

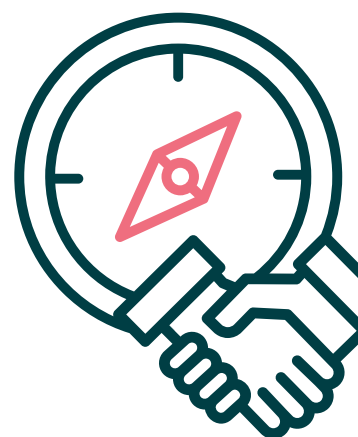
# 2024 ENGAGEMENT REPORT

April 2025

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# 1

# INTRODUCTION



# 1. INTRODUCTION

## 1.1. Active engagement for a sustainable future

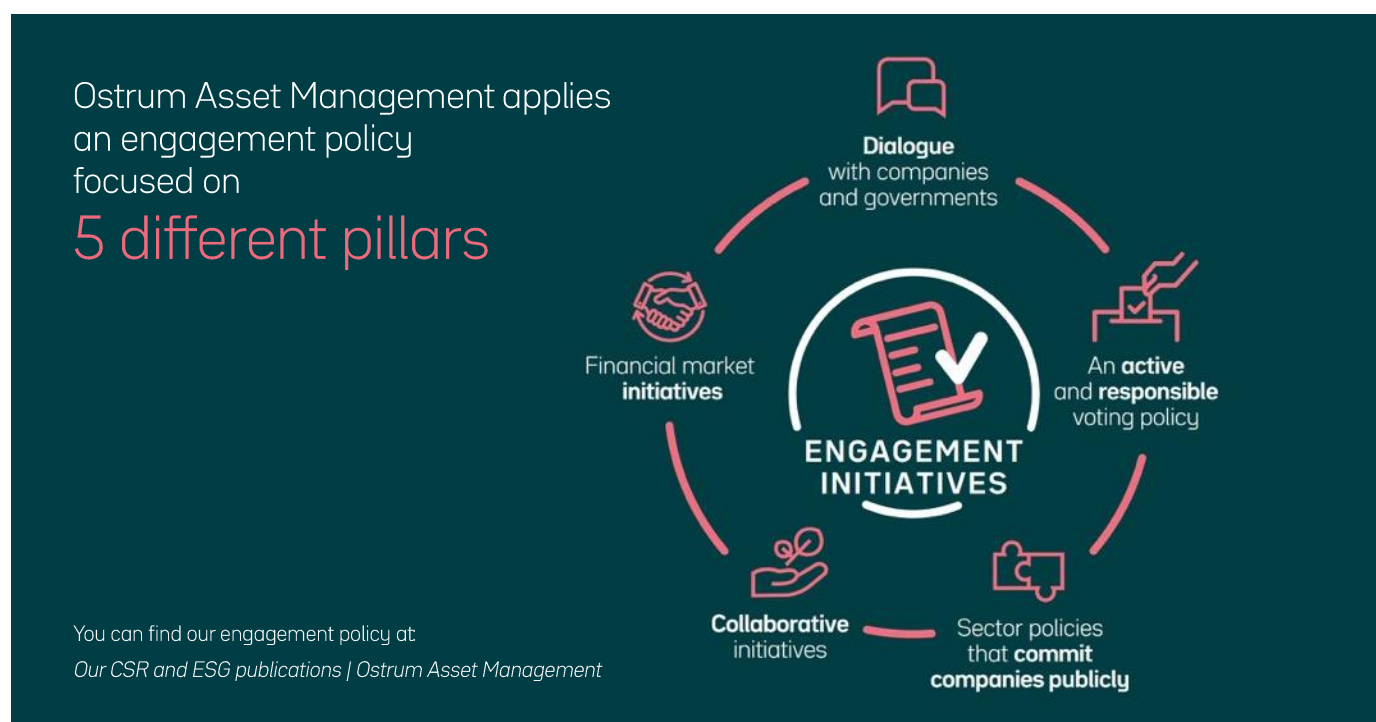
For almost forty years<sup>1</sup>, Ostrum Asset Management has been resolutely committed to sustainable development and sustainable finance. Our ambition is to continuously improve our practices and implement a responsible investment policy that reflects our core values.

To achieve this, Ostrum Asset Management changed its organisation in 2024 by creating a Sustainable Transitions Department, reporting directly to the CEO. This department defines the main orientations in terms of CSR policy and ESG strategy.

At the same time, the Credit Research and Sustainability team, within the Portfolio Management Department, systematically integrates ESG factors based on double materiality (financial and environmental materiality). The latter allows us to gain an in-depth understanding of the companies in which we invest. In this respect, analysts contact these companies to encourage them to make progress on their material ESG issues.

We also exercise our power as a shareholder through dialogue and voting, to encourage greater transparency, improve governance practices and promote solutions that are both economically viable and socially responsible in the face of environmental, social and governance issues.

Engagement also plays a central role in our sector policies. Our policies on coal and on oil and gas have catalysed our ambitions for dialogue and support for companies in building a sustainable future for generations to come. These policies will continue to evolve in order to gradually encourage companies to adopt best practices.



<sup>1</sup> Ostrum Asset Management was created by the separation of Ostrum AM's fixed-income and equity investment management operations into a separate subsidiary on 1 October 2018 (registered on the Paris Trade and Companies Register under number 329 450 738, previously Natixis AM). Our management history dates back to the creation of CDC Gestion in 1984.



## 1.2. Some figures on our engagement practices

Ostrum Asset Management promotes its convictions in particular through its engagement efforts, which involve individual dialogue with issuers, collaborative initiatives and voting.



### ONGOING DIALOGUE WITH COMPANIES

**153**

Commitments\*  
achieved



**97**

Companies were  
the subject of an  
engagement plan



**112**

Meetings and contacts\*\*  
with companies

of which

**65**

with fixed income issuers  
[excl. GSS\*\*\*]



### AN ACTIVE AND RESPONSIBLE VOTING POLICY

**97%**

Votes cast

of which

**8%**

resolutions not approved



**16**

Say on climate votes at  
shareholder meetings

of which

**19%**

votes against



### COLLABORATIVE ENGAGEMENT INITIATIVES

**13**

Collaborative initiatives  
in 2024

of which

**5**

new

SOURCE: OSTRUM ASSET MANAGEMENT AT 12/31/2024. \* ONE MEETING CAN LEAD TO SEVERAL COMMITMENTS.

\*\* ON SUBJECTS INCLUDING NON-FINANCIAL ASPECTS. \*\*\* GREEN, SOCIAL AND SUSTAINABILITY BONDS

### 1.3. Priority themes and areas of engagement

Ostrum Asset Management has identified eight priority engagement themes in environmental, social and governance matters.

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 engagement themes 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 on them 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.

The existence of a Worst Offenders Committee (which brings together the Sustainable Transitions Department, Portfolio Management, the Risk Department and the Compliance Department), with a highly supervised process, allows us to assess controversies against commonly established international standards (United Nations Global Compact and the OECD Guidelines for Multinational Enterprises).

The Worst Offenders Committee may decide that the issuers identified are:

- A. placed on the **Worst Offenders Exclusion List** (issuers excluded because they are the subject of proven and severe controversies that go against international standards)
- or
- B. placed on the **Worst Offenders Watch List** (issuers not excluded but monitored),
- or
- C. considered as **Other Controversies**.

Ostrum Asset Management focuses its commitment initiatives on issuers placed on the Worst Offenders Watch List, giving priority to issuers for which the severity criterion is ticked and on which Ostrum Asset Management has leverage.

Some controversies that are relevant in relation to our aforementioned priority areas of engagement are also covered under collaborative engagement efforts.

## 1.4. Principle underlying the escalation of engagement

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



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:

- **Rating Improvement Approach:** Exclude portfolio issuers that fall within the bottom 30% of 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 comes into effect on the policy review date.



# 2

## SECTOR POLICIES

A mark of active engagement



## 2. SECTOR POLICIES - A MARK OF ACTIVE ENGAGEMENT

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



### SECTOR OR 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).



## 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 the following thresholds:



**10 %**

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

**5 GW**

in installed capacity

**10 million**

tons of thermal coal production on an annual basis

**10%**

of coal-fired energy generation

## 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.

A gradual tightening of the thresholds is therefore planned to support companies in their transition, while continuing to uphold our exacting standards.



