PRINCIPAL ADVERSE IMPACT STATEMENT

2024

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1. Summary

Principal Adverse Impacts (PAIs) are impacts of investment decisions that result in negative effects on sustainability factors. Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

CPR Asset Management [LEI 969500E0FOS38XJ2E978] considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of CPRAM.

This statement on Principal Adverse Impacts on sustainability factors covers the reference period from 1st of January 2022 to 31st of December 2023.

A summary of Principal Adverse Indicators considered by Amundi is presented in the table below:

Applicable to	Theme	PAI indicator	Number
Investment companies	Greenhouse gas emissions	GHG emissions	1
		Carbon footprint	2
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		Share of non-renewable energy consumption and production	5
		Energy consumption intensity per high impact climate sector	6
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		Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	11
		Unadjusted gender pay gap	12
		Board gender diversity	13
		Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons)	14
	Human rights	*Additional PAI*: Lack of a human rights policy	9 (table 3)

Sovereigns & supranationals	Environmental	GHG intensity	15
	Social	Investee countries subject to social violations	16
Real Estate	Fossil fuels	Exposure to fossil fuels through real estate assets	17
	Energy efficiency	Exposure to energy-inefficient real estate assets	18
	Energy consumption	*Additional PAI*: Energy consumption intensity	19 (table 2)

2. Description of principal adverse impacts of investment decisions on sustainability factors

Amundi present the 2023 version of the Principal Adverse Impacts (PAI) statement, marking our second year of this disclosure. This year, we have continued to enhance our PAI statement by improving the transparency and robustness of our methodology, while making progress in reducing adverse impacts across our portfolios. As a point of reference, at the end of 2023, Amundi had an 0.06% exposure to companies active in coal. We also have implemented methodological changes to ensure the results reflect our activities. This period also provided an opportunity for major data providers in the market to review and refine their methodologies, enhancing the assessment of issuers' activities, and leading to discrepancies on certain indicators compared to the previous year.

Given the current regulatory environment, which offers limited methodological guidance, and the ongoing efforts of data providers to refine certain PAI metrics, it is important to note that key indicators such as PAI 1, 2, 3, 8, 9, 15, and 4 (Table 2) are not comparable to the previous year's data. Changes in these indicators reflect methodological adjustments compared to previous year.

Additionally, direct comparisons with peers are currently of limited relevance due to the nascent state of regulatory guidance and data maturity. Methodologies can vary significantly between asset managers, and calculations across different data providers are not yet harmonized. For instance, in the calculation of scope 3 emissions, we observed a 30% variance in absolute emissions between two major data providers, which directly affects PAI 1, 2, and 3. As such, comparing PAI metrics between asset managers may lead to incorrect conclusions.

In a context of evolving methodologies, non-harmonised data, and the significant impact of calculation assumptions on the figures produced, Amundi has striven to provide transparency in its calculations for better understanding.

2.1 Indicators applicable

Adverse sustainability indicator		Metric	Impact year n	Impact year n-1	Explanation	Actions taken, and actions planned and targets set for the next reference period *(please refer to 2.3 for additional information)*
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions – tCO_2eq[1]	1 427 568	2 619 251	We calculate the total carbon footprint of the relevant portfolio by combining the carbon emissions of the companies in the portfolio, which include Scope 1, Scope 2, and Scope 3 emissions, and weighting them based on the investment value in each company and the company's enterprise value including cash (EVIC) in euros. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi changed data provider for EVIC calculation.	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *Voting:* Criteria requirement linked to the energy transition in executive compensation for sectors with a significant impact on climate, use of voting rights as an escalation in the event of significant negative impacts *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model
		Scope 2 GHG emissions – tCO_2eq[2]	407 367	692 452		
		Scope 3 GHG emissions – tCO_2eq[3]	19 811 975	1 853 645		
		Total GHG emissions – tCO_2eq[4]	21 283 395	5 165 348		

1 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.
2 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.
3 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.
4 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.

					For scope 3 : Amundi reviewed its methodology for the reporting year 2023 and publish the full Scope 3 emissions, as opposed to only disclosing the Scope 3 upstream first tier emissions in 2022. Potential biases and inaccuracies in the data related to Scope 3 emissions remains. Also note that Amundi changed data provider for EVIC calculation. Due to the significant methodology changes described, the figures from this year and the previous year are not comparable.	
	2. Carbon footprint	Carbon footprint – tCO_2eq/€m invested[5]	534	99	We calculate the total carbon footprint associated with 1 million EUR invested in the portfolio by combining the carbon emissions of the portfolio companies, which include Scope 1, Scope 2, and Scope 3 emissions, and weighting them based on the investment value in each company and the company's	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *Voting:* Criteria requirement linked to the energy transition in executive compensation for sectors with a significant impact on climate, use of voting rights

5 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.

					enterprise value including cash (EVIC) in euros to show the emissions associated with 1 million EUR invested in the portfolio. The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi reviewed its methodology and publish the full Scope 3 emissions, as opposed to only disclosing the Scope 3 upstream first tier emissions in 2022. Potential biases and inaccuracies in the data related to Scope 3 emissions remains. Also note that Amundi changed data provider for EVIC calculation. Due to the significant methodology changes described, the figures from this year and the previous year are not comparable.	as an escalation in the event of significant negative impacts *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model

	3. GHG intensity of investee companies	GHG intensity of investee companies – tCO_2eq/€m revenues[6]	991	205	We calculate the GHG intensity of the relevant portfolio by calculating the portfolio weighted average of the total greenhouse gas emissions intensity per million euros of sales of the companies in the portfolio (t/EUR million sales). The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi reviewed its methodology and publish the full Scope 3 emissions, as opposed to only disclosing the Scope 3 upstream first tier emissions in 2022. Potential biases and inaccuracies in the data related to Scope 3 emissions remains. Also note that Amundi changed data provider for EVIC calculation. Due to the significant methodology changes described, the figures from	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *Voting:* Criteria requirement linked to the energy transition in executive compensation for sectors with a significant impact on climate, use of voting rights as an escalation in the event of significant negative impacts *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model

6 GHG emissions source: Trucost - Reported and Proxy data. The choice of data providers (and their estimation models) has a significant impact when calculating Carbon Footprint & Intensity.

