

# RI TRANSPARENCY REPORT

## 2013/14

# Groupama Asset Management

## 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

This document is based on information reported by signatories and responses have not been independently audited by the PRI Secretariat, PRI working groups, or any other third party. While this information is believed to be reliable, no representations or warranties are made as to its accuracy and no responsibility or liability can be accepted for any error or omission.

# 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	🔒	n/a							✓
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	✓	Public	✓						
FI 11	Review of ESG issues while researching companies/sectors	✓	Public	✓						
FI 12	Processes to ensure integration is based on robust analysis	✓	Public	✓						
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		✓					

# Groupama Asset Management

## Reported Information

## Public version

## Organisational Overview

## PRI disclaimer

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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

273

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		84	510	486	084
Currency	EUR				
Assets in USD		111	316	712	741

**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

	Internally managed (%)	Externally managed (%)
Listed equity	6	0
Fixed income – corporate	21	0
Fixed income – government	42	0
Fixed income – other	2	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	15	0
Other (1), specify	10	0
Other (2), specify	4	0

☐ Publish our asset class mix as broad ranges

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

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 %

## Gateway asset class implementation indicators

OO 10	Mandatory	Gateway	General
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<b>OO 10.1</b>	Select the responsible investment activities your organisation implemented, directly and/or indirectly, for listed equities in the reporting year.
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- ☒ We incorporate ESG issues into investment decisions on our internally managed assets
- ☒ 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

<b>OO 10.2</b>	Indicate if your combined internally and externally managed listed equities are 10% or more of your total AUM.
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- ☐ 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

<b>OO 11</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>General</b>
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<b>OO 11.1</b>	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.
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- ☒ Fixed income – corporate
- ☒ Fixed income – government
- ☐ Fixed Income – other
- ☐ Cash
- ☐ Other (1)
- ☐ Other (2)
- ☐ None of the above

<b>OO 12</b>	<b>Mandatory</b>	<b>Gateway</b>	<b>General</b>
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<b>OO 12.1</b>	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.
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#### **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
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- ☒ 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.

# Groupama Asset Management

## Reported Information

### Public version

### Overarching Approach

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## Responsible investment policy

OA 01	Mandatory	Gateway/Core Assessed	General
OA 01.1	Indicate if you have a responsible investment policy.		
	<input checked="" type="radio"/> Yes <input type="radio"/> No		
OA 01.2	Indicate if you have other guidance documents or more specific policies related to responsible investment.		
	<input checked="" type="radio"/> Yes <input type="radio"/> No		
OA 01.3	Provide a brief description of the key elements of your responsible investment policy or, if you do not have a policy, of your overall approach to responsible investment. [Optional]		

Groupama Asset Management, as an economical actor, considers it is part of its fiduciary and social responsibilities to take into account ESG issues into investment decisions for the benefits of investors but also issuers and all the other stakeholders.

Groupama AM initiated a specific SRI approach in the early 2000s and has internalised its SRI research since 2003. It is convinced from the start that taking into account ESG issues allows better understandings and provides a better assessment of companies' risks and opportunities.

Groupama AM develops in parallel a twofold approach :

1. a "Broad" RI approach (mainstream) that integrates key ESG issues into the fundamental analysis and investment decisionmaking
2. a "Core" SRI approach with a range of SRI products with specific and strict guidelines.

The policy meets three objectives:

- Raise awareness among managers and encourage them to consider sustainable development principles for analyses and management choices
- Communicate SRI to all areas of the management company (marketing, sales, support, advertising and PR...) in order to promote SRI among institutional and private clients
- Work with clients and serve their interest for a sustainable development approach and make SRI, a tool for steering their commitment to responsible investment, consistent with their principles for action.

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

☒ Yes

**OA 02.2** Provide a URL to your responsible investment policy.

URL

[http://www.groupama-am.com/com\\_eng/sri/](http://www.groupama-am.com/com_eng/sri/)

☐ No

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

☒ 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.

Policy or document name	URL
Annual Report	<a href="http://www.groupama-am.com/com_eng/publications">http://www.groupama-am.com/com_eng/publications</a>
Code transparency SRI	<a href="http://www.groupama-am.com/com_eng/sri/contribution-engagement">http://www.groupama-am.com/com_eng/sri/contribution-engagement</a>
Voting Policy	<a href="http://www.groupama-am.com/com_eng/sri/shareholder-engagement">http://www.groupama-am.com/com_eng/sri/shareholder-engagement</a>
Engagement Report	<a href="http://www.groupama-am.com/com_fre/ir/engagement-actionnarial">http://www.groupama-am.com/com_fre/ir/engagement-actionnarial</a>

☐ No

<b>OA 03</b>	<b>Mandatory</b>	<b>Core Assessed</b>	<b>PRI 1,2</b>
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**OA 03.1** Indicate the components/types and coverage of your responsible investment policy and guidance documents.

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 checked="" type="checkbox"/> Specific guidelines on corporate governance <input checked="" type="checkbox"/> Specific guidelines on environmental issues <input checked="" type="checkbox"/> Specific guidelines on social issues <input checked="" type="checkbox"/> Asset class-specific guidelines <input checked="" type="checkbox"/> Screening/exclusion policy <input checked="" type="checkbox"/> Other, specify Dialogue with issuers - HR policy <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 03.2**

Comment on any variations or exceptions in the coverage of your responsible investment policy. [Optional]

We are continuing to upgrade our SRI policy

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.

☒ Yes

**OA 04.2**

Describe your policy on managing potential conflicts of interest in the investment process. [Optional]

1/ Groupama Am is the sole investor on behalf of its main client Groupama SA.

2/ In order to preserve the interests of all clients and their equally treatment, Groupama AM is using a pre order allocation tool for all investment transactions.

3/ Groupama AM respects the Best Execution principles

4/ Groupama Am doesn't invest in parent company entities.

☐ 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.