\*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**



In addition, Ostrum Asset Management reserves the right to exclude Defence sector issuers or subcontractors in other sectors, which would not be included in the aforementioned exclusion categories, if the weapons produced are likely to "inflict unnecessary or unjustifiable suffering on combatants, or indiscriminately strike civilians", in accordance with 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**

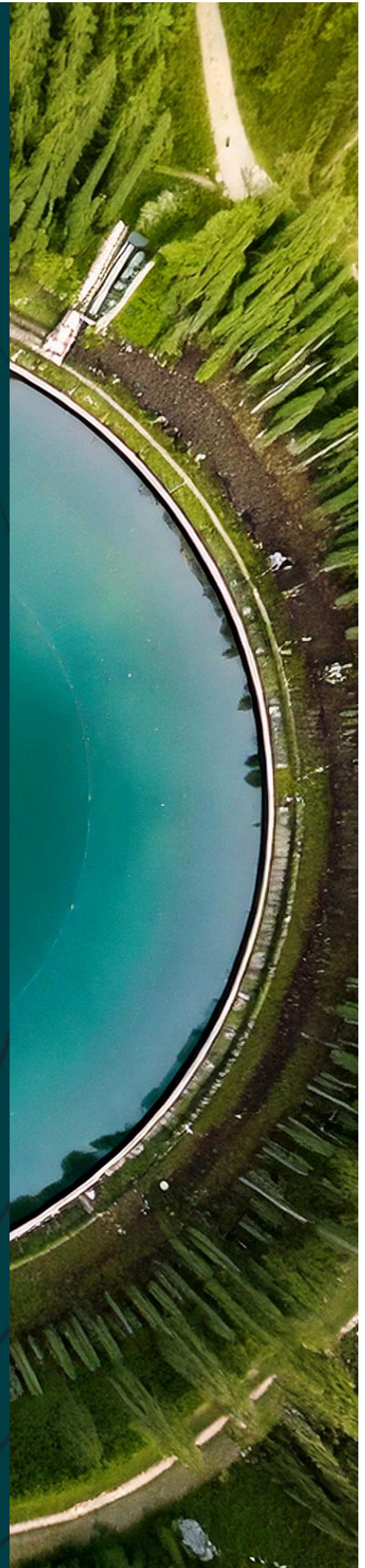
For further information: <https://www.ostrum.com/en/our-csr-and-esg-publications>



# 3

## INDIVIDUAL ENGAGEMENT

Dialogue with bond issuers  
and portfolio companies



### 3. INDIVIDUAL ENGAGEMENT: DIALOGUE WITH BOND ISSUERS AND PORTFOLIO COMPANIES

Ostrum Asset Management actively engages with issuers, not only to help them comply with its sector policies, but also to address more broadly the environmental, social and governance (ESG) issues integrated into its engagement policy.

In this context, analysts engage in constructive dialogue with companies on various ESG-related topics. A specific focus is placed on climate issues in the case of companies active in high emission sectors through the development of a proprietary qualitative methodology for assessing the climate strategies of these players (so-called "CSA" methodology: "Climate Strategy Assessment"). This methodology makes it possible to deepen the understanding of companies' willingness and ability to transition in a sustainable manner and to orient investment decisions in a responsible way.

#### 3.1. Constant dialogue with bond issuers



Bond investors are not shareholders, but as creditors, through corporate and sovereign bonds, they can play an important role in promoting responsible investment.

#### UN PRI <sup>2</sup>

Pursuing dialogue with bond issuers across all social, environmental and governance dimensions ensures:

- better management of material ESG risks <sup>3</sup>;
- increased transparency and quality of disclosure as regards ESG factors;
- improvement in their practices.

As part of our due diligence or prior analysis process, Ostrum Asset Management's portfolio management teams, who may be supported by the Sustainable Transitions Department, hold **meetings and conference calls** with bond issuers. We embark on these dialogue efforts either before making our investments, or as part of our constant monitoring of positions in our portfolios.

Our goal is to pre-empt ESG risks, although we may also stage these efforts in response to problems that have already affected the issuer, such as a specific controversy. We systematically disclose the results to our investment teams.

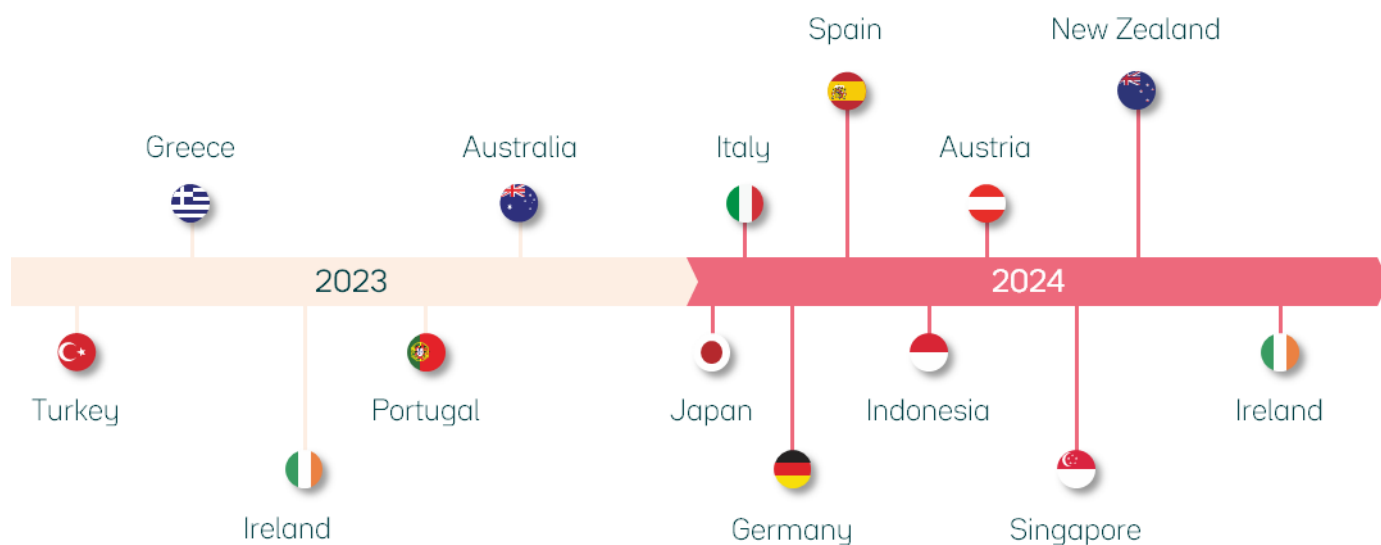
<sup>2</sup> Source: PRI - <https://www.unpri.org/>

<sup>3</sup> An ESG factor is deemed to be material if it has a positive or negative impact on the company's credit risk profile and a relatively high likelihood of occurrence during our investment timeframe.

## FOCUS ON DIALOGUE 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 with the Paris Agreement and respond to the challenges of biodiversity.

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



SOURCE : OSTRUM AM



## DIALOGUE WITH SOVEREIGN ISSUERS IN 2024

Commitments with sovereign issuers			
Issuer country	Score SDG Index	SDGs being worked on	Topics covered
<b>Japan</b> 01/17/2024	79.4/100	 	Transition obligation Carbon neutrality objective
<b>Italy</b> 01/26/2024	78.8/100	 	Climate strategy Phasing-out of coal
<b>Germany</b> 02/01/2024	83.4/100	 	Climate strategy Phasing-out of coal CO <sub>2</sub> emissions linked to imports
<b>Spain</b> 02/08/2024	80.4/100	 	Circular economy Climate strategy
<b>Indonesia</b> 03/19/2024	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> 03/20/2024	82.3/100	 	Dependence on Russian gas Climate strategy Circular economy
<b>Singapore</b> 04/25/2024	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> 10/15/2024	78.7/100	  	Company taxation Climate transition Circular economy Spending of the budget surplus Biodiversity and housing

## ENGAGEMENT IS CRUCIAL FOR GREEN, SOCIAL AND SUSTAINABILITY BONDS

At the end of 2024, Ostrum Asset Management had invested a total of €42 billion in green, social, sustainability and sustainability-linked bonds. These investments aim to promote a more responsible economy, from both an environmental and a social point of view. Ostrum Asset Management's green, social, sustainability and sustainability-linked (GSSS) bond analysts **met issuers** during the year with a focus on engagement theme 15 – Ensure financial and non-financial data transparency. The analysts dialogue with the issuing companies to encourage them to communicate in a transparent manner the information necessary for a good understanding of the quality of the instruments issued. They also discuss aspects where issuers could improve their practices in terms of GSSS bond issues, so as to promote good market practice and to ensure that we invest in high-quality instruments.

### Our areas of engagement in 2024:

- Issuer practices in terms of transparency and consistency of information communicated during the time of issue and in the context of annual allocation and impact reports. The objective is to ensure that we have a good understanding of the nature of the [re]financed projects, as well as their actual impacts [or, if applicable, to ensure that we have a good understanding of the key reference indicators, and the associated sustainability performance objectives].
- The requirement level and clarity in the definitions of the eligible project categories, as published in the framework by the issuers. A reference to the activities and technical examination criteria defined by the European Taxonomy is favoured.
- Issuers' sustainable development strategies and their level of ambition. Particular attention is paid to the coherence of the sustainable bond issues with these strategies, and to the contribution of the sustainable bonds to the achievement of the issuer's environmental and social objectives.

