



**andera** PARTNERS

ACTION FOR CLIMATE  
AND SUSTAINABILITY

**RESPONSIBLE  
INVESTMENT  
POLICY**

JULY 2022



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# Introduction

## REGULATORY SCOPE

This policy covers all Andera Partners' investment activities. It enables us to meet the obligations of Regulation (EU) 2019/2088 of the European Parliament and Council of 27 November 2019 on the publication of sustainability information in the financial services sector ('Disclosure Regulation') and Article 29 of the French Energy-Climate Act.

## PRESENTATION OF THE APPROACH

Andera Partners, a French and European management company specialised in unlisted investments, aims to support entrepreneurs in their growth strategy. Andera Partners is a responsible and committed steward that endeavours to work towards maximising its positive contribution to all its stakeholders.

To formalise its commitment, Andera Partners is involved with several external initiatives and organisations:

### ■ SIGNATORY TO THE UN PRINCIPLES FOR RESPONSIBLE INVESTMENT (UNPRI) SINCE 2012



1. Integrating ESG issues in investment decision-making and analysis processes;
2. Being an active shareholder and incorporating ESG issues in shareholder policies and procedures;
3. Asking the companies in which we invest to be transparent about ESG issues;
4. Promoting the adoption and implementation of the Principles in the investment sector;
5. Cooperating to improve the effectiveness of our implementation of the Principles;
6. Reporting on our activities and progress in implementing the Principles.

### ■ SIGNATORY OF THE "INITIATIVE CLIMAT INTERNATIONAL" SINCE 2019



1. Recognising that climate change will have effects on the economy that represent risks and opportunities for companies;
2. Rallying to contribute, at their level, to the COP21 objective of limiting global warming to two degrees;
3. Contributing to reducing the greenhouse gas emissions of their portfolio companies and ensuring the sustainability of performance.

### ■ SIGNATORY OF THE FRANCE INVEST PARITY CHARTER SINCE 2020



1. In our management company :
  - Adopting more inclusive recruitment practices
  - Implementing measures to retain female talent in our management companies
2. In the companies we support: committing to monitoring parity
  - For venture, corporate venture and growth equity funds
  - For growth capital, buyout capital, infrastructure and private debt funds
3. Among investors in private equity funds





**GOVERNANCE  
AND  
DEDICATED  
RESOURCES**



# CSR Governance

The governance of Andera Partners is collegial and composed of a Management Board (two members), a Managing Partners (11 members representing the main activities of Andera Partners) and a Supervisory Board (3 experts in the sector, as independent members). The systematic and annual inclusion of CSR on the agenda of the Supervisory Board is planned from 2022.

Environmental, social and governance criteria have been incorporated in the rules of the Supervisory Board.

A CSR team, attached to the Management, is responsible for coordinating the implementation of the initiatives of the Climate & Sustainability Committee (composed of 3 partners) and for defining and deploying a CSR strategy for the management company and its portfolio companies.



Noëlla de Bermingham  
**Chief Sustainability Officer**

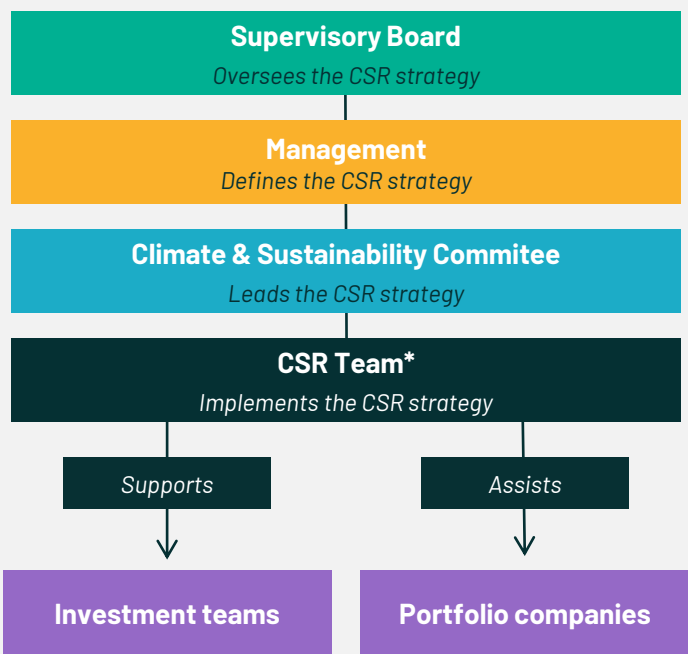


Elsa Baillet  
**Sustainability Officer**



**Climate & Sustainability Committee**  
Mayeul Caron – Partner  
Sofia Ioannidou – Partner  
Laurent Tourtois – Partner

## ORGANISATION OF CSR GOVERNANCE WITHIN ANDERA PARTNERS



\*The CSR team is composed of two FTEs, who account for 2.61% of Andera Partners' FTEs