					this year and the previous year are not comparable.	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector – %	6%	10%	We calculate the exposure to companies active in the fossil fuel sector of the portfolio by summing the weights of the companies in the portfolio that have active exposure to the fossil fuel sector or have ties to industries such as coal, oil and gas. The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. Please note that issuers for which data was not available were assigned a 0 for this indicator. For the reporting year 2023, Amundi has revised its methodology by changing its ESG data provider to identify companies active in the fossil fuel sector. Companies are active from the first euro in the fossil fuel sector. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *Voting:* Criteria requirement linked to the energy transition in executive compensation for sectors with a significant impact on climate, use of voting rights as an escalation in the event of significant negative impacts *Exclusion Policy:* part of Amundi's Exclusion Policy dedicated to coal and to unconventional hydrocarbons

	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 of total energy sources – %	Non-renewable energy consumption	66%	78%	We assess the portfolio share of non-renewable energy consumption sources by calculating the portfolio weighted average of the percentage of non-renewable energy consumption for the companies in the relevant portfolio. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, the data provider reviewed its methodology to estimate the share of non-renewable energy consumption & production. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *ESG Score Integration:* included under the environmental pillar of Amundi's proprietary ESG model
			Non-renewable energy production	68%	64%	We assess the portfolio share of non-renewable energy production sources by calculating the portfolio weighted average of the percentage of non-renewable energy production for the	

						companies in the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, the data provider reviewed its methodology to estimate the share of non-renewable energy consumption & production. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector – GWh/€m revenues	NACE A[7]	0,4	0,3	We assess the energy efficiency of the portfolio by calculating the portfolio weighted average of the energy consumption intensity (measured in GWh per EUR million sales) for companies in high impact climate sectors (NACE	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *ESG score integration:* included under the environmental pillar of
			NACE B	1,1	1,3		
			NACE C	0,4	0,4		
			NACE D	3,0	2,8		
			NACE E	2,0	1,7		

7 Please refer to European commission NACE codes documentation for additional information

			NACE F	0,2	0,2	section codes A, B, C, D, E, F, G, H, and L) in the relevant portfolio. The Nomenclature of Economic Activities (NACE) Group Code used for each investee company is based on the activity that has the highest reported or estimated revenue for the most recent year available. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. While Amundi didn't proceed to changes on methodology or ESG data providers, do note that variations may come from data providers calculation or portfolio evolutions.	Amundi's proprietary ESG model
			NACE G	0,3	0,2		
			NACE H	1,8	1,8		
			NACE L	0,5	0,5		
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	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 – %		0,2%	0,0%	We assess the exposure and potential risks to biodiversity and the environment by summing the weights of companies in the relevant portfolio that have operations located in biodiversity sensitive areas and are involved in controversies with severe impact on the environment.	*Engagement policy:* part of Amundi's engagement focusing on natural capital preservation *Voting:* Use of voting rights as escalation in the event of significant negative impacts *Controversy monitoring:* screening among a large universe of issuers taking

					The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	into account flags on biodiversity and land use *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average – t/€m invested	0,0	213,9	We assess the 'emissions to water' associated with 1 million EUR invested in the portfolio by summing the emissions (measured in metric tons) of portfolio companies and weighting them by the value of investment in each company divided by the company's most recently available enterprise value including cash (EVIC). The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. When there are limited available indicators, figures are no longer extrapolated in the presence of missing data. Please note that	*Engagement:* part of Amundi's engagement focusing on natural capital preservation *Controversy monitoring:* screening among a large universe of issuers taking into account flags on biodiversity and waste *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model

					issuers for which data was not available were assigned a 0 for this indicator. For the reporting year 2023, following the data provider's review of its methodology to better align the indicator with the SFDR regulatory requirements, the coverage has decreased in 2023. Due to the significant methodology changes described, the figures from this year and the previous year are not comparable.	
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average – t/€m invested	0,2	5,8	We assess the hazardous waste ratio associated with 1 million EUR invested in the portfolio by summing the hazardous waste (measured in metric tons) of portfolio companies and weighting them by the value of investment in each company divided by the company's most recently available enterprise value including cash (EVIC). The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. When there are limited available indicators, figures are no longer extrapolated in the presence of missing	*Engagement:* part of Amundi's engagement focusing on natural capital preservation *Controversy monitoring:* screening among a large universe of issuers taking into account flags on toxic emission, effluents and waste *ESG Score Integration:* included under the environmental pillar of Amundi's proprietary ESG model

					data. Please note that issuers for which data was not available were assigned a 0 for this indicator. For the reporting year 2023, the data provider reviewed data. Improved disclosure from the companies has been observed and hence more granular data available. As a result, there has been a decrease in figures and outliers. Due to the significant methodology changes described, the figures from this year and the previous year are not comparable.	
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 – %	0,3%	0,3%	We assess the violations of UN Global Compact Principles within the relevant portfolio by summing the weights of companies in the portfolio that have violations of the UN Global Compact. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi reviewed its	*Exclusion:* issuers that violate, repeatedly and seriously, one or more of the ten principles of the Global Compact, without credible corrective action are excluded *Engagement:* part of Amundi's engagement focusing on social cohesion *Vote:* Use of voting rights as escalation for companies with controversial social practices *Controversy monitoring:* screening among a large universe of issuers taking

					methodology to provide better granularity on a quarterly basis. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	into account flags on UN Global Compact breaches
	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 – %	5,3%	17,2%	To evaluate the share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handing mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises, we sum the weights of companies in the relevant portfolio that lack any proof of a monitoring mechanism for compliance with the UN Global Compact. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, the data provider reviewed its methodology to assess	*Engagement:* part of Amundi's engagement focusing on strong governance for sustainable development *Vote:* Use of voting rights as escalation for companies with controversial social practices *Controversy monitoring:* screening among a large universe of issuers taking into account flags on public policies and governance incidents

					the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (%). Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies – %	11,0%	11,8%	We calculate the unadjusted gender pay gap of the relevant portfolio by calculating the portfolio weighted average of the company's Gender Pay Gap ratio. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. When the coverage of the Gender Pay Gap ratio is less than 100%, the weights of the portfolio are adjusted to account for incomplete data coverage. While Amundi didn't proceed to changes on methodology or ESG data providers, do note that variations may come from data providers calculation or portfolio evolutions.	*Engagement:* part of Amundi's engagement focusing on a social cohesion *Voting:* part of Amundi's voting priority theme on social cohesion *Controversy monitoring:* screening among a large universe of issuers taking into account flags on labor relations employee management