### 3.2. Shareholder engagement to support better practices

Ostrum Asset Management holds itself to the highest standards as an active and engaged shareholder and is therefore committed to constructive dialogue with the companies in its portfolios. This includes in particular an assessment of issuers' ESG practices prior to shareholder meetings where voting rights are exercised.

The aim is to draw each company's attention to any ESG issues that may have been overlooked or underestimated and share ESG best practices with the company. The identified areas for improvement and expected outcomes are conveyed to the firm either verbally or in writing, with the aim of encouraging progress. Any changes are monitored over time to measure improvements made by the issuer and adjust its ESG score accordingly.

### 3.3. Our individual engagement in 2024

#### KEY FIGURES

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

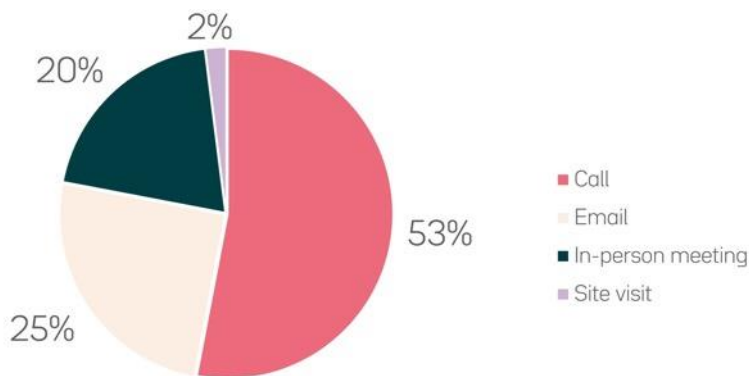
**112** meetings and contacts on financial and non-financial topics were organised with companies

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

Main **themes for dialogue** in 2024:

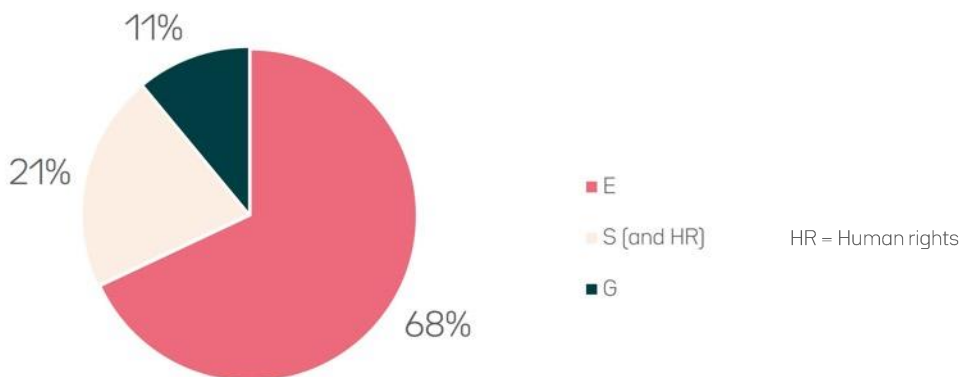
- Support mitigation and adapt to climate change
- Limit impact on environmental ecosystem
- Balance powers and compensation

Main **meeting formats**



SOURCE: OSTRUM AM

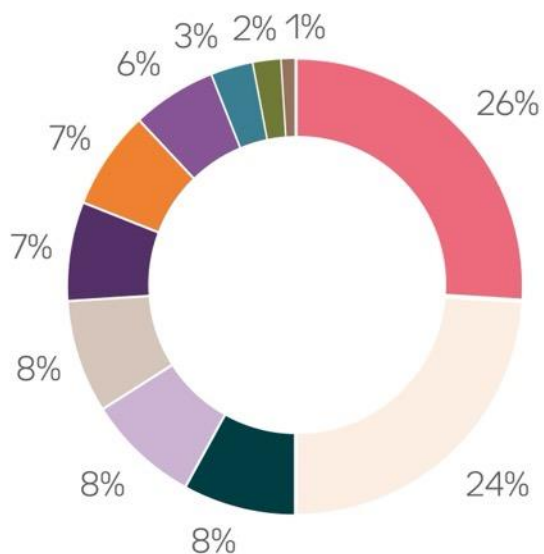
Breakdown of commitments **by ESG criteria**



SOURCE: OSTRUM AM



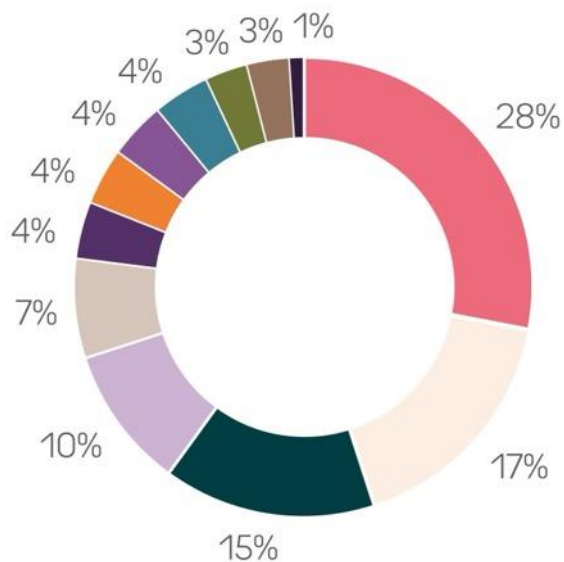
## Breakdown of engagement initiatives **by SDG**



- SDG 13 Measures to combat climate change
- SDG 7 Clean and affordable energy
- SDG 14 Life below water
- SDG 15 Life on land
- SDG 12 Responsible consumption and production
- SDG 5 Gender equality
- SDG 10 Reduced inequalities
- SDG 3 Good health and well-being
- SDG 8 Decent work and economic growth
- SDG 16 Peace, justice and strong institutions
- SDG 4 Quality education

SOURCE: OSTRUM AM

## Breakdown **by sector**



- Banking
- Non-cyclical consumption
- Utilities
- Cyclical consumption
- Basic industry
- Fin Cies + Brok + Other Fin + REITS
- Capital goods + other industries
- Insurance
- Non cable media + technology
- Telecommunications
- Energy
- Agency

SOURCE: OSTRUM AM

### 3.4. Some examples of our engagement in action<sup>4</sup>

#### TORONTO-DOMINION BANK

##### Description

Toronto-Dominion Bank is one of the largest financial institutions in North America, offering a wide range of banking services across Canada and the United States.

##### Background

- Gaps in transaction monitoring that allowed criminal networks to transfer more than **\$670m over a period of more than six years, facilitating the trafficking of drugs**, including fentanyl.
- April 2024: CEO publicly acknowledged shortcomings in the Anti-Money Laundering (AML) program.
- October 2024: **pleaded guilty** to violations of the Banking Secrecy Act, historic fine of \$3bn.

##### Date of the commitment

10/30/2024

##### Objective of the commitment

Understand the gaps that led to this controversy, as well as the remediation actions taken. Promote a robust corporate and risk management culture.

##### Results: **NEUTRAL**

Measures considered serious and credible for addressing the problems of governance and controls. Implementation to be monitored:

- Management changes and massive recruitment: 40 leaders and 700 AML specialists.
- Investments to improve its AML program. \$350m in 2024 and \$500m in 2025.
- Technology: New transaction monitoring platform.

##### Actions taken by Ostrum Asset Management

- ESG materiality score revised downwards, given the shortcomings in governance and internal controls.
- Increased monitoring to verify that the bank is executing its remediation plan.

##### Next steps

- Monitor the effectiveness of these measures, which will be implemented over several months/years. Monitor the risk of other breaches being discovered.
- Promote a full audit of the bank.

<sup>4</sup> The analysis and opinions mentioned in this document represent the point of view of the referenced author(s). They are issued on the date indicated, are subject to change and may not be interpreted as having any contractual force.

## BASF

### Description

BASF is one of the world's largest diversified chemical companies. Approximately 30% of its revenue comes from raw material chemicals (petrochemicals and basic chemicals), 45% from intermediate chemicals (resins, catalysts and coatings) and 25% from specialised chemicals (nutrition and care, and agriculture).

### Background

- Delay in addressing climate and biodiversity issues.
- Criticism of its production of harmful substances, mainly pesticides. BASF sells pesticides (fipronil and dicamba) that are banned in certain regions, to regions where they can be sold. Controversies relating to PFAS.
- Allegations of forced labour in its JV in Xinjiang, China. Sale announced in Q4 2023 but still not taken place.