## Internal training

In order to ensure ownership and dissemination of knowledge, the investment teams are trained each year on sustainability risks during our Climate & Sustainability Week: a week dedicated to CSR. Furthermore, a presentation of the CSR Reporting results is given to all employees. In addition to the Climate & Sustainability Week, Andera Partners' employees are trained or educated at least twice a year.

## Remuneration policy

The Andera Partners remuneration policy includes consideration of sustainability risks. It will be strengthened in the future. Andera Partners has set a performance-related remuneration approach so it does not encourage risk taking. Andera Partners' objective is to create a reasonable and appropriate remuneration framework and to ensure that employees are not encouraged to take risks that are excessive and/or inappropriate, including sustainability risks.

Any decision on the allocation of variable remuneration for a team or an individual employee takes into account the company and team's performance and will gradually incorporate ESG criteria, including in terms of sustainability risks.

For example, two teams have committed to linking their Carried Interest to CSR criteria in their latest fund. For the Andera MidCap 5 fund, 10% of the team's Carried Interest is conditional on meeting the SFDR Article 8 commitments. For the Infra 1 fund, 15% of the Carried Interest is conditional on achieving 20 impact KPIs. For both teams, if the commitments or KPIs are not met, then the share of Carried Interest associated will be paid to the Andera Partners Foundation.





II

## ENGAGEMENT STRATEGY

# Dialogue with companies

Our ambition as a responsible investor is to help the companies in which we invest to be sustainable in a world where social, societal and environmental issues are growing, in order to make CSR a strong strategic theme, a source of innovation, value creation and differentiating factor. Andera Partners sees dialogue and engagement as an important pillar of its relationship with portfolio companies. Andera Partners may assist portfolio companies in the implementation of their strategy, risk management, environmental and social policies and governance.

Indeed, supporting portfolio companies in the implementation of a CSR approach is an integral part of Andera Partners' strategy. This commitment to companies is detailed in Part III of this document.

All portfolio companies are eligible for the CSR support offered by Andera, and systematic support has been put in place with almost all portfolio companies (with the exception of companies being divested).

## ■ WITHIN GOVERNANCE BODIES

As part of its monitoring role, Andera Partners is responsible for attending, where appropriate, meetings of the company's governing bodies and at general meetings. If the investment conditions allow it, Andera Partners systematically requests a seat on the governance bodies of unlisted companies.

## ■ USING THE VOTING POLICY AND THE SHAREHOLDER ENGAGEMENT POLICY

The Andera Partners voting policy aims to promote company projects, value creation and the development of economic activities under sustainable and fair conditions. Andera Partners will promote the implementation of good governance practices, business ethics, social and environmental policies. Andera Partners will vote in the exclusive interest of the investors of the funds it manages.

The Shareholder Engagement Policy, which aims to present Andera Partners' strategy in terms of shareholder engagement and long-term investment, is formalised in a document published on the Andera Partners website.





# INTEGRATING SUSTAINABILITY RISKS AND PRINCIPAL ADVERSE IMPACTS INTO THE CORE OF THE INVESTMENT CYCLE



# General presentation

Due to the diversity of the sizes and sectors of the companies in which Andera Partners invests, the integration of sustainability risks and the principal adverse impacts of investments on sustainability factors is carried out with a view to considering the materiality of the ESG stakes in relation to the business model.

This consideration of sustainability risks and principal adverse impacts is integrated and formalised for all Andera Partners funds at each stage of the investment cycle:

## 1. Investment

### EXCLUSIONS

- Application of sectorial and normative exclusions

### PRELIMINARY ANALYSIS OF THE OPPORTUNITY

- Analysis of the materiality of CSR issues and potential exposure to the UN Sustainable Development Goals
- Study of eligibility for the European Taxonomy

### PRE-ACQUISITION DUE DILIGENCE

- Internal or external analysis of risks and opportunities for opportunities and the main negative impacts
- Incorporation of the analysis' summary in the investment note for discussion during the Investment Board meeting

### SHAREHOLDER AGREEMENTS

- Incorporation of CSR clauses

## 2. Transformation

### SUPPORT FOR THE IMPLEMENTATION OF A CSR APPROACH

- Custom support for the implementation of a CSR approach
- Carbon Footprint assessment of portfolio companies and drawing up an action plan to reduce it

### MONITORING

- Annual CSR reporting including the measurement of the principal adverse impacts of investments (SFDR 'PAI' indicators)
- Annual sustainability risk mapping
- Production of annual reports including the consolidation of ESG data for each fund as well as a and a summary sheet for each company to identify areas for progress and improvement

## 3. Divestment

### TRANSMISSION

- Provision of relevant CSR information at the time of exit in order to value the efforts made during the holding period by the portfolio company.