	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members – %	33,1%	32,7%	We calculate the % board gender diversity of the relevant portfolio by calculating the portfolio weighted average of the percentage of board members who are female in investee companies, expressed as a percentage of all board members. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. When the coverage of board gender diversity is less than 100%, the weights of the portfolio are adjusted to account for incomplete data coverage. While Amundi didn't proceed to changes on methodology or ESG data providers, do note that variations may come from data providers calculation or portfolio evolutions.	*Engagement:* making gender diversity mainstream is part of Amundi's engagement policy via the launch in 2020 of the 30% Club France Investor Group which Amundi became co-chair *Vote:* part of Amundi's voting policy on companies with controversial social practices
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons – %	0,0%	0,0%	We assess the exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) of the relevant portfolio by summing the weights of companies in the portfolio that have exposure	*Exclusion policy:* controversial weapons are excluded as per Amundi's weapons exclusion policy. As part of our Exclusion Policy, Amundi can engage with specific issuers to confirm their exposure to controversial weapons

					to controversial weapons. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi reviewed its methodology to provide better granularity on a quarterly basis. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	*Vote:* Use of voting rights as escalation for companies with controversial social practices
INDICATORS APPLICABLE TO INVESTMENTS IN SOVEREIGNS AND SUPRANATIONALS						
Environmental	15. GHG intensity	GHG intensity of investee countries – tCO_2eq/€m GDP	10	264	The carbon intensity of investee countries is calculated by dividing each country's emissions by its GDP, resulting in the carbon intensity of each holding. To calculate the carbon intensity of the portfolio, these individual carbon intensities are then averaged using the weights assigned to each holding in the portfolio. The PAI indicator uses the "all investments" approach, meaning that the	*ESG Score Integration:* part of Amundi ESG sovereign methodology under the environmental pillar

						denominator is determined by considering all investments. Due to the significant methodology changes described, the figures from this year and the previous year are not comparable.	
Social	16. Investee countries subject to social violations	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 – absolute number and relative number in %	Absolute number of investee countries	1	4	We calculate the absolute number of investee countries by counting the number of unique identified countries with social violations in the portfolio. The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. For the reporting year 2023, Amundi has revised its methodology by changing its ESG data provider to identify countries subject to social violations. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	*Exclusion:* Countries on the European Union (EU) sanction list with a sanction consisting of asset freezing, and a sanction index at the highest level (considering both United States and EU sanctions) are excluded, after formal review and validation from Amundi's Rating Committee
			Relative number divided by all	1%	6%	To calculate the relative number of investee countries with social violations, we divide the absolute number by the total number of	

			investee countries			investee countries in the portfolio. The PAI indicator uses the "all investments" approach, meaning that the denominator is determined by considering all investments. For the reporting year 2023, Amundi has revised its methodology by changing its ESG data provider to identify countries subject to social violations. Due to changes in the methodology, The figures from this year and the previous year may not be directly comparable.	
INDICATORS APPLICABLE TO INVESTMENTS IN REAL ESTATE ASSETS							
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuel – %		-	-	Pollution is integrated into the ESG rating of assets	*ESG analysis* : ESG analysis during the acquisition and managements phases
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets		-	-	The level of energy performance of each building is taken into account by means of its EPC	*ESG scoring methodology*: ESG analysis during the acquisition and managements phases

OTHER INDICATORS FOR PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS						
Energy consumption	Energy Consumption Intensity	Energy consumption in GWh of owned real estate assets per square meter – GWh/m²	-	-	The level of energy performance of each building is taken into account by means of its EPC	*ESG scoring methodology*: ESG analysis during the acquisition and managements phases
Emissions	Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement – %	24%	66%	We assess the extent of investments in companies without carbon emissions reduction initiatives in the relevant portfolio by calculating the sum of the weights of these companies in the relevant portfolio that don't have submitted Science-Based Target (SBT) or CDP target. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. For the reporting year 2023, Amundi reviewed its methodology. In this review, both issuers that have submitted or have a validated target are considered to be taking initiatives to reduce carbon emissions. Due to the significant methodology changes	*Engagement:* part of Amundi's engagement focusing on transition towards a low carbon economy *Voting:* Criteria requirement linked to the energy transition in executive compensation for sectors with a significant impact on climate, use of voting rights as an escalation in the event of significant negative impacts *ESG score integration:* included under the environmental pillar of Amundi's proprietary ESG model

					described, the figures from this year and the previous year are not comparable.	
Human rights	Lack of a human rights policy	Share of investments in entities without a human rights policy – %	10%	16%	We assess the share of investments in entities without a human rights policy in the relevant portfolio by calculating the sum of the weights of these companies in the relevant portfolio that has not disclosed a human rights policy. The PAI indicator uses the "relevant" approach, meaning that the denominator is determined by considering the relevant portfolio. The weights of the portfolio are adjusted to account for incomplete data coverage. While Amundi didn't proceed to changes on methodology or ESG data providers, do note that variations may come from data providers calculation or portfolio evolutions.	*ESG score integration:* included under the social pillar of Amundi's proprietary ESG model *Controversy monitoring:* screening among a large universe of issuers taking into account flags on Human Rights UN Global Compact breaches

2.2 Actions taken during the period and actions planned to avoid or reduce main adverse impacts

During the period, Amundi implemented two new policies: the “Human Rights Policy” and the “Biodiversity and Ecosystem Services Policy” which were validated by the ESG Strategic and Climate Committee in 2023. These policies are integrated in the Global Responsible Investment Policy as part of Amundi’s minimum standards and exclusion policy. They specifically outline Amundi’s approach in monitoring companies identified as particularly exposed to high risks or exposed to potential risks that lack sufficient processes or disclosure. It highlights the process of exclusion of companies’ high severe cases, and for those facing controversies or specific risks, the process of engagement in place and the escalation process. In this latter case, our voting rights could be used or the ESG rating may be overridden with exclusion as a last resort if engagement fails to meet the required objectives.

Furthermore, the Global Responsible Investment Policy now details not only the thresholds for sectors’ exclusions (regarding thermal coal, unconventional fossil fuels, tobacco and nuclear weapons) but also all the processes that are implemented (objective and scope of application, engagement, ESG rating, related data used).

For the upcoming period, the focus will be to continue to engage with issuers on specific themes that have a direct effect on PAIs. Planned actions include:

- Pro-actively re-engage all issuers with whom we have started the Net Zero process
- Push for more disclosure on methane data
- Continue to proactively engage on the issue of water via the collaborative engagement campaign, the Valuing Water Finance initiative[8]
- Continue to develop our engagement on working conditions

As part of the annual review and learning from the 2023 proxy season, Amundi’s Global Voting Policy was updated with the following enhancements

- **ESG and climate criteria for executive compensation**: strengthened expectations, requiring a minimum of 10% of variable remuneration to be based on these criteria
- **Audit committee independence**: increased the minimum threshold for audit committee independence from 50% to 66%
- **Recruitment and executive packages**: more detailed expectations regarding recruitment packages, one-off awards, and executive departure packages
- **Say on climate, social cohesion, and board responsibility**: added granularity to expectations regarding these areas and Amundi’s analysis framework of shareholder proposals
- **Board Gender diversity**: strengthened our policy for large Japanese companies as Amundi now requires the Board to include at least 2 women

Amundi will continue to update its voting policy during the next period, leveraging experiences from the 2024 proxy season to inform potential evolutions.