### Date of the commitment

09/26/2024

### Objective of the commitment

- Encourage BASF to adopt an ambitious climate strategy (SBTi).
- Replace harmful substances with safer alternatives.
- Ensure activities in Xinjiang end.

### Results: **NEUTRAL**

- Targets not validated but following SBTi recommendations and 2050 carbon neutrality target, and 25% reduction in Scope 1 and 2 emissions by 2030.
- Discontinuation of PFAS production. BASF does not question the export of pesticides (fipronil and dicamba), which are banned in certain regions, to regions where they can be sold.
- BASF confirms that it is still in the process of selling its activities in Xinjiang.

### Action taken by Ostrum Asset Management

Increased vigilance maintained on the subject of pesticides.

### Next steps

- Continue to push towards an ambitious climate strategy and validation of targets by SBTi.
- Promote transparency on the production of harmful substances, R&D for safer alternatives, and stop the marketing of fipronil and dicamba.
- Ensure that activities in Xinjiang end in 2025 [or according to a clear timetable].



## NESTLÉ

### Description

Nestlé S.A. is a multinational company specialising in nutrition, health and well-being. Nestlé offers a wide range of products, including powdered and liquid drinks, water, dairy products and ice cream, etc.

### Background

- **Nestlé Unauthorised treatments:** Nestlé Waters used unauthorized purification methods (UV and charcoal filters) on certain mineral waters, concealing bacterial contamination and violating mineral water regulations for several years.
- **Illegal exploitation and lack of transparency:** The company is accused of illegal exploitation of wells for more than 20 years, without authorisations or controls, resulting in the overexploitation of water resources.

### Date of the commitment

02/29, 04/05 and 10/31/2024

### Objective of the commitment

- Comply with mineral water regulations in all geographical areas.
- Adopt transparent and responsible water resource management practices.

### Results: **NEUTRAL**

- Admissions and fines: Nestlé has admitted illegal practices regarding mineral water treatment, paid fines (€2m) and confirmed the cessation of these practices in France.
- Enhanced controls: Quality controls have been strengthened following the controversy.
- These practices do not pose a major risk to consumer health or the environment, but nevertheless constitute a misleading commercial practice, contrary to the regulations on mineral water.

### Actions taken by Ostrum Asset Management

- Downgrading of ESG materiality score, linked to lack of transparency and reputational risk.
- Ongoing and enhanced dialogue.

### Next steps

- Monitor the progress of ongoing investigations and potential new complaints, in particular the latest controversies regarding lobbying at the Elysée Palace.
- Check that Nestlé's "renaturation" and water management commitments are being implemented and producing the expected results.

## VEOLIA

### Description

Veolia is the leader in energy transition and operates in the fields of water, waste treatment and Customer Solutions.

### Background

- We have been engaging with Veolia in connection with the Ostrum Asset Management coal policy since 2021.
- Veolia has committed to phasing out coal in OECD countries by 2030.
- Outside the OECD, Veolia operates on the Harbin heating networks in China.

### Date of the commitment

01/23, 01/29, 02/29 (Veolia Strategy Day),  
09/10/2024 (visit to the Méry-sur-Oise site)

### Objective of the commitment

Promote exit from coal activities in line with the Ostrum Asset Management Coal Policy (plan to exit coal by 2030 in OECD countries and 2040 in non-OECD countries).

### Results: **NEUTRAL**

- No progress on the Harbin case.
- Veolia is considering alternative solutions for Harbin, such as gas or nuclear power, but has not come up with any concrete solutions as yet.
- Veolia stresses that the contract is very profitable and represents only 1% of its revenues.

### Actions taken by Ostrum Asset Management

Continued monitoring under our Coal Policy.

### Next steps

Monitoring of developments on Harbin with Veolia.

## EDF

### Description

EDF is France's long-standing energy provider and one of the largest electricity producers in Europe with a mix composed mainly of nuclear (3/4) and hydroelectric power (10%).

### Background

- We have been engaging with EDF in connection with the coal policy since 2021.
- EDF has only one coal-fired power plant, Cordemais, between Nantes and Saint-Nazaire, 2x600MW.
- EDF initially thought about converting it to pellet manufacturing by selling it to Paprec but studies have shown that this solution would not be profitable.

### Date of the commitment

10/10/2024 (meeting with the Investor Relations team at the Santander forum),

10/14/2024 (visit to the Saint-Laurent-des-Eaux power plant),

12/09/2024 (meeting with the Investor Relations team at the CACIB sustainable forum).

### Objective of the commitment

Promote exit from coal activities in line with the Ostrum Asset Management Coal Policy (plan to exit coal by 2030 in OECD countries and 2040 in non-OECD countries).

### Results: **PROGRESS**

- Regular contacts with EDF, in particular the Investor Relations team, Nicolas Deblaye and Flore de la Hougue, whom we met three times in 2024.
- EDF has confirmed to us that it intends to exit from coal by 2027.
- EDF is considering selling the Cordemais plant to Framatome to make spare parts for the EPR2. This solution would enable 200 of the 500 jobs to be saved.

### Actions taken by Ostrum Asset Management

Continued monitoring under the Coal Policy.

### Next steps

- Monitoring of EDF's exit from coal by 2027.
- We met with a member of the Performance, Impact, Investment and Finance (France) team in Q1 2025.



## BBVA

### Description

Banco Bilbao Vizcaya Argentaria, S.A. (BBVA) is the second largest financial group in Spain, with €772 billion in total assets at the end of 2024.

### Background

- We have engaged in two discussions with BBVA (email and virtual meeting) as part of our assessment of green, social and sustainability bonds according to our proprietary methodology.
- This exchange follows the need for clarification on the allocation of funds raised (details of the various assets financed/refinanced) as well as on the impact associated with sustainable instruments.

### Date of the commitment

05/2024

### Objective of the commitment

Encourage BBVA to increase the transparency of its allocation and impact report by clarifying certain elements and sharing our areas for improvement.

### Results: **PROGRESS**

- This commitment has enabled greater transparency on the allocation of funds, particularly with regard to the types of projects included in the Clean Mobility, Renewable Energy and "Other" categories.
- However, BBVA should continue its efforts to improve the impact measures of the assets included in its eligible green portfolio.

### Actions taken by Ostrum Asset Management

No improvement in our internal sustainable development score.

### Next steps

- Monitor changes in reporting practices during the annual publication of BBVA's allocation and impact reports.
- Possibility of upgrading the rating if transparency in the allocation of funds raised and impact reporting improves.

## VOLKSWAGEN

### Description

Volkswagen is one of the world's largest car manufacturers. The Group, together with its partner SAIC Motor Corporation Limited, owns SAIC Volkswagen, a joint venture that until recently owned sites in China's Xinjiang region.

### Background

- Since 2013, the JV has been operating the Urumqi site in Xinjiang. It has been accused in an article in Der Spiegel of using Uyghur forced labour.
- December 2023: An audit conducted at the request of investors concluded that there were no "indications or evidence of forced labour." However, in an open letter, employees of the audit firm expressed their disagreement with the audit's findings.
- February 2024: an article in the Handelsblatt reveals that forced labour was used at another JV site, in Turpan, between 2015 and 2019.

### Date of the commitment

05/15/2024

### Objective of the commitment

Understand the measures taken by the Group:

- following the questioning of the independence of the audit;
- to ensure the absence of human rights violations in the Group's activities in Xinjiang.

### Results: **SUCCESS**

- November 2024: sale of the two controversial sites, Urumqi and Turpan, to Chinese state entities, ending operations in Xinjiang.
- Given the difficulties in conducting an independent audit in the region, this appears to be the most appropriate measure.

### Actions taken by Ostrum Asset Management

Following the remediation, Ostrum Asset Management plans a review at its next Worst Offenders Committee meeting.

## OIL&GAS COMPANY A

### Description

Company specialising in the prospecting, development and production of hydrocarbons, as well as in the supply and marketing of gas, LNG, electricity, petroleum products, petrochemicals, plastics and elastomers, and in the trading of raw materials.

### Background

Commitment under Ostrum Asset Management's Oil & Gas Policy, which commits us to fully withdrawing from unconventional and/or controversial oil and gas exploration and production activities by 2030 on our open-ended funds, while evaluating the strategies and action plans of companies in the sector to ensure they align with the recommendations of the International Energy Agency and the objectives of the Paris Agreement.

### Date of the commitment

11/13/2024

### Objective of the commitment

- Climate: understand the factors that led to the increase in direct emissions and how the company plans to achieve its carbon neutrality targets by 2050.
- Unconventional: clarify the Group's position on unconventional activities.

