




The image shows two overlapping forms from the PRI LEA (Leadership Engagement Assessment) toolkit. The top form is LEA 02, titled 'Discretionary', and the bottom form is LEA 03, titled 'Mandatory'. Both forms are designed to assess engagement with companies on ESG issues. LEA 02 includes sections for 'Type of engagement' (Individual/Staff, Collaborative, Service provider) and 'Reason for interaction' (To support investment decision-making, To enhance corporate transparency, To enhance corporate practice, To enhance corporate ESG disclosure, To support investment decision-making in a company's ESG issues, To support investment decision-making in a company's ESG issues, To support investment decision-making in a company's ESG issues). LEA 03 includes sections for 'Type of engagement' (Individual/Staff, Collaborative, Service provider) and 'Reason for interaction' (To support investment decision-making, To enhance corporate transparency, To enhance corporate practice, To enhance corporate ESG disclosure, To support investment decision-making in a company's ESG issues, To support investment decision-making in a company's ESG issues, To support investment decision-making in a company's ESG issues).

RI TRANSPARENCY REPORT

2013/14

Fédérés Gestion d'Actifs



UNEP Finance Initiative
Changing finance, financing change



United Nations Global Compact

An investor initiative in partnership with UNEP Finance Initiative and UN Global Compact

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2013-14 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted. This results in some Principles not being explicitly highlighted. For instance, Principle 1 and 2 cannot be implemented without implementing Principle 3, but there are cases when Principle 3 is not explicitly highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
⌛	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

PRI disclaimer

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Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	n/a							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Segregated mandates or pooled funds	✓	Public							✓
OO 08	Breakdown of AUM by market	✓	Public							✓
OO 09	Additional information about organisation	✓	Public							✓
OO 10	RI activities for listed equities	✓	Public							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓

Overarching Approach				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OA 01	RI policy and other guidance documents	✓	Public							✓
OA 02	Publicly available policies / documents	✓	Public						✓	
OA 03	Policy components and coverage	✓	Public	✓	✓					
OA 04	Conflicts of interest	✓	Public							✓
OA 05	RI goals and objectives	✓	Public							✓
OA 06	Main goals/objectives this year	✓	Public							✓
OA 07	Governance, management structures and RI processes	✓	Public							✓
OA 08	RI roles and responsibilities	✓	Public							✓
OA 09	RI in performance management, reward and/or personal development	✓	Public							✓
OA 10	Collaborative organisations / initiatives	✓	Public				✓	✓		
OA 11	Promoting RI independently	✓	Public				✓			
OA 12	Dialogue with public policy makers or standard setters	✓	Public				✓	✓	✓	
OA 13	ESG issues in strategic asset allocation	✓	Public	✓						
OA 14	Allocation of assets to environmental and social themed areas	✓	Public	✓						
OA 15	ESG issues for internally managed assets not reported in framework	🔒	n/a							✓
OA 16	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
OA 17	RI/ESG in execution and/or advisory services	🔒	n/a	✓	✓					
OA 18	Innovative features of approach to RI	✓	Public							✓
OA 19	Internal and external review and assurance of responses	✓	Public							✓

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public	✓						
LEI 02	Description of ESG incorporation	✓	Public	✓						
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Public	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Public	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 09	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
LEI 10	Description of ESG integration	✓	Public	✓						
LEI 11	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 12	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 13	Aspects of analysis ESG information is integrated into	✓	Public	✓						
LEI 14	ESG issues in index construction	🔒	n/a	✓						
LEI 15	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
LEI 16	Incorporation of ESG issues has improved financial/ESG performance and reduced risk	✓	Public	✓						
LEI 17	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
LEI 18	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 06	Objectives for engagement activities	✓	Public		✓					
LEA 07	Role in engagement process	🔒	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	🔒	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	✓	Public	✓	✓					
LEA 10	Tracking number of engagements	✓	Public		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Public		✓					
LEA 12	Engagements on E, S and/or G issues	✓	Public		✓					
LEA 13	Companies changing practices / behaviour following engagement	✓	Public		✓					
LEA 14	Examples of ESG engagements	✓	Public		✓					
LEA 15	Disclosure of approach to ESG engagements	✓	Public		✓				✓	
LEA 16	Description of approach to (proxy) voting	✓	Public		✓					
LEA 17	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 18	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 19	Confirmation of votes	✓	Public		✓					
LEA 20	Securities lending programme	✓	Public		✓					
LEA 21	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 22	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 23	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 24	Shareholder resolutions	✓	Public		✓					
LEA 25	Examples of (proxy) voting activities	✓	Public		✓					
LEA 26	Disclosing voting activities	✓	Public		✓				✓	

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public	✓						
FI 02	Breakdown of investments by credit quality	✓	Public							✓
FI 03	Description of ESG incorporation	✓	Public	✓						
FI 04	Percentage of each incorporation strategy	✓	Public	✓						
FI 05	Type of ESG information used in investment decision	✓	Public	✓						
FI 06	Types of screening applied	✓	Public	✓						
FI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
FI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
FI 09	Types of sustainability thematic funds/mandates	🔒	n/a	✓						
FI 10	Description of ESG integration	🔒	n/a	✓						
FI 11	Review of ESG issues while researching companies/sectors	🔒	n/a	✓						
FI 12	Processes to ensure integration is based on robust analysis	🔒	n/a	✓						
FI 13	Incorporation of ESG issues into analysis and decision making	✓	Public	✓						
FI 14	ESG issues in index construction	🔒	n/a	✓						
FI 15	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
FI 16	Incorporation of ESG issues has improved financial/ESG performance and reduced risk	✓	Public	✓						
FI 17	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
FI 18	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	
FI 19	Engagement with corporate issuers	✓	Public		✓					
FI 20	Engagement with government issuers	✓	Public		✓					

Fédérés Gestion d'Actifs

Reported Information

Public version

Organisational Overview

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Basic Information

OO 01

Mandatory

Gateway/Peering

General

OO 01.1

Select the services you offer.

☒ Fund management

% of assets under management (AUM) in ranges

☐ <10%

☐ 10-50%

☒ >50%

☒ Fund of funds, manager of managers, sub-advised products

% of assets under management (AUM) in ranges

☐ <10%

☒ 10-50%

☐ >50%

☐ Other, specify

☐ Execution and advisory only services

OO 02

Mandatory

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

France

OO 02.2

Indicate the number of countries in which you have offices (including your headquarters).

☒ 1

☐ 2-5

☐ 6-10

☐ >10

OO 02.3

Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

49

OO 03

Mandatory

Descriptive

General

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

☐ Yes☒ No**OO 04****Mandatory****Gateway/Peering****General****OO 04.1**

Indicate the year end date for your reporting year.

31/12/2013

OO 04.2

Indicate your total AUM at the end of your reporting year.

	trillions	billions	millions	thousands	hundreds
Total AUM		25	822	772	000
Currency	EUR				
Assets in USD		34	013	602	644

OO 04.3

Indicate the level of detail you would like to provide about your asset class mix.

☒ Approximate percentage breakdown to the nearest 5% (e.g. 45%)☐ Broad ranges breakdown (i.e. <10%; 10-50%; >50%)**OO 06****Mandatory****Descriptive****General****OO 06.1**

To contextualise your responses to the public, indicate how you would like to disclose your asset class mix.

☐ Publish our asset class mix as percentage breakdown☒ Publish our asset class mix as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	<10%
Fixed income – corporate	10-50%	<10%
Fixed income – government	10-50%	<10%
Fixed income – other	0	0
Private debt	0	0
Private equity	0	0
Property	0	0

Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	<10%
Other (1), specify	0	0
Other (2), specify	0	0

☐ Publish our asset class mix as per attached file (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

OO 07	Mandatory to Report	Voluntary to Disclose	Peering	General
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OO 07.1 Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds.

	% of externally managed assets
Segregated mandate(s)	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %
Pooled fund(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
<i>Total externally managed assets</i>	<i>100%</i>

OO 07.2 Indicate the proportion of your externally managed assets in fund-of-funds.

	% of externally managed assets
Fund-of-funds	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %

OO 08	Mandatory to Report Voluntary to Disclose	Peering	General
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OO 08.1	Indicate the breakdown of your organisation's AUM by market.
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Market breakdown	% of AUM
Developed Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Emerging, Frontier and Other Markets	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %

OO 09	Voluntary	Descriptive	General
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OO 09.1

Provide any additional information about your organisation, its mission, strategies, activities or investments which are important to contextualise your responsible investment activities.

Federis Gestion d'Actifs strongly believes that ESG issues have a significant impact on long term financial returns and risks.

Thus, FGA has developed a range of SRI Funds since 2000 and is gradually integrating environmental, social and governance criteria into all classes of assets under management.

7 of our funds are SRI funds : Federis ISR Euro (Euro equities), Federis Obligations ISR (Euro government bonds), Federis Selection ISR Euro (fund of equities funds), Federis Credit ISR (OECD corporate bonds), Federis Entreprises (Small& Mid Cap Euro Equities), Federis Pro Actions ISR Euro (Euro equities), Federis ISR Tresorerie (Money Market Fund).

Fédérés Gestion d'Actifs is also proud to team up with UBP to provide an attractive Socially responsible investment vehicle on European convertible bonds : FGA provides the best-in-class SRI universe and UBP's portfolio managers select the securities from the socially responsible European convertible bond universe.

Fédérés Gestion d'Actifs actively votes for all shareholder meetings in Europe and the United States and collaborates with other French institutional investors so as to promote and clarify the French SRI market.

Gateway asset class implementation indicators

OO 10**Mandatory****Gateway****General****OO 10.1**

Select the responsible investment activities your organisation implemented, directly and/or indirectly, for listed equities in the reporting year.

- ☒ We incorporate ESG issues into investment decisions on our internally managed assets
- ☐ We address ESG incorporation, engagement and/or (proxy) voting in our external manager selection, appointment and/or monitoring processes
- ☒ We engage with companies on ESG issues via our staff, collaborations or service providers
- ☒ We cast our (proxy) votes directly or via service providers
- ☐ None of the above

OO 10.2

Indicate if your combined internally and externally managed listed equities are 10% or more of your total AUM.

- ☒ Yes, our total listed equities are 10% or more of our total AUM
- ☐ No, our total listed equities are less than 10% of our total AUM

OO 10.3**Additional information. [Optional]**

In december 2009, Fédérés Gestion d'Actifs created Federis Selection ISR Euro, a fund of SRI Equity funds. Federis Selection ISR Euro was shut down in January 2014 and the AUM of this fund was insignificant compared to our total AUM at the end of the reporting year. That is why, we don't indicate that " We address ESG incorporation, engagement and/or (proxy) voting in our external manager selection, appointment and/or monitoring processes".

Fédérés Selection ISR was invested in ESG positive screened or best in class equity funds. First, the fund selection process identified SRI funds with the best track records. For this purpose funds were screened. Those of greater interest were interviewed and underwent a thorough due diligence. This stage focused on the the quality of the SRI process : skills, competencies and experience of the SRI team, SRI research positions, in-house SRI research, number of research agencies, research coverage, update of company analysis, demanding of the sustainable investment universe, voting records, whether the organisation is a signatory to PRI, whether the fund gets the Novethic SRI Label...

Except for this fund, we don't include ESG factors in the selection of external manager.

OO 11	Mandatory	Gateway	General
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OO 11.1

Indicate if in the reporting year you incorporated ESG issues into your investment decisions and/or your active ownership practices in the following internally managed asset classes.

- ☒ Fixed income – corporate
- ☒ Fixed income – government
- ☐ None of the above

OO 11.2

Indicate if in the reporting year you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes in the following externally managed asset classes.

- ☐ Fixed income – corporate
- ☐ Fixed income – government
- ☐ Cash
- ☒ None of the above

OO 12	Mandatory	Gateway	General
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OO 12.1

The modules and sections that you will be required to complete are listed below. They are based on the percentages provided in your AUM breakdown and your responses to the gateway indicators. Note, you are only required to report on asset classes that represent 10% or more of your AUM. You may report voluntarily on any applicable modules or sections by selecting them from the list. Direct - Fixed Income and Infrastructure are always voluntary.

Core modules

- ☒ Organisational Overview
- ☒ Overarching Approach (including assets which do not have a separate module)

RI implementation directly or via service providers

Direct - Listed Equity incorporation

☒ Listed Equity incorporation

Direct - Listed Equity active ownership

☒ Engagements

☒ (Proxy) voting

Direct - Fixed Income

☒ Fixed Income - Corporate

☒ Fixed Income - Government

Closing module

☒ Closing module

Note: Please make sure your response to this indicator is complete and confirmed before you progress. Your response will determine which tailored modules and sections you will be presented with.

Fédérés Gestion d'Actifs

Reported Information

Public version

Overarching Approach

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Responsible investment policy

OA 01	Mandatory	Gateway/Core Assessed	General
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OA 01.1 Indicate if you have a responsible investment policy.

☒ Yes

☐ No

OA 01.2 Indicate if you have other guidance documents or more specific policies related to responsible investment.

☒ Yes

☐ No

Federis Gestion d'Actifs strongly believes that ESG issues have a significant impact on long term financial returns and risks.

Fédérés Gestion d'Actifs is convinced that tomorrow leaders are the one who anticipate all the stakes of sustainable development and embrace a longer-term vision to deal with problems such as climate change, extreme poverty, the deterioration of the ecosystem and the scarcity of raw materials. Taking account of these issues not only improves financial performances, but also helps to better align our investments with the broader objectives of society.

Thus, Fédérés Gestion d'Actifs has developed a range of SRI Funds since 2000.

7 of our funds are SRI funds : Federis ISR Euro (Euro equities, created in 2000), Federis Obligations ISR (Euro government bonds, created in 2008), Federis Selection ISR Euro (fund of equity SRI funds, created in 2009), Federis Credit ISR (OECD corporate bonds, created in 2012), Federis Entreprises (Small& Mid Cap Euro Equities, created in 2012), Federis Pro Actions ISR Euro (Euro equities, created in 2013), Federis ISR Tresorerie (Money Market Fund, created in 2013).