☒ Yes

**OA 05.2** | Indicate how frequently your organisation sets or revises objectives for responsible investment.

- ☐ 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	Strengthen the ESG integration in fixed income corporate (FIC), equity and fixed income government (FIG) investments.
Key performance indicators	FIC : identification of major ESG risks impacting funds financial performance - Equity : definition of an analytical transversal tool - FIG : realization of country profiles covered developed countries
Describe the progress achieved	FIC : formalization and testing of methodology. Equity : application of a financial and extra-financial grid to the equity portfolios. FIG : achievement of coverage.

☒ Add responsible investment objective 2

Objective 2	Reinforce our shareholder engagement and dialogue with companies 1/prior AGMs 2/engaging with companies to evaluate their HR practices.
Key performance indicators	1/number of companies met prior AGMs. 2/ number of votes cast in the reporting year 3/ number of HR managers met.
Describe the progress achieved	1/ 6 companies met 2/ Voting at 209 AGMs for 3011 resolutions : 74% of our equity portfolio.3/ 25 meetings and 17 letters sent.

☒ Add responsible investment objective 3

Objective 3	Deepen our SRI investment process
Key performance indicators	Better intergation of ESG sector issues
Describe the progress achieved	Integration in the management of SRI portfolio of an sector analysis model

<b>OA 06.2</b>	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.
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☒ Add responsible investment objective 1 for the next reporting year

Objective 1 for the next reporting year	Strengthen the ESG integration in fixed income corporate (FIC), equity and fixed income government (FIG) investments.
Key performance indicators	FIC : implementation of ESG risks and opportunities monitoring process. Equity : extension of the implementaion of the analytical grid. FIG : extension to the emerging countries (reflection)

☒ Add responsible investment objective 2 for the next reporting year

Objective 2 for the next reporting year	Reinforce our shareholder engagement and dialogue with the companies prior AGMs
Key performance indicators	Number of companies met prior AGMs and number of votes cast

☒ Add responsible investment objective 3 for the next reporting year

Objective 3 for the next reporting year	Encourage the companies to better HR performances
Key performance indicators	Number of companies who engages with us and the progress recorded

## Governance and human resources

<b>OA 07</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>General</b>
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**OA 07.1**

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

Groupama AM SRI strategy is part of the global strategy decided by the CEO and CIO. The strategy is then implemented by the Director of Research, the Head of Equity management, the Head of Credit management and the Head of SRI development. The Director of Research is responsible for the integration of ESG issues into financial and non- financial analysis.

☐ 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

☒ Oversight/accountability for responsible investment

☐ Implementation of responsible investment

☐ No oversight/accountability or implementation responsibility for responsible investment

☒ 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

**The Director of Research**

- ☒ 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
  - ☒ Oversight/accountability for responsible investment
  - ☒ Implementation of responsible investment
  - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ 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
  - Sales/Marketing**
    - ☒ Oversight/accountability for responsible investment
    - ☒ Implementation of responsible investment
    - ☐ No oversight/accountability or implementation responsibility for responsible investment
  - ☐ Other role, specify

OA 09	Voluntary	Additional Assessed	General
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<b>OA 09.1</b>	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
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#### Board members/Board of trustees

- ☐ Responsible investment included in personal development and/or training plan
- ☒ None of the above

#### 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

Director of Research

- ☒ 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

#### Investment analysts

- ☒ 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

##### Sales/Marketing

- ☒ 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

### 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
- ☐ CDP Forests
- ☐ CDP Water
- ☐ 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)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

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

1/ Signes up PRI 2/ Attended conferences as a participant 3/ Attended to the meetings to be informed of progress of PRI initiatives

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

EUROSIF, SPAINSIF, FRENCHSIF

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]
--

1/ ESG disclosure in the KID (European Funds Prospectus)

2/ Update of Euro Transparency Code

3/ Position papers on : a/ Responsible finance b/ Corporate Governance and Shareholders Rights c/ Integrated reporting d/ Long term investment and sustainable growth

4/ SRI definitions with Frenchsif, AFG (French Asset Management Industry)

5/ Guidances for euro Sri label

6/ESG performances indicators measurement

7/SRI week (annually)

- ☐ Shareholder Association for Research and Education (Share)
- ☒ United Nations Environmental Program Finance Initiative (UNEP FI)

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

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

- ☒ United Nations Global Compact

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]

Parent company

☒ Other collaborative organisation/initiative, specify

ORSE, FDIR, SFAF

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]

1/ SRI Guide book publication (2010-2012)

2/ Workshop on sector indicators (banks)

- ☐ Other collaborative organisation/initiative, specify  
☐ Other collaborative organisation/initiative, specify  
☐ Other collaborative organisation/initiative, specify

☐ No

OA 11	Mandatory	Core Assessed	PRI 4
OA 11.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.		
<input checked="" type="radio"/> 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]

- 1/ Training for institutionals clients (ANCV, Prefon)
- 2/ Financial support to FIR : frenchsif/pri academic research awards
- 3/ financial support to fdir chair of afg
- 4/ encouraged the adoption of the pri (prefon, afg, ircantec - on ongoing process)

**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

- ☒ Yes, individually
- ☒ Yes, in collaboration with others

**OA 12.2**

Select the methods you have used.

- ☒ Endorsed written submissions to governments, regulators or standard-setters developed by others
- ☐ Drafted your own written submissions to governments, regulators or standard-setters
- ☒ Participated in face-to-face meetings with government members or officials to discuss policy
- ☐ Other, specify

**OA 12.3**

Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.