### Results: **NEUTRAL**

- No significant change compared to the previous year. Willingness to accelerate investments in renewable energy, but concerns remain about the robustness of the company's long-term climate strategy.
- As regards unconventional activities, the company says it has an exploration project in the Arctic.

### Actions taken by Ostrum Asset Management

Continued commitment under Ostrum Asset Management's Oil & Gas Policy.

### Next steps

- Monitor progress on climate strategy, including their commitment to reduce net emissions by 2026.
- Ask for clarification on their definition of unconventional, in particular with regard to the Arctic project.



# 4

## VOTING POLICY

An active and responsible  
voting policy



## 4. AN 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 issues, as well as corporate governance guidelines. Ostrum Asset Management publicly discloses all votes that it takes part in at shareholder meetings.

For 2024, we recorded the following figures for all portfolios held by Ostrum Asset Management as at 12/31/2024:



**97%**



Participation rate at  
general meetings

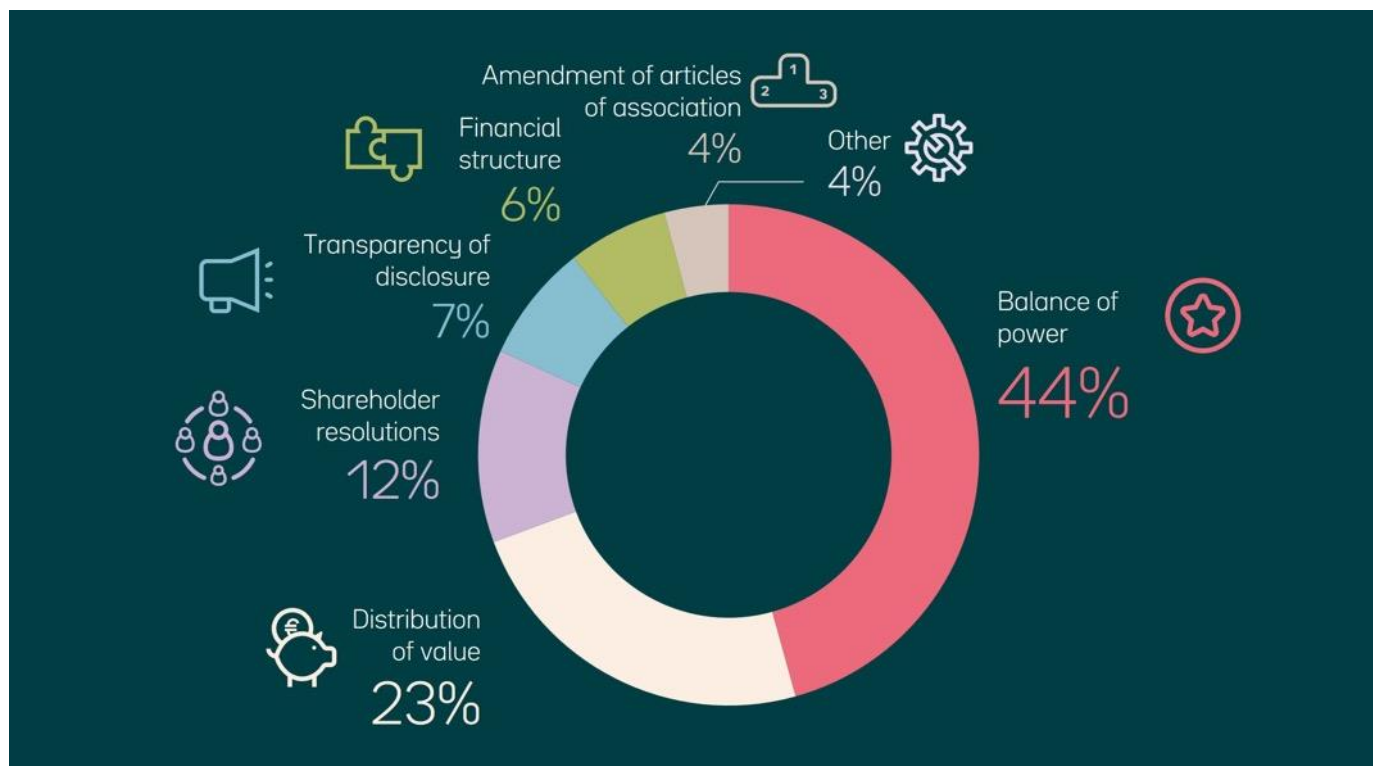
Country	Breakdown of votes by geographical area (number of shareholder meetings)	
	No.	%
Americas	658	46
Europe	538	38
Asia	231	16
Oceania	6	0
Total	1,433	100

SOURCE: OSTRUM AM – ISS GOVERNANCE

Ostrum Asset Management places particular emphasis on **the robustness of the governance bodies** within the portfolio companies. We actively analysed data transparency, requirements in relation to objectives, integration of non-financial aspects and assessed whether amounts paid out were reasonable.

Ostrum Asset Management maintained its shareholder engagement strategy in line with its **sector policies**, particularly with regard to **climate strategy** issues related to the oil & gas and coal sectors.

In terms of dissent, the breakdown of the topics of resolutions which Ostrum Asset Management voted against is as follows:



SOURCE: OSTRUM AM - ISS GOVERNANCE

## 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, accountability and executive incentives.

### A. Say on Climate

In 2024, the number of **Say on Climate** resolutions was 26 proposals worldwide (including 16 on 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

Brief review of the four **Say on Climate** resolutions on which Ostrum Asset Management voted:

SAY ON CLIMATE			
Shareholder meeting	Sector	Vote	Comment
EDP	Utilities	Support	Ostrum Asset Management supports the company in its climate transition plan as no particular concerns have been identified in the company's implementation of its climate transition plan.
Unilever	Food	Support	Support for Unilever's Say on Climate serves as an encouragement for the company, even as its climate policy and strategy appear to be largely improvable.
Icade	Real estate	Support	Climate issues are fully integrated into the company's strategy. The company is currently on track with the targets it has set itself. It has also worked on its climate reporting methodology.
TotalEnergies	Energy	Abstention	TotalEnergies is committed to improving its emissions impact, as illustrated by its high rating with most extra-financial agencies. However, the company does not currently meet all of our key Oil & Gas policy objectives.

## B. Shareholder climate resolutions

The number of external climate resolutions (proposed by shareholders) remained strong at the global level, with around 200 resolutions proposed, **123** of which within Ostrum Asset Management's voting scope, stable compared with 2023 (200 resolutions). Over the past two years, however, the rate of support has tended to decline. From 22% support in 2021 and 2022, the rate fell to 16% in 2023 and was only 14% in 2024. Ostrum Asset Management, which is very committed to this theme, supported **81%** of the resolutions.



81%



Support rate for shareholder  
climate resolutions



There are various reasons for the decrease observed at the global level:

- The many resolutions and repeated filing from year to year of the same resolutions by the same groups has tended to dilute their scope for the shareholder;
- As shareholder resolutions are more frequent in the United States, for legal reasons, the low priority of, if not hostility to, ESG issues has led to a reduction in the rate of support for these resolutions.

The trend is downward in the United States, from 20% to 18% between 2023 and 2024.

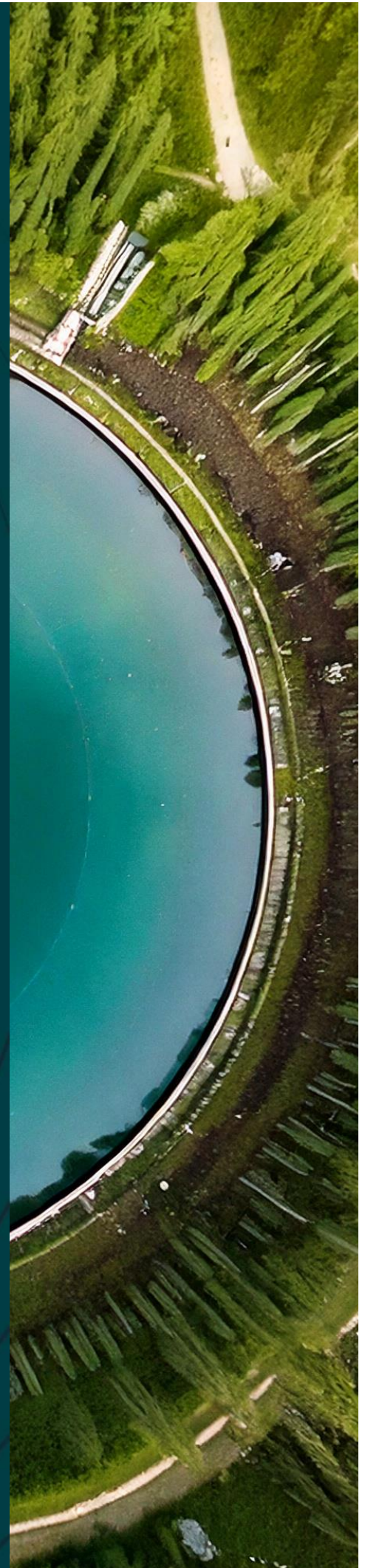
For more information, see our report on voting rights exercised in 2024:

<https://www.ostrum.com/en/our-csr-and-esg-publications>



# 5

## COLLABORATIVE ENGAGEMENT INITIATIVES



## 5. COLLABORATIVE ENGAGEMENT INITIATIVES

**Ostrum Asset Management pursues a consistent policy and, with this in mind,** goes beyond the individual engagement initiatives coordinated by the portfolio management teams.