Federis ISR Euro, Federis Obligations ISR, Federis Credit ISR and Federis Entreprises obtained in 2013 the SRI label launched by Novethic (the leading research centre in France on SRI& Corporate Social Responsibility). The Novethic SRI Label is awarded to open-end funds (pooled funds) managed systematically in light of ESG criteria. The fund manager must detail the fund's SRI management approach, report on its extra-financial characteristics and disclose a complete list of portfolio holdings. The Novethic SRI Label is intended to be used by individual investors as a quality standard. As the Label is awarded by an independent body, Novethic's SRI Research Centre, investors can be sure that the process offers the greatest possible transparency about SRI products in which they might invest. It guarantees systematic integration of ESG criteria into fund management and promotes transparency and selective SRI. To measure the impact of ESG analysis, Novethic examined the selectivity of each candidate fund, i.e. the number of excluded companies as ratio of the number of ESG-analysed companies. Although this indicator alone cannot guarantee that controversial companies will be excluded from the portfolio, it does ensure that a best-in-class approach consists in choosing companies with the best ESG practices.

Fédérés Gestion d'Actifs is also proud to team up with UBP to provide an attractive Socially responsible investment vehicle on European convertible bonds : FGA provides the best-in-class SRI universe and UBP's portfolio managers select the securities from this socially responsible European convertible bond universe.

Furthermore, Fédérés Gestion d'Actifs is gradually integrating environmental, social and governance criteria into all classes of assets under management :

- In our investment analysis and decision-making process of internally managed assets, ESG scoring represents 20% of all listed equity assessment.
- Fédérés Gestion d'Actifs has a formal policy that excludes all types of investments in companies involved in controversial sectors/activities : Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines; Companies/issuers from countries or emitting from countries involved in tax evasion; Companies/issuers whose ESG practices are insufficient, presents risks or facing allegations on 4 major criteria : Pollution prevention and control (soil, accident), respect of fundamental Human Rights, prevention of Corruption, Audit and Internal Controls.

Fédérés Gestion d'Actifs collaborates with other French institutional investors to promote and

clarify the French SRI market.

Finally, Fédérïs Gestion d'Actifs actively votes for all shareholder meetings in Europe and the United States. Our voting policy is strict and fosters ESG best practices, which led to vote against 30% of the resolutions supported by the management in 2013.

OA 02	Mandatory	Core Assessed	PRI 6
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OA 02.1	Indicate if your responsible investment policy is publicly available.
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☒ Yes

OA 02.2	Provide a URL to your responsible investment policy.
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	URL
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http://www.federisga.fr/blobs/medias/s/24b8143d92000522/Charte_ISRv2-harmonis%C3%A9e_17_10_2013.pdf

☐ No

OA 02.3	Indicate if your other policies or guidance documents related to responsible investment are publicly available.
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☒ Yes

☒ Yes, all

☐ Yes, some

OA 02.4	List these other policies or guidance documents related to responsible investment that are publicly available and their URLs.
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Policy or document name	URL
our SRI processes	http://www.federisga.fr/blobs/medias/s/251949ff92a00580/Processus_de_gestion_ISR_FB_09_09_2013.pdf
our quarterly SRI newsletter	http://www.federisga.fr/blobs/medias/s/25bf06fb92c02147/Lettre_ISR_21_Janvier_2014_HD.pdf
our proxy voting policy	http://www.federisga.fr/blobs/medias/s/251949ff92a0047f/politique-de-vote-2013.pdf
our 2012 proxy voting results	http://www.federisga.fr/blobs/medias/s/2562c08b92e01169/bilan-campagne-2012.pdf
our SRI expertise and funds	http://www.federisga.fr/2604258700805800114/Expertise.htm

☐ No

OA 02.5	Additional information. [Optional]
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Monthly, we edit the reporting of our SRI funds in which investors can find comments on our ESG strategy regarding the fund or the evolution of the investment universe regarding the SRI score.

Each year, we update the AFG/FIR Transparency Code of our SRI funds in which we provide a full description of how each fund address RI and ESG issues (investment and ESG strategies, SRI criteria, engagement and voting policies etc).

These documents are also publicly available on our website.

OA 03	Mandatory	Core Assessed	PRI 1,2
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OA 03.1	Indicate the components/types and coverage of your responsible investment policy and guidance documents.
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Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> (Proxy) voting policy <input checked="" type="checkbox"/> Engagement/active ownership policy <input type="checkbox"/> Specific guidelines on corporate governance <input type="checkbox"/> Specific guidelines on environmental issues <input type="checkbox"/> Specific guidelines on social issues <input type="checkbox"/> Asset class-specific guidelines <input checked="" type="checkbox"/> Screening/exclusion policy <input type="checkbox"/> Other, specify <input type="checkbox"/> Other, specify	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

OA 04	Mandatory	Core Assessed	General
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OA 04.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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☒ Yes

OA 04.2	Describe your policy on managing potential conflicts of interest in the investment process. [Optional]
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Fédérés Gestion d'Actifs has a formal policy that excludes investments in companies that may present a potential conflicts of interest. A conflict of interest committee is in place to determine excluded companies and monitor compliance with the policy on conflict of interest.

☐ No

Objectives and strategies

OA 05	Mandatory	Gateway/Core Assessed	General
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OA 05.1	Indicate if your organisation sets objectives for its responsible investment activities.
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☒ Yes

OA 05.2	Indicate how frequently your organisation sets or revises objectives for responsible investment.
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☒ At least once per year

☐ Less than once per year

OA 05.3

Indicate how frequently your organisation formally reviews performance against its objectives for responsible investment.

- ☐ Quarterly
☐ Biannually
☒ Annually
☐ Every two years or less
☐ It is not reviewed
☐ No

OA 06	Voluntary	Descriptive	General
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OA 06.1

List your three main responsible investment objectives you had set for the reporting year. For each, indicate any key performance indicators you set to measure your progress and also indicate your progress towards achieving your objectives.

- ☒ Add responsible investment objective 1

Objective 1	develop the AUM of our SRI Funds
Key performance indicators	% of our SRI funds AUM as of % of total AUM
Describe the progress achieved	the SRI funds AUM progressed from 2% to 4% of total AUM during the reporting year

- ☒ Add responsible investment objective 2

Objective 2	develop SRI Funds on all classes of assets under management
Key performance indicators	number of SRI Funds internally managed
Describe the progress achieved	We created 2 new SRI funds in 2013 : Federis Pro Actions ISR Euro (Euro equities) and Federis ISR Tresorerie (Money Market Fund).

- ☒ Add responsible investment objective 3

Objective 3	develop incorporation of ESG issues into investment analysis and decision-making processes.
Key performance indicators	% of our investment incorporating significant ESG issues (i.e exclusion on 4 major criteria : Pollution, Human Rights, Corruption, Audit) as of % of total AUM
Describe the progress achieved	the indicator progressed from 5% to 11% of total AUM during the reporting year

OA 06.2

List your three main objectives for responsible investment implementation for the next reporting year and indicate any key performance indicators you intend to use to measure your progress.

☒ Add responsible investment objective 1 for the next reporting year

Objective 1 for the next reporting year	develop the AUM of our SRI Funds
Key performance indicators	% of our SRI funds AUM as of % of total AUM

☒ Add responsible investment objective 2 for the next reporting year

Objective 2 for the next reporting year	develop SRI Funds on all classes of assets under management
Key performance indicators	number of SRI Funds internally managed

☒ Add responsible investment objective 3 for the next reporting year

Objective 3 for the next reporting year	develop incorporation of ESG issues into investment analysis and decision-making processes.
Key performance indicators	% of our investment incorporating significant ESG issues as of % of total AUM

Governance and human resources

OA 07	Voluntary	Descriptive	General
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OA 07.1

Provide a brief description of your organisation's governance, management structures and processes related to responsible investment.

A SRI Committee hold meetings quarterly and ensure the implementation of our responsible investment policy to a broader range of assets. Our SRI Committee comprises all the members of the executive committee of Fédéris Gestion d'Actifs and the Head of SRI analysis.

Our SRI team is composed of the Head of SRI analysis, 1 SRI Quantitative analyst and 5 SRI portfolio managers : 2 Equity portfolio managers, 1 Sovereign bond portfolio manager, 1 Corporate bond portfolio manager and 1 Money Market manager.

The Head of SRI analysis and the SRI Quantitative analyst report hierarchically to the Chief Investment Officer.

Furthermore, as we integrate ESG issues in all our class of assets, the SRI research results are sent to all our portfolio managers and each portfolio manager is concerned by ESG issues.

The Head of SRI analysis is responsible for the responsible investment activities : ESG research, engagement activities, proxy voting.

The SRI Quantitative analyst designs and implements quantitative tools to evaluate the materiality of ESG data and so works on the integration of ESG criteria to all our investment processes.

Both in-house research and analysis from research agencies are used for the ESG research : our ESG rating service providers are Eiris and Vigeo for listed equities and fixed income corporate issuers, Ethifinance for fixed income sovereign issuers.

Likewise, we use service providers for proxy voting (Proxinvest and ISS) but all resolutions are analyzed by the SRI analyst and the compliance officers according to our own voting policy. We actively vote ourselves for all shareholder meetings. Our proxy voting policy is strict and seeks to ensure better governance in the broad sense, by also incorporating social and environmental criteria, which led to vote against 30% of the resolutions supported by the management in 2013.

Finally, we assess the SRI/ESG research of our brokers for European equities, and it represents 20% of their rating. This way, 20% of the fees for research on European equities is directly linked to SRI/ESG items.

☐ I would like to attach an organisation chart (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

OA 08**Mandatory****Gateway/Core Assessed****General****OA 08.1**

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- ☐ Board members or trustees
- ☒ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - ☒ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Other Chief-level staff or head of department, specify
 - members of the executive committee**
 - ☒ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Portfolio managers
 - ☐ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Investment analysts
- ☒ Dedicated responsible investment staff
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ External managers or service providers
- ☒ Other role, specify
 - compliance officers**
 - ☒ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
 - ☒ Other role, specify
 - Marketing officers.**
 - ☐ Oversight/accountability for responsible investment
 - ☐ Implementation of responsible investment
 - ☒ No oversight/accountability or implementation responsibility for responsible investment

OA 08.2

Indicate the number of dedicated responsible investment staff your organisation has. [Optional]

Number

2

OA 08.3**Additional information. [Optional]**

SRI portfolio managers are involved in the portfolio construction of our SRI funds and in the ESG issue related engagements regarding these funds.

Compliance officers verify our votes are in accordance with our own proxy voting policy, our SRI funds are in accordance with our best-in-class approach and all our portfolios are in accordance with our exclusion policy.

Marketing officers are involved in marketing and sales-related activities of our SRI funds.

OA 09**Voluntary****Additional Assessed****General****OA 09.1**

Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Other C-level staff or head of department**members of the executive committee**

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☐ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ Responsible investment included in personal development and/or training plan
- ☒ None of the above

Portfolio managers

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☐ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Dedicated responsible investment staff

- ☒ Responsible investment KPIs and/or goals included in objectives
- ☒ Responsible investment included in appraisal process
- ☒ Variable pay linked to responsible investment performance
- ☒ Responsible investment included in personal development and/or training plan
- ☐ None of the above

Other role

compliance officers

- ☐ Responsible investment KPIs and/or goals included in objectives
- ☐ Responsible investment included in appraisal process
- ☐ Variable pay linked to responsible investment performance
- ☐ Responsible investment included in personal development and/or training plan
- ☒ None of the above

OA 09.3

Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

Rewards of the SRI portfolio managers depend on the financial performance of the SRI funds. The Head of SRI analysis has also objectives based on the integration of ESG issues into decision making processes.

Promoting responsible investment

OA 10

Mandatory

Core Assessed

PRI 4,5

OA 10.1

Indicate if your organisation is a member of and/or participant in any collaborative organisation or initiatives that promote responsible investment.

☒ Yes

OA 10.2

Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Select all that apply

- ☐ Asian Corporate Governance Association
- ☐ Association for Sustainable & Responsible Investment in Asia
- ☐ Australian Council of Superannuation Investors
- ☒ CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

As a signatory of the Carbon Disclosure Project and the CDP Carbon Action, we require the communication of strategies towards climate change. We consider climate change reporting as an important element in the investment decision making process. Thus, we integrate the annual report of the CDP in our ESG scoring process: on one hand, we increase by 10% the Environment score of companies in the Carbon Disclosure Leadership Index. On the other hand, we decrease by 10% the Environment score of companies who declined to participate or gave no response to the CDP.

☒ CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
☐ Moderate
☐ Advanced

☒ CDP Water

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
☐ Moderate
☐ Advanced

- ☐ CFA Institute Centre for Financial Market Integrity
☐ Council of Institutional Investors (CII)
☐ Eumedion
☐ Extractive Industries Transparency Initiative (EITI)
☐ Global Investors Governance Network (GIGN)
☐ Global Real Estate Sustainability Benchmark (GRESB)
☐ Institutional Investors Group on Climate Change (IIGCC)
☐ Interfaith Center on Corporate Responsibility (ICCR)
☐ International Corporate Governance Network (ICGN)
☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
☐ Investor Network on Climate Risk (INCR)/CERES
☐ Local Authority Pension Fund Forum
☒ Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)
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- ☒ Basic
☐ Moderate
☐ Advanced

☒ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

FIR (Forum pour l'Investissement Responsable), French Social Investment Forum.

Your organisation's role in the initiative during the reporting period (see definitions)
--

- ☐ Basic
☒ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
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The FIR is a non-profit and multi-stakeholder organisation, which brings together organisations and individuals interested in promoting SRI in France. Fédérés Gestion d'Actifs represents within this organisation its parent company Malakoff Médéric. As a member of the FIR, Fédérés Gestion d'Actifs contributes to SRI public policy making, supports research initiatives in the field of SRI and promotes socially responsible and sustainable investment practices.

- ☐ Shareholder Association for Research and Education (Share)
☐ United Nations Environmental Program Finance Initiative (UNEP FI)
☐ United Nations Global Compact
☒ Other collaborative organisation/initiative, specify

Member of the SRI Commission of the AFG (French Asset Management Association)

Your organisation's role in the initiative during the reporting year (see definitions)
--

- ☐ Basic
☒ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

As a member of the SRI Commission of the AFG, Fédérés Gestion d'Actifs contributes to the promotion of SRI in the financial sector and participates in market dialogue and debate focusing on ESG, SRI and Sustainable Development.