The risk management framework is reviewed annually to ensure its relevance.

# 1. Integration of sustainability risks and key negative impacts of investments in the investment phase

## EXCLUSIONS

Systematic exclusion of companies affiliated with the sectors listed in Annex 2. In addition, any company that already has a high sustainability risk identified in the pre-investment phase that could impact the value of the investment (examples of major risks include physical or transition risks related to climate change, reputation or governance) and/or that has a high risk of adverse impact on sustainability factors is excluded.

## PRELIMINARY ANALYSIS OF THE CSR OPPORTUNITY

A pre-investment analysis grid has been developed internally and is now systematically deployed by all teams in the pre-investment phase. It includes:

- an estimate of the impact of an investment on the Sustainable Development Goals
- a pre-analysis of the potential eligibility of the investment opportunity for the European green taxonomy
- an analysis of the company's commitments
- an analysis of material sector- and industry-specific CSR issues (based on the SASB Materiality Map)
- an analysis of dependencies and impacts on Biodiversity
- a study of the exposure of the main sites to the physical risks of climate change

- |   |  |
|---|--|
| ▪ Supply Chain Management               | ▪ Product Design & Life cycle Management           |
| ▪ Labour Practices                      | ▪ Management of the Legal & Regulatory Environment |
| ▪ Access & Affordability                | ▪ Competitive Behaviour                            |
| ▪ Human Rights & Community Relations    | ▪ Critical Incident Risk Management                |
| ▪ Selling Practices & Product Labelling | ▪ Employee Health & Safety                         |
| ▪ Materials Sourcing & Efficiency       | ▪ Waste & Hazardous Materials Management           |
| ▪ Physical Impacts of Climate Change    | ▪ Air Quality                                      |
| ▪ Systemic Risk Management              | ▪ Employee Engagement                              |
| ▪ Product Quality & Safety              | ▪ Diversity & Inclusion                            |
| ▪ Customer Welfare                      | ▪ Business Model Resilience                        |
| ▪ Energy Management                     | ▪ Customer Privacy                                 |
| ▪ GHG Emissions                         | ▪ Data Security                                    |
| ▪ Water & Wastewater Management         | ▪ Business Ethics                                  |
| ▪ Ecological Impacts                    |  |



## PRE-ACQUISITION DUE DILIGENCE

CSR due diligence is systematically carried out prior to investment. Its modalities depend on the investment typology and the materiality of the sustainability issues as well as the categorisation of the funds. The objective is to analyse the risks, opportunities and possible adverse impacts on the target's sustainability factors.

Depending on the importance of the pre-identified sustainability issues, three approaches exist:

- **Internal CSR due diligence** based on a questionnaire sent to management (questions on social, environmental, societal, ethical and governance issues);
- **External CSR due diligence** on the main risks (social due diligence, HSE/Environmental due diligence in the event of significant materiality, in particular on climate issues, use of resources in relation to biodiversity, industrial risks and, more broadly, all forms of pollution in the air, soil or water);
- **Strategic due diligence** incorporating CSR at the heart of strategic and commercial analysis.

A summary of the conclusions of this due diligence is included in the investment memorandum presented to the Investment Committee. CSR due diligence is an integral part of the investment decision.

## SHAREHOLDER AGREEMENTS

The standard clauses in shareholders' agreements always include :

- CSR
- Anti-money laundering
- Anti-corruption

## 2. Transformation & CSR monitoring during the holding period

### SUPPORT FOR THE IMPLEMENTATION OF CSR APPROACHES

Andera Partners is committed to supporting portfolio companies in their progress throughout the life of the investment. Andera Partners is committed to supporting the companies in considering the best Social, Societal, Environmental, Ethical and Governance practices and preventing or mitigating the sustainability risks to which they may be exposed as well as the possible adverse impacts related to their activities.

Specific support is offered to portfolio companies by the Andera Partners CSR team, occasionally with the support of an external consultancy. The objective is to support management in defining a CSR roadmap with quantitative objectives.