Each year, Ostrum Asset Management pledges to get involved in collaborative initiatives that resonate with our own convictions.

**Collaborative engagement** entails identifying controversial practices within an industry or group of companies and engaging in dialogue to appeal for increased transparency and a change in practices, where necessary.

Engagement is conducted with other investors with a view to increasing the influence of responsible investors and encouraging issuers to make clear and measurable changes within a specific timeframe. Engagement can also be conducted at the level of sector-wide organisations and/or public policy.

Dialogue is formally established either by a personal letter signed by all investors involved, or by a publicly disclosed investor statement.

Ostrum Asset Management has been actively involved in collective initiatives for several years. The process for conducting these engagement actions involves selection by the Sustainable Transitions Department of collaborative initiatives that chime with our own convictions. We then inform the members of the Executive Committee and the portfolio management department of these points to ensure the overall consistency of our engagements. The CSR department monitors these actions on a long-term basis.

In 2019, Ostrum Asset Management decided to contribute to initiatives that focus on the **ten principles of the UN Global Compact**, programmes to promote the **Paris Agreement on Climate Change** and the **declaration from the Paris financial centre in July 2019** for a low-carbon economy.

Ostrum Asset Management is unable to take part in all initiatives to address these key principles, and has focused on actions that target Sustainable Development Goals **3** (Good Health and Well-being), **5** (Gender Equality), **13** (Climate Action), **14** (Life Below Water) and **15** (Life on Land).

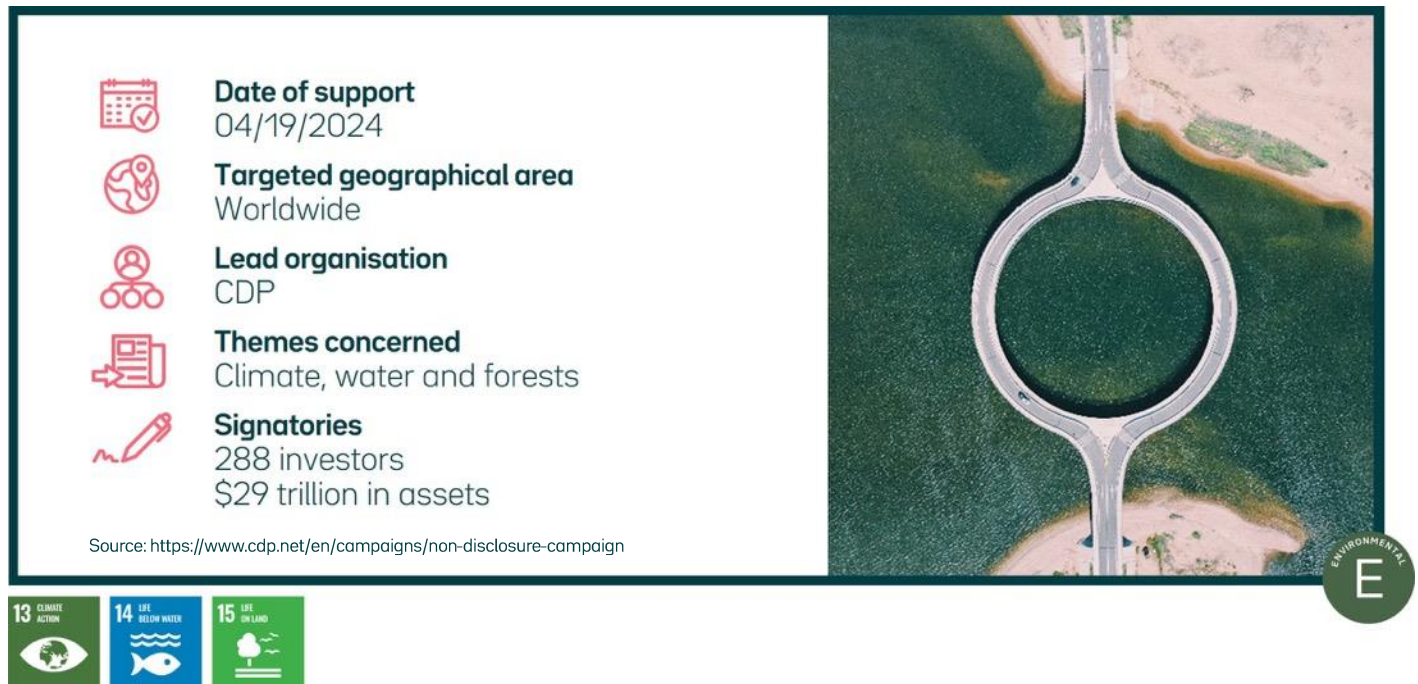




## 5.1. Actions supported in 2024

### IN 2024 OSTRUM ASSET MANAGEMENT CONTRIBUTED TO THE FOLLOWING 5 NEW INITIATIVES

#### 1. 2024 Non-Disclosure Campaign



**Date of support**  
04/19/2024

**Targeted geographical area**  
Worldwide

**Lead organisation**  
CDP

**Themes concerned**  
Climate, water and forests

**Signatories**  
288 investors  
\$29 trillion in assets

Source: <https://www.cdp.net/en/campaigns/non-disclosure-campaign>

13 CLIMATE ACTION  
14 LIFE BELOW WATER  
15 LIFE ON LAND

ENVIRONMENTAL  
E

#### Background and summary

Since 2017, the CDP (Carbon Disclosure Project) has been coordinating an annual investor-led global engagement campaign, called the Non-Disclosure Campaign (NDC), to ask the world's largest companies to communicate on their impact and management of climate change, forests and water security. Investors are encouraged to conduct engagement initiatives or co-sign letters in cooperation with other investors to request the disclosure of information from companies that have not yet issued their data.


#### Advancements

- 1,998 companies were selected from a list of non-reporting companies for a targeted commitment to the importance of disclosure – representing an 26% increase compared to 2023.
- 1,329 were asked directly by their shareholders or bondholders to disclose information on climate change, 373 on forests and 1,029 on water safety.


Ostrum Asset Management participated directly in this campaign by engaging in dialogue with two of the targeted companies concerning forests.




## 2 . Declaration by the private financial sector to the member states negotiating the legally binding instrument (ILBI) aimed at ending plastic pollution




**Date of support**  
04/19/2024




**Targeted geographical area**  
Worldwide



**Lead organisation**  
PRI, Finance for Biodiversity Foundation, UNEP FI, Business Coalition for a Global Plastics Treaty, CDP








**Themes concerned**  
Pollution, climate, biodiversity, human rights, health and the circular economy



**Signatories**  
180 investors  
\$17.2 trillion in assets

Source:  
<https://www.unpri.org/circular-economy/the-un-global-plastics-treaty/12160.article>

### Background and summary


Many financial institutions are calling for a legally binding international treaty to end plastic pollution. They are calling for clear objectives, binding rules on the entire life cycle of plastic and the alignment of public/private financial flows with these objectives.

The treaty should also require companies to be transparent about the risks associated with plastic and encourage investment in the circular economy through public-private partnerships and risk reduction mechanisms.


### Advancements

At this stage, no binding agreement has been signed.


### 3 • 2024 Global Investor Statement to governments on the Climate Crisis




**Date of support**  
09/09/2024




**Targeted geographical area**  
Worldwide



**Lead organisation**  
The Investor Agenda








**Themes concerned**  
Climate and biodiversity



**Signatories**  
651 investors  
\$34 trillion in assets

Source: <https://theinvestoragenda.org/press-releases/7-november-2024/>

#### Background and summary

The signatories of this letter are calling on governments to strengthen regulatory frameworks to support the transition to a low-carbon economy. The initiative highlights the importance of climate targets aligned with a 1.5°C trajectory, transparency mechanisms for companies, and tailored financing, particularly in developing countries. It aims to encourage stable and predictable public policies in order to facilitate the allocation of capital towards solutions compatible with climate issues.

#### Advancements

Ostrum Asset Management has been a signatory to this initiative since 2021. In 2024, Ostrum Asset Management renewed its commitment alongside more than 600 other investors.