☒ Other collaborative organisation/initiative, specify

Member of the Finance Club of the ORSE (Observatoire sur la Responsabilité Sociétale des Entreprises – French watchdog for Corporate Social Responsibility)

Your organisation's role in the initiative during the reporting year (see definitions)

- ☐ Basic
☒ Moderate
☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

As a member of the Finance Club of the ORSE, Fédérés Gestion d'Actifs participates in market dialogue and debate focusing on ESG, CSR and Sustainable Development. For example, Fédérés Gestion d'Actifs participates in the drafting of a practical guide focusing on operational risks and ESG risks.

☐ Other collaborative organisation/initiative, specify

☐ Other collaborative organisation/initiative, specify

☐ No

OA 11	Mandatory	Core Assessed	PRI 4
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OA 11.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

☒ Yes

OA 11.2

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- ☒ Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- ☐ Provided financial support for academic or industry research on responsible investment
- ☐ Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- ☒ Spoke publicly at events and conferences to promote responsible investment
- ☒ Wrote and published in-house research papers on responsible investment
- ☐ Encouraged the adoption of the PRI
- ☐ Other, specify

☐ No

OA 11.3

Additional information. [Optional]

During the reporting year, our CIO and CEO spoke at several Responsible investment-related conferences or published in-house articles in order to promote responsible investment and present our responsible investment approach.

On a quarterly basis, Fédérés Gestion d'Actifs published a SRI newsletter, in which we publish in-house articles on ESG issues or describe our activities and progress regarding our responsible investments.

OA 12

Voluntary

Additional Assessed

PRI
4,5,6

OA 12.1

Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or standard-setters in support of responsible investment in the reporting year.

☐ Yes

☒ No

ESG issues in asset allocation

OA 13

Voluntary

Descriptive

PRI 1

OA 13.1

Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between geographic markets.

☐ Yes

☒ No

OA 14

Voluntary

Descriptive

PRI 1

OA 14.1

Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

☐ Yes

☒ No

Innovation

OA 18

Voluntary

Descriptive

General

OA 18.1

Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

Fédérés Gestion d'Actifs has created Fédérés Entreprises, an SRI equity fund, which process is based on the long-term materiality of ESG factors regarding investment performance and risks.

Fédérés Gestion d'Actifs is also proud to team up with UBP to provide an attractive Socially responsible investment vehicle on European convertible bonds : FGA provides the best-in-class SRI universe and UBP's portfolio managers select the securities from the socially responsible European convertible bond universe.

Assurance of responses

OA 19

Voluntary

Additional Assessed

General

OA 19.1

Indicate whether your reported information has been reviewed, validated and/or assured by internal and/or external parties.

☒ Yes

OA 19.2

Indicate who has reviewed, validated and/or assured your reported information.

- ☒ Reviewed by Board, CEO, CIO or Investment Committee
- ☒ Validated by internal audit or compliance function
- ☐ Assured by an external independent provider, specify name

☐ No

Fédérés Gestion d'Actifs

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

LEI 01

Mandatory to Report Voluntary to Disclose

Gateway/Peering

PRI 1

LEI 01.1

Provide a breakdown of your internally managed listed equities by passive, quantitative, fundamental and other active strategies. For strategies that account for less than 10% of your internally managed listed equities, indicate if you would still like to report your activities.

Strategies

☒ Passive

% of internally managed listed equities

☒ <10%

Report on your strategies that represent <10% of listed equities

☐ Yes

☒ No

☐ 10-50%

☐ >50%

☐ Active – quantitative (quant)

☒ Active – fundamental and other active strategies

% of internally managed listed equities

☐ <10%

☐ 10-50%

☒ >50%

LEI 02

Voluntary

Descriptive

PRI 1

LEI 02.1

Provide a brief overview of how you incorporate ESG issues in listed equity investments.

FGA evaluates each company on 6 key ESG issues : Human Ressources, Environment, Human Rights, Corporate Governance, Community Involvement and Business Behaviour.

4 of our equity funds are SRI funds : Federis ISR Euro (equities from the Euro zone), Federis Selection ISR Euro (fund of Equity SRI funds), Federis Entreprises (Small& Mid Cap Euro Equities) and Federis Pro Actions ISR Euro (Euro equities). Therefore, around 13% of our assets in equities are invested in SRI funds.

We also integrate ESG scores into the decision-making process of all our listed equity investment : in FGA's investment analysis and decision-making process of internally managed assets, ESG scoring represents 20% of listed equity assessment.

Moreover, Fédérés Gestion d'Actifs has a formal policy that excludes investments in companies involved in controversial sectors/activities :

- Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines;
- Companies/issuers from countries or emitting from countries involved in tax evasion;
- Companies/issuers whose ESG practices are insufficient, presents risks or are facing allegations on 4 major criteria : Pollution prevention and control (soil, accident), respect of fundamental Human Rights, prevention of Corruption, Audit and Internal Controls.

FGA's ESG exclusion policy applied to all listed equity investments actively managed by FGA.

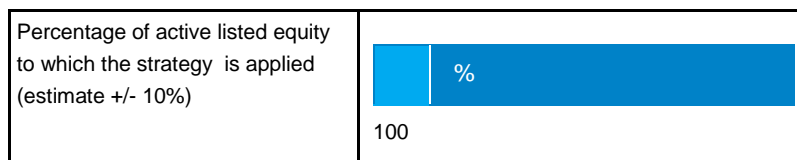
ESG incorporation in actively managed listed equities

Implementation processes

LEI 03	Mandatory	Gateway/Core Assessed	PRI 1
LEI 03.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies.		

ESG incorporation strategy (select all that apply)

- ☐ Screening alone (i.e. not combined with any other strategies)
- ☐ Thematic alone (i.e. not combined with any other strategies)
- ☐ Integration alone (i.e. not combined with any other strategies)
- ☒ Screening + Integration strategies



- ☐ Thematic + integration strategies
- ☐ Screening + thematic strategies
- ☐ All three strategies combined
- ☐ No incorporation strategies applied

Total actively managed listed equities

100%

LEI 03.2 Describe your primary reasons for choosing a particular ESG incorporation strategy.

FGA is convinced that tomorrow leaders are the one who anticipate all the stakes of sustainable development and embrace a longer-term vision to deal with problems such as restructurings, climate change, extreme poverty, the deterioration of the ecosystem and the scarcity of raw materials. We strongly believe that ESG issues have a significant impact on longterm financial returns. Taking account of these issues not only improves financial performances, but also helps to better align our investments with the broader objectives of society.

FGA has also a formal policy that excludes investments in companies involved in controversial sectors/activities in order to mitigate reputational and financial risks.

LEI 03.3

If assets are managed using a combination of ESG incorporation strategies, describe briefly how these are used in combination. [Optional]

Around 13% of our assets in equities are invested in SRI funds using positive/best-in-class screening.

Moreover, in FGA's investment analysis and decision-making process of internally managed assets, ESG scoring represents 20% of listed equity assessment.

Fédérés Gestion d'Actifs has also a formal policy that excludes investments in companies involved in controversial sectors/activities : Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines; Companies/issuers from countries or emitting from countries involved in tax evasion; Companies/issuers whose ESG practices are insufficient, presents risks or are facing allegations on 4 major criteria : Pollution prevention and control (soil, accident), respect of fundamental Human Rights, prevention of Corruption, Audit and Internal Controls. FGA's negative/exclusionary screening applied to all listed equity investments.

So, integration of ESG issues applied to 100% of our listed equity investments.

LEI 04**Voluntary****Additional Assessed****PRI 1****LEI 04.1**

Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.

Type of ESG information

- ☐ Raw ESG company data
- ☒ Company-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Sector-related analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Country-related analysis or ratings

Indicate who provides this information

- ☐ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☒ In-house – analyst or portfolio manager
- ☒ Screened stock list

Indicate who provides this information

- ☒ ESG research provider
- ☐ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☒ Issue-specific analysis or ratings

Indicate who provides this information

- ☒ ESG research provider
- ☒ Sell-side
- ☒ In-house – specialised ESG analyst or team
- ☐ In-house – analyst or portfolio manager
- ☐ Other, specify

LEI 04.2

Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.

We use the research of Eiris and Vigeo, to compute a score on 6 different criteria : Human Resources, Human Rights, Environment, Corporate Governance, Business Behaviour and Corporate Involvement. We also use in-house research, the SRI Research of our brokers and we integrate the annual report of the Carbon Disclosure Project in our ESG scoring process : on one hand, companies included in the Carbon Disclosure Leadership Index get a 10% bonus on their environmental mark. On the other hand, all companies who declined to participate or gave no response to the CDP get a 10% decrease in their environmental mark. The score in each criterion is then weighted by using our own sector analysis matrix. Our SRI database is updated every month and sent to all portfolio managers.

Likewise, we use the research of Eiris and Vigeo, in-house research and the SRI research of our brokers to determine the companies involved in controversial sectors/activities.

Regarding countries involved in tax evasion, Fédérés Gestion d'Actifs refers to the status of countries in the FATF's (Financial Action Task Force) global network and to the French government's "black list" of countries identified as being non-cooperative states and territories.

LEI 04.3

Indicate if you incentivise brokers to provide ESG research.

☒ Yes

LEI
04.4

Describe how you incentivise brokers.

We assess the SRI/ESG research of our brokers for European equities, and it represents 20% of their rating. This way, 20% of the fees for research on European equities is directly linked to SRI/ESG items.

☐ No

(A) Implementation: Screening

LEI 06

Mandatory

Descriptive

PRI 1

LEI 06.1

Indicate and describe the type of screening you apply to your internally managed active listed equities.

Type of screening

☒ Negative/exclusionary screening

Screened by

- ☒ Product
- ☐ Activity
- ☐ Sector
- ☒ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

Description

We have a formal policy that excludes investments in companies involved in controversial activities / businesses :

- Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines.
- Companies/issuers from countries or emitting from countries involved in tax evasion.

Companies/issuers whose ESG practices are insufficient, presents risks or facing allegations on 4 major criteria:

- Pollution prevention and control (soil, accident)
- Respect of fundamental human rights
- Prevention of corruption
- Audit and Internal Controls

☒ Positive/best-in-class screening

Screened by

- ☐ Product
- ☐ Activity
- ☒ Sector
- ☐ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

Description

4 of our funds are SRI funds which invest in companies selected for positive ESG performance relative to industry peers.

☐ Norms-based screening

LEI 06.2

Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

For these funds, we use the research of Eiris and Vigeo, to compute a score, using a best-in-class approach on 6 main criteria :

- Environment (Environmental strategy and eco-design, Pollution prevention and control, Development of green products, Protection of biodiversity, Protection of water resources, Environmental impacts from energy use, Atmospheric emissions, Waste management, Management of local pollution, Management of environmental impacts from transportation, Environmental impacts from the use and disposal of products)
- Human Resources (Promotion of labour relations, Responsible management of restructurings, Career management and promotion of employability, Quality of remuneration systems, Improvement of health and safety conditions, Respect and management of working hours)
- Business Behaviour (Product safety, Information to customers, Responsible Contractual Agreement, Integration of CSR in the purchasing process, Sustainable Relationships with suppliers, Integration of environmental factors in the supply chain, Integration of social factors in the supply chain, Prevention of corruption, Prevention of anti-competitive practices, Transparency and integrity of influence strategies and practices)
- Corporate Governance (Board of Directors, Audit & Internal Controls, Shareholders, Executive Remuneration)
- Human Rights (Respect for human rights standards and prevention of violations, Respect for freedom of association and the right to collective bargaining, Elimination of child labour, Abolition of forced labour, Non-discrimination)
- Community Involvement (Promotion of the social and economic development, Societal impacts of the company's products / services, Contribution to general interest causes).

Moreover, as a signatory of the Carbon Disclosure Project, we require the communication of strategies towards climate change and we integrate the annual report of the CDP in our ESG scoring process: on one hand, we increase by 10% the Environment score of companies in the Carbon Disclosure Leadership Index. On the other hand, we decrease by 10% the Environment score of companies who declined to participate or gave no response to the CDP.

The score in each criterion is then weighted by using our own sector analysis matrix (environmental issues for a driller and a media group cannot be equally considered).

The final mark of each company must be 10/20 minimum to be included in our SRI investment universe. This matrix excludes approximately 50% of companies in each sector. A company whose mark drops under the 10/20 barrier exits the SRI portfolio as soon as possible. A monthly committee informs portfolio managers on new companies entering our investment universe or new companies excluded from our investment universe. Every year, this committee makes a full review of the SRI process, the criteria we use (from Eiris and Vigeo's research) and the new positive criteria we could add to improve our value added.

We inform clients when changes are made in our monthly reports or in the annual SRI Transparency Code of the funds.

Our SRI database is updated every month and sent to all portfolio managers as we integrate ESG scoring into the decision-making process of all listed equity investments and not only our SRI funds.

LEI 07	Mandatory	Core Assessed	PRI 1
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LEI 07.1	Indicate which processes your organisation uses to ensure that screening is based on robust analysis.
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- ☒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- ☒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- ☒ Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- ☐ A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- ☐ A periodic review of the quality of the research undertaken or provided is carried out
- ☒ Other, specify

Federis ISR Euro and Federis Entreprises obtained in 2013 the SRI label launched by Novethic.
- ☐ None of the above

LEI 07.2	Additional information. [Optional]
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Federis ISR Euro, and Federis Entreprises obtained in 2013 the SRI label launched by Novethic (the leading research centre in France on SRI& Corporate Social Responsibility).

The Novethic SRI Label is awarded to open-end funds (pooled funds) managed systematically in light of ESG criteria. The fund manager must detail the fund's SRI management approach, report on its extra-financial characteristics and disclose a complete list of portfolio holdings.

The Novethic SRI Label is intended to be used by individual investors as a quality standard. As the Label is awarded by an independent body, Novethic's SRI Research Centre, investors can be sure that the process offers the greatest possible transparency about SRI products in which they might invest.