☒ Yes, publicly available

provide URL
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[http://www.afg.asso.fr/index.php?option=com\\_docman&Itemid=234&lang=fr](http://www.afg.asso.fr/index.php?option=com_docman&Itemid=234&lang=fr)

provide URL
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<http://www.frenchsif.org/isr/nos-actions/plaidoyer/>

☐ No

☐ No

## ESG issues in asset allocation

OA 13	Voluntary	Descriptive	PRI 1
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**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
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**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
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**OA 18.1** Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

First, Groupama AM's innovative approach is to integrate ESG analysis into financial analysis. Financial and non- financial analysts work together and publish unique report that integrates both financial and non- financial analysis. Non- financial analysis may have a strong impact on both the equity recommendation and/or the credit recommendation. For example, a very negative rating on corporate governance prohibits the analysts to have a "BUY" recommendation and a "POSITIVE" perspective for the credit. Second, Groupama AM has been working for years on an in-house human capital methodology. This methodology has been enhanced in 2013 by the introduction of the meetings with HR managers prior to all companies analysis.

## Assurance of responses

OA 19	Voluntary	Additional Assessed	General
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**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

**OA 19.3**

Describe the steps you have taken to review, validate and/or assure the content of your reported information.

Relevant departments were interviewed about certain issues. Internal documents and presentations were consulted as well as web site. All reported information have been validated by Director of Research and the CIO.

☐ No

# Groupama Asset Management

## 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
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### 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
- ☐ Active – quantitative (quant)
- ☒ Active – fundamental and other active strategies

#### % of internally managed listed equities

- ☐ <10%
- ☐ 10-50%
- ☒ >50%

LEI 02	Voluntary	Descriptive	PRI 1
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### LEI 02.1

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

The SRI approach used for SRI Euro Equity management is a « Best in Class » approach. This approach aims at favouring the companies which adopt, within each sector, the best ESG practices. All sectors are represented; our Best in Class approach does not exclude any sector. We recently made an effort to improve our SRI approach by incorporating more ESG sector concerns in the early planning stages. Sectors are measured against objective, consistent and relevant ratings criteria for each sector.

We rank all companies based on a quantitative and a qualitative analysis, and create an eligible universe of 40% of the total companies studied. Extra-financial analysts are responsible of companies fundamental analysis and the ranking that leads to the determination of the investment universe of the fund. A specialized SRI equity portfolio manager is in charge of implementing the investment process to construct the final portfolio.

As SRI has transitioned towards RI, Groupama AM teams have developed a sustainable quality matrix. This cross-disciplinary tool aimed at all equity management underscores the quality of the company's long-term strategy by analysing criteria such as governance, client capital, human capital, natural capital and brand. This matrix is completed for each security thanks to collaboration between analysts and managers.

## ESG incorporation in actively managed listed equities

## Implementation processes

LEI 03	Mandatory	Gateway/Core Assessed	PRI 1
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### 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

Percentage of active listed equity to which the strategy is applied (estimate +/- 10%)	%
	100

- ☐ 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.

#### The aim of the Groupama AM RI strategy is to respond to three objectives:

1/ To favour the integration of ESG challenges by making all managers aware of the need to take these criteria into account in their selection of issuers in the compiling and management of portfolios.

2/ To publicise RI to all areas of the management company (management, marketing/sales/reporting/communication, etc.) in order to promote Responsible Investment to the Group's institutional and individual investors, and distribution networks; but also, more generally, to the financial industry.

3/ To accompany our institutional clients in their own approach to sustainable development, and to make Responsible Investment a management tool for their engagement as a responsible investor, in line with the principles of action of their policy of Corporate Social Responsibility - CSR

**LEI 03.3**

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

Our methodology consists on the merger of two complementary approaches:

1. A quantitative approach: an ESG ranking methodology, by sector, to evaluate all companies of the investment universe (scoring tables)
2. A qualitative approach: a thorough extra-financial analysis made by our analysts. Conclusions of these analyses are integrated to the fundamental analysis, gathering both financial and extra-financial analysis. Furthermore, Groupama AM exclude companies which are subject of several material and recurring controversies on ESG issues. We receive specific researches on those issues from external researches providers and we complete it by in-house qualitative analysis

**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

**Indicate who provides this information**

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

ESG research is obtained from several sources : 1/ ESG data providers 2/ Company's reports/web sites 3/ companies meetings 4/ brokers research reports.

SRI analysts use it systematically for writing in-house reports on companies under review. These reports are made in collaboration with financial analysts and are available to asset managers. ESG ratings coming from ESG data providers are used for the quantitative extra-financial ranking methodology. Two in-house methodologies have been developed on corporate governance and human capital analysis in order to communicate harmonized and detailed data and analysis to asset managers. Sector related analysis and issues specific analysis are used to produce the annual sector reviews for the core sectors under coverage.

**LEI 04.3**

Indicate if you incentivise brokers to provide ESG research.

☒ Yes

**LEI 04.4**

Describe how you incentivise brokers.

Our brokers review include an ESG component.

☐ No



LEI 05	Voluntary	Additional Assessed	PRI 1
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LEI 05.1	Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.
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☒ Engagement

- ☒ We have a systematic process to ensure the information is made available.
- ☐ We occasionally make this information available.
- ☐ We do not make this information available.

☒ (Proxy) voting

- ☒ We have a systematic process to ensure the information is made available.
- ☐ We occasionally make this information available.
- ☐ We do not make this information available.

## (A) Implementation: Screening

LEI 06	Mandatory	Descriptive	PRI 1
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LEI 06.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.
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### Type of screening

☒ Negative/exclusionary screening

#### Screened by

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

#### Description

- Personal mines and/or cluster bomb business
- E&S controversies in material level
- Business ethic controversies in material level

☒ Positive/best-in-class screening

#### Screened by

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

	Description
--	-------------

Scores ranking + qualitative review

- ☐ Norms-based screening

<b>LEI 06.2</b>	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.
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#### Negative screening

1/Groupama AM excludes all investments in companies that have activities in the personal mines and/or cluster bomb businesses.

2/ Concerning active equity investments, Groupama AM exclude companies which are subject of several material and recurring controversies on ESG issues. We receive specifics researches on those issues from external researches providers and we complete it by in-house qualitative analysis (point 2).