2.3 Targets

As a member of several international standards and initiatives, Amundi has made commitments and set targets related to Principle Adverse Impacts (PAIs) in order to guide its activities and effectively monitor its evolution. By doing so, Amundi ensures that it remains aligned with the principles and objectives of the PAI reporting and can further track evolutions. For more details on the specific standards and

8 See Amundi 2023 engagement report for more information

initiatives related to PAIs, please refer to section 5 of this document. Amundi will continue to evolve its approach regarding PAIs in the coming years, according to the scientific reference scenarios and in close connection with its clients' objectives.

3. Description of policies to identify and prioritise principal adverse impacts on sustainability factors

3.1 Policy priorities

Amundi has made responsible investment one of its founding pillars since it was created in 2010. In 2018, Amundi launched a three-year action plan aimed at integrating ESG into 100% of its open funds under active management. On 8 December 2021, with the aim of further strengthening its commitments, Amundi set up a new **Ambitions ESG 2025** plan. This new 3-year Action Plan is comprised of an ambitious set of goals that aims to address clients' current and future responsible investing needs. Please find details of our corporate ambitions in the ESG Ambitions 2025 brochure.

The following policies support the Ambitions ESG 2025 plan and inform Amundi's processes for identifying, monitoring and mitigating the principal adverse impacts deriving from its investment activities:

Amundi Group Policy	Principal adverse impacts - thematic mitigation priorities	Approval and revision process
Amundi Global Responsible Investment Policy 2023	*Normative exclusions*: Controversial weapons, UN Global Compact controversies *Sectoral exclusions*: Tobacco, Coal, Unconventional Oil and Gas *ESG integration*: 38 material ESG issues identified and prioritized per economic sector *Product policies*: ESG mainstream, Net Zero, Impact	Policy reviewed by Compliance, Legal, Risk and investment management teams and approved by CRIO[9] Published on 28/11/2023 Updated annually
Amundi Climate Strategy ("Say on climate")	Climate change Energy transition	Voted by General Assembly in 18/05/22
Amundi Voting Policy 2024	Energy transition, and in particular the decarbonisation of our economies Social cohesion, in particular through controls of the wage balance within the framework of remuneration policies, employee involvement in companies' governance and employee share ownership	Policy reviewed by Compliance, Legal and investment management teams and approved by voting committee Published on 30/01/2024 Updated annually

Amundi will continue to adjust its climate strategy in the coming years, according to the scientific reference scenarios and in close connection with its clients' objectives, both by developing investment solutions to accelerate the transition and by progressively aligning its portfolios with the 2050 neutrality objective.

9 Chief Responsible Investment Management

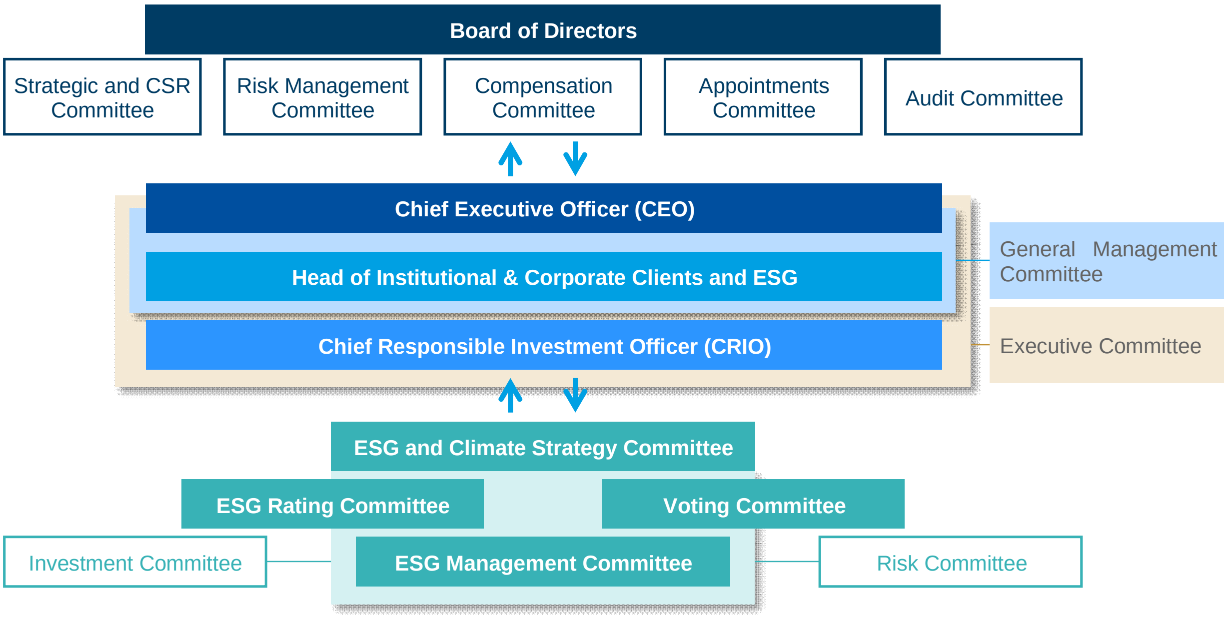
3.2 Policy governance

a) At Amundi level

Supervision of the responsible investment strategy by Amundi Board of Directors

The missions of the Board of Directors of Amundi relate to the definition of the strategic orientations of Amundi's activity, while ensuring their operational implementation by the senior management. The responsible investment strategy is therefore fully integrated within the scope of its deliberations and decisions. This role is described in detail in Article 2 of its Rules of Procedure: "It regularly reviews, in connection with the strategy it has defined, the opportunities and risks such as financial, legal, operational, social and environmental risks as well as the measures taken as a result.

A dedicated internal organisation to monitor and manage the responsible investment strategy



Within overall ESG and climate governance, four Responsible Investment Steering Committees have been put in place and are monitored by Amundi's CEO on a regular basis.