It guarantees systematic integration of ESG criteria into fund management and promotes transparency and selective SRI. To measure the impact of ESG analysis, Novethic examined the selectivity of each candidate fund, i.e. the number of excluded companies as ratio of the number of ESG-analysed companies. Although this indicator alone cannot guarantee that controversial companies will be excluded from the portfolio, it does ensure that a best-in-class approach consists in choosing companies with the best ESG practices.

LEI 08	Voluntary	Additional Assessed	PRI 1
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LEI 08.1	Indicate which processes your organisation uses to ensure that fund criteria are not breached
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☒ Checks are performed to ensure that stocks meet the funds' screening criteria. These checks are:

☒ Systematic

☐ Occasional

☐ Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.

☒ Audits of fund holdings are undertaken regularly by internal audit function

☐ Other, specify

☐ None of the above

LEI 08.2	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
-----------------	--

if a breach of fund screening criteria is identified, the portfolio manager must sell the excluded stock before the end of the current month.

LEI 08.3	Additional information.
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Audits of fund holdings are undertaken monthly by the SRI analyst and quarterly by internal audit function.

(C) Implementation: Integration of ESG issues

LEI 10	Voluntary	Descriptive	PRI 1
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LEI 10.1	Describe how you integrate ESG factors into investment decision making processes.
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In FGA's investment analysis and decision-making process of internally managed assets, ESG scoring represents 20% of all listed equity assessment. This ESG scoring results from our own SRI matrix.

In this matrix, we use a best-in-class approach to compute a score on 6 main criteria : Human Resources, Human Rights, Environment, Corporate Governance, Business Behaviour and Community Involvement.

The score in each criterion is then weighted by using our own sector analysis matrix (environmental issues for a driller and a media group cannot be equally considered). Each security is graded relative to sector peers.

LEI 11	Mandatory	Core Assessed	PRI 1
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LEI 11.1	Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.
----------	---

ESG issues	Coverage/extent of review on these issues
Environmental	<input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

LEI 12	Voluntary	Descriptive	PRI 1
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LEI 12.1	Indicate which processes your organisation uses to ensure that ESG integration is based on a robust analysis.
----------	---

- ☒ Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- ☒ Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ Company information and/or ratings on ESG are updated regularly
- ☐ A periodic review of the quality of the research undertaken or provided is carried out
- ☐ Other, specify
- ☐ None of the above

LEI 12.2	Describe how ESG information is held and used by your portfolio managers.
----------	---

- ☒ ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ☐ ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- ☐ Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- ☐ Other, specify
- ☐ None of the above

LEI 12.3	Additional information.
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ESG grade and evaluation of each security is accessible in the Equity database. In this database each company is graded based on 20% of ESG criteria and 80% of financial criteria (growth, quality, value...).

LEI 13	Voluntary	Additional Assessed	PRI 1
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LEI 13.1	Indicate into which aspects of investment analysis you integrate ESG information.
-----------------	---

- ☐ (Macro) economic analysis
- ☒ Industry analysis
 - ☐ Systematically
 - ☒ Occasionally
- ☒ Analysis of company strategy and quality of management
 - ☒ Systematically
 - ☐ Occasionally
- ☒ Idea generation
 - ☐ Systematically
 - ☒ Occasionally
- ☒ Portfolio construction
 - ☒ Systematically
 - ☐ Occasionally
- ☐ Fair value/fundamental analysis
- ☐ Other, specify

Outputs and outcomes

LEI 15	Voluntary	Descriptive	PRI 1
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LEI 15.1	Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.
-----------------	---

- ☒ Screening

	Describe any reduction in your starting investment universe or other effects.
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more than 30 companies of our universe are excluded because of their involvement in controversial activities or their questionable ESG practices.

	Specify the percentage reduction
--	----------------------------------

	%
--	---

5

☒ Integration of ESG issues

	Select which of these effects followed your ESG integration:
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- ☒ Reduce or prioritise the investment universe
- ☐ Overweight/underweight at sector level
- ☒ Overweight/underweight at stock level
- ☒ Buy/sell decisions
- ☐ Other, specify

LEI 16	Voluntary	Descriptive	PRI 1
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LEI 16.1	Indicate if you believe that incorporating ESG factors has: (a) Impacted funds' financial performance; (b) Reduced funds' risk or volatility; (c) Improved funds' ESG performance.
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	a) Impacted funds' financial performance
--	--

Screening		Integration of ESG issues	
<input type="radio"/> Yes		<input type="radio"/> Yes	
<input checked="" type="radio"/> No		<input checked="" type="radio"/> No	

	b) Reduced funds' risk or volatility
--	--------------------------------------

Screening		Integration of ESG issues	
<input type="radio"/> Yes		<input type="radio"/> Yes	
<input checked="" type="radio"/> No		<input checked="" type="radio"/> No	

	c) Improved funds' ESG performance
--	------------------------------------

Screening		Integration of ESG issues	
<input checked="" type="radio"/> Yes		<input checked="" type="radio"/> Yes	
<input type="radio"/> No		<input type="radio"/> No	

LEI 16.2	Describe how you are able to determine these outcomes and your actual performance.
-----------------	--

We calculate a SRI performance attribution for some of our SRI funds and so we can determine that incorporating ESG factors had no significant impact (negative or positive) on funds' financial performance or volatility.

We also calculate the average SRI score of all our funds (SRI funds but also non-SRI) relative to their benchmark. Incorporating ESG factors had positively impacted funds' SRI Score.

LEI 17	Voluntary	Descriptive	PRI 1
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LEI 17.1	Provide examples of ESG issues that affected your investment view and/or performance during the reporting year.
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☒ ESG issue 1

	ESG issue and explanation
<p>ESG issue : corruption .</p> <p>Finmeccanica explains that it promotes the knowledge of the Code of Ethics, and that in-charge-offices take care of the interpretation and explanation of the Code's contents. However no further specification on the means that are implemented to raise awareness are provided.</p> <p>In addition, the high level and the gravity of the controversies occurred in the period under review question the effectiveness of these means. In July 2013, Finmeccanica allegedly resorted to mafia-middleman in its African transactions. In March 2013 a scandal burst on Finmeccanica contract with Rome townhill for the furniture of 45 buses. The press reveals an alleged case of corruption and bribes for 600,000 Euros, together with false bills. The cases involves Mr Borgogni, member of the board of directors of the company and one of Finmeccanica's consultants.</p> <p>In March 2013 a scandal burst about Finmeccanica's contract with the Italian government won in 2006 for the traceability of hasardous waste. The press reveals that one of the company's subsidiaries, Selex won the contract for a value of Eur 416.7 m without any call for tender. In addition, while the price of the contract appeared to be unreasonably high, Selex still kept the contract and the Government classed the business as "secret" for national security reasons. A special task force in charge of investigating the affair discovered in 2012 a series of irregularities going from the lack of call for tender to the lack of follow up and monitoring of the development of the business to the overpricing of the products used for the service. Investigations are still continuing.</p> <p>The CEO and Chairman of Finmeccanica, Giuseppe Orsi, was arrested on February 12 2013 in a corruption probe. An Eur 50 m bribe was allegedly paid in 2010 to win a contract of Eur 560 m for furnishing 12 helicopters to the Indian Government. Three other people have been placed under house arrest as part of the probe, including the Chief Executive of Finmeccanica helicopter unit AgustaWestland, Bruno Spagnolini.</p>	
	ESG incorporation strategy applied
<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Integration</p> <p><input type="checkbox"/> Combination of ESG incorporation strategies</p>	
	Impact on investment decision or performance
<p>We excluded Finmeccanica of all our portfolio.</p>	

☒ ESG issue 2

	ESG issue and explanation
<p>ESG issue : pollution prevention and control</p> <p>Chevron is engaged in every aspect of the oil and natural gas industry, including exploration and production, refining, marketing and transportation, chemicals manufacturing and sales, geothermal, mining operations, and power generation. However, the recurrent allegations regarding major incidental pollution or industrial accidents (Ecuador, Brazil, Nigeria, etc.) and the irrelevance of the communication on possible corrective measures have conducted us to question the efficiency of Chevron's reported means allocated to pollution prevention and control. - In November 2011, Chevron's faced an oil spill 370 km northeast of Rio de Janeiro. On December 15th 2011, federal prosecutors' office in Campos, Rio de Janeiro state, announced Chevron and Transocean were being sued for USD 10.7 billion for their alleged roles in the November oil spill near Rio de Janeiro. The civil suit also seeks to suspend the companies from operating in Brazil. During the investigations, the prosecutors found that Chevron and Transocean "weren't able to control the damage caused by the spill of nearly 3,000 barrels of oil, which shows a lack of planning and environmental management by the companies," according to the statement of the Federal Public Ministry (MPF) in Campos. Relations with Brazilian authorities are getting always more tense as in March 2012 a Brazilian court ordered 17 employees from Chevron and Transocean to surrender their passports, barring them from leaving Brazil as authorities prepare to file criminal charges. - In January 2012, a fire initiated on a drilling rig offshore Nigeria operated by FODE Drilling Nigeria Limited killing two workers. The rig was drilling a natural gas exploration well, located in the Funiwa Field approximately 10 km offshore and in approximately 12 m of water. Chevron has estimated a sheen of approximately 13 barrels in close proximity to the well during the following days. The company has started drilling two relief wells to kill the well at reservoir depth. - In March 2012, Chevron reported a plant shutdown following a leak in a pipeline at its oil refinery in Pascagoula, Mississippi. An estimated 10 pounds of benzene was released. Refinery personnel barricaded the area and shut the plant down</p>	
	ESG incorporation strategy applied
<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Integration</p> <p><input type="checkbox"/> Combination of ESG incorporation strategies</p>	
	Impact on investment decision or performance
<p>We excluded Chevron of all our portfolio because of these controversies and the lack of transparency and corrective measures of the company on this issue.</p>	

☒ ESG issue 3

	ESG issue and explanation
<p>ESG issue : controversial weapons</p> <p>General Dynamics Corp, Lockheed Martin Corp, Raytheon Co, Singapore Technologies Engineering LTd, Textron Inc are involved in the production, trading or storage of cluster munitions or antipersonnel land mines.</p>	
	ESG incorporation strategy applied
<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Integration</p> <p><input type="checkbox"/> Combination of ESG incorporation strategies</p>	
	Impact on investment decision or performance
<p>These companies are excluded of all our portfolio.</p>	

☒ ESG issue 4

	ESG issue and explanation
<p>ESG issue : Audit and control</p> <p>Cargill is an international producer and marketer of food, agricultural, financial and industrial products and services. The Company operates in five segments: Agriculture Services, Food Ingredients and Applications, Origination and Processing, Risk Management and Financial, and Industrial. Information obtained from company and public sources regarding the role of the Audit Committee in overseeing the internal controls system is insufficient. In February 2011, Cargill settled a tax dispute between Ford County and Cargill Meat Solutions. In fact, the Kansas Court of Tax Appeals signed off on a settlement between the county and Cargill, which had challenged the valuations for land and improvements at its Dodge City plant for 2008 through 2010. The county and Cargill reached a settlement before the case went to trial. As part of the settlement, Cargill dropped its challenge concerning the valuations for 2008-2009 and on four parcels of agricultural land. The county and Cargill also agreed on revised valuations on four parcels for 2010. In June 2011, The Guardian reported that Argentinian authorities accuse big four transnational companies of avoiding tax. According to the Guardian, the country's revenue and customs service "Afip" is seeking to claim USD 476m (£290m) for what it says are unpaid tax and duties from Bunge, USD 252m from Cargill and USD 140m from Dreyfus. According to the Article, Cargill had also used Uruguay and Swiss subsidiaries to evade taxes in Argentina, and that Cargill, ADM and Dreyfus were suspended from the exporters' register by the government earlier in 2011 as a result of the investigation.</p>	
	ESG incorporation strategy applied
<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Integration</p> <p><input type="checkbox"/> Combination of ESG incorporation strategies</p>	
	Impact on investment decision or performance
<p>We excluded Cargill of all our portfolio because of these controversies and the lack of transparency and response of the company on this issue.</p>	

☒ ESG issue 5

ESG issue and explanation
<p>ESG issue : human rights</p> <p>Kellogg does not disclose any commitment to respect and promote human rights in society. Kellogg faces criticism over negative environmental and social impacts of its sourcing of palm oil from Indonesia. One of the Company's palm oil suppliers, Wilmar International, is accused of trading illegally-grown palm oil from the Tesso Nilo National Park, a nationally protected forest in Sumatra, Indonesia. Wilmar International is also accused of infringements of indigenous peoples rights, property rights and faces criticism over the state of community relations in Sumatra.</p>
ESG incorporation strategy applied
<p><input checked="" type="checkbox"/> Screening</p> <p><input type="checkbox"/> Integration</p> <p><input type="checkbox"/> Combination of ESG incorporation strategies</p>
Impact on investment decision or performance
<p>We excluded Kellogg of all our portfolio.</p>

Communication

LEI 18	Mandatory	Core Assessed	PRI 2,6
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LEI 18.1	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.
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☒ We disclose it publicly

Provide URL

http://www.federisga.fr/blobs/medias/s/24b8143d92000522/Charte_ISRv2-harmonis%C3%A9e_17_10_2013.pdf

Provide URL

<http://www.federisga.fr/2604258700805800114/Expertise.htm>

LEI 18.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
----------	---

☒ Yes

**LEI
18.3**

Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.

- ☒ Broad approach to ESG incorporation
- ☐ Detailed explanation of ESG incorporation strategy used

**LEI
18.4**

Indicate how frequently you typically report this information.

- ☐ Quarterly or more frequently
 - ☒ Between quarterly and annually
 - ☐ Less frequently than annually
 - ☐ Other, specify
- ☐ No
- ☐ We disclose it to clients and/or beneficiaries only
 - ☐ We do not proactively disclose it to the public and/or clients/beneficiaries

LEI 18.5

Additional information. [Optional]

Monthly, we edit the reporting of our SRI funds in which investors can find comments on our ESG strategy regarding the fund or the evolution of the investment universe regarding the SRI score. Each year, we update the AFG/FIR Transparency Code of our SRI funds in which we provide a full description of how each fund address RI and ESG issues (investment and ESG strategies, SRI criteria, engagement and voting policies etc).