The carbon footprint of each portfolio company is also measured annually (Scope 1, 2 and 3), either in detail or estimated where materiality is low or moderate. Andera Partners also encourages companies to define action plans specifically on the reduction of greenhouse gas emissions in order to limit companies' impact on climate change.

Similarly, Andera Partners will particularly encourage companies to identify their impact on the issue of biodiversity conservation and to define an action plan to reduce their footprint in case of materiality.

### MONITORING VIA ANNUAL CSR REPORTING

Since 2016, Andera Partners has carried out an annual analysis of the CSR performance of its portfolio companies, as part of a process of continuous improvement of the comprehensiveness, relevance and reliability of the data collected, in particular through the verification of CSR reporting by an external firm. This annual CSR reporting is carried out for the portfolios of all Andera Partners' activities and allows for annual monitoring of sustainability risks and the principal adverse impacts of investments on sustainability factors. CSR reporting covers more than 100 KPIs (including the regulatory indicators required by the SFDR) which cover, but are not limited to, the following items:



#### General information

Scope of the company, its activities, its customers and its turnover



#### Governance

Governance bodies, management, ethics and certifications



#### Supply chain

Supply chain organisation, sustainable procurement, suppliers



#### Social footprint

Workforce, absenteeism, accidentology, training and diversity



#### Environmental footprint

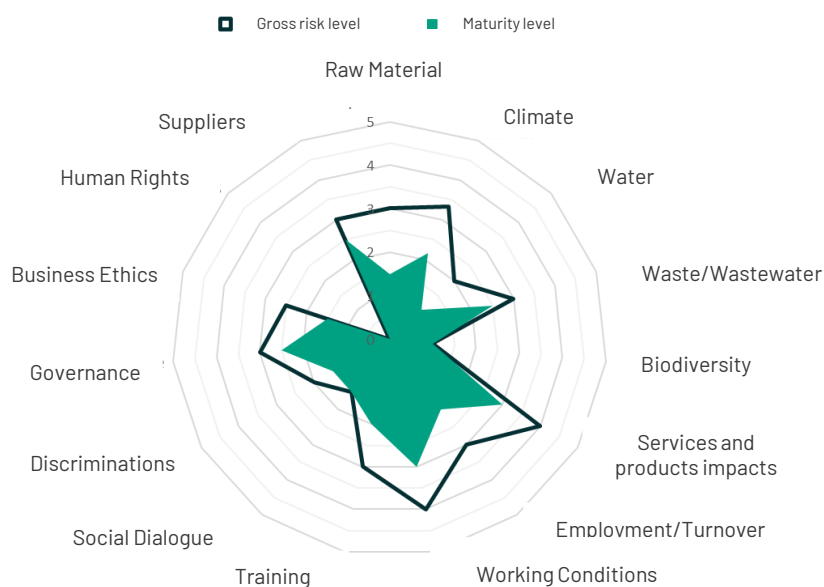
Energy consumption, water consumption, waste generated, transport, carbon footprint, biodiversity

## 2. Transformation & CSR monitoring during the holding period

### ANNUAL SUSTAINABILITY RISK MAPPING AND PRINCIPAL ADVERSE IMPACTS

CSR Reporting data allows for an annual assessment of the level of sustainability risk and the principal adverse impacts for companies and their level of maturity in dealing with these risks. The residual risk identified during this analysis corresponds to the gap between the gross risk identified and the maturity of the company, which may or may not be implementing initiatives to reduce these risks. This analysis is carried out both in terms of the portfolio company and the fund.

Example of a risk analysis matrix



#### Analysis methodology:

##### **GROSS RISK: 0 = no risk; 5 = significant risk**

The level of risk is assessed with regard to the size of the company, its sector of activity, the potential frequency of occurrence, the scope of the risk (in terms of workforce or revenue) and the potential impact of the realisation of the risk on the value of the company

##### **MATURITY:** assessed in relation to the level of challenge and the following aspects:

*Is the company aware of the risk?*

*Does the company have policies in place to address this risk?*

*Does the company monitor quantitative data on this risk?*

*Are the results satisfactory? (in absolute terms, in intensity, compared to the benchmark, and in terms of evolution over time)*

*Has the company done everything in its power to address this risk and is there is no room for improvement?*

The greater the gap between the gross risk level and the maturity level, the greater the residual CSR risk. This qualitative analysis makes up for the lack of a quantitative estimate of the financial impact of the main environmental, social and governance risks identified for the companies in Andera's portfolio.