LEI 06.3	Additional information. [Optional]
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#### Positive Best-in class screening

Our in-house Extra-Financial analysts monitor the ESG ratings stemming from our proprietary ESG scorecard. They work in order to improve our ESG scoring methodology: activation and/or integration of new criteria, new weightings etc. Finally, they complete the evaluation given by the ESG scorecard with a qualitative extra-financial assessment which relies among others on the one to one meetings with companies. They are also in charge of the relation with our extra-financial databases providers and evaluate the quality of the information they provide.

No sector is ruled out. However, we recently made an effort to improve our SRI approach by incorporating more ESG sector concerns in the early planning stages. Sectors are measured against objective, consistent and relevant ratings criteria for each sector. The top 40% of the best-rated stocks in each sector is eligible. In complement of the eligible universe, we have a "Watch List " : a selection of companies based on their positive trends in terms of CSR policy. Selection is done through a quantitative methodology completed by a qualitative stock selection done during a quarterly SRI committee (with SRI analysts and SRI fund managers).

The clients are regularly informed through quarterly reporting's about all changes made.

LEI 07	Mandatory	Core Assessed	PRI 1
LEI 07.1	Indicate which processes your organisation uses to ensure that screening is based on robust analysis.		
	<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies <input type="checkbox"/> A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions <input checked="" type="checkbox"/> A periodic review of the quality of the research undertaken or provided is carried out <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above		
LEI 08	Voluntary	Additional Assessed	PRI 1

<b>LEI 08.1</b>	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

☐ Occassional

☒ 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

<b>LEI 08.2</b>	If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.
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Pre trade : An automated system prevent investment managers from investing in excluded bonds at each order placed.

Post trade : Checks are performed on the weekly basis. Any exceeding are reported to investment managers, who are incentive to sell the bonds which meet the exclusion criteria's.

## (C) Implementation: Integration of ESG issues

<b>LEI 10</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1</b>
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**LEI 10.1**

Describe how you integrate ESG factors into investment decision making processes.

**A dual approach**

1/ An approach founded on the progressive spread of the incorporation of the ESG challenge principles and the application of the principles of action of a Responsible Investor - RI.

For the management of equities, the Research department, which includes macro-economic, fundamental and credit analysis, has also included extra-financial analysis since 2003 covering European issuers; in this way, the recommendations from the macro and fundamental analysis take into account the main extra-financial challenges and risks (country/sector/issuer).

This approach is characterised by:

- access to macro and fundamental studies incorporating extra-financial informations
- access to the quantitative ESG rating of issuers,
- ex-post measuring of objectives for the ESG quality of portfolios and their monitoring

2/ A more specific approach to SRI companies, constructed according to a structured process of SRI management starting from a universe of eligible investments; these result from the conclusions of SRI committees that combine the results of quantitative ESG analysis and the recommendations of qualitative macro and fundamental analysis.

Groupama AM's expertise and methodology developed for over 10 years and a process revolving around:

- a quantitative ESG extra-financial analysis methodology from 'Country' and 'Sectoral' analysis grids for the European issuers
- the formulation and updating of a universe of eligible investment at the SRI committees, resulting from a combination of the results of the quantitative ESG analysis and recommendations of the macro and fundamental analysis integrating the main ESG challenges in terms of medium- and long-term risks and opportunities (environmental approach, sectoral and regulatory dynamics, management quality, etc.)
- a hierarchy of private issuers of capital by sector for equities management,
- application of management processes from a universe of eligible investment structured hierarchically in this way

**LEI 11****Mandatory****Core Assessed****PRI 1****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.
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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
- ☒ 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.
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- ☒ 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 13	Voluntary	Additional Assessed	PRI 1
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<b>LEI 13.1</b>	Indicate into which aspects of investment analysis you integrate ESG information.
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- ☒ (Macro) economic analysis
  - ☐ Systematically
  - ☒ Occasionally
- ☒ 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
  - ☐ Systematically
  - ☒ Occasionally

<b>LEI 13.2</b>	Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis.
-----------------	--

- ☒ Adjustments to income forecasts (sales, earnings, cash flows)
- ☐ Adjustments to valuation tools (discount rates, return forecasts, growth rates)
- ☐ Other adjustments to fair value projections, specify
- ☐ Other, specify

## Outputs and outcomes

<b>LEI 15</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 1</b>
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<b>LEI 15.1</b>	Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.
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- ☒ Screening
- ☒ Integration of ESG issues

	Select which of these effects followed your ESG integration:
--	--

- ☒ 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 checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No

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

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

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

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

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

First, all portfolio managers receive an ex post ESG score for all portfolios that show the ESG performance of their portfolio. Second, financial and non-financial analysts cannot give a "BUY" recommendation to companies that receive the worst corporate governance rating; sending a strong message to portfolio managers about the governance profile of the company. Third, "core" SRI portfolios can only be composed of the "ESG best in class" companies (on a sector basis), i.e. the companies that have the best performance in integrating ESG issues.

LEI 16.3	Additional information.
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The answers above are related to actively managed funds.

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.

☒ ESG issue 1

ESG issue and explanation
Material controversies on energy sector
ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies
Impact on investment decision or performance
No position on major issuers within the sector

☒ ESG issue 2

ESG issue and explanation
Problematic governance
ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Integration <input checked="" type="checkbox"/> Combination of ESG incorporation strategies
Impact on investment decision or performance
Stock can be exclude from eligible universe

☒ ESG issue 3

ESG issue and explanation
Favour sector that will benefit from exposition to ESG thematic : ex Energy efficiency
ESG incorporation strategy applied
<input type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies
Impact on investment decision or performance
Overweight sector in portfolio in long term view

☐ ESG issue 4

☐ ESG issue 5

LEI 17.2	Additional information.
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The answers above are related to actively managed funds

## 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.groupama-am.com/com\\_eng/sri/esg-integration](http://www.groupama-am.com/com_eng/sri/esg-integration)

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

☐ Yes

☒ No

LEI 18.3	Indicate the information your organisation proactively discloses to clients/ beneficiaries and/or the public regarding your approach to ESG incorporation.
----------	--

