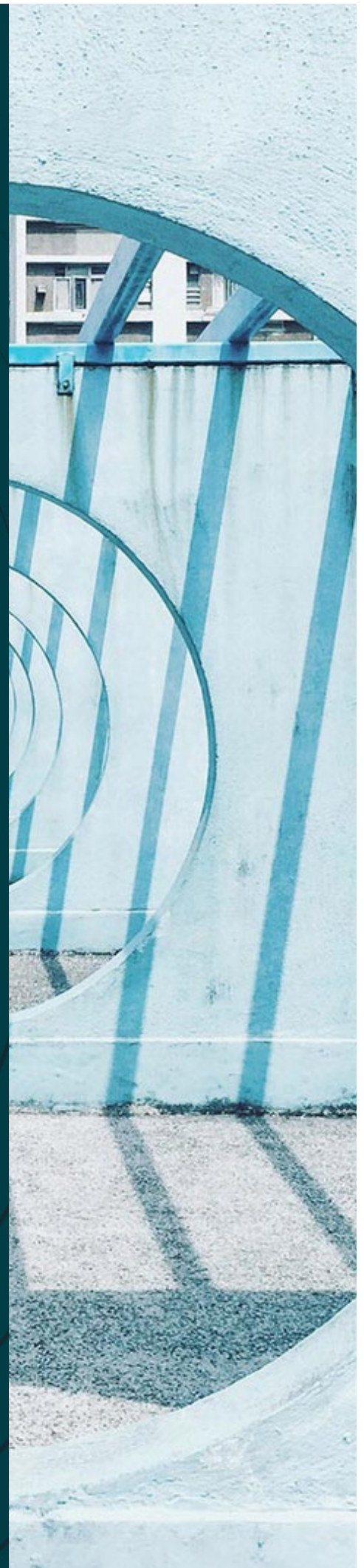
We chose the *Canarumwe Clean Cookstoves* project in Rwanda to offset our emissions in 2024. This project entails distributing fuel-efficient stoves free of charge to people who cannot afford to buy them. The stoves are produced locally, creating jobs and reducing wood consumption and exposure to smoke from wood burning. On the whole, it avoids the emission of 66,385 tCO<sub>2</sub> per year. This avoidance offset approach enables us to have a direct and immediate effect.

At the same time, Ostrum Asset Management is launching numerous initiatives to encourage eco-friendly practices and everyday resource utilisation. These include recycling cigarette butts, reducing water and energy consumption, improving waste management through sorting, collection and recovery, and eliminating most paper.

For 2025, Ostrum Asset Management's goal is to further reduce its carbon footprint while continuing its offsetting initiatives.

# 10

## APPENDIX



## 10. APPENDIX

The list of financial products in our open-ended funds classified as Article 8 and 9 according to SFDR is as follows:

FUND NAME	MANAGEMENT COMPANY	FINANCIAL MANAGER	FUND CLASSIFICATION
Ecureuil Actions France	NIMI	Ostrum AM	Article 8
ECUREUIL SRI OBLI EURO	NIMI	Ostrum AM	Article 8
ECUREUIL SRI OBLI MOYEN TERME	NIMI	Ostrum AM	Article 8
Fructi Flexible 100	NIMI	Ostrum AM	Article 8
Le Livret Portefeuille	NIMI	Ostrum AM	Article 8
Monceau Marché Monétaire	Monceau	Ostrum AM	Article 8
Natixis Asia Equity Fund	NIMI	Ostrum AM	Article 8
Natixis Pacific Rim Equity Fund	NIMI	Ostrum AM	Article 8
Natixis Solutions Protect 75	NIMI	Ostrum AM	Article 8
OSTRUM CRÉDIT EURO 1-3	NIMI	Ostrum AM	Article 8
OSTRUM EURO HIGH INCOME	NIMI	Ostrum AM	Article 8
Ostrum Euro Inflation	NIMI	Ostrum AM	Article 8
OSTRUM global Inflation	NIMI	Ostrum AM	Article 8
OSTRUM Short Term Global High Income	NIMI	Ostrum AM	Article 8
OSTRUM SRI CASH	NIMI	Ostrum AM	Article 8
OSTRUM SRI CASH A1P1	NIMI	Ostrum AM	Article 8
OSTRUM SRI CASH PLUS	NIMI	Ostrum AM	Article 8
OSTRUM SRI CREDIT 12M	NIMI	Ostrum AM	Article 8
OSTRUM SRI CREDIT 6M	NIMI	Ostrum AM	Article 8
OSTRUM SRI CREDIT EURO	NIMI	Ostrum AM	Article 8
Ostrum SRI Credit Short Duration	NIMI	Ostrum AM	Article 8
OSTRUM SRI CREDIT ULTRA SHORT PLUS	NIMI	Ostrum AM	Article 8