## 2. Transformation & CSR monitoring during the holding period

### DIALOGUE WITH PORTFOLIO COMPANIES

A summary sheet is produced at the end of the CSR Reporting for each portfolio company with an individual approach to raising awareness and defining an improvement plan. This annual monitoring of indicators covering the major sustainability risks and negative impacts allows precise monitoring of the change in consideration of material CSR issues by each of the companies.

These sheets are shared with the management of the portfolio companies and become a tool for dialogue between the investment teams and the companies, particularly during Supervisory Board meetings.

### DIALOGUE WITH INVESTORS

Fund-specific reports are also formalised and communicated annually to investors in order to transparently share the CSR progress of companies within the fund portfolio.

Reporting in accordance with the requirements of the SFDR (SFDR templates) will also be provided to investors in Articles 8 and 9 funds from 2023.

## 3. Divestment

Andera Partners implements long-term actions that extend beyond the investment horizon and provides CSR information at the time of disposal in order to value the efforts made during the holding period by the companies in the portfolio. Where relevant, Vendor CSR Due Diligence is carried out.

# 4. Our specific commitments for the latest funds raised or in being raised

## SFDR CLASSIFICATION OF OUR FUNDS

andera Infra	Andera Smart Infra 1 <b>Article 9</b> fund
andera Co-Invest	Andera Co-invest <b>Article 8</b> fund
andera Expansion	Andera Expansion 3 <b>Article 8</b> fund
andera Life Sciences	Bio Discovery 6 <b>Article 8</b> fund
andera MidCap	Andera Midcap 5 <b>Article 8</b> fund

All other funds are classified as Article 6 under SFDR

## SOME RATIOS

30%	Of the <b>Assets under management</b> take into account <b>environmental, social and governance criteria</b> within the <b>total amount of assets under management</b> (classified as Articles 8 and 9 under SFDR)
80%	Of the <b>last funds raised by</b> each of the <b>five strategies</b> are classified as <b>Article 8 or 9</b> under SFDR
80%	Of the <b>Assets under management in the latest funds raised</b> are <b>Article 8 or 9</b> under SFDR



# IV

## FOCUS ON CLIMATE AND BIODIVERSITY RISKS



# Integration of sustainability risks and principal adverse impacts of climate change and biodiversity conservation into the core of the investment cycle

## 1. Investment

### EXCLUSIONS

- Application of sectorial and normative exclusions
  - **Climate:** *exclusions for coal and unconventional and conventional fossil fuels*
  - **Biodiversity:** *exclusions for palm oil or logging*

### PRELIMINARY ANALYSIS OF THE OPPORTUNITY

- Materiality analysis of CSR issues and potential exposure to the Sustainable Development Goals
  - **Examples of climate & biodiversity issues:** *Physical risks of climate change, Energy management, GHG emissions, Environmental impacts, Product design and life cycle management*
- Study of eligibility for the European Taxonomy
  - *Analysis of contribution to climate change mitigation or adaptation*

### PRE-ACQUISITION DUE DILIGENCE

- Internal or external analysis of risks and opportunities for opportunities and the main negative impacts
- Incorporation of a summary of the analysis in the investment memorandum for discussion at the Investment Committee

### SHAREHOLDER AGREEMENTS

- Incorporation of CSR clauses

## 2. Transformation

### SUPPORT WITH THE IMPLEMENTATION OF A CSR APPROACH

- Personalised support for the implementation of CSR procedures (including actions to **combat climate change and preserve biodiversity** in case of materiality)
  - **Climate:** *Carrying out a carbon footprint measurement within the portfolio companies and drawing up an action plan to reduce it*

### MONITORING

- Annual CSR reporting including the measurement of the principal adverse impacts of investments (SFDR 'PAI' indicators)  
4 indicators on **Climate** issues and 2 on **Biodiversity** issues
- Annual sustainability risk mapping (analysis of exposure to **Climate** and **Biodiversity** issues and maturity in taking them into account)
- Production of annual reports including the consolidation of ESG data for each fund as well as a and a summary sheet for each company to identify areas for progress and improvement

## 3. Divestment

### TRANSMISSION

- Provision of relevant CSR information at the time of divestment in order to value the efforts made during the holding period by the portfolio company.

# 1. Specific approach to fight against climate change

## 1. MANAGEMENT COMPANY’S COMMITMENT TO THE CLIMATE

In early 2019, Andera Partners joined **the “Initiative Climat International”**, co-signed by a large number of French and international private equity players. This commitment marks Andera Partners’ desire to actively contribute to the fight against climate change.