Reporting to public	Reporting to clients/beneficiaries
<input checked="" type="radio"/> Broad approach to ESG incorporation <input type="radio"/> Detailed explanation of ESG incorporation strategy used	<input type="radio"/> Broad approach to ESG incorporation <input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used

<b>LEI 18.4</b>	Indicate how frequently you typically report this information.
---------------------	--

Reporting to public	Reporting to clients/beneficiaries
<input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Between quarterly and annually <input type="radio"/> Less frequently than annually <input type="radio"/> Other, specify	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Between quarterly and annually <input type="radio"/> Less frequently than annually <input type="radio"/> Other, specify

- ☐ We disclose it to clients and/or beneficiaries only  
☐ We do not proactively disclose it to the public and/or clients/beneficiaries

# Groupama Asset Management

## 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.		

At Groupama AM, shareholder commitment is not a question of activism; it is any deliberate step on the part of one or more investors to demand that certain companies commit to improving their ESG practices. This commitment manifests itself in several ways:

1/ Frank and recurring discussions with the senior management of major European companies are held on a regular basis. Financial and extra-financial analysts are present together at all meetings with companies' management. This provides an ideal opportunity to question companies on ESG issues. At the same time, while conducting research, special meetings may be organised at the request of Groupama AM with sustainable development and HR managers.;

2/ A stringent voting policy in place since 2001

3/ In addition to its votes at general shareholders' meetings, Groupama AM is able to discuss resolutions ahead of time to be presented at the meetings

4/ Meetings with HR managers to discuss and to better understand HR related 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
<b>Individual/Internal staff engagements</b>	<input checked="" 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
<b>Collaborative engagements</b>	<input checked="" 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
<b>Service provider engagements</b>	<input checked="" 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 type="checkbox"/> We do not engage via service providers

## Process

### Process for engagements run internally

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

☉ Yes

LEA  
03.2

Describe how you identify and prioritise engagements.

The main objective of our engagement policy is to convince companies to publish information on material ESG issues. Our engagement strategy goes beyond voting at AGM resolutions as it includes also raising ESG issues with management that are not part of AGMs' agenda. This dialogue is done all the yearlong through meeting with management.

☐ No

LEA 04

Mandatory

Core Assessed

PRI 2

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 keep a record of all meetings with companies. This record contains questions and answers; which allow us to follow up with companies at future meetings. Last year, we met 68 companies in the context of the financial and extra-financials one to one.

☐ 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

LEA  
05.2

Describe how you identify and prioritise collaborative engagements.

Groupama AM participates in and leads different cross-industry initiatives in three levels :

**Local level** : the implementation, in 2010, at the behest of the Forum for Responsible Investment (FIR) of a new tool for dialogue with companies over CSR issues, the "CorDial" (Corporate Dialogue), comes under this logic. Groupama AM has invested a lot into this approach, notably by leading a working group about how companies' social policies have evolved during the crisis. This process has continued in 2012, when a working group on environmental issues has been set up. Research on how environmental risk is addressed by companies will be used to check consistency between environmental reporting and risk assessment as described in their reference documents.

**European level** : involvement in the workshops on the Euro Transparency Code update and on the ESG disclosure project.

**International level** : in 2013 Groupama AM has joined the PRI Clearinghouse platform on the subject of HR management focuses on employee relations. Besides, Groupama AM is supporting a shareholders initiative "CEO to worker pay ratio disclosure".

☐ 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.

In general terms, objectives are defined by workshops groups where we are involved. All collaborative engagement activities are monitored and reported on internal data basis. Example of progress evaluation : SRI definition has been reincorporated on the Transparency Code answer for SRI UCITS funds as well as labelling process.

☐ 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 checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

**LEA  
09.2**

Additional information.

No formal process, but sharing of information in most cases : most of the meetings are held with portfolio managers.

**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
<b>Individual / Internal staff engagements</b>	<input checked="" 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 type="radio"/> No, we do not track and cannot estimate our engagements
<b>Collaborative engagements</b>	<input checked="" 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 type="radio"/> No, we do not track and cannot estimate our engagements

## Outputs and outcomes

<b>LEA 11</b>	<b>Mandatory to Report Voluntary to Disclose</b>	<b>Core Assessed</b>	<b>PRI 2</b>
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<b>LEA 11.1</b>	Indicate the number of companies with which your organisation engaged during the reporting year.
-----------------	--

	<b>Number of companies engaged</b> (avoid double counting, see explanatory notes)
Individual / Internal staff engagements	99
Collaborative engagements	0

<b>LEA 11.2</b>	Indicate what percentage of your engagements were comprehensive during the reporting year. [Optional]
-----------------	---

Type of engagement	<b>% Comprehensive engagements</b>
Individual / Internal staff engagements	<input checked="" type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None
Collaborative engagements	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None

<b>LEA 11.3</b>	Indicate what percentage of your collaborative engagements you were a leading organisation during the reporting year. [Optional]
-----------------	--

Type of engagement	% Leading role
Collaborative engagements	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> None

<b>LEA 12</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 2</b>
---------------	------------------	----------------------------	--------------

<b>LEA 12.1</b>	Indicate if your engagements in the reporting year covered E, S and/or G issues.
-----------------	--

Type of engagement	Coverage
Individual / Internal staff engagements	<input 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

<b>LEA 12.2</b>	Provide an estimated breakdown by E, S and/or G issues.
-----------------	---

	Individual / Internal staff engagements
--	---

	% Social only
--	---------------

25

	% Corporate Governance only
--	-----------------------------

6

	% Overlapping ESG issues
--	--------------------------

69

**100%**

	Collaborative engagements
--	---------------------------

	% Overlapping ESG issues
--	--------------------------

100

**100%**

<b>LEA 13</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
---------------	------------------	--------------------	--------------

<b>LEA 13.1</b>	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.
-----------------	--

☐ Yes

☒ No

<b>LEA 14</b>	<b>Voluntary</b>	<b>Descriptive</b>	<b>PRI 2</b>
---------------	------------------	--------------------	--------------