FUND NAME	MANAGEMENT COMPANY	FINANCIAL MANAGER	FUND CLASSIFICATION
OSTRUM SRI CROSSOVER	NIMI	Ostrum AM	Article 8
Ostrum SRI Crossover 2026	NIMI	Ostrum AM	Article 8
OSTRUM SRI EURO AGGREGATE	NIMI	Ostrum AM	Article 8
OSTRUM SRI EURO BONDS 1-3	NIMI	Ostrum AM	Article 8
OSTRUM SRI EURO BONDS 3-5	NIMI	Ostrum AM	Article 8
OSTRUM SRI EURO BONDS 5-7	NIMI	Ostrum AM	Article 8
Ostrum SRI Euro High Dividend Equity	NIMI	Ostrum AM	Article 8
Ostrum SRI Euro Minvol Equity	NIMI	Ostrum AM	Article 8
OSTRUM SRI EURO SOVEREIGN BONDS	NIMI	Ostrum AM	Article 8
Ostrum SRI Europe Equity	NIMI	Ostrum AM	Article 8
Ostrum SRI Europe MinVol Equity	NIMI	Ostrum AM	Article 8
Ostrum SRI Global MinVol Equity	NIMI	Ostrum AM	Article 8
Ostrum SRI Global Subordinated Debt	NIMI	Ostrum AM	Article 8
OSTRUM SRI MONEY	NIMI	Ostrum AM	Article 8
OSTRUM SRI MONEY 6M	NIMI	Ostrum AM	Article 8
OSTRUM SRI MONEY PLUS	NIMI	Ostrum AM	Article 8
Ostrum SRI Total Return Conservative	NIMI	Ostrum AM	Article 8
Ostrum SRI Total Return Dynamic	NIMI	Ostrum AM	Article 8
OSTRUM SRI TOTAL RETURN SOVEREIGN	NIMI	Ostrum AM	Article 8
Ostrum SRI US Equity	NIMI	Ostrum AM	Article 8
Palatine Ambition Rendement 2026	Palatine AM	Ostrum AM	Article 8
Palatine Ambition Rendement 2027	Palatine AM	Ostrum AM	Article 8
Palatine Conviction Credit 3-5 ANS	Palatine AM	Ostrum AM	Article 8
Palatine Global Bond	Palatine AM	Ostrum AM	Article 8
Palatine Monétaire court terme	Palatine AM	Ostrum AM	Article 8
Palatine Monétaire Standard	Palatine AM	Ostrum AM	Article 8



FUND NAME	MANAGEMENT COMPANY	FINANCIAL MANAGER	FUND CLASSIFICATION
Palatine Objectif Rendement 30 Mois	Palatine AM	Ostrum AM	Article 8
Palatine Opportunités 6-12 Mois	Palatine AM	Ostrum AM	Article 8
Palatine Optimum Credit 1-3 ans	Palatine AM	Ostrum AM	Article 8
OSTRUM CLIMATE AND SOCIAL IMPACT BOND	NIMI	Ostrum AM	Article 9

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

All portfolios listed above carry a risk of capital loss.