As part of this initiative, Andera Partners is actively contributing in particular to the Working Group on 1.5°C alignment and net zero commitments.

## 2. CONSIDERATION OF CLIMATE RISK IN THE PORTFOLIO

During the pre-acquisition phase, Andera Partners systematically carries out an analysis of the issues related to climate change.

In addition, since 2022, Andera Partners has carried out an **in-depth analysis of the physical and transitional risks related to climate change** for its entire portfolio. The analysis is based on the Task Force on Climate-related Financial Disclosures (TCFD) recommendations for identifying climate-related risks and opportunities.

RISKS ANALYSED		OPPORTUNITIES ANALYSED
Transition risks	Policies and regulations	Resource efficiency
	Technological	Energy source
	Market	Products and services
	Reputational	
Physical risks	Acute	Market
	Chronic	Resilience

The results of this analysis are available in the Andera Partners CSR Annual Report.

## 3. STRATEGY FOR ALIGNMENT WITH THE PARIS AGREEMENTS

Andera Partners incorporates the climate dimension at the heart of its investment process, in particular by measuring Scope 1, 2 and 3 for all of its portfolio companies and drawing up reduction action plans. Andera Partners is currently working on a strategy to align with the targets of the Paris Agreement.

The alignment strategy will be defined in 2023. Andera Partners is working on the reliability and analysis of the carbon data collected from its portfolio companies in order to define an action plan to reduce its own emissions and those of its portfolio in the near future.

## 2. Specific approach to the preservation of Biodiversity

### 1. MANAGEMENT COMPANY COMMITMENTS TO BIODIVERSITY

Andera Partners is committed to the objectives of the **1992 Convention on Biological Diversity**, including its three main objectives:

- the conservation of biological diversity;
- the sustainable use of biological diversity and;
- the fair and equitable sharing of benefits arising from the use of genetic resources.

In 2021, Andera Partners also initiated the creation of a Biodiversity Working Group within the France Invest Sustainability Commission to accelerate the definition of a methodology and approach adapted to Private Equity.

### 2. CONSIDERATION OF BIODIVERSITY RISK IN THE PORTFOLIO

During the pre-acquisition phase, Andera Partners systematically carries out an analysis of the issues related to the erosion of Biodiversity.

Andera Partners uses the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) tool developed by the Natural Capital Finance Alliance in partnership with UNEP-WCMC (UN Environment Programme World Conservation Monitoring Centre).

This tool allows for a dual materiality analysis of biodiversity risks: from the perspective of dependence on ecosystem services and impacts on biodiversity loss.

The results of this analysis are available in the Andera Partners CSR Annual Report.

### 3. STRATEGY FOR ALIGNMENT WITH BIODIVERSITY OBJECTIVES

Andera Partners is committed to integrating the biodiversity aspect at the heart of its investment process, in particular by measuring the materiality of the issue for all of its shareholdings and defining a conservation action plan.

Andera Partners is currently working on a strategy to align with the long-term goals for biodiversity.

The alignment strategy will be defined in 2023 and Andera Partners is currently working on the reliability and analysis of biodiversity data in order to set targets for 2030.





V

TAXONOMY

## ANDERA PARTNERS' APPROACH

In the context of Regulation (EU) 2020/852 of the European Parliament and Council of 18 June 2020 on the establishment of a framework for sustainable investment ('Taxonomy Regulation'), Andera Partners has developed an approach by portfolio company.

## USING TOOLS DEVELOPED IN-HOUSE

To this end, a Taxonomy eligibility analysis is systematically carried out before the investment, during the Due Diligence phase. Research is then carried out by the CSR teams to link them to NACE codes in order to better understand the potential eligibility and alignment of the planned investment with the European Green Taxonomy.

Once in the portfolio, the company is analysed in detail to allow Andera Partners to study eligibility and alignment. An internal tool has been developed to allow taxonomy analysis of each company. This tool is supplemented in collaboration with the investment and CSR teams to provide a better understanding of the company and the challenges of the regulatory framework.

## LEADING TO RESULTS PUBLISHED TRANSPARENTLY

The first results in relation to the Taxonomy will be published in the management company's annual CSR report.