ESG and Climate Strategic Committee

This Committee, chaired by Amundi's CEO, meets every month to set the strategic orientations of the Amundi Group with respect to ESG integration, sustainability and climate, and determine and approve the ESG and climate policies applicable to investments. Its purpose is to:

- Steer, confirm and monitor Amundi's climate and responsible investment strategy;
- Validate the main strategic orientations of the Global Responsible Investment Policy (Sector Policy, Exclusion Policy, Voting Policy, Engagement Policy);
- Monitor key strategic projects.

Voting Committee

This Committee is chaired by the member of executive management in charge of Responsible Investment supervision. It meets once a year to approve the Voting Policy, monthly and on an ad hoc basis during the rest of the year, with the purpose to:

- Advise on voting decisions at the General Meetings for special cases; members are called upon to give their views in an expert capacity;
- Approve Amundi's Voting Policy (for the entities covered) and its rules of implementation;

- Approve specific/local approaches that are not directly covered by the Voting Policy;
- Approve periodic reports on voting disclosures.

ESG Rating Committee

Chaired by the Chief Responsible Investment Officer, this Committee is composed of senior managers from investment platforms, risk and compliance divisions, and meets every month with the aim to:

- Validate Amundi's standard ESG methodology;
- Review exclusion policies and sector-specific policies and approve their rules of application;
- Review and decide on individual ESG rating issues, and advise on new ESG cases whenever necessary.

ESG Management Committee

This weekly Committee is chaired by the member of executive management in charge of Responsible Investment supervision. It focuses on the definition and implementation of the responsible investment strategy by the responsible investment team, including monitoring of business development, HR, budgeting, regulatory projects, audits, ESG communication campaigns, market initiatives and specific communication topics.

The Chief Responsible Investment Officer also participates in the Group's Investment Committee.

b) At CPRAM level

CPR AM adheres to Amundi's Responsible Investment policy and it has a representative on each of the above committees. Within this Amundi framework, CPR AM possesses its own strategic guidelines and develops management methodologies tied to its responsible investment philosophies and client profiles. It possesses internal and independent governance bodies.

ESG Management Committee

Chaired by CPR AM's Chief Executive Officer and attended by all members of the Management Committee, the Chief Responsible Officer, the Head of Research and Head of Risk and Compliance, the ESG Management Committee meets every month. Its main objectives are to validate the ESG, Climate, Impact and CSR strategic orientations of the Company, to monitor and prioritize the different projects including labeling campaigns, to monitor regulatory calendars and ESG advocacy actions.

ESG Committee

The ESG Committee is responsible for monitoring the development of CPR AM's ESG and Impact projects. Chaired by the Head of ESG, this committee brings together every six weeks ESG project representatives from the management, research, marketing and communication, sales, compliance and risk control teams.

Sustainability Committee

The Sustainability Committee is in charge of reviewing and monitoring the investment universes of our ESG strategies. Co-chaired by the Director of Investments and the head of ESG, this committee brings together on a monthly basis the portfolio managers in charge of ESG funds, research engineers, product specialists and risk controllers.

Universe Committee

This ad hoc committee, is responsible for reviewing and monitoring thematic investment universes. Chaired by the Research team, it aims to:

- ensure the pertinence and consistency of the universe with their investment theme and, where applicable, impact case.
- Monitoring of in and out of stocks based on the thematic rational.

Risk controls

Sustainability risks are integrated into CPRAM's internal control and risk management team system. Responsibilities for managing sustainability risks are divided between:

- The first level of control, carried out by the management teams, and;
- The second level of control, carried out by the risk management teams, who check that the funds comply with their ESG objectives and constraints.

Risk management team participates in Amundi's Responsible Investment governance system. They monitor compliance with regulatory requirements and the management of related risks.

ESG constraints are monitored by the risk management teams in the same way as other management constraints. They are based on the same tools and procedures and cover our exclusion policies as well as the eligibility criteria and ESG rules specific to the funds. These constraints are monitored automatically using a proprietary control tool (ALTO Investment Compliance). This tool can be used to trigger

- Pre-trade alerts, which may or may not be blocking, particularly for exclusion policies;
- Post-trade alerts: managers receive notification of any overruns so that they can be rectified quickly.

3.3 Methodologies and data sources for the calculation of PAI values

General principles

In order to disclose metrics that have the closest representation of the sustainability indicators related to adverse impacts at entity level ("Management Company" or "ManCo"), Amundi has adopted two different approaches for the calculation and management of sustainability indicators related to principal adverse impacts, one that is based on all investments related to the entity, and one that it is based on the principle of portfolio covered or relevant portfolio with covered data divided by to the sole assets they relate to.

While Amundi has identified both short- and long-term adverse impacts that are principal to the investment portfolios, the information available for assessing and reporting on the adverse impacts is limited and often lacks standardisation across sectors and regions. Therefore, Amundi's approach to principal adverse impact assessment is applied bottom up at the portfolio level. Moreover, investment portfolios may be exposed to variably acute and chronic adverse impacts depending on companies' sectors and geography.

The perimeter for the calculation of our PAI has been identified based on the following assumptions:

Portfolios that we delegate to an external manager are in scope of the PAI statement. Portfolios that we manage by delegation are also in the perimeter of the PAI statement;

Investments in an internal underlying fund (managed by the same Manco) are not included as the investments made by this internal fund are already included in the scope (to avoid double counting).

Additional information on the calculation methodology can be provided by Amundi on request.

Methodology limitation and margin of error

Our methodology limitations are by construction mainly linked to the use of sustainability indicators ("ESG data"). The ESG data landscape is currently being standardized, which can impact data quality; data coverage is also a limitation. Current and future regulations will improve standardized reporting and corporate disclosures on which ESG data rely. We are aware of these limitations, which we mitigate by a combination of approaches: the use of several data providers, a structured qualitative assessment by our ESG research team of the ESG scores, and the implementation of a strong governance.

Finally, in some specific cases portfolio data may not be easily obtained. Despite our best effort approach to retrieve all necessary figures (see also section below), a lack of data availability may impact a certain portion of our assets. As a result, there is a possibility of a substantial margin of error in our calculations. We encourage stakeholders to exercise caution and consider this potential margin of error when interpreting and utilizing the provided information.

In the context of establishing the report on principal adverse impact indicators, it is important to note that the database used to retrieve the positions held by investment portfolios has been modified in 2023. This database has been enriched with positions held in fund shares throughout the year 2023, and particularly from the third quarter of 2023.