<b>LEA 14.1</b>	Provide examples of the engagements that your organisation carried out during the reporting year.
-----------------	---

☒ Add Example 1

Topic or ESG issue	HR practices
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	3. Evaluate HR practices 4. Encourage to better HR reporting
Scope and Process	<ul style="list-style-type: none"> <li>We engaged with 25 companies</li> <li>We conducted meetings and/or conference calls with Head of RH</li> </ul>
Outcomes	4 companies asserted that they will try to implement our recommendations

☒ Add Example 2

Topic or ESG issue	Corporate governance
Conducted by	<input checked="" type="checkbox"/> Individual / Internal <input type="checkbox"/> Collaborative
Objectives	Present our voting policy principles and encourage companies to improve corporate governance practices
Scope and Process	We engaged with 6 companies prior AGM
Outcomes	One company said that it will consider changing its standards recording to our recommendations

☒ Add Example 3

Topic or ESG issue	Transparency in consideration of ESG criteria by asset management companies
Conducted by	<input type="checkbox"/> Individual / Internal <input checked="" type="checkbox"/> Collaborative
Objectives	Implementation of strengthening SRI legislation (224 article)
Scope and Process	We worked at AFG workshop and FIR workshop groups
Outcomes	<p>The results have been implemented in the beginning at 2013 to with :</p> <ul style="list-style-type: none"> <li>• description of the RI methodology on the website</li> <li>• accounting of the RI assets integrating ESG issues</li> <li>• ratios disclosure of RI assets against total assets</li> </ul>

- ☐ Add Example 4  
☐ Add Example 5  
☐ Add Example 6  
☐ Add Example 7  
☐ Add Example 8  
☐ Add Example 9  
☐ Add Example 10

## Communication

LEA 15	Mandatory	Core Assessed	PRI 2,6
--------	-----------	---------------	---------

LEA 15.1	Indicate whether your organisation proactively discloses information on its engagements.
----------	--

☒ We disclose it publicly

	please provide URL
--	--------------------

[http://www.groupama-am.com/com\\_eng/sri/](http://www.groupama-am.com/com_eng/sri/)

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

☒ 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.

(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).		

The annual general meeting (AGM) offers a unique opportunity for companies to communicate with and be held to account by their shareholders, which implies and requires a high level of transparency. Voting at shareholder AGMs is an integral part of the management process and a key component in Groupama AM's RI strategy, particularly with regard to corporate dialogue and engagement on matters of governance.

Compliance with good standards of governance is essential for management bodies to operate effectively, supporting long-term investment growth. In Groupama AM's view, the quality of governance is often an early indicator of risk: companies with "bad governance" present an increased risk of bad management of their operational, reputational and financial risks. If these risks materialise, this may have a significant impact on the performance of the company's assets.

The voting policy is reviewed every year to take into consideration any legal and regulatory developments, changes in codes of governance and best practices, as well as recommendations from internal audits. Groupama AM takes a pragmatic approach, which means that the application of the voting policy can be adapted in line with the specific circumstances of each company.

## 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]
----------	-----------------------------------

Fund managers use proxy advisor's services but they don't follow systematically all voting recommendations. They make their own voting decisions according to our own voting policy or/and our clients requests/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:
- ☐ 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.
----------	--

We are applying our best effort in order to register our votes properly, but we don't have a confirmation process.

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 20.3	Additional information. [Optional]
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We have no more securities lending programme. When we did, we recalled every security for voting.

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



<b>LEA 21.1</b>	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

When we meet companies we make them know how we plan to vote.

☐ No  
☐ Not applicable as we and/or our service providers do not abstain or vote against management recommendations

## Outputs and outcomes

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

<b>LEA 22.1</b>	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  
☒ We do not track or collect this information

<b>LEA 22.3</b>	Additional information. [Optional]
-----------------	------------------------------------

The vote cast should be very close to 100% in our view, but we don't track this information.

LEA 23	Voluntary	Descriptive	PRI 2
--------	-----------	-------------	-------

<b>LEA 23.1</b>	Indicate if you track the voting instructions that you and/or your third party have issued on your behalf.
-----------------	--

- ☒ Yes, we track this information

<b>LEA 23.2</b>	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> 79
Against (opposing) management proposals	<div> <div></div> <div>%</div> </div> 21
Abstentions	<div> <div></div> <div>%</div> </div> 0

100%

☐ 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.
----------	---

☐ Yes

☒ No

## 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.groupama-am.com/com\\_eng/sri/shareholder-engagement](http://www.groupama-am.com/com_eng/sri/shareholder-engagement)

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

# Groupama Asset Management

## Reported Information

### Public version

#### Direct - Fixed Income

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## 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
- ☐ 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
- ☐ 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 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%
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 type="radio"/> <10% <input checked="" 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

Our Euro SRI corporate bond process is based on a Best-in-Class approach. We use this positive approach to overweight in portfolio companies that have the best ESG practices and exclude from this investment universe the companies that have the worst practices. Extra-financial analysts are responsible of companies fundamental analysis and the ranking that leads to the determination of the investment universe of the fund. A specialized SRI corporate bonds portfolio manager is in charge of implementing the investment process to construct the final portfolio.

## Fixed Income - Government

Our Euro SRI government bond process is based on a Best-in-universe approach. Governments of the Euro zone are ranked according to their ESG practices, analysed by our extra-financial analysts. We do not exclude any issuer but overweight government with best practices and underweight the one that have worst practices. A specialized SRI government bonds portfolio manager is in charge of implementing the investment process to construct the final portfolio.

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

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

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

Total actively managed fixed income - corporate
---

100%

<b>FI 04.2</b>	Describe your primary reasons for choosing a particular incorporation strategy.
----------------	---

**The aim of the Groupama AM RI strategy is to respond to three objectives:**

1/ To favour the integration of ESG challenges by making all managers aware of the need to take these criteria into account in their selection of issuers in the compiling and management of portfolios.