#### 4 • Investor Initiative on hazardous chemicals



**Date of support**  
05/29/2024



**Targeted geographical area**  
Worldwide



**Lead organisation**  
ChemSec



**Themes concerned**  
Use of hazardous chemical products (PFAS), health and the environment



**Signatories**  
+70 investors  
\$18 trillion in assets

Source: <https://chemsec.org/knowledge/iihc/>





#### Background and summary

Launched in 2023 and coordinated by the NGO ChemSec, this initiative aims to reduce the risks associated with hazardous chemical substances, in particular PFAS. Investors are calling on companies in the sector to increase transparency on the use of these substances, to publish clear plans to phase them out, and to invest in the development of safer alternatives. The initiative relies in particular on the ChemScore tool to assess the sustainability performance of large chemical companies.

#### Advancements

Ostrum Asset Management uses ChemSec's research to assess the risks of PFAS, particularly as part of the assessment of the main PFAS producers.

## 5 • Investors letter on PFAS to UVDL<sup>5</sup>



**Date of support**  
11/25/2024

**Targeted geographical area**  
European Union

**Lead organisation**  
ChemSec

**Themes concerned**  
Eternal pollutants (PFAS),  
health and the environment

**Signatories**  
60 investors  
\$20 trillion in assets

Source:  
<https://chemsec.org/you-d-like-to-clarify-pfas-here-is-the-place-to-start/>

3 GOOD HEALTH AND WELL-BEING  
14 LIFE BELOW WATER  
15 LIFE ON LAND

SOCIAL  
ENVIRONMENTAL

### Background and summary

The Investor Initiative on Hazardous Chemicals (IIHC) aims to reduce the financial risks associated with the impacts of hazardous chemicals, including PFAS, which pose a systemic risk.

PFAS, which are persistent substances, pose health and environmental risks, with high remediation costs and legal risks for companies. They are associated with cancers and immune system problems.

The initiative supported the restriction of PFAS in Europe to eliminate their production and use, encouraging the European Commission to maintain ambitious legislation.

The IIHC urged the Commission to act quickly and decisively to restrict PFAS, thereby facilitating a transition to safer and sustainable solutions, while protecting investment and stimulating innovation.

### Goals and actions

This initiative is reinforcing ongoing discussions within the EU on these persistent chemical substances. It supports the proposed restriction of 10,000 PFAS still under evaluation and gives weight to negotiations around the PACT laws, a set of reforms aimed at better controlling toxic substances. By highlighting the financial risks associated with inaction, this initiative reinforces the legitimacy of ambitious European regulations on PFAS.

<sup>5</sup> Perfluorinated and polyfluorinated alkyls (PFAS)



## 5.2. Other initiatives that continued in 2024

### 1 • Support retailer tobacco disclosure

*Requirement for transparency concerning revenue from the sale of products that contain tobacco*



**Date of support**  
10/01/2023



**Targeted geographical area**  
United States



**Lead organisation**  
Pella Funds Management



**Themes concerned**  
Health and the environment

Source: <https://www.pellafunds.com/lettertosec>





### Background and summary

Pella Funds Management started from the following observation: the vast majority of US companies do not report their revenue from the sale of tobacco. This lack of transparency poses a problem for investors on two counts, both commercially (in terms of financial risk) and ethically.


### Goals and actions

Pella Funds Management has petitioned the Securities and Exchange Commission (SEC) to establish rules requiring public-sector companies in the retail sector that sell products containing tobacco to disclose their revenue from the sale of such products.


If the SEC does not accept this first request, at a minimum, Pella Funds Management is asking for more transparency from companies.

It would like to make transparency mandatory and for companies to report when more than 10% of their income comes from the sale of products that contain tobacco.


## 2 • Climate transition plan resolution letter




**Date of support**  
10/01/2023




**Targeted geographical area**  
UK (FTSE 100)



**Lead organisation**  
CCLA Investment Management  
LAPFF (Local Authority Pension Fund Forum)






**Themes concerned**  
Climate and governance



**Signatories**  
39 investors  
£1.6 trillion in assets

Source: <https://www.ccla.co.uk/insights/investors-call-climate-strategy-vote-uks-largest-listed-companies>

### Background and summary

This investor statement aims to encourage companies to provide shareholders with details of their climate strategy through a resolution. Therefore, this initiative invites investors to sign a letter to 76 high carbon emitting UK companies asking about their approach to providing shareholders with the opportunity to support their climate strategy by means of a specific AGM resolution.

### Progress made in 2024

Two companies have made concrete commitments in response to the initiative. The first has pledged to propose a vote on their climate strategy at their annual general meeting (AGM) in 2025. The second plans to put its climate transition plan to a shareholder vote in 2026.

The initiative is in its fourth year and has seen a significant increase in corporate engagement compared to previous years. The percentage of companies responding positively has increased from less than 20% before the 2022 AGM season, to 60% in 2024, and finally to 64% for the 2025 AGM season. This indicates an upward trend in the consideration of climate resolutions by companies.

The majority of companies state that a vote on the transition plan is a subject they will continue to examine, showing the growing emphasis on guaranteeing accountability to shareholders.

### 3 • Spring

A PRI stewardship initiative on nature

	<b>Date of support</b> 12/01/2023	
	<b>Targeted geographical area</b> Worldwide	
	<b>Lead organisation</b> PRI	
	<b>Themes concerned</b> Biodiversity, forestry and the supply chain	
	<b>Signatories</b> 225 investors \$16 trillion in assets	

Source: <https://www.unpri.org/investment-tools/stewardship/spring>







#### Background and summary

Spring is an initiative of the PRI that focuses on the fight against deforestation and land degradation as key factors in biodiversity loss and systemic risks, targeting companies with a high impact on biodiversity.

#### Goals and actions

The signatories of the Spring initiative undertake to exercise their role as shareholders to encourage companies to protect nature. They expect companies to adopt clear commitments to curb deforestation, set time-based targets, report on their progress in a transparent manner, and assess their impacts and dependencies on biodiversity. The signatories also expect companies' political commitment, including their relationships with policymakers and industry associations, to be fully aligned with the objectives of the Paris Agreement and the Kunming-Montréal Global Biodiversity Framework.

#### 4 • The 30% Club Investor Group to promote greater diversity within SBF 120 management teams



**Date of support**  
11/11/2020



**Targeted geographical area**  
France



**Lead organisation**  
30% Club Investor Group



**Themes concerned**  
Governance, diversity



**Signatories**  
16 investors  
\$6 trillion in assets

Source: <https://30percentclub.org/france-investor-group/>







#### Summary and objectives


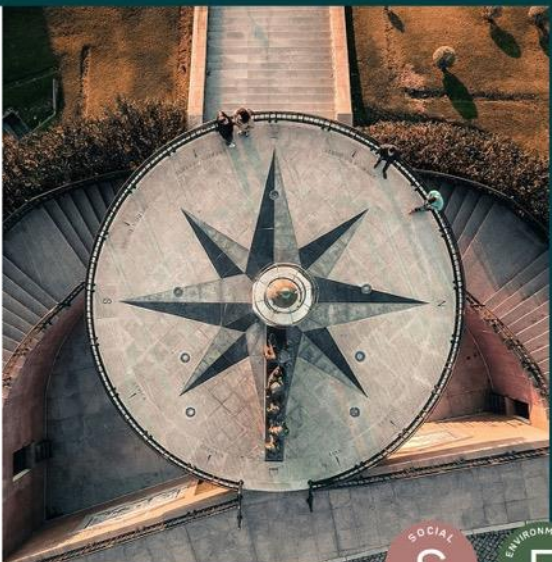




The 30% Club Investor Group, founded in 2020, aims to increase female representation in SBF 120 management teams to at least 30% by 2025, favouring a voluntary approach rather than quotas. The group encourages companies to integrate gender diversity into their recruitment and promotion processes, using their right to vote to encourage concrete action.

#### Progress made in 2024


Companies are generally open to the commitment to achieve 30% of women on their executive committee, although overall progress remains slow. While the financial and consumer sector faces a "glass ceiling," the manufacturing, technology, engineering, mathematics and science sectors are struggling to attract women. In 2024, growth appears to have stabilised. Indeed, the percentage of women in executive positions was 29.98%, compared with 29.8% in 2023.



## 5 • Tobacco Free Finance Pledge

	<b>Date of support</b> 2019	
	<b>Targeted geographical area</b> Worldwide	
	<b>Lead organisation</b> Tobacco Free Portfolios	
	<b>Themes concerned</b> Health and the environment	
	<b>Signatories</b> 214 investors \$18 trillion in assets	

Source: <https://tobaccofreeportfolios.org/the-pledge/>



### Summary and objectives


The Tobacco-Free Finance Pledge (TFFP) aims to reduce tobacco-related deaths to seven million a year. Its actions include: promoting the leadership of tobacco-free financial institutions; encouraging the financial sector to support global anti-smoking priorities; raising awareness of the importance of finance in this fight; and de-normalising trade relations with the tobacco industry. The TFFP supports the transition towards tobacco-free financial policies and prioritises this issue in business strategies.