Best effort approaches to PAI coverage

Data coverage is uneven across principal adverse impact indicators. In the case of indicators with a coverage below 100% (e.g., gender pay gap), Amundi has adopted a reweighting approach across holdings for which data is available. This avoids setting missing data at zero which would "dilute the indicator over all assets". For PAI indicators 8 and 9, we estimated that the data coverage from the providers was too limited to perform the reweighting, thus figures are not extrapolated in the presence of missing data.

For investments in third-party funds, the PAI data source used has been the PAI values reported by the investment managers in their publicly available EET.

Amundi reserves the right to modify this methodology and our data sources in the future.

Selection of additional principal adverse impact indicators

Amundi has identified the additional principal adverse impact indicators from Table 2 and 3 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 assessing:

i) their relevance to Amundi ESG strategic priorities as outlined in the overarching policies described in section 3.1;

ii) the availability of data for measuring the severity of impact of those risks within the investment universe.

Data sources: Data providers used only for PAIs

Entity	Data provider
Investee company	MSCI
	ISS
	Trucost
	Refinitiv (LSEG)
	SBT
	CDP
Sovereign & Supra-national	MSCI
	Verisk Maplecroft

For real estate assets

i) Data collected directly from main stakeholders (property managers, tenants, technical managers, etc.)

ii) Energy consumption data is collected from each tenant of the properties under management via a dedicated service provider

Sources may be reviewed in the future and include more data providers

4. Engagement policies and other PAIs levers

As a responsible asset manager, Amundi understands its fiduciary duty as encompassing the need to contribute positively to addressing major socio-economic and environmental challenges in the interests of our clients, our stakeholders and of society. For this reason, Amundi has embraced the concept of "double materiality" around which we build our ESG analysis and rating methodology. This means that not only do we assess the way ESG factors can materially impact the value of companies, but we also assess how the companies impact the environment, and social matters or human rights.

Under the Disclosure Regulation, financial market participants, which consider the principal adverse impacts of investment decisions on sustainability factors at a product level, should disclose in the pre-contractual information for each financial product, concisely in qualitative or quantitative terms, how such impacts are considered as well as a statement that information on the principal adverse impacts on sustainability factors is available in the periodic reporting. Please refer to products' precontractual documentation and periodic reports for product-level information.

At entity level, Amundi considers PAIs via a combination of approaches that can vary depending on the asset class, investment process or type of strategy and fund range.

4.1 Engagement[10]

Engagement is a continuous and purpose driven process aimed at influencing the activities or behavior of investee or potential investee companies to improve ESG practices or their impact on key sustainability linked topics. Therefore, it must be result driven, proactive, considering double materiality, and integrated in our global ESG process. This approach applies to all of Amundi's products.

4.2 Vote

Amundi's voting policy responds to a holistic analysis of all the long-term issues that may influence value creation, including material ESG issues. For more information, please refer to Amundi's Voting Policy and Amundi's Voting Report. This approach applies by default to all of Amundi products.

4.3 Exclusion

Amundi has defined normative, activity-based and sector-based exclusion rules covering some of the key adverse sustainability indicators listed by the Sustainable Finance Disclosure Regulation (SFDR). This approach applies to all Amundi funds in scope of Amundi Minimum Standards and Exclusion Policy[11].

4.4 ESG factors integration

Amundi has adopted minimum ESG integration standards applied by default to its actively managed open-ended funds (exclusion of G rated issuers and better weighted average ESG score than the applicable ESG benchmark)[12]. The 38 criteria used in Amundi ESG rating approach were also designed

10 Additional information regarding engagement at Amundi can be found in our 2023 engagement report

11 Refer to Amundi Responsible Investment Policy for additional information on the scope of application and always review Funds' offering documents for complete information on ESG integration

12 Wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and

to consider key impacts on sustainability factors, as well as quality of the mitigation undertaken are also considered in that respect. All criteria are available in fund managers' portfolio management system.

4.5 Controversy monitoring

Amundi has developed a controversy tracking system that uses third-party data from three providers to systematically identify controversies and establish their level of severity on a proprietary scale from 1 to 5 (5 being the highest). This quantitative approach is then supplemented by an in-depth analysis of the scope of controversies deemed to be severe (score of 3 or more), carried out by ESG analysts, and a periodic review of developments. In the most severe and repeated cases, when no credible corrective action is taken, the analyst may propose a downgrade of the company's ESG rating. This may ultimately lead to exclusion from the active investment universe (G rating), which is validated by the ESG Rating Committee.

For Article 8 and 9 actively managed products, Amundi considers all the mandatory PAIs applicable to the products' strategy and relies on a combination of some, or all, of the approaches mentioned above.

For Article 6, Amundi considers PAI 14 in its normative Exclusion Policy on exclusion weapons.

The same approach for PAI consideration applies by default to mandates delegated to Amundi.

The table below details the approach for each PAI that Amundi generally implements at Group level. Specific PAI approaches can also be followed at product level; in such case, the specific approach is also described in the precontractual documentation. Where applicable, PAIs are prioritized given the sustainable objectives or characteristics of the fund, provided that all minimum standards are met.

Indicators scope of application

#	Metric	General considerations on the scope of application[13]
1	**GHG emissions (Scope 1, 2, 3 and total)**	*Engagement:* active funds and passive funds *Voting:* active funds and passive funds *ESG score integration:* active funds with ESG rating improvement target[14] and/or selectivity approaches[15] (included under the environmental pillar of Amundi's proprietary ESG model).
2	**Carbon footprint**	*Engagement:* active funds and passive funds *Voting:* active funds and passive funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
3	**GHG intensity of investee companies**	*Engagement:* active and passive funds *Voting:* active and passive funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)

Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Refer to Amundi Responsible Investment Policy for additional investment information on the scope of application and always review Funds' offering documents for complete information on ESG integration.