# Appendices

**1 CONCORDANCE TABLE**

**2 CSR EXCLUSIONS**

# Concordance Table

Regulation	Content/Article	Reference
<b>Implementing decree Art. 29 of the Energy-Climate Law No. 3 of Article 1</b>	1. Entity's general approach <ul style="list-style-type: none"> <li>Entity's general approach to the consideration of ESG criteria</li> <li>Communication with subscribers</li> <li>List of Articles 8 and 9 products, share of assets under management taking ESG criteria into account</li> <li>Entity's membership of initiatives, ESG labels</li> </ul>	<ul style="list-style-type: none"> <li>Page 3</li> <li>Page 15</li> <li>Page 16</li> <li>Page 3</li> </ul>
	2. Internal means to contribute to the transition <ul style="list-style-type: none"> <li>Internal means and actions to strengthen internal ESG capacities</li> </ul>	<ul style="list-style-type: none"> <li>Pages 5 and 6</li> </ul>
	3. ESG governance within the financial entity <ul style="list-style-type: none"> <li>Taking ESG into account in Governance</li> <li>Consideration of sustainability risks in the remuneration policy</li> <li>Incorporation of ESG criteria in the internal rules and regulations of the Supervisory Board</li> </ul>	<ul style="list-style-type: none"> <li>Page 5</li> <li>Page 6</li> <li>Internal rules and regulations of the SB</li> </ul>
	4. Engagement strategy with issuers or managers <ul style="list-style-type: none"> <li>Engagement strategy and voting policy</li> <li>Assessment of the engagement strategy (share of companies with which the entity has initiated dialogue, issues covered, follow-up actions)</li> <li>Review of the voting policy (tabling of and voting on ESG resolutions at the AGM), decisions on sectoral disengagement</li> </ul>	<ul style="list-style-type: none"> <li>Page 8 and Voting Policy</li> <li>Annual report</li> </ul>
	5. 'Sustainable' and 'fossil fuel' investments	<ul style="list-style-type: none"> <li>In progress, to be published in 2023</li> </ul>
	6 and 7. <ul style="list-style-type: none"> <li>Strategy for alignment with the Paris agreements</li> <li>Strategy for alignment with the Biodiversity agreements</li> </ul>	<ul style="list-style-type: none"> <li>Page 20 (in progress)</li> <li>Page 21 (in progress)</li> </ul>
	8. Incorporating ESG in risk management <ul style="list-style-type: none"> <li>Identification, assessment and management process</li> <li>Frequency of risk management framework review</li> <li>Quantitative estimate of the financial impact</li> <li>Description and characterisation of risks</li> </ul>	<ul style="list-style-type: none"> <li>Pages 9 to 20</li> <li>Fund ESG report</li> </ul>
	9. Improvement measures Recourse in case of non-publication of information required by the regulations	<ul style="list-style-type: none"> <li>In progress</li> </ul>
<b>SFDR: 'Disclosure' Regulation (EU) 2019 2088</b>	Article 3: Incorporating sustainability risks in the investment decision-making process	<ul style="list-style-type: none"> <li>Pages 9 to 20</li> </ul>
	Article 4: Consideration of the key adverse impacts of investments on sustainability factors	<ul style="list-style-type: none"> <li>Pages 9 to 20</li> </ul>
	Article 5: Incorporation of sustainability risks in remuneration policy	<ul style="list-style-type: none"> <li>Page 6</li> </ul>
<b>MIF 2</b>	Organisation: Incorporation of sustainability risks in the organisation and risk management policies and procedures	<ul style="list-style-type: none"> <li>Pages 5 to 20</li> </ul>
<b>Task force on Climate-related Financial Disclosure (TCFD)</b>	1. Governance of climate-related risks and opportunities	<ul style="list-style-type: none"> <li>Page 5</li> </ul>
	2. Climate Strategy	<ul style="list-style-type: none"> <li>Page 19 (in progress)</li> </ul>
	3. Management of climate-related risks and opportunities	<ul style="list-style-type: none"> <li>Page 19 (in progress)</li> <li>Fund ESG reports</li> </ul>
	4. KPIs and indicators used to assess climate-related risks and opportunities	<ul style="list-style-type: none"> <li>Page 19</li> <li>Fund ESG reports</li> </ul>
<b>United Nations Global Compact</b>	1. Incorporating the Ten Principles of the UN Global Compact in our strategy and operations, and promoting them in our sphere of influence (portfolio companies)	<ul style="list-style-type: none"> <li>CSR Annual Report</li> </ul>
	2. Publication of a report to publicly communicate progress (COP/ECO)	
	3. Actions in support of the UN SDGs	