### Progress made in 2024


In 2024, the initiative gained momentum with ten new signatories, bringing the total to 214. Among them, the University Pension Plan Ontario formalised its commitment during Climate Week in New York. This progress marks a step towards a tobacco-free future.

## 6 • Investor Initiative for Sustainable Forests (IISF)<sup>6</sup>


Investor Initiative for Sustainable Forests




**Date of support**  
06/29/2020




**Targeted geographical area**  
Worldwide



**Lead organisation**  
PRI and CERES






**Themes concerned**  
Forestry, climate, biodiversity and the supply chain



**Signatories**  
44 investors  
\$6.8 trillion in assets

Source: <https://www.unpri.org/collaborative-engagements/investor-initiative-for-sustainable-forests-engagement-results/9595.article>

### Summary and objectives

The Investor Initiative for Sustainable Forests, in collaboration with Ceres, helps investors understand how deforestation in cattle and soybean supply chains poses a material risk to businesses. It coordinates the collaborative engagement of investors with companies exposed, directly or indirectly, to commodity-related deforestation, while addressing other ESG issues such as precarious working conditions, land rights and the impact on indigenous peoples.

### Engagement and actions

More than 35 investors are working with more than 20 companies in the soybean and livestock value chains. Although the production of these commodities has encouraged economic development in Latin America, it is also responsible for about 70% of tropical deforestation in the region. There is a growing awareness of the environmental and social problems associated with this production, but companies' commitments to deforestation in these chains are still limited.

<sup>6</sup> We previously signed a commitment called "Letter to Meatpackers and Processors on Traceability of Indirect Suppliers in their Brazilian Supply Chains", which merged with this current commitment, of which we are signatories.

## 7 • Investor statement on job standards and community impacts

**Date of support**  
01/26/2022

**Targeted geographical area**  
Worldwide

**Lead organisation**  
ICCR

**Themes concerned**  
Finance and a just transition

**Signatories**  
97 investors  
\$4.3 trillion in assets

Source: <https://www.iccr.org/reports/iccrs-statement-of-investor-expectations-for-job-standards-community-impacts-in-the-just-transition/>

8 TRAVAIL DÉCENT ET CROISSANCE ÉCONOMIQUE

13 MESURES RELATIVES À LA LUTTE CONTRE LES CHANGEMENTS CLIMATIQUES

SOCIAL S

### Summary and objectives

The idea for this statement came from one of the ICCR's Just Transition partners, Gas Leaks Allies, who identified the need to demonstrate investor support for Just Transition values and principles to policymakers and businesses.

It was deemed useful for meetings with governments and companies to convey investor support for Just Transition principles as they prepare their climate transition plans. Until now, much of this planning has failed to take into account the impacts on workers and communities. At the same time, the need was expressed for a more granular set of expectations as regards Just Transition principles, to help educate investors.

This statement is intended to be used extensively with a wide range of stakeholders in all sectors.


### Advancements

Signatories used this statement in their individual exchanges with companies, primarily energy utilities, to clearly illustrate what investors are looking for when it comes to a Just Transition.


## 8 • Investor initiative for responsible care




**Date of support**  
09/22/2022




**Targeted geographical area**  
Worldwide



**Lead organisation**  
UNI Global Union

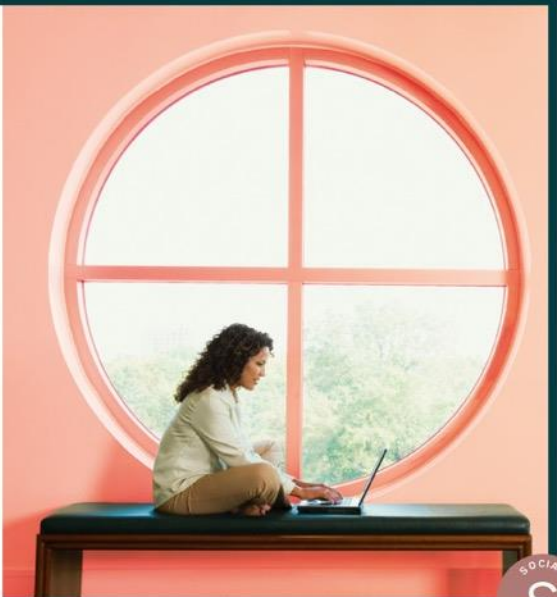



**Themes concerned**  
Healthcare, nursing homes and healthcare professionals



**Signatories**  
100 investors  
\$3.7 trillion in assets

Source: <https://uniglobalunion.org/investor-initiative-for-responsible-care/>





### Summary and objectives

The effects of the pandemic highlighted and exacerbated many long-known problems in the nursing home sector.

These problems have multiple causes, including the inherent vulnerability of elderly care recipients, the lack of preparedness for the pandemic globally, poor working conditions and, in some cases, the inability of governments to adequately support and/or regulate this sector.



# 6

## INITIATIVES

Development and promotion  
of ESG standards



## 6. INITIATIVES AROUND THE DEVELOPMENT AND PROMOTION OF ESG STANDARDS

### 6.1. Our responsible investment practices responsible

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



##### PRI

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 efforts as part of the PRI.

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



##### 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 encourages investors, companies and cities to take 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 is a member of the Stewardship, Market Integrity & ESG Investment standing committee. Ostrum Asset Management is also 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 Committee, of which Ostrum Asset Management is a member. This Committee is organized into various working groups to promote best practices in sustainable finance.

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



## 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/>



## 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/>



## 6.2. Participation in commissions/working groups

In 2024, Ostrum Asset Management mainly participated in working groups initiated by two bodies: Association française de la gestion (AFG), Forum pour l'investissement responsable (FIR) and the International Capital Market Association (ICMA).

### AFG

#### Responsible Investment Plenary

The Responsible Investment Plenary brings together all the management companies interested in topics relating to Sustainable Finance. All topics related to this topic are shared.

#### Responsible Investment Commission

The mission of the Responsible Investment Commission is to define the association's main strategic directions on sustainable finance issues. It actively contributes to the development of positions and the prioritisation of key issues in this area, particularly in response to consultations and regulatory changes. The Director of Sustainable Transitions is a permanent member of this Commission.

#### Working Group: bringing transition plans into operation

Following on from the drafting of the Institute of Sustainable Finance guide on transition plan analysis, this working group aims to offer management companies more operational elements for implementing transition plan analysis, in particular to meet regulatory requirements (SRI label, etc.).

#### SFDR Working Group

Following a review of the various documents published on level 2 of the SFDR Regulation and work on the definition of Sustainable Investment, this working group aims to refine the AFG's position on the revision of level 1 of SFDR.

#### CSRD Working Group: biodiversity

Following the publication by EFRAG of draft detailed reporting standards, the AFG formed several groups on each topic addressed in order to provide feedback to EFRAG. We worked in particular on issues relating to biodiversity.

### Forum pour l'Investissement Responsable

#### Dialogue & Engagement Committee

This committee meets several times a year to bring together all members who wish to be involved in issuer-related engagement actions conducted by the platform.

The committee provides input for the strategy and action of the platform of collaborative engagement activities carried out and supported by the FIR aimed at positively influencing the behaviour of companies in relation to ESG issues. The Platform's activities are structured around major areas: an annual campaign of written ESG questions at general meetings of large listed companies, thematic engagements, investor briefings around ESG controversies and engagement activities for small- and mid-cap companies, carried out within the "SMID Club".

### Working group: Social indicators & taxonomy

Composed of 50 investors and initiated in October 2023, this working group aims to reintroduce the social issue into the European agenda, in particular by reigniting the debate around the social taxonomy project. The Working Group focuses its efforts on three key stakeholders: workers, citizens and end users, while taking into account the complexity of the roles everyone can play. The approach adopted by the group is both vertical, identifying key sectors of activity, and horizontal, exploring social transformation strategies in various areas. The ultimate goal is to create a social framework that can be adapted to different contexts within the European Union.

The group's work led to the publication, in February 2025, of a report entitled "Committing to social impact". This report proposes indicators and an analytical framework for evaluating the social contribution of investments.

### ICMA

We are signatories to the Principles of the International Capital Market Association (ICMA) and participate in several working groups on the following topics:

- Impact reporting on environmental and social projects financed by funds raised through sustainable bonds;
- Sustainability-linked bond issuance practices;
- Green enabling activities, insofar as they facilitate the achievement of environmental objectives in certain sectors.

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



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

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