13 Active funds refer to funds that are actively managed, passive funds refer to funds that are passively managed

14 Categories of funds which aim to invest in issuers improving their ESG rating over time

15 ESG criteria are taken into account when selecting issuers to invest in

4	**Exposure to companies active in the fossil fuel sector**	*Engagement:* active and passive funds *Voting:* active and passive funds *Exclusion Policy (coal and unconventional hydrocarbons):* active funds and ESG passive funds (that apply Amundi's Sector Policy).
5	**Share of non-renewable energy consumption and production**	*Engagement:* active and passive funds *ESG Score Integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
6	**Energy consumption intensity per high impact climate sector**	*Engagement:* active and passive funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches.
7	**Activities negatively affecting biodiversity sensitive areas**	*Engagement:* active and passive funds *Voting:* active and passive funds *Controversy monitoring:* active funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
8	**Emissions to water**	*Engagement:* active and passive funds *Controversy monitoring:* active funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
9	**Hazardous waste ratio**	*Engagement:* active and passive funds *Controversy monitoring:* active funds *ESG Score Integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
4 (table 2)	**Investments in companies without carbon emission reduction initiatives**	*Engagement:* active and passive funds *Voting:* active and passive funds *ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
10	**Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines**	*Exclusion (UN Global Compact principles):* active funds and ESG passive funds (that apply Amundi Exclusion Policy) *Engagement:* active funds and passive funds *Vote:* active funds and passive funds *Controversy monitoring:* active funds
11	**Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines**	*Engagement:* active funds and passive funds *Vote:* active and passive funds *Controversy monitoring:* active funds
12	**Unadjusted gender pay gap**	*Engagement:* active funds and passive funds *Vote:* active funds and passive funds *Controversy monitoring:* active funds
13	**Board gender diversity**	*Engagement:* active funds and passive funds *Vote:* active funds and passive funds
14	**Exposure to controversial weapons**	*Exclusion:* active funds and passive funds *Vote:* active funds and passive funds

9 (table 3)	**Lack of a human rights policy**	*Engagement:* active funds and passive funds *Vote:* active and passive funds *Controversy monitoring:* active funds
15	**GHG intensity**	*ESG score integration:* active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
16	**Investee countries subject to social violations**	*Exclusion:* active funds and passive ESG funds[16].
17	**Exposure to fossil fuels through real estate assets**	*ESG analysis:* all assets be subject to an ESG analysis during the investment and management phases
18	**Exposure to energy-inefficient real estate assets**	*ESG score integration:* the level of energy performance of each building is taken into account by means of its EPC[17]
19 (table 2)	**Energy consumption intensity**	*ESG score integration:* the level of energy performance of each building is taken into account by means of its EPC

These engagement policies will be reviewed and adapted based on PAIs results over each period.

16 Passive funds classified with an ESG component

17 Energy performance certificate

5. Reference to international standards

Principal Adverse Impacts		Standards, initiatives and public policies relevant to principal adverse impacts[18]
1, 2, 3, 4, 5, 6 and 4 (table 2)	**GHG emissions (Scope 1, 2, 3 and total)** **Carbon footprint** **GHG intensity of investee companies** **Exposure to companies active in the fossil fuel sector** **Share of non-renewable energy consumption and production** **Energy consumption intensity per high impact climate sector** **Investments in companies without carbon emission reduction initiatives**	Paris Agreement on Climate Sustainable Development Goals (SDGs) EU Taxonomy Net Zero Asset Managers Initiative (NZAMI) Climate Action 100+ Carbon Disclosure Project (CDP) Science-based Targets initiative Task Force on Climate-related Financial Disclosures (TCFD) The Japan TCFD Consortium Montréal Carbon Pledge Portfolio Decarbonisation Coalition (PDC) Institutional Investors Group on Climate Change (IIGCC) Asia Investor Group on Climate Change (AIGCC) Investors for a Just Transition China-Singapore Green Finance Taskforce Eurosif Observatoire de l'Immobilier Durable
7,8,9	**Activities negatively affecting biodiversity sensitive areas** **Emissions to water** **Hazardous waste ratio**	Task Force on Nature-related Financial Disclosures (TNFD) Finance for Biodiversity Pledge Farm Animal Investment Risk and Return (FAIRR) Investor Action on Antimicrobial Resistance CDP Water CDP Forest Fondation de la Mer Global Reporting Initiative (GRI) Global Impact Investing Network (GIIN) Impact Disclosure Taskforce Biodiversity Impulsion Group (BIG) Nature Action 100
10, 11	**Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines** **Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines**	UN Global Compact OECD Guidelines on Multinational Enterprises UN Guiding Principles on Business and Human Rights PRI Human Rights Engagement

18 The table only reflect the most relevant PAIs associated to the different initiatives, please note that some initiatives have a broader coverage

		Human Rights Reporting and Assurance Frameworks Initiative
12	**Unadjusted gender pay gap**	Workforce Disclosure Initiative (WDI) Platform Living Wage Financials (PLWF)
13	**Board gender diversity**	The 30% Club France Investor Group The 30% Club Japan Investor Group The 30% Club Germany Investor Group International Corporate Governance network (ICGN) France Invest – Equality Charter
14	**Exposure to controversial weapons**	Ottawa and Oslo treaties
9 (table 3)	**Lack of a human rights policy**	UN Guiding Principles on Business and Human Rights
15	**GHG intensity of investee countries**	Paris Agreement on Climate Green bond principles
16	**Investee countries subject to social violations**	International Bill of Human Rights
17	**Exposure to fossil fuels through real estate assets**	SFDR regulation
18	**Exposure energy-inefficient real estate assets**	Energy performance diagnostics (EPC) - calculation methodology is determined by the regulations in each country
19 (table 2)	**Energy consumption intensity**	

The following paragraphs aim to detail the internationally recognized standards that are the most relevant to act on PAI.

Paris agreement: Net Zero Asset Managers initiative (NZAMi)

PAIs: 1-6 Greenhouse gas emissions

As a member of the Net Zero Asset Managers Initiative since July 2021, Amundi not only embraces global carbon neutrality objectives, but is actively taking action to accelerate investing aligned with net zero emissions by 2050 or sooner. Within this commitment, Amundi disclosed dedicated targets in 2022 to highlight engagement

1. 18% of total AuM[19] will be Net Zero aligned by 2025, Amundi considers that Net-zero alignment commitment must be clear and binding for the investment strategies in-scope, consequently, the 18% will be only composed of funds and mandates with explicit net zero alignment objectives. Only net Zero investment frameworks compatible with this principle are validated and eligible, including:
    a. For PAII Net Zero Investment Framework, the following Net Zero baselines:
        i. -30% carbon intensity reduction target in 2025 vs. 2019, and -60% vs. 2030 (minimum targets that need to be exceeded) on scope 1, 2 and part of scope 3;

19 Based on total aggregated portfolios at Group level

ii. -16% absolute emission reduction target in 2025 vs. 2019, and -41% vs. 2030 on scope 1, 2 and part of scope 3;

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

c. For real estate portfolio, targets compatible with CREEM Net Zero trajectories set at asset levels;

2. -30% in carbon intensity (tCO2e/€m turnover) by 2025 and -60% by 2030 for committed portfolios under NZIF (Net Zero Investment Framework);

3. financed emissions under engagement: In 2023, Amundi engaged with 966 additional companies on climate. As part of its Ambition 2025 Plan, Amundi will begin a significant cycle of engagement with 1,000 additional businesses by 2025. Through this dialogue, Amundi requests that businesses publish a detailed climate strategy based on specific indicators and objectives for each carbon emission scope, and on the corresponding capital expenditure (investment plan). In addition, Amundi will carry on engaging all investee companies exposed to thermal coal and that have not communicated a thermal coal exit in line with our policy.