On a quarterly basis, Fédérés Gestion d'Actifs published a SRI newsletter, in which we publish in-house articles on ESG issues or describe our activities and progress regarding our responsible investments

These documents are publicly available on our website.

Fédérés Gestion d'Actifs

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Engagement

Overview

LEA 01	Voluntary	Descriptive	PRI 2
LEA 01.1	Provide a brief overview of your organisation's approach to engagement.		

Our engagement policy is defined in our SRI Charter.

The objectives of our engagement activities are to monitor ESG activities of companies and to influence company ESG behaviour. The SRI analyst is in charge of the implementation of this policy.

We use written communications, phone calls and meetings with management of European companies in order to warn them or discuss with them about ESG issues. The aim is to make them more aware and sensitive about sustainable development and to promote better ESG performance by companies.

Besides, as a small French investment manager, we enjoy joining collective initiatives in order to have more impacts on ESG issues.

LEA 02	Mandatory	Gateway	PRI 1,2,3
LEA 02.1	Indicate your reasons for interacting with companies on ESG issues and indicate who carries out these interactions.		

Type of engagement	Reason for interaction
Individual/Internal staff engagements	<input type="checkbox"/> To support investment decision-making (e.g. company research) <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input type="checkbox"/> To support investment decision-making (e.g. company research) <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To support investment decision-making (e.g. company research) <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers

Process

Process for engagements run internally

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.

- ☐ Yes
☒ No

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1 Indicate if you define specific objectives for your engagement activities.

- ☒ Yes
☐ Yes, for all engagement activities
☐ Yes, for the majority of engagement activities
☒ Yes, for a minority of engagement activities
☐ No

**LEA
04.2**

Indicate if you monitor the actions that companies take following your engagements.

- ☒ Yes
- ☐ Yes, in all cases
- ☐ Yes, in the majority of cases
- ☒ Yes, in the minority of cases

**LEA
04.3**

Describe how you monitor and evaluate the progress of your engagement activities.

We write to companies who declined to participate or gave no response to the Carbon Disclosure Project in order to ask them to participate next year. As a signatory of the Carbon Disclosure Project, we require the communication of strategies towards climate change and we integrate the annual report of the CDP in our SRI scoring process: on one hand, we increase by 10% the Environment score of companies in the Carbon Disclosure Leadership Index. On the other hand, we decrease by 10% the Environment score of companies who declined to participate or gave no response to the CDP.

☐ No

Process for engagements conducted via collaborations

LEA 05

Mandatory

Core Assessed

PRI 2

**LEA
05.1**

Indicate whether your organisation has a formal process for identifying and prioritising collaborative engagements.

- ☐ Yes
- ☒ No

LEA 06

Mandatory

Core Assessed

PRI 2

**LEA
06.1**

Indicate if the collaborative engagements in which you are involved have defined objectives.

- ☒ Yes
- ☐ Yes, for all collaborative engagement activities
- ☒ Yes, for the majority of collaborative engagement activities
- ☐ Yes, for a minority of collaborative engagement activities
- ☐ No

**LEA
06.2**

Indicate if you monitor the actions companies take following your collaborative engagements.

- ☒ Yes
- ☐ Yes, in all cases
- ☐ Yes, in the majority of cases
- ☒ Yes, in the minority of cases

**LEA
06.3**

Describe how you monitor and evaluate the progress of your collaborative engagement activities.

We support via the PRI Engagement Clearinghouse a collaborative engagement to eradicate cluster munitions.

5 US companies are concerned and are excluded from all our portfolios because they gave no response to the engagement letter or because they are still involved in cluster munitions.

☐ No

General processes for all three groups of engagers

LEA 09

Voluntary

Additional Assessed

PRI 1,2

**LEA
09.1**

Indicate if the insights gained from your engagements are shared with your internal or external investment managers as input for consideration in investment decisions.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input type="radio"/> Yes, systematically <input checked="" type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 10

Mandatory

Gateway/Core Assessed

PRI 2

**LEA
10.1**

Indicate if you track the number of companies you engage with.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input type="radio"/> Yes, we track the number of our engagements in full <input checked="" type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers <input type="radio"/> No, we do not track and cannot estimate our engagements
Collaborative engagements	<input type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> No, we do not track our engagements but can provide a reasonable estimate of our engagement numbers <input checked="" type="radio"/> No, we do not track and cannot estimate our engagements

Outputs and outcomes

LEA 11	Mandatory to Report Voluntary to Disclose	Core Assessed	PRI 2
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LEA 11.1	Indicate the number of companies with which your organisation engaged during the reporting year.
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	Number of companies engaged (avoid double counting, see explanatory notes)
Individual / Internal staff engagements	33

LEA 11.2	Indicate what percentage of your engagements were comprehensive during the reporting year. [Optional]
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Type of engagement	% Comprehensive engagements
Individual / Internal staff engagements	<input type="radio"/> > 50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> None

LEA 12	Voluntary	Additional Assessed	PRI 2
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LEA 12.1	Indicate if your engagements in the reporting year covered E, S and/or G issues.
-----------------	--

Type of engagement	Coverage
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Corporate Governance <input type="checkbox"/> We do not track this information
Collaborative engagements	<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Corporate Governance <input type="checkbox"/> We do not track this information

LEA 12.2

Provide an estimated breakdown by E, S and/or G issues.

Individual / Internal staff engagements

% Environmental only

18

% Social only

24

% Corporate Governance only

38

% Overlapping ESG issues

20

100%

Collaborative engagements

% Overlapping ESG issues

100

100%

LEA 13

Voluntary

Descriptive

PRI 2

LEA 13.1	Indicate whether you have a reliable estimate of the number of cases during the reporting year where a company has changed its practices, or made a commitment to do so, following your organisation's and/or your service provider's engagement activities.
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☐ Yes

☒ No

LEA 14	Voluntary	Descriptive	PRI 2
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LEA 14.1	Provide examples of the engagements that your organisation carried out during the reporting year.
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☒ Add Example 1

Topic or ESG issue	we believe that greater gender diversity at board level can lead to more effective boards.
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Make companies commit to increase the representation of women on the board to 20% or greater
Scope and Process	If the representation of women on the board is below 20% and if we are a shareholder of the company, we wrote to the company.
Outcomes	approximately 50% of the companies gave a detailed response about the Board's diversity policy and engage to increase gender diversity when vacancies arise.

☒ Add Example 2

Topic or ESG issue	AREVA - Risk prevention and nuclear safety
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	monitoring and evaluation of AREVA's transparency and performance on this issue
Scope and Process	We visit the sites of Creusot Forge and Chalon with managers of the company. Creusot Forge is one of the very few forges in the world capable of making the sophisticated parts necessary for the manufacture of the primary components for the nuclear island. The Chalon plant supplies heavy equipment for nuclear power plants. This establishment is the biggest industrial site owned by Areva.
Outcomes	By visiting these sites, we got a better understanding and assessment of Areva's performance on risk prevention and nuclear safety.

☒ Add Example 3

Topic or ESG issue	Respol - Overlapping ESG issues : health and safety conditions, environmental strategy, pollution prevention, unconventional resources, board composition...
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Increasing transparency and ESG performance of Respol
Scope and Process	We met the CEO and the head of CSR
Outcomes	They both committed to increase transparency and to improve the safety and environmental performance of Respol's operations.

☒ Add Example 4

Topic or ESG issue	Veolia Environnement - Overlapping ESG issues : responsible management of restructurings, board composition, health and safety conditions, environmental strategy...
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Increasing transparency and ESG performance of Veolia
Scope and Process	We met the head of CSR
Outcomes	We focused on the social impacts of the transformation and cost reduction plan. The company commits to guarantee the employability of its employees and promote internal transfers.

☒ Add Example 5

Topic or ESG issue	Communication of strategies towards climate change.
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Make companies commit to participate to the Carbon Disclosure Project next year
Scope and Process	If the company gave no response to the CDP in 2012 and if we are a shareholder of the company, we wrote to the company.
Outcomes	We engaged with 5 companies. 2 of them gave a response on their climate change strategy and committed to think about a participation to the CDP in 2013. Finally, one participate to the CDP in 2013.

☒ Add Example 6

Topic or ESG issue	Letter to SEC in support of CEO-to-worker pay ratio disclosure via the PRI clearinghouse
Conducted by	<input type="checkbox"/> Individual / Internal <input checked="" type="checkbox"/> Collaborative
Objectives	The proposed pay ratio disclosure would require all publicly traded companies in the U.S., with the exception of "emerging growth" companies, including smaller reporting companies and foreign private issuers to disclose "the median of the annual total compensation of all employees of an issuer (excluding the chief executive officer), the annual total compensation of that issuer's chief executive officer and the ratio of the median of the annual total compensation of all employees to the annual total compensation of the chief executive officer."
Scope and Process	We joined by signing the letter that has been sent to the SEC as a joint investor letter on 26 November 2013.
Outcomes	Engagement ongoing

- ☐ Add Example 7
☐ Add Example 8
☐ Add Example 9
☐ Add Example 10

Communication

LEA 15	Mandatory	Core Assessed	PRI 2,6
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LEA 15.1	Indicate whether your organisation proactively discloses information on its engagements.
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- ☒ We disclose it publicly

	please provide URL
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http://www.federisga.fr/blobs/com.cardiweb.cardiboxv6.cm.business.Article/2645887035755207340/fichier/1/fr/Code_de_transparence_F%C3%A9d%C3%A9ris_ISR_Euro.pdf

LEA 15.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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- ☒ Yes

LEA 15.3	Indicate what engagement information your organisation proactively discloses to clients/beneficiaries and/or the public.
----------	--

Engagement information disclosed

- ☒ Details of the selections, priorities and specific goals of engagement
- ☐ Number of engagements
- ☐ Breakdown of engagements by type/topic
- ☐ Breakdown of engagements by region
- ☐ An assessment of the current status of the engagement
- ☐ Outcomes that have been achieved from the engagement
- ☐ Other information

**LEA
15.4**

Indicate how frequently you typically report engagements information.

- ☐ Disclosed continuously (prior and post engagements)
- ☐ Disclosed quarterly
- ☒ Disclosed annually
- ☐ Disclosed every two years or less
- ☐ Other, specify
- ☐ No
- ☐ We disclose it to clients and/or beneficiaries only
- ☐ We do not proactively disclose it to the public and/or clients/beneficiaries.

**LEA
15.6**

Additional information. [Optional]

We disclose information on our engagements in the Transparency Code of all our SRI funds.

(Proxy) voting and shareholder resolutions

Overview

LEA 16

Voluntary

Descriptive

PRI 2

**LEA
16.1**

Provide a brief overview of your organisation's approach to (proxy) voting (including the filing and/or co-filing of shareholder resolutions if applicable).

We actively vote ourselves for all shareholder meetings. Our voting policy applies to all our funds and not only our SRI funds.

In January 2013, we decided to extend the coverage of our proxy voting policy to the US market. Thus, we vote on all of our holdings except Austrian and Danish stocks which are not covered by our depository.

Federis Gestion d'Actigs believes that promoting good corporate governance standards is an essential part of its ownership responsibilities.

Our voting policy is strict and fosters ESG best practices, which led to vote against 30% of resolutions supported by the management in 2013. For instance, we vote against the following resolutions: lack of transparency or excessiveness of executive and supervisory board members remuneration, inappropriate performance conditions attached to share plan, resolutions which would lead to a decline of ESG issues in the company, antitakeover or voting power dilution measures, elections of directors which would lead to a low level of board independence, elections of male directors when the representation of women on the board is below 20% etc.

We also approve resolutions proposed by shareholders or we are co-filing shareholder resolutions which would lead to an improvement of ESG practices in the company.

Our voting policy and the results of the annual proxy voting campaign are available on our website.

Process**LEA 17****Mandatory****Descriptive****PRI 2****LEA
17.1**

Indicate how you typically make your (proxy) voting decisions and what this approach is based on.

Approach

- ☐ We use our own research or voting team and make our own voting decisions without the use of service providers.
- ☒ We hire service provider(s) which make voting recommendations or provide research that we use to inform our voting decisions.

	Based primarily on
--	--------------------

- ☐ the service provider voting policy signed off by us
- ☒ our own voting policy
- ☐ our clients requests or policy
- ☐ other, explain

☐ We hire service provider(s) which make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.

☐ We hire service provider(s) which make voting decisions on our behalf.

LEA 17.2	Additional information.[Optional]
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Our service providers for proxy voting are ISS (European and American AGM) and Proxinvest (French AGM), but all resolutions are analysed by the SRI analyst and the compliance officers regarding our own voting policy.

LEA 19	Voluntary	Descriptive	PRI 2
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LEA 19.1	To ensure that your (proxy) votes are cast and reach their intended destination on time, indicate if you did the following.
----------	---

- ☒ Obtain confirmation that votes have been lodged:
 - ☒ for a majority of votes
 - ☐ for a minority of votes
- ☐ Participate in projects to improve the voting trail and/or to obtain vote confirmation
- ☐ None of the above

LEA 19.2	Provide additional information on your organisation's vote confirmation efforts.
----------	--

Our service providers for proxy voting ensure that our votes are cast and reach their intended destination on time.

LEA 20	Voluntary	Additional Assessed	PRI 2
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LEA 20.1	Indicate if your organisation has a securities lending programme.
----------	---

- ☐ Yes
- ☒ No

LEA 21	Mandatory	Core Assessed	PRI 2
--------	-----------	---------------	-------

LEA 21.1	Indicate if you ensure that companies are informed of the rationale when you and/or the service providers acting on your behalf abstain or vote against management recommendations.
-----------------	---

- ☐ Yes, in most cases
☒ Sometimes, in the following cases:
 ☐ votes in selected markets
 ☒ votes on certain issues (all markets)
 ☐ votes for significant shareholdings (all markets)
 ☐ other, explain
☐ No
☐ Not applicable as we and/or our service providers do not abstain or vote against management recommendations

LEA 21.2	Additional information. [Optional]
-----------------	------------------------------------

Listed equity companies are informed on the rationale when we vote against management recommendations on these issues :

- the election of all non-independant male directors when the representation of women on the board is below 20%. Fédérés Gestion d'Actifs believes that greater gender diversity at board level can lead to more effective boards.