2/ To publicise RI to all areas of the management company (management, marketing/sales/reporting/communication, etc.) in order to promote Responsible Investment to the Group's institutional and individual investors, and distribution networks; but also, more generally, to the financial industry.

3/ To accompany our institutional clients in their own approach to sustainable development, and to make Responsible Investment a management tool for their engagement as a responsible investor, in line with the principles of action of their policy of Corporate Social Responsibility - CSR

<b>FI 04.3</b>	If assets are managed using a combination of ESG incorporation strategies, describe briefly how these are used in combination. [Optional]
----------------	---

**Our methodology consists on the merger of two complementary approaches:**

5. A quantitative approach: an ESG ranking methodology, by sector, to evaluate all companies of the investment universe (scoring tables)
6. A qualitative approach: a thorough extra-financial analysis made by our analysts. Conclusions of these analyses are integrated to the fundamental analysis, gathering both financial and extra-financial analysis. Furthermore, Groupama AM exclude companies which are subject of several material and recurring controversies on ESG issues. We receive specifics researches on those issues from external researches providers and we complete it by in-house qualitative analysis

<b>FI 05</b>	<b>Voluntary</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
--------------	------------------	----------------------------	--------------



**FI 05.1**

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

**Type of ESG information**

- ☒ Raw ESG company data

Describe who provides this information.

In-house ESG analysts; data providers

- ☒ Issuer-related analysis or ratings

Describe who provides this information.

In-house ESG analysts; Sell-side; ESG research providers .

- ☒ Sector-related analysis or ratings

Describe who provides this information.

In house ESG analysts; Brokers; data providers

- ☒ Country-related analysis or ratings

Describe who provides this information.

In house ESG analysts; Brokers; data providers

- ☒ Screened bond list

Describe who provides this information.

ESG data providers; In-house ESG analysts

- ☒ Issue-specific analysis or ratings

Describe who provides this information.

In-house ESG analysts ;Sell-side; Specialized agencies

☐ 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.

ESG research is obtained from several sources :

1/ ESG data providers

2/ Company's reports/web sites

3/ companies meetings

4/ brokers research reports.

SRI analysts use it systematically for writing in-house reports on companies under review. These reports are made in collaboration with financial analysts and are available to asset managers. ESG ratings coming from ESG data providers are used for the quantitative extra-financial ranking methodology. Two in-house methodologies have been developed on corporate governance and human capital analysis in order to communicate harmonized and detailed data and analysis to asset managers. Sector related analysis and issues specific analysis are used to produce the annual sector reviews for the core sectors under coverage.

## (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
-------------

- Personal mines and/or cluster bomb business
- E&S controversies in material level
- Business ethic controversies in material level

☒ Positive/best-in-class screening

**Screened by**

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

Description
-------------

Scores ranking + qualitative review

☐ Norms-based screening

**Negative screening**

1/Groupama AM excludes all investments in companies that have activities in the personal mines and/or cluster bomb businesses.

2/ Concerning active corporate fixed income investments, Groupama Am exclude companies which are subject of several material and recurring controversies on ESG issues. We receive specifics researches on those issues from external researches providers and we complete it by in-house qualitative analysis (point 04.3).

The clients are regularly informed through quarterly reporting's about all changes made.

**Best-in class screening**

Issuers are ranked function of their E, S and G ratings. An automatic alimentation from external extra-financial databases of the in-house scoring tables are made. These scoring tables and the weighting of each pillar and sub-criteria are reviewed and updated on a yearly basis.

Within each sector, issuers are ranked by quintile in function of their ESG ratings. Issuers rated quintile 1 have the best ESG evaluation within each sector. Issuers rated quintile 5 have the worst ESG evaluation within each sector. Moreover, controversial issuers are downgraded to the quintile 5, the worst rating issuers list.

The ranking by quintile is then qualitatively reviewed by Groupama Asset Management's extra-financial analysts and SRI Credit Portfolio Manager during the SRI Credit Committee meeting. This qualitative review leads to a new issuers quintile ranking (SRI final Quintile).

In the context of the transition from SRI to RI, an approach has been developed to target the major ESG risks. This approach will be able to better predict the occurrence of elevated risks that lead to much larger spreads and even to an issuer's default: account integrity and risk of fraud, overall risk and reward transparency, liability and consolidation of power, risks to one's reputation and operational risks. These broad criteria were chosen from a universe of 800 issuers.

The clients are regularly informed through quarterly reporting's about all changes made.

**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
- ☐ None of the above

**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.

- ☒ Checks are performed to ensure that issuers meet the funds' screening criteria. These checks are:
  - ☒ Systematic
  - ☐ Occasional
- ☒ Automated IT systems prevent investment managers from investing in excluded bonds 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

**FI 08.2**

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

- Pre trade : An automated system prevent investment managers from investing in excluded bonds at each order placed.
- Post trade : Checks are performed on the weekly basis. Any exceeding are reported to investment managers, who are incentive to sell the bonds which meet the exclusion criteria's.

## (C) Implementation: Integration of ESG factors

**FI 10****Voluntary****Descriptive****PRI 1**

**A dual approach**

1/ An approach founded on the progressive spread of the incorporation of the ESG challenge principles and the application of the principles of action of a Responsible Investor - RI.

The Research department, which includes macro-economic, fundamental and credit analysis, has included extra-financial analysis since 2003 covering European issuers; in this way, the recommendations from the macro and fundamental analysis take into account the main extra-financial challenges and risks (country/sector/issuer).

This approach is characterised by:

- access to macro and fundamental studies incorporating extra-financial
- access to the quantitative ESG rating of issuers,
- ex-post measuring of objectives for the ESG quality of portfolios and their monitoring

2/ A more specific approach to SRI companies, constructed according to a structured process of SRI management starting from a universe of eligible investments; these result from the conclusions of SRI committees that combine the results of quantitative ESG analysis and the recommendations of qualitative macro and fundamental analysis.