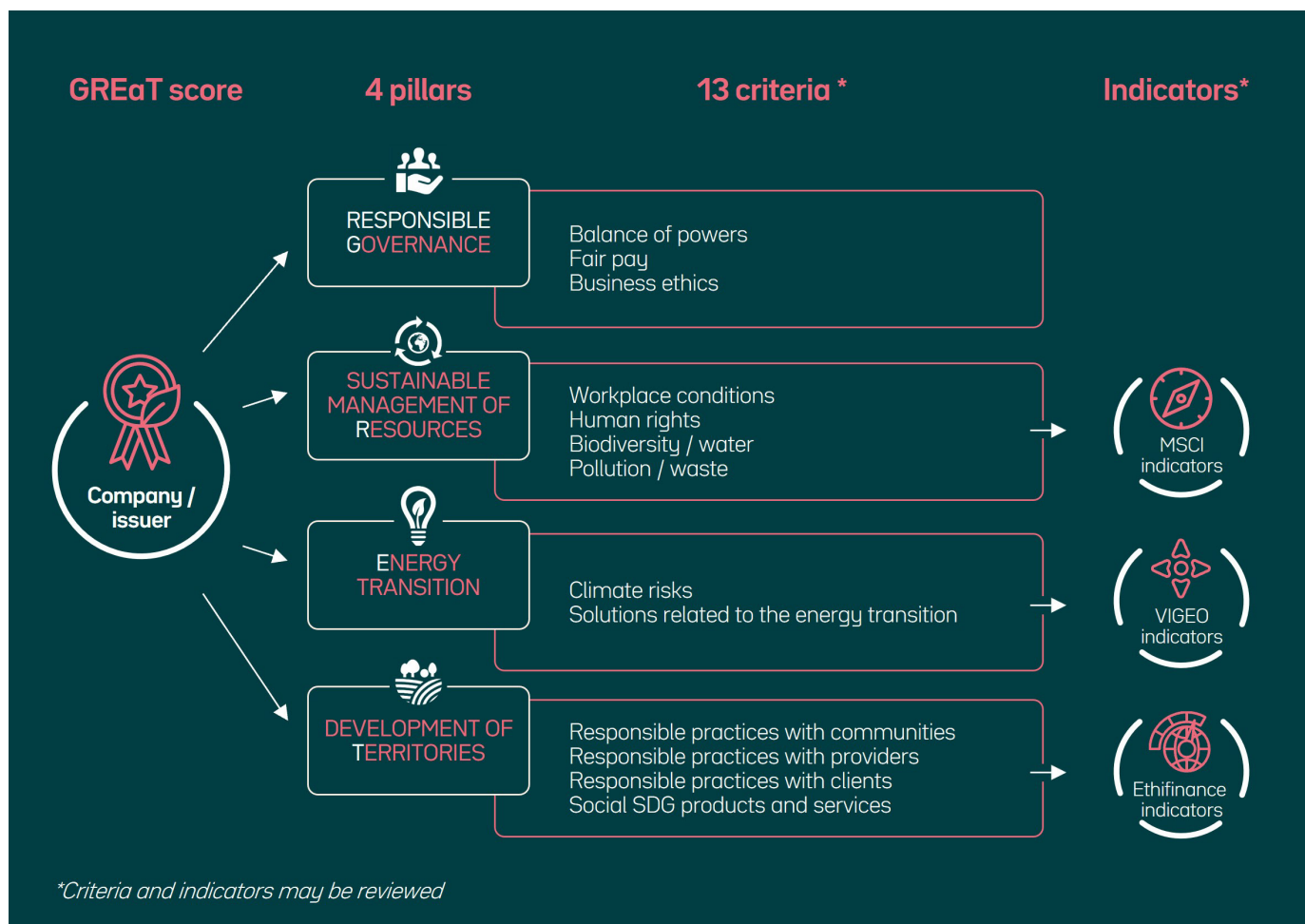
## MATERIALITY SCORE OF ESG FACTORS FOR COMPANIES

We interpret the table as follows: an ESG2+ materiality score means that of the various E, S or G factors that we have identified, we believe that (i) the opportunities outweigh the risks, and (ii) the extent of the impact is moderate for the company's operational profile.

ESG MATERIALITY SCORE	TYPE OF IMPACT ON THE COMPANY	ANALYSIS CRITERIA
ESG1+	<b>Positive</b> low magnitude	ESG issues having an impact on the sector but little impact on the fundamental quality of the company Or
ESG1-	<b>Negative</b> low magnitude	The impact is very long-term and the company has time to adapt
ESG2+	<b>Positive</b> moderate magnitude	ESG risks and opportunities are high in the short/medium term but the company is aware of them. Or
ESG2-	<b>Negative</b> moderate magnitude	There will be a material impact in the long term and the company has not yet adapted its model
ESG 3+	<b>Positive</b> and very material	ESG factors have a significant effect on the quality of companies' operating model Or
ESG3-	<b>Negative</b> and very material	They become significant when combined with other factors

SOURCE: OSTRUM ASSET MANAGEMENT AT 31/12/2024

## GREaT METHODOLOGY



SOURCE: OSTRUM ASSET MANAGEMENT, LBPAM



## DISCLAIMER

### Ostrum Asset Management

A société anonyme (limited company) with share capital of €50,938,997

An Asset Management Company authorised under No. GP-18000014

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Our sector and exclusion policies are available on Ostrum Asset Management's website:  
<https://www.ostrum.com/en/our-sector-policies>



#### Ostrum Asset Management

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