- the company proposes the election of a single slate of directors. We disapprove in principle of bundling together proposals that could be presented as separate voting items because bundled resolutions leave shareholders with an all-or-nothing choice, skewing power toward the board and away from shareholders. Fédérés Gestion d'Actifs considers director elections to be one of the most important voting decisions that shareholders make. Therefore, directors should be elected individually, and we call on the company to adopt such a practice in the future.

Outputs and outcomes

LEA 22	Mandatory	Core Assessed	PRI 2
---------------	------------------	----------------------	--------------

LEA 22.1	For listed equities where you and/or your service provider has the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.
-----------------	---

- ☒ We do track or collect this information

	Votes cast (to the nearest 1%)
--	--------------------------------

	%
--	---

85

Specify the basis on which this percentage is calculated

- ☐ of the total number of ballot items on which you could have issued instructions
- ☒ of the total number of company meetings at which you could have voted
- ☐ of the total value of your listed equity holdings on which you could have voted

LEA 22.2

If there are specific reasons why you did not vote certain holdings, explain these, and if possible, indicate the percentage of holdings affected by these factors. [Optional]

We vote on all of our holdings except Austrian and Danish stocks which are not covered by our depository. Percentage of holdings affected by this factor : 2%.

In January 2013, we decided to extend the coverage of our proxy voting policy to the US market but the processing time required by our depository to implement the process and record our holdings was 3 months. So we missed the AGM attended in January, February and March. Percentage of holdings affected by this processing time : 13%

☐ We do not track or collect this information

LEA 23	Voluntary	Descriptive	PRI 2
LEA 23.1	Indicate if you track the voting instructions that you and/or your third party have issued on your behalf.		

☒ Yes, we track this information

LEA 23.2

Of the voting instructions that you and/or third parties have issued on your behalf, indicate the proportion of ballot items that were:

Voting instructions	Breakdown as percentage of votes cast
For (supporting) management proposals	<div> <div></div> <div>%</div> </div> <div>70</div>
Against (opposing) management proposals	<div> <div></div> <div>%</div> </div> <div>29</div>
Abstentions	<div> <div></div> <div>%</div> </div> <div>1</div>

100%

LEA 23.3	For the reporting year, describe your approach towards voting on shareholder resolutions.
-----------------	---

we approve resolutions proposed by shareholders which would lead to an improvement of ESG practices in the company.

☐ No, we do not track this information

LEA 24	Voluntary	Descriptive	PRI 2
---------------	------------------	--------------------	--------------

LEA 24.1	Indicate if your organisation directly or via a service provider filed or co-filed any shareholder resolutions during the reporting year.
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☒ Yes

LEA 24.2	Indicate the number of ESG shareholder resolutions you filed or co-filed.
-----------------	---

	Total number
--	--------------

2

LEA 24.3	Indicate what percentage of these ESG shareholder resolutions.
-----------------	--

Went to vote	<div><div></div><div>%</div></div> <div>0</div>
Were withdrawn due to changes at company and/or negotiations with the company	<div><div></div><div>%</div></div> <div>0</div>
Were withdrawn for other reasons	<div><div></div><div>%</div></div> <div>100</div>

	Total
--	-------

100%

**LEA
24.5**

Describe the ESG shareholder resolutions that you filed or co-filed and the outcomes achieved.

We cofiled resolution leaded by the Proxy Active Investors Sicav at Renault and Societe General AGMs requesting the separation of the roles of Chairman and CEO. Unfortunately, we had not achieved the threshold of capital necessary for the resolutions to be placed on the agenda of the General Meeting.

☐ No

LEA 25	Voluntary	Descriptive	PRI 2
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**LEA
25.1**

Provide examples of the (proxy) voting activities that your organisation and/or service provider carried out during the reporting year.

☒ Add Example 1

Topic or ESG issue	gender diversity at board level
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	we believe that greater gender diversity at board level can lead to more effective boards.
Scope and Process	vote against the election of all non-independant male directors if the representation of women on the board is below 20%
Outcomes	this against voting topic has been applied to 34 companies and 249 resolutions.

☒ Add Example 2

Topic or ESG issue	Management & Director Compensation
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	<p>Fédérés Gestion d'Actifs considers that aligning the interests of management with those of shareholders is a central element of corporate governance. The remuneration policy within the company should contribute to this objective.</p> <p>We believe that the company's remuneration policy with respect to executive and senior management must be transparent and must be systematically subject to quantified performance criteria and targets. Variable remuneration must be linked with the company's overall performance and relative to sector peers over time.</p>
Scope and Process	<p>vote against the remuneration policy if Director's remuneration is not sufficiently transparent or excessive (greater than €4,6 million), if inappropriate performance conditions are attached to variable remuneration or a share plan, or if the remuneration committee is not independent (consisting of more than 50% independent directors and no company executives)...</p>
Outcomes	<p>this against voting topic has been applied to 90 companies and 250 resolutions.</p>

☒ Add Example 3

Topic or ESG issue	Board structure and independence
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	<p>The structure of the board must represent a fair balance between executive, independent and non-independent members.</p> <p>For non-controlled companies, we consider that half of the board should be independent to attain an appropriate balance of powers. For controlled companies, Fédérés Gestion d'Actifs believes that independent directors should make up at least one-third of the board.</p>
Scope and Process	<p>vote against elections of directors which would lead to a low level of independence at board level</p>
Outcomes	<p>this against voting topic has been applied to approximately 190 companies and 290 resolutions.</p>

☒ Add Example 4

Topic or ESG issue	ratification of auditors
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	In order to avoid conflicts of interests and ensure the quality and independence of the verification of the accounts, some cases of negative vote or abstention can be identified such as consulting fees exceeding 25% of total fees or auditors having had executive positions in the company.
Scope and Process	vote against the ratification of auditors when there is clear evidence of a lack of independence or annual non-audit fees are excessive
Outcomes	this against voting topic has been applied to 47 companies and 80 resolutions.

☒ Add Example 5

Topic or ESG issue	shareholders' rights
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	Fédérés Gestion d'Actifs is attached to the corporate governance principle of equality between majority and minority shareholders.
Scope and Process	Fédérés Gestion d'Actifs supports the principle of one share/one vote and maintaining a single category of shares. We are in principle opposed to any bylaws amendments that result in unequal treatment of shareholders by artificially separating the economic interest from the voting rights, such as double voting rights, multiple voting rights, non-voting shares. Fédérés Gestion d'Actifs also opposes permanent anti-takeover measures and poison pills, which usually go against shareholders interests.
Outcomes	this against voting topic has been applied to 69 companies and 74 resolutions.

☒ Add Example 6

Topic or ESG issue	Capital Structure
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	Minority shareholders must be attentive to the issue of excessive dilution of capital. Fédérés Gestion d'Actifs believes that, except in specific cases, cumulative capital increases must not represent more than 50% of equity capital.
Scope and Process	<p>Share issuances without pre-emptive rights : a vote in favor will be granted up to a maximum of 10% of the existing share capital for routine authorizations.</p> <p>Share issuances with pre-emptive rights : a vote in favor will be granted up to a maximum of 50% of the existing share capital for routine authorizations.</p>
Outcomes	this against voting topic has been applied to approximately 85 companies and 160 resolutions.

☒ Add Example 7

Topic or ESG issue	Apple Inc - SHAREHOLDER PROPOSAL : Establish Board Committee on Human Rights
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	In his statement supporting the proposal, Harrington asserts that the establishment of a Board Committee on Human Rights would enable the board to meet its responsibility for oversight of human rights issues. The filer specifically notes recent human rights and labor controversies involving Foxconn Technology Group, a company supplier with operations in China. In addition, Harrington asserts that technology companies, such as Apple, are under pressure to stop the use of "conflict minerals" such as cassiterite (a tin ore), coltan, wolframite (a tungsten ore), and gold, because the pursuit of the revenue from their extraction leads to human rights abuses.
Scope and Process	we approve resolutions proposed by shareholders which would lead to an improvement of ESG practices in the company
Outcomes	We have voted FOR the shareholder resolution

☒ Add Example 8

Topic or ESG issue	Franklin Resources, Inc. SHAREHOLDER PROPOSAL : Institute Procedures to Prevent Investments in Companies that Contribute to Genocide or Crimes Against Humanity
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	In his statement supporting the proposal, the proponent contends that current policies do not effectively address investing in companies that support genocide, noting that the company and its funds hold shares in PetroChina whose parent company, China National Petroleum Company, is the largest business partner of Sudan. Furthermore, the filer states that the company claims to consider social and political issues in its investment risk assessment process for fund holdings but continued to maintain investments in PetroChina after being advised of the company's link to genocide and has not provided evidence of effectively engaging with PetroChina on this issue.
Scope and Process	we approve resolutions proposed by shareholders which would lead to an improvement of ESG practices in the company
Outcomes	We have voted FOR the shareholder resolution

☒ Add Example 9

Topic or ESG issue	General Mills, Inc. SHAREHOLDER PROPOSAL : Report on Responsibility for Post-Consumer Product Packaging
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	In its statement supporting the proposal, the proponent asserts that packaging and printed paper consumes a significant amount of natural resources and energy, and that only half is recycled, and recycling rates are even lower for aluminum, glass, and plastic. The filer reports that more than 40 countries have adopted some form of producer responsibility, that EPR legislation is pending in several states in the U.S., and that, as producers control design and marketing, they are in the best position to reduce the environmental impact of packaging. The proponent states that General Mills has acknowledged that an increase in recycling would require a combined effort by governments, producers, and recycling experts, but contends that the company has not helped in the development of such an initiative or taken a position on its responsibility for post-consumer packaging. Finally, the filer states that the requested report should be an analysis of what packaging design changes the company could make to increase package recyclability and its participation in the development of EPR.
Scope and Process	we approve resolutions proposed by shareholders which would lead to an improvement of ESG practices in the company
Outcomes	We have voted FOR the shareholder resolution

☒ Add Example 10

Topic or ESG issue	FedEx Corporation. SHAREHOLDER PROPOSAL : Report on Political Contributions
Decision made by	<input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Service provider
Objectives	In its statement supporting the proposal, the proponent says that it supports transparency and accountability in corporate political spending and that such disclosure is in the best interest of the company and its shareholders. Citing Congressional Quarterly's MoneyLine and the National Institute on Money in State Politics, the proponent reports that FedEx contributed at least \$3.7 million in corporate funds since 2003. The filer acknowledges that the company has a political spending policy, contending that FedEx's policy does not address independent political spending and indirect spending, such as that by trade associations and 501(c)(4) organizations. The proponent asserts that comprehensive disclosure is required to be able to fully understand how the company's assets are being used for political purposes.
Scope and Process	we approve resolutions proposed by shareholders which would lead to an improvement of ESG practices in the company
Outcomes	We have voted FOR the shareholder resolution

Communication

LEA 26	Mandatory	Core Assessed	PRI 2,6
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LEA 26.1 Indicate if your organisation proactively discloses information on your voting activities.

☒ We disclose it publicly

provide URL

<http://www.federisga.fr/blobs/medias/s/251949ff92a0047f/politique-de-vote-2013.pdf>

provide URL

<http://www.federisga.fr/blobs/medias/s/2562c08b92e01169/bilan-campagne-2012.pdf>

LEA 26.2 Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

☒ Yes

LEA 26.3 Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.

Indicate how much of your voting record you disclose

- ☐ All voting decisions
- ☐ Some voting decisions
- ☐ Only abstentions and opposing vote decisions
- ☒ Summary of votes only

Indicate what level of explanation you provide

- ☒ Explain all voting decisions
- ☐ Explain some voting decisions
- ☐ Only explain abstentions and votes against management
- ☐ No explanations provided

**LEA
26.4**

Indicate how frequently you typically report voting information.

- ☐ Continuously (primarily before meetings)
- ☐ Continuously (soon after votes are cast)
- ☐ Quarterly or more frequently
- ☒ Between quarterly and annually
- ☐ Less frequently than annually
- ☐ Other, specify
- ☐ No
- ☐ We disclose it to clients/beneficiaries only
- ☐ We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

Fédérés Gestion d'Actifs

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

FI 01

Mandatory to Report Voluntary to Disclose

Gateway/Peering

PRI 1

FI 01.1

Provide a breakdown of your internally managed fixed income investments by passive, quantitative, fundamental and other active strategies. For strategies that account for less than 10% of your fixed income investments, indicate if you would still like to report your activities.

Fixed income – corporate

Strategies

☒ Passive

Percentage of internally managed fixed income - corporate

☒ <10%

Report on your strategies that represents <10% of corporate fixed income

☐ Yes

☒ No

☐ 10-50%

☐ >50%

☐ Active – quantitative (quant)

☒ Active - fundamental and other active strategies

Percentage of internally managed fixed income - corporate

☐ <10%

☐ 10-50%

☒ >50%

Fixed income – government

Strategies

☒ Passive

Percentage of internally managed fixed income - government

☒ <10%

Report on your strategies that represents <10% of government fixed income

☐ Yes

☒ No

☐ 10-50%

☐ >50%

☐ Active – quantitative (quant)

☒ Active - fundamental and other active strategies

Percentage of internally managed fixed income - government

☐ <10%

☐ 10-50%

☒ >50%

FI 02

Mandatory to Report Voluntary to Disclose

Peering

General

FI 02.1

Provide a breakdown of your internally managed fixed income investments by credit quality.

Credit quality	Fixed Income - Corporate	Fixed Income - Government
Investment grade	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
High yield	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Distressed	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%

FI 02.2

Provide a breakdown of your fixed income investments between primary and secondary market.