Hereunder is additional information regarding methodology used to calculate and define targets, greenhouse gases (GHG) emissions considered, data providers and scenario leveraged:

Methodologies leveraged

- Net Zero Asset Owner Alliance Target Setting Protocol
- Net Zero Investment Framework

GHG scopes

- Scope 1, 2 and 3 upstream (tier 1)[20]

Data providers

- As part of Amundi proprietary Net Zero framework, two data providers are leveraged: MSCI & Trucost

Forward-looking climate scenario

- IEA Net Zero Emissions by 2050 – Developed in 2021

United Nations Global Compact (UNGC) and human rights

PAIs: 10-11 and 9 (table 3) Social and employee matters

As an asset manager, we recognize our responsibility to uphold human rights and address human rights abuses in our investment activities. We see human rights violations as a breach of Amundi's investment principles, therefore, we pay particular attention to company exposure to human rights risks.

Amundi's parent company, Crédit Agricole, is a signatory of the UN Global Compact and Amundi endorses it through its normative exclusions and controversy monitoring methodology. Please refer to Amundi's 2023 Global Responsible Investment Policy for more detail about the scope of application.

Amundi considers that to qualify as Sustainable Investment, among other criteria, investment should pass the two Do Not Significantly Harm tests ("DNSH Test") below:

1. The first DNSH Test relies on the monitoring of specific Principal Adverse Impacts. In order to pass the test, a company should:

20 Only accounting for emissions linked to tier 1 supplier

- Have a CO2 intensity which does not belong to the last decile compared to other companies within its sector (only applies to high intensity sectors) (unit: $tCO_2e/M€$[21] revenues, source: Trucost);
- Have a Board of Directors' diversity which does not belong to the last decile compared to other companies within its sector (unit: %, source: Refinitiv);
- Be cleared of any severe controversy in relation to work conditions and human rights (unit: yes or no, source: MSCI and Sustainalytics);
- Be cleared of any severe controversy in relation to biodiversity and pollution (unit: yes or no, source: MSCI and Sustainalytics).

Amundi already considers specific principal adverse impacts within its Exclusion Policy as part of its Global Responsible Investment Policy. These exclusions, which apply on top of the tests detailed above, cover the following topics: exposure to **controversial weapons (PAI 14), violations of UN Global Compact Principles (PAI 10), and coal & unconventional fossil fuel (PAI 4)[22].**

2. Beyond the specific sustainability factors covered in the first test, Amundi implements a second DNSH Test in order to verify that the company does not belong to the worst performers on environmental or social matters compared to the other companies within its sector. The approach relies on Amundi's ESG scoring methodology. Amundi has set a threshold for this test that corresponds approximately to excluding the worst ~7% on environmental or social performance pillars across each sector. Using Amundi's ESG scoring methodology, this means that a company should have an environmental and or a social score better or equal to E.

In addition to research and monitoring, Amundi exercises leverage with issuers through engagement. Human rights engagement follows a two-pronged approach. First, we aim to engage proactively with companies on identification and management of human rights risks. Second, we can engage reactively when an abuse or allegation occurs. In this case, we would seek to ensure that companies are taking appropriate measures for effective remediation.

Finance for Biodiversity Pledge

PAI: 7 Biodiversity

As a financial institution, Amundi recognizes the need to protect biodiversity and reverse nature loss in this decade. As such, in 2021 Amundi joined the Finance for Biodiversity Pledge, an unprecedented coalition of 170 signatories representing over €22 trillion in AUM across 26 countries as of 2024. The pledge is a commitment of financial institutions to protect and restore biodiversity through their finance activities and investments.

This initiative brings together financial institutions from around the globe, committing to protect and restore biodiversity through their finance activities and investments. Amundi represented the signatories with a speech at the High-Level Segment of the Fifteenth United Nations Conference on Biodiversity (COP15) to call on global leaders to protect and restore biodiversity.

Amundi began engaging with companies in 2021 on biodiversity strategy, growing the engagement pool from 52 companies in 2021 to 301 in 2023 (up from the 92 companies engaged last year) across a diverse range of sectors[23]. The expansive nature of the initial engagement sample in 2021 meant that Amundi could begin to identify best practices within and across sectors and geographies, and use this as guidance for companies. Details on these practices can be seen in our standalone report (found

21 Tons of carbon dioxide equivalent per million euros

22 The remaining Principle Adverse Impact are not included yet in the DNSH test because of a lack of good quality data or because of a limited coverage

23 Insurance, energy, pharmaceuticals, materials, food retailing, fashion, consumer services, household personal products, and banks among others

here). We have built on that initial work annually, continuing to develop our company, sector, and global expectations.

Amundi also expanded its efforts on biodiversity in 2023 in part due to the establishment of its new biodiversity policy[24]. The policy focuses on companies with high exposure to biodiversity harming activities that are either lacking sufficient processes/disclosure or have been involved in serious controversies.

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

6. Historical comparison

Amundi present the 2023 version of the Principal Adverse Impacts (PAI) statement, marking our second year of this disclosure. This year, we have continued to enhance our PAI statement by improving the transparency and robustness of our methodology, while making progress in reducing adverse impacts across our portfolios. As a point of reference, at the end of 2023, Amundi had an 0.06% exposure to companies active in coal. We also have implemented methodological changes to ensure the results reflect our activities. This period also provided an opportunity for major data providers in the market to review and refine their methodologies, enhancing the assessment of issuers' activities, and leading to discrepancies on certain indicators compared to the previous year.

Given the current regulatory environment, which offers limited methodological guidance, and the ongoing efforts of data providers to refine certain PAI metrics, it is important to note that key indicators such as PAI 1, 2, 3, 8, 9, 15, and 4 (Table 2) are not comparable to the previous year's data. Changes in these indicators reflect methodological adjustments compared to previous year.

Further information on historical comparison for each indicator can be found in the table in section 2.1. in the "Explanation" column.

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The above-mentioned OPCs offer no guarantee of performance and present a risk of capital loss, notably due to market fluctuations. Past performance is not constant over time, is not guaranteed and is therefore not a reliable indicator of future performance.

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CPR ASSET MANAGEMENT

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