Groupama AM's expertise and methodology developed for over 10 years and a process revolving around:

- a quantitative ESG extra-financial analysis methodology from 'Country' and 'Sectoral' analysis grids for the European issuers: a/-sovereign debts, public authorities and other supranational organisations denominated in euros b/in private European capital
- a quantitative ESG ranking of issuers of debt and capital
- the formulation and updating of a universe of eligible investment at the SRI committees, resulting from a combination of the results of the quantitative ESG analysis and recommendations of the macro and fundamental analysis integrating the main ESG challenges in terms of medium- and long-term risks and opportunities (environmental approach, sectoral and regulatory dynamics, management quality, etc.)
- a classification in quintiles of issuers of private debt or as groups of issuers of similar performance according to their ESG profile for sovereign states and public authorities for bond management and,
- application of management processes from a universe of eligible investment structured hierarchically in this way

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

FI 12	Voluntary	Descriptive	PRI 1
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FI 12.1	Indicate which processes your organisation uses to ensure that ESG integration is based on a 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
- ☒ 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

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

## Fixed income - Government

FI 13	Mandatory	Core Assessed	PRI 1
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**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 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

**FI 13.4**

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

We have our own in-house methodology, in place since 2008 . An ESG evaluation is performed for each of the 27 European Union countries, taking into account: 10 environmental criteria, such as green growth, energy efficiency and carbon footprint - 16 social criteria, such as human capital/labour market, demographics, social cohesion, and lifestyles - 9 governance criteria, such as institutional efficiency and ethics. The ESG country analysis serves either to temper or reinforce the portfolio position for each country, thereby supplementing the financial strategy. The economic research team, collaborating with an extra-financial analyst, is in charge of analysing the results of this methodology.

☐ No



## Outputs and outcomes

FI 15	Voluntary	Descriptive	PRI 1
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**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	Integration of ESG issues
<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No

b) Reduced funds' risk or volatility

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

c) Improved funds' ESG performance

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

#### Fixed Income - Government

#### a) Impacted funds' financial performance

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

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

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

#### c) Improved funds' ESG performance

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

<b>FI 16.2</b>	Describe how you are able to determine these outcomes and your actual performance.
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First, all portfolio managers receive an ex post ESG score for all portfolios that show the ESG performance of their portfolio. Second, financial and non-financial analysts cannot give a "POSITIVE" recommendation to companies that receive the worst corporate governance rating; sending a strong message to portfolio managers about the governance profile of the company. Third, core SRI portfolios are managed according to a "best in universe" process i.e. companies with the best ESG performance being overweight in the portfolio and the companies with the worst ESG performances being underweight or excludes.

Furthermore, concerning Fixes Income Government funds, we calculate its ESG score relative to the index and then we compare it to the score calculated for the same funds but not impacted by ESG strategy.

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 checked="" type="checkbox"/> Corporate	
<input type="checkbox"/> Government	
	ESG issue and explanation
	Lack of social progress of an issuer
	ESG incorporation strategy applied
<input type="checkbox"/> Screening	
<input type="checkbox"/> Thematic	
<input type="checkbox"/> Integration	
<input checked="" type="checkbox"/> Combination of ESG incorporation strategies	
	Impact on investment view or performance
	Underweighting of this issuer

☒ ESG issue 2

	Fixed Income - Corporate and/or Government
<input checked="" type="checkbox"/> Corporate <input type="checkbox"/> Government	
	ESG issue and explanation
Problematic governance of an issuer	
	ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies	
	Impact on investment view or performance
Excluding or incentive to sell	

☒ ESG issue 3

	Fixed Income - Corporate and/or Government
<input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Government	
	ESG issue and explanation
Positive financial rating on a country but a low ESG score	
	ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies	
	Impact on investment view or performance
Less exposure on this country	

☐ ESG issue 4

☐ ESG issue 5

## Communication

FI 18

Mandatory

Core Assessed

PRI 2,6

FI 18.1

Indicate if your organisation proactively discloses information on your approach to ESG incorporation in all fixed income investments.

☒ We disclose it publicly

Provide URL

[http://www.groupama-am.com/com\\_eng/sri/esg-integration](http://www.groupama-am.com/com_eng/sri/esg-integration)

FI 18.2

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

☐ Yes

☒ No

FI 18.3

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

Reporting to public	Reporting to clients/beneficiaries
<input checked="" type="radio"/> Broad approach to ESG incorporation	<input type="radio"/> Broad approach to ESG incorporation
<input type="radio"/> Detailed explanation of ESG incorporation strategy used	<input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used

FI 18.4

Indicate how frequently you typically report this information.

Reporting to public	Reporting to clients/beneficiaries
<input type="radio"/> Quarterly or more frequently	<input checked="" type="radio"/> Quarterly or more frequently
<input checked="" type="radio"/> Between quarterly and annually	<input type="radio"/> Between quarterly and annually
<input type="radio"/> Less frequently than annually	<input type="radio"/> Less frequently than annually
<input type="radio"/> Other, specify	<input type="radio"/> Other, specify

☐ We disclose it to clients/beneficiaries only

☐ We do not proactively disclose it to the public and/or clients/beneficiaries

## Engagement in fixed income investments

### Fixed Income - Corporate

FI 19

Voluntary

Descriptive

PRI 2

**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.

Our engagement activity aims to lead the companies to a new level of higher social responsibility and to improve their ESG practices. For Groupama AM, the engagement activity revolves around three types of actions:

1/seeking permanent dialogue with the companies in which its portfolios are invested; because this is the best way of developing the companies' practices. Financial and extra-financial analysts are presents together at all meetings with companies' management. Each discussion is a special time to question the company about its main ESG challenges and understand how it is responding to them. At the same time, while conducting research, special meetings may be organised at the request of Groupama AM with sustainable development and Hr managers.

2/ participation in marketplace debates in which Groupama AM plays an important role in leading different think-tanks

3/ the realisation of studies and ad hoc works.

☐ 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.

☐ Yes☒ No