Market	Fixed Income - Corporate	Fixed Income - Government
Primary market (new issues)	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Secondary market	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%

ESG incorporation in actively managed fixed income

FI 03	Voluntary	Descriptive	PRI 1
FI 03.1	Provide a brief overview of how you incorporate ESG issues in fixed income investments.		
	Fixed Income - Corporate		

Fédérés Gestion d'Actifs has a formal policy that excludes investments in companies involved in controversial sectors/activities : Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines; Companies/issuers from countries or emitting from countries involved in tax evasion; Companies/issuers whose ESG practices are insufficient, presents risks or are facing allegations on 4 major criteria : Pollution prevention and control (soil, accident), respect of fundamental Human Rights, prevention of Corruption, Audit and Internal Controls.

Fédérés Gestion d'Actifs' ESG exclusion policy applied to all corporate fixed income funds actively managed by FGA.

Moreover, 2 of our corporate fixed income funds are SRI best-in-class funds : Fédérés Crédit ISR launched in January 2012 and Fédérés ISR Trésorerie created in August 2013. Fédérés Crédit ISR invests in corporate bonds from the OECD zone. Fédérés ISR Trésorerie invests in money-market bonds from the OECD zone.

FGA evaluates each company on 6 key ESG issues : Human Ressources, Environment, Human Rights, Corporate Governance, Community Involvement and Business Behaviour.

Fixed Income - Government

Fédérés Obligations ISR, was created in June 2008. This fund invests in sovereign bonds from the 17 states of the Eurozone, using Ethifinance research to compute scores with a best-in-class approach.

In this fund, Environmental, Social and Governance considerations are all taken into account. Criteria such as deforestation, energy mix, waste production, carbon intensity, water pollution, and SO2 and NOx emissions are used to determine the 'Environment' score; government efficiency and corruption perceptions index for 'Governance'; and public spending on education, life expectancy, women's political participation and poverty index for the 'Social' score.

For the Fédérés Obligations ISR fund as a whole, Environment represents 70% of the final score, Social development 20% and Governance 10%. Environmental criteria weigh most heavily because Fédérés Gestion d'Actifs believes that the environmental field is the one in which the Eurozone states diverge most sharply. The 17 countries are ranked regarding their ESG score and the 4 worst-in-class countries are excluded from the investment universe. Thus, at the moment, the fund manager can't invest in sovereign bonds issued by Italy, Greece, Malta and Cyprus.

Fédérés Gestion d'Actifs has a formal policy that excludes investments in bonds issued by countries involved in tax evasion based on the status of countries in the FATF's (Financial Action Task Force) global network and on the French government's "black list" of countries identified as being non-cooperative states and territories.

Fixed Income - Corporate

Implementation processes

FI 04	Mandatory	Gateway/Core Assessed	PRI 1
FI 04.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed corporate fixed income investments; and, (2) the breakdown of your actively managed corporate fixed income investments by incorporation strategy or combination of strategies.		

ESG incorporation strategy (select all that apply)

☒ Screening alone (i.e. not combined with any other strategies)

Percentage of active corporate fixed income to which the strategy is applied (estimate +/- 10%)	<div> <div></div> <div>%</div> </div> 100
---	---

- ☐ Thematic alone (i.e. not combined with any other strategies)
- ☐ Integration alone (i.e. not combined with any other strategies)
- ☐ Screening + Integration strategies
- ☐ Thematic + integration strategies
- ☐ Screening + thematic strategies
- ☐ All three strategies combined
- ☐ No incorporation strategies applied

	Total actively managed fixed income - corporate
--	---

100%

FI 04.2	Describe your primary reasons for choosing a particular incorporation strategy.
----------------	---

Fédérés Gestion d'Actifs has a formal policy that excludes investments in companies involved in controversial sectors/activities in order to mitigate reputational and financial risks.

Moreover, 2 of our corporate fixed income funds are SRI best-in-class funds because we strongly believe that ESG issues have a significant impact on long term financial returns. Fédérés Gestion d'Actifs evaluates each corporate on 6 key CSR issues : Human Ressources, Environment, Human Rights, Corporate Governance, Community Involvement and Business Behaviour. Taking account of these issues also reduces risks within our portfolio and helps to better align our investments with the broader objectives of society.

FI 05	Voluntary	Additional Assessed	PRI 1
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FI 05.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.
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Type of ESG information

- ☐ Raw ESG company data
- ☒ Issuer-related analysis or ratings

Describe who provides this information.

Regarding controversial weapons and companies/issuers whose ESG practices are insufficient, Fédérés Gestion d'Actifs uses the research of Eiris and Vigeo. Based on the information provided by Eiris and Vigeo, the SRI analyst decides on exclusion of companies from the investment universe.

Regarding the 2 SRI funds using a best-in-class screening, we use the research of Eiris and Vigeo, to compute a score on 6 different criteria : Human Resources, Human Rights, Environment, Corporate Governance, Business Behaviour and Community Involvement. We also use in-house research, the SRI research of our brokers and we integrate the annual report of the Carbon Disclosure Project in our ESG scoring process.

- ☒ Sector-related analysis or ratings

Describe who provides this information.

Likewise, we use the research of Eiris and Vigeo, in-house research and the SRI research of our brokers to determine the controversial sectors/activities.

- ☒ Country-related analysis or ratings

Describe who provides this information.

Regarding countries involved in tax evasion, Fédérés Gestion d'Actifs refers to the status of countries in the FATF's (Financial Action Task Force) global network and to the French government's "black list" of countries identified as being non-cooperative states and territories.

- ☒ Screened bond list

Describe who provides this information.

We use the research of Eiris and Vigeo, in-house research and the SRI research of our brokers to determine the companies excluded from the investment universe.

Regarding the 2 corporate fixed income SRI funds, Fédérés Gestion d'Actifs uses the research of Eiris and Vigeo to compute a score, using a best-in-class approach on 6 different criteria : Human Resources, Human Rights, Environment, Corporate Governance, Business Behaviour and Community Involvement. Moreover, as a signatory of the Carbon Disclosure Project, we integrate the annual report of the CDP in our ESG scoring process. The score in each criterion is then weighted by using our own sector analysis matrix. The final mark of each company must be 10/20 minimum to be included in our SRI investment universe.

☐ Issue-specific analysis or ratings

☐ Other, specify

FI 05.2

Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.

Regarding the 2 corporate fixed income SRI funds, Fédérés Gestion d'Actifs uses the research of Eiris and Vigeo., to compute a score, using a best-in-class approach on 6 different criteria : Human Resources, Human Rights, Environment, Corporate Governance, Business Behaviour and Community Involvement. Moreover, as a signatory of the Carbon Disclosure Project, we integrate the annual report of the CDP in our ESG scoring process: on one hand, we increase by 10% the Environment score of companies in the Carbon Disclosure Leadership Index. On the other hand, we decrease by 10% the Environment score of companies who declined to participate or gave no response to the CDP. The score in each criterion is then weighted by using our own sector analysis matrix. The final mark of each company must be 10/20 minimum to be included in our SRI investment universe.

Likewise, we use the research of Eiris and Vigeo, in-house research and the SRI research of our brokers to determine the companies involved in controversial sectors/activities.

Regarding countries involved in tax evasion, Fédérés Gestion d'Actifs refers to the status of countries in the FATF's (Financial Action Task Force) global network and to the French government's "black list" of countries identified as being non-cooperative states and territories.

(A) Implementation: Screening

FI 06

Mandatory

Descriptive

PRI 1

FI 06.1

Indicate and describe the type of screening you apply to your internally managed active corporate fixed income investments.

Type of screening

☒ Negative/exclusionary screening

Screened by

- ☒ Product
- ☐ Activity
- ☐ Sector
- ☒ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

Description

We have a formal policy that excludes investments in companies involved in controversial activities / businesses :

- Controversial weapons encompassing the production, trading or storage of cluster munitions and antipersonnel land mines.
- Companies/issuers from countries or emitting from countries involved in tax evasion.

Companies/issuers whose ESG practices are insufficient, presents risks or facing allegations on 4 major criteria:

- Pollution prevention and control (soil, accident)
- Respect of fundamental human rights
- Prevention of corruption
- Audit and Internal Controls

☒ Positive/best-in-class screening

Screened by

- ☐ Product
- ☐ Activity
- ☒ Sector
- ☐ Country/geographic region
- ☒ Environmental and social practices and performance
- ☒ Corporate governance

Description

2 of our corporate fixed income funds are SRI best-in-class funds. For these funds, Fédérés Gestion d'Actifs evaluates each company on 6 key CSR issues :

- Environment (Environmental strategy and eco-design, Pollution prevention and control, Development of green products, Protection of biodiversity, Protection of water resources, Environmental impacts from energy use, Atmospheric emissions, Waste management, Management of local pollution, Management of environmental impacts from transportation, Environmental impacts from the use and disposal of products)
- Human Resources (Promotion of labour relations, Responsible management of restructurings, Career management and promotion of employability, Quality of remuneration systems, Improvement of health and safety conditions, Respect and management of working hours)
- Business Behaviour (Product safety, Information to customers, Responsible Contractual Agreement, Integration of CSR in the purchasing process, Sustainable Relationships with suppliers, Integration of environmental factors in the supply chain, Integration of social factors in the supply chain, Prevention of corruption, Prevention of anti-competitive practices, Transparency and integrity of influence strategies and practices)
- Corporate Governance (Board of Directors, Audit & Internal Controls, Shareholders, Executive Remuneration)
- Human Rights (Respect for human rights standards and prevention of violations, Respect for freedom of association and the right to collective bargaining, Elimination of child labour, Abolition of forced labour, Non-discrimination)
- Community Involvement (Promotion of the social and economic development, Societal impacts of the company's products / services, Contribution to general interest causes).

Moreover, as a signatory of the Carbon Disclosure Project, we require the communication of strategies towards climate change and we integrate the annual report of the CDP in our ESG scoring process: on one hand, we increase by 10% the Environment score of companies in the Carbon Disclosure Leadership Index. On the other hand, we decrease by 10% the Environment score of companies who declined to participate or gave no response to the CDP.

The score in each criterion is then weighted by using our own sector analysis matrix (environmental issues for a driller and a media group cannot be equally considered).

The final mark of each company must be 10/20 minimum to be included in our SRI investment universe. The SRI investment universe represents approximately 50% of the initial investment universe.

☐ Norms-based screening

FI 06.2

Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.

The negative/exclusionary screening criteria are established by the SRI Committee. The SRI Committee meets on a quarterly basis. So, every three months, companies excluded from the investment universe are reviewed based on the research of Eiris and Vigeo and excluded countries are reviewed based on the status of countries in the FATF's (Financial Action Task Force) global network or on the French government's "black list" of countries identified as being non-cooperative states and territories. We don't disclose publicly the list of companies excluded for these reasons but we notify clients when changes are made in the exclusion policy in our SRI Charter available on our website.

The positive/best-in-class screening are established by the SRI analyst. The criteria and evaluation of each company are reviewed approximately every 12 to 18 months by Eiris and Vigeo. Our SRI database is updated every month. When a company in the SRI portfolio is excluded because its ESG score drops under the 10/20 barrier, we inform clients in the monthly report of the fund.

FI 07**Mandatory****Core Assessed****PRI 1****FI 07.1**

Indicate which processes your organisation uses to ensure that screening in corporate fixed income is based on robust analysis.

- ☒ Comprehensive research is undertaken or sourced to determine issuers' ESG performance
- ☒ Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- ☒ External research and data used to identify issuers to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- ☒ Information on ESG issues and/or ratings is updated regularly to ensure that portfolio holdings comply with fund policies
- ☐ A committee or body with representatives independent of the individuals who conduct ESG research reviews some or all screening decisions
- ☐ A periodic review of the quality of the research undertaken or provided is carried out
- ☒ Other, specify
 Federis Obligations ISR and Federis Credit ISR obtained in 2013 the SRI label launched by Novethic.
- ☐ None of the above

FI 07.2**Additional information. [Optional]**

Federis Obligations ISR and Federis Credit ISR obtained in 2013 the SRI label launched by Novethic (the leading research centre in France on SRI& Corporate Social Responsibility).

The Novethic SRI Label is awarded to open-end funds (pooled funds) managed systematically in light of ESG criteria. The fund manager must detail the fund's SRI management approach, report on its extra-financial characteristics and disclose a complete list of portfolio holdings.

The Novethic SRI Label is intended to be used by individual investors as a quality standard. As the Label is awarded by an independent body, Novethic's SRI Research Centre, investors can be sure that the process offers the greatest possible transparency about SRI products in which they might invest.

It guarantees systematic integration of ESG criteria into fund management and promotes transparency and selective SRI. To measure the impact of ESG analysis, Novethic examined the selectivity of each candidate fund, i.e. the number of excluded companies as ratio of the number of ESG-analysed companies. Although this indicator alone cannot guarantee that controversial companies will be excluded from the portfolio, it does ensure that a best-in-class approach consists in choosing companies with the best ESG practices.

FI 08	Voluntary	Additional Assessed	PRI 1
FI 08.1	Indicate which processes your organisation uses to ensure that fund criteria are not breached in corporate fixed income investments.		
<div><input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet the funds' screening criteria. These checks are:<div><div><input checked="" type="radio"/> Systematic</div><div><input type="radio"/> Occasional</div></div><div><input type="checkbox"/> Automated IT systems prevent investment managers from investing in excluded bonds or those that do not meet positive screening criteria</div><div><input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit function</div><div><input type="checkbox"/> Other, specify</div><div><input type="checkbox"/> None of the above</div></div>			
FI 08.2	If breaches of fund screening criteria are identified, describe the process followed to correct those breaches.		

if a breach of fund screening criteria is identified, the portfolio manager must sell the excluded stock before the end of the current month.

FI 08.3

Additional information.

Audits of fund holdings are undertaken monthly by the SRI analyst and quarterly by internal audit function.

Fixed income - Government
FI 13
Mandatory
Core Assessed
PRI 1
FI 13.1

Indicate if you incorporate ESG issues in investment analysis and decision making for your government fixed income investments.

☒ Yes

FI 13.2

Indicate for what percentage of your government fixed income investments you incorporate ESG issues in investment analysis and decision making.

- ☒ <10%
☐ 10-50%
☐ 51-90%
☐ >90%

FI 13.3

Indicate if in active strategies, E, S and G issues are reviewed while researching government issuers.