# CSR exclusions : normative

Normative Exclusions	Clarification on exclusion	Details of the standard's content	
UNGC Principles	Exclusion of companies that seriously and repeatedly violate international standards or conventions or one or more of the ten Global Compact principles.  Covers operations and supply chain.	<b>Human rights</b> Principle 1: Businesses must support and respect the protection of internationally proclaimed human rights; and Principle 2: Businesses are urged to ensure that they are not complicit in human rights abuses. <b>Labour</b> Principle 3: Businesses must uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: Businesses must contribute to the elimination of all forms of forced and compulsory labour; Principle 5: Businesses must contribute to the effective abolition of child labour; and Principle 6: Businesses must contribute to the elimination of discrimination in respect of employment and occupation. <b>Environment</b> Principle 7: Businesses must support a precautionary approach to environmental challenges; Principle 8: Businesses must undertake initiatives to promote greater environmental responsibility; and Principle 9: Businesses must encourage the development and diffusion of environmentally friendly technologies. <b>Anti-corruption</b> Principle 10: Businesses must work against corruption in all its forms, including extortion and bribery.	<a href="https://www.unglobalcompact.org/what-is-gc/mission/principles">https://www.unglobalcompact.org/what-is-gc/mission/principles</a>
OECD Guidelines		The Guidelines are recommendations by governments to multinational enterprises to promote responsible business conduct in the areas of labour relations, human rights, environment, taxation, disclosure, anti-corruption, consumer interests, science and technology, and competition.	<a href="http://mneguidelines.oecd.org/guidelines/">http://mneguidelines.oecd.org/guidelines/</a>
ILO		In particular, the eight core ILO Conventions that deal with four key issues: freedom of association, non-discrimination and the prohibition of child labour and forced labour. - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); - Right to Organise and Collective Bargaining Convention, 1949 (No. 98); - Forced Labour Convention, 1930 (No. 29); - Abolition of Forced Labour Convention, 1957 (No. 105); - Minimum Age Convention, 1973 (No. 138); - Worst Forms of Child Labour Convention, 1999 (No. 182); - Equal Remuneration Convention, 1951 (No. 100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	
CITES Convention	Trade in any species or animal or plant product regulated by the CITES Convention	The Convention on International Trade in Endangered Species of Wild Fauna and Flora, known by its acronym CITES or as the Washington Convention, is an international agreement between states. It aims to ensure that international trade in wild animal and plant specimens does not threaten the survival of the species to which they belong.	

# CSR exclusions : sectorial

Controversial activities	Clarification on exclusion	Exceptions allowed	Tolerance threshold
<b>Tobacco</b>	Production and sale of tobacco and related products (including vaping products)		
<b>Arming</b>	Production, sale and components of controversial weapons: anti-personnel landmines (defined by the 1999 Ottawa Treaty), cluster bombs (defined by the 2008 Oslo Convention on Cluster Munitions), chemical and biological weapons (defined in the 1993 Paris Convention on Chemical Weapons), nuclear weapons  Production and sale of conventional lethal weapons	Conventional weapons components, services for military purposes	
<b>Gambling</b>			
<b>GMO</b>	Production, sale outside the context of biomedical research or for therapeutic purposes	Use of GMOs for medical purposes (e.g. gene therapy products for human use, drug production, production of biological tools for therapeutic R&D purposes, etc.) with the existence of a liability policy and compliance with international conventions on GMOs	
<b>Cloning</b>	For human or animal reproductive purposes outside the context of biomedical research or for therapeutic purposes	Animal reproduction for biomedical research or therapeutic purposes	
<b>Pornography</b>			
<b>Illegal economic activity</b>			
<b>Alcohol</b>	Companies directly involved (brewers, distillers, etc.) and any activity related to Groups 4 & 5	Trade	30%
<b>Casinos</b>	activity of casinos and similar businesses		
<b>Palm oil</b>	Companies that have not achieved or are not committed to achieving RSPO or other internationally recognised certification	Supply	30%
<b>Conventional and unconventional fossil fuels (shale gas, shale oil and oil sands)</b>	Extraction, production, sale, storage and transport	Service providers or component manufacturing (no limitation in case of impact-limiting activities)	30%
<b>Nuclear</b>	Production, sale, storage and transport	Providers of services to nuclear power plants or production of components (no limitation in case of impact-limiting activities) Use of this technology for therapeutic and/or medical diagnostic purposes	
<b>Activities in oppressive and uncooperative regimes</b>	No investment in a company with headquarters in the list of prohibited countries (see list below) If present in countries classified as very high risk or non-cooperative (see list below) - Compliance check required	If the list is modified during the annual update	
<b>Animal experimentation</b>	Companies that conduct animal experiments for products that are not subject to this legal and/or regulatory requirement and outside the context of biomedical research or therapeutic purposes		
<b>Logging</b>		Sustainably managed forests (with certification)	