ESG issues	Coverage/extent of review on these issues
Environmental	<input type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	<input type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	<input type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input checked="" type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

FI 13.4

Describe your approach to incorporating ESG issues in government fixed income investments. [Optional]

Fédérés Obligations ISR, was created in June 2008. This fund invests in sovereign bonds from the 17 states of the Eurozone, using Ethifinance research to compute scores with a best-in-class approach. In this fund, Environmental, Social and Governance considerations are all taken into account. Criteria such as deforestation, energy mix, waste production, carbon intensity, water pollution, and SO2 and NOx emissions are used to determine the 'Environment' score; government efficiency and corruption perceptions index for 'Governance'; and public spending on education, life expectancy, women's political participation and poverty index for the 'Social' score. For the Fédérés Obligations ISR fund as a whole, 'Environment' represents 70% of the final score, 'Social development' 20% and 'Governance' 10%. Environmental criteria weigh most heavily because Fédérés Gestion d'Actifs believes that the environmental field is the one in which the Eurozone states diverge most sharply. The 17 countries are ranked regarding their ESG score and the 4 worst-in-class countries are excluded from the investment universe. Thus, at the moment, the fund manager can't invest in sovereign bonds issued by Italy, Greece, Malta and Cyprus.

Fédérés Gestion d'Actifs has a formal policy that excludes investments in bonds issued by countries involved in tax evasion based on the status of countries in the FATF's (Financial Action Task Force) global network and on the the French government's "black list" of countries identified as being non-cooperative states and territories. We don't consider this type of exclusion as a significant incorporation of ESG issues. That's why we indicate the percentage of our government fixed income investments we incorporate ESG issues in investment analysis and decision making is below 10%.

☐ No

Outputs and outcomes

FI 15

Voluntary

Descriptive

PRI 1

FI 15.1

Indicate how your ESG incorporation strategies have influenced the composition of your fixed income portfolio(s) or investment universe.

Fixed Income - Corporate

- ☒ Narrow down or prioritise the investment universe
- ☒ Buy / sell / weight decisions
- ☐ Other, specify

Fixed Income - Government

- ☒ Narrow down or prioritise the investment universe
- ☒ Buy / sell / weight decisions
- ☐ Other, specify

FI 16	Voluntary	Descriptive	PRI 1
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FI 16.1	Indicate if you believe (by applicable strategy) that incorporating ESG factors has: (a) Impacted funds' financial performance; (b) Reduced funds' risk or volatility; (c) Improved funds' ESG performance.
---------	--

Fixed Income - Corporate

	a) Impacted funds' financial performance
--	--

Screening				
<input type="radio"/> Yes				
<input checked="" type="radio"/> No				

	b) Reduced funds' risk or volatility
--	--------------------------------------

Screening				
<input type="radio"/> Yes				
<input checked="" type="radio"/> No				

	c) Improved funds' ESG performance
--	------------------------------------

Screening				
<input checked="" type="radio"/> Yes				
<input type="radio"/> No				

Fixed Income - Government

	a) Impacted funds' financial performance
--	--

ESG incorporation (for actively managed funds)	
<input checked="" type="radio"/> Yes	
<input type="radio"/> No	

	b) Reduced funds' risk or volatility
--	--------------------------------------

ESG incorporation (for actively managed funds)	
<input type="radio"/> Yes <input checked="" type="radio"/> No	

c) Improved funds' ESG performance

ESG incorporation (for actively managed funds)	
<input checked="" type="radio"/> Yes <input type="radio"/> No	

FI 16.2	Describe how you are able to determine these outcomes and your actual performance.
----------------	--

We calculate the average ESG score of our SRI funds relative to their benchmark. All our SRI funds present an average ESG score better than the average score of their benchmark.

Regarding Federis Obligations ISR, incorporating ESG factors negatively impacted the funds' financial performance because of the good relative performance of sovereign bonds issued by Italy during the reporting period. Italy represents 25% of the benchmark but the fund manager can't invest in sovereign bonds issued by Italy. In the fund, the 17 countries of the Eurozone are ranked regarding their ESG score and the 4 worst-in-class countries (Italy, Greece, Malta and Cyprus) are excluded from the investment universe.

FI 17	Voluntary	Descriptive	PRI 1
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FI 17.1	Provide examples of ESG issues that affected your fixed income investment view and/or performance during the reporting year.
----------------	--

☒ ESG issue 1

	Fixed Income - Corporate and/or Government
<input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Government	
	ESG issue and explanation
Exclusion of sovereign bonds issued by Italy because of the ESG score of the country.	
	ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies	
	Impact on investment view or performance
<p>Federis Obligations ISR invests in sovereign bonds from the 17 states of the Eurozone, using Ethifinance research to compute scores with a best-in-class approach. The 17 countries are ranked regarding their ESG score and the 4 worst-in-class countries are excluded from the investment universe. Thus, at the moment, the fund manager can't invest in sovereign bonds issued by Italy, Greece, Malta and Cyprus.</p> <p>Italy represents 25% of the benchmark. Therefore, incorporating ESG factors negatively impacted the fund's financial performance because of the good relative performance of sovereign bonds issued by Italy during the reporting period.</p>	

☒ ESG issue 2

Fixed Income - Corporate and/or Government			
<input checked="" type="checkbox"/> Corporate <input type="checkbox"/> Government			
<table border="1"> <tr> <td>ESG issue and explanation</td> </tr> <tr> <td> <p>ESG issue : Corruption.</p> <p>Wendel does not disclose any commitment to prevent corruption or money laundering. However, several controversies have been reported :</p> <p>1. On December 13 2010, the French financial regulator, i.e the Financial Markets Authority (AMF), imposed Wendel company and its former CEO, Jean-Bernard Lafonta, a fine of EUR 1.5 million each for failing to inform the market regarding the rise of Wendel's capital in Saint-Gobain in 2007.</p> <p>2. In January 2011, media sources reported that the French tax authorities were requesting back taxes and fines (EUR 240 m in total) from 14 present or former managers of Wendel, as a result of alleged irregularities in a share pay-out scheme of 2007. The tax authorities considered the share pay-out scheme should have been included in the calculation of directors's annual salaries, thereby incurring extra tax. In addition, on December 2011, French media sources reported a similar case since French tax authorities were seeking back taxes from 12 present and formers managers of Wendel, as a result of alleged irregularities in a share pay-out scheme regarding the selling of Editis in 2008. Again the tax authorities considered the share pay-out scheme should have been included in the calculation of directors's annual salaries.</p> <p>3. In December 2010, Wendel Group was assigned before the Commercial court of Paris after a subpoena for "misconduct" was filed by a former executive director of the group, who was dismissed in June 2009. He denounced suspicious practices related to share pay-out schemes that have enriched the former executives at the expense of managers to which he belonged.</p> </td> </tr> </table>		ESG issue and explanation	<p>ESG issue : Corruption.</p> <p>Wendel does not disclose any commitment to prevent corruption or money laundering. However, several controversies have been reported :</p> <p>1. On December 13 2010, the French financial regulator, i.e the Financial Markets Authority (AMF), imposed Wendel company and its former CEO, Jean-Bernard Lafonta, a fine of EUR 1.5 million each for failing to inform the market regarding the rise of Wendel's capital in Saint-Gobain in 2007.</p> <p>2. In January 2011, media sources reported that the French tax authorities were requesting back taxes and fines (EUR 240 m in total) from 14 present or former managers of Wendel, as a result of alleged irregularities in a share pay-out scheme of 2007. The tax authorities considered the share pay-out scheme should have been included in the calculation of directors's annual salaries, thereby incurring extra tax. In addition, on December 2011, French media sources reported a similar case since French tax authorities were seeking back taxes from 12 present and formers managers of Wendel, as a result of alleged irregularities in a share pay-out scheme regarding the selling of Editis in 2008. Again the tax authorities considered the share pay-out scheme should have been included in the calculation of directors's annual salaries.</p> <p>3. In December 2010, Wendel Group was assigned before the Commercial court of Paris after a subpoena for "misconduct" was filed by a former executive director of the group, who was dismissed in June 2009. He denounced suspicious practices related to share pay-out schemes that have enriched the former executives at the expense of managers to which he belonged.</p>
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<table border="1"> <tr> <td>ESG incorporation strategy applied</td> </tr> <tr> <td> <input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies </td> </tr> </table>		ESG incorporation strategy applied	<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies
ESG incorporation strategy applied			
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<table border="1"> <tr> <td>Impact on investment view or performance</td> </tr> <tr> <td> <p>We excluded Wendel of all our portfolio and so, we sold our positions in bonds issued by the French company during the reporting year.</p> </td> </tr> </table>		Impact on investment view or performance	<p>We excluded Wendel of all our portfolio and so, we sold our positions in bonds issued by the French company during the reporting year.</p>
Impact on investment view or performance			
<p>We excluded Wendel of all our portfolio and so, we sold our positions in bonds issued by the French company during the reporting year.</p>			

☒ ESG issue 3

Fixed Income - Corporate and/or Government	
<input checked="" type="checkbox"/> Corporate	
<input type="checkbox"/> Government	
ESG issue and explanation	
<p>ESG issue : corruption .</p> <p>Finmeccanica explains that it promotes the knowledge of the Code of Ethics, and that in-charge-offices take care of the interpretation and explanation of the Code's contents. However no further specification on the means that are implemented to raise awareness are provided.</p> <p>In addition, the high level and the gravity of the controversies occurred in the period under review question the effectiveness of these means. In July 2013, Finmeccanica allegedly recurred to mafia-middleman in its African transactions. In March 2013 a scandal burst on Finmeccanica contract with Rome townhill for the furniture of 45 buses. The press reveals an alleged case of corruption and bribes for 600,000 Euros, together with false bills. The cases involves Mr Borgogni, member of the board of directors of the company and one of Finmeccanica's consultants.</p> <p>In March 2013 a scandal burst about Finmeccanica's contract with the Italian government won in 2006 for the traceability of hasardous waste. The press reveals that one of the company's subsidiaries, Selex won the contract for a value of Eur 416.7 m without any call for tender. In addition, while the price of the contract appeared to be unreasonably high, Selex still kept the contract and the Government classed the business as "secret" for national security reasons. A special task force in charge of investigating the affair discovered in 2012 a series of irregularities going from the lack of call for tender to the lack of follow up and monitoring of the development of the business to the overpricing of the products used for the service. Investigations are still continuing.</p> <p>The CEO and Chairman of Finmeccanica, Giuseppe Orsi, was arrested on February 12 2013 in a corruption probe. An Eur 50 m bribe was allegedly paid in 2010 to win a contract of Eur 560 m for furnishing 12 helicopters to the Indian Government. Italian newspaper La Repubblica reports the arrest is a preventive measure to avoid reiteration of the offense and the tampering of evidence.</p> <p>Three other people have been placed under house arrest as part of the probe, including the Chief Executive of Finmeccanica helicopter unit AgustaWestland, Bruno Spagnolini.</p>	
ESG incorporation strategy applied	
<input checked="" type="checkbox"/> Screening	
<input type="checkbox"/> Thematic	
<input type="checkbox"/> Integration	
<input type="checkbox"/> Combination of ESG incorporation strategies	
Impact on investment view or performance	
We excluded Finmeccanica of all our portfolio.	

☐ ESG issue 4

☐ ESG issue 5

Communication

FI 18	Mandatory	Core Assessed	PRI 2,6
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FI 18.1	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in all fixed income investments.
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- ☒ We disclose it publicly

Provide URL

http://www.federisga.fr/blobs/medias/s/24b8143d92000522/Charte_ISRv2-harmonis%C3%A9e_17_10_2013.pdf

Provide URL

<http://www.federisga.fr/2604258700805800114/Expertise.htm>

FI 18.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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- ☒ Yes

FI 18.3	Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.
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- ☒ Broad approach to ESG incorporation
☐ Detailed explanation of ESG incorporation strategy used

FI 18.4	Indicate how frequently you typically report this information.
---------	--

- ☐ Quarterly or more frequently
☒ Between quarterly and annually
☐ Less frequently than annually
☐ Other, specify
- ☐ No
- ☐ We disclose it to clients/beneficiaries only
☐ We do not proactively disclose it to the public and/or clients/beneficiaries

FI 18.5**Additional information. [Optional]**

Monthly, we edit the reporting of our SRI funds in which investors can find comments on our ESG strategy regarding the fund or the evolution of the investment universe regarding the SRI score.

Each year, we update the AFG/FIR Transparency Code of our SRI funds in which we provide a full description of how each fund address RI and ESG issues (investment and ESG strategies, SRI criteria, engagement and voting policies etc).

On a quarterly basis, Fédéris Gestion d'Actifs published a SRI newsletter, in which we publish in-house articles on ESG issues or describe our activities and progress regarding our responsible investments.

These documents are publicly available on our website.

Engagement in fixed income investments

Fixed Income - Corporate

FI 19	Voluntary	Descriptive	PRI 2
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FI 19.1

Indicate if you engage with corporate issuers.

☒ Yes

FI 19.2

Describe your organisation's approach to engagement in corporate fixed income.

As corporate issuers are often listed companies, we indirectly engage with corporate issuers. We adopt the same approach to engagements in our corporate fixed income investments as we do in your listed equity investments. The objectives of our engagement activities is to influence company behaviour and performance on ESG issues.

For instance, we write to companies who declined to participate or gave no response to the Carbon Disclosure Project in order to ask them to participate next year. As a signatory of the Carbon Disclosure Project, we require the communication of strategies towards climate change and we integrate the annual report of the CDP in our SRI scoring process. This SRI scoring process is used for our equity SRI funds but also for our corporate fixed income SRI funds.

Therefore, during the reporting year, we wrote to French food retailer Casino because the company gave no response to the CDP in 2012. We hold several corporate bonds issued by Casino.

☐ No

Fixed Income - Government

FI 20	Voluntary	Descriptive	PRI 2
FI 20.1	Indicate if you engage with government issuers such as government departments (national or local), agencies and other entities in order to influence their approach to ESG issues that may affect creditworthiness.		
<input type="radio"/> Yes			
<input checked="" type="radio"/> No			