

Sustainability related disclosures

Capitalised terms used but not defined herein shall have the meanings set forth in the Fund's supplement.

Product name: CoRe Series – Sustainable Enhanced Bond 12M Fineco AM Fund (the “Sub-Fund” or the “financial product”)

Legal entity identifier: 254900OQFK53UW8Y2E07

The Management Company has populated this Annex using information provided by the Investment Manager of the Sub-Fund, BNP Paribas Asset Management France.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of sustainable investments with an environmental objective: %

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of sustainable investments with a social objective: ___%

It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but will not make any sustainable investments

A. Summary

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment. Any further information regarding the sustainable investment of this financial product are indicated in the below section "No sustainable investment objective".

All of the information concerning the binding elements of the investment strategy and the good governance policies are indicated in the below section "Investment strategy".

The minimum proportion of investments used to meet the environmental or social characteristics promoted by the financial product is equal to 50%. In addition, the minimum proportion of Sustainable Investments is equal to 30%.

The monitoring of environmental or social characteristics for article 8 products is ensured through a dedicated two-layers control framework.

Internal guidelines have been defined and implemented to classify products under article 8 (promotion of environmental and/or social characteristics) of SFDR.

The classification of products in these two categories entails the follow-up of sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product or the sustainable investment objective.

On one hand, investment teams carried out daily controls within Front Office systems to ensure that the features attached to article 8 sustainability indicators are follow-up at any time.

On the other hand, independent risk function also performs second level of controls on a daily basis to spot any breach which are dealt with under an escalation procedure.

All the methodologies used to measure how the social or environmental characteristics promoted by the financial product are met are indicated in the below section "Methodologies for environmental or social characteristics".

Any information relating to data sources used to attain each of the environmental or social characteristics promoted by the financial product, the measures taken to ensure data quality, how data are processed and the proportion of data that are estimated can be used in the below section "Data sources and processing".

Any limitation to the methodologies and data sources referred above and how such limitations do not affect how the environmental or social characteristics promoted by the financial product are met can be found in the section "Limitations to methodologies and data".

For passively managed products BNPP AM performs due diligence on the index methodology and ESG research.

Independent controls are also carried out by the Risk function of BNPP AM to identify any potential breach which would be remedied following an escalation process.

Any further information describing the due diligence carried out on the underlying assets of the financial product can be found in the below section "Due Diligence".

Any information regarding the engagement policies implemented by this financial product can be found in the below section "Engagement policies".

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

B. No sustainable Investment Objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objectives of the sustainable investments made by the financial product are to finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

The internal methodology integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives;
2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets;
3. A company operating in high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C;
4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region.

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation "POSITIVE" or "NEUTRAL" from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm "DNSH" principle) and should follow good governance practices. BNP Paribas Asset Management (BNPP AM) uses its proprietary methodology to assess all companies against these requirements. More information on the internal methodology can be found on the website of the investment manager : Sustainability documents - [BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com)

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How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Sustainable investments that the product partially intends to make should not significantly harm any environmental or social objective (DNSH Principle) . In this respect, the investment manager commits to consider principal adverse impacts on sustainability factors by taking into account indicators for adverse impacts as defined in SFDR and set out in Table 1 and any relevant additional indicator from Tables 2 and 3 of Annex I of the Delegated Regulation, and to not invest in companies that do not

meet their fundamental obligations in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

How does this financial product take into account principal adverse impacts on sustainability factors?

The investment manager ensures that throughout its investment process, the financial product takes into account principal adverse impact indicators that are relevant to its investment strategy to select the sustainable investments that the financial product partially intends to make by systematically implementing the sustainable investment pillars defined in the BNP Paribas Asset Management Global Sustainability Strategy (GSS) into its investment process and as further detailed below in this document; RBC policy, ESG integration guidelines, Stewardship, the forward-looking vision – the ‘3Es’ (Energy transition, Environmental sustainability, Equality & Inclusive Growth).

Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

The investment universe of the financial product is periodically screened with a view to identify issuers that are potentially in violation or at risk of violation of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business & Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This assessment is conducted within the BNPP AM Sustainability Centre on the basis of internal analysis and information provided by external experts, and in consultation with BNP Paribas Group CSR Team. If an issuer is found to be in serious and repeated violations of any of the principles, it will be placed on an “exclusion list” and will not be available for investment. Existing investments should be divested from the portfolio according to an internal procedure. If an issuer is at risk of violating any of the principles, it is placed on a “watch list” monitored, as appropriate.

C. Environmental or social characteristics promoted by this financial product

What are the environmental or social characteristics promoted by this financial product?

The Sub-Fund promotes environmental and social characteristics by assessing underlying investments against Environmental, Social, and Governance (ESG) criteria using an ESG internal proprietary methodology, and by investing in issuers that demonstrate good environmental, social and governance practices.

Corporate issuers

The investment strategy selects corporate issuers with the best ESG practices within their sector of activity.

The positive screening using a selectivity approach. This involves evaluation of ESG performance of an issuer against a combination of environmental, social and governance factors which include but are not limited to:

- o Environmental: energy efficiency, reduction of emissions of greenhouse gases (GHG), treatment of waste;

- o Social: respect of human rights and workers' rights, human resources management (workers' health and safety, diversity);

- o Governance: Board of Directors independence, managers' remuneration, respect of minority shareholders rights.

The negative screening applying exclusion criteria with regard to issuers that are in violation of international norms and convention, or operate in sensitive sectors as defined by the Responsible Business Conduct Policy (RBC Policy).

Sovereign issuers

The investment strategy selects sovereign issuers based on their performance across the environmental, social and governance pillars. The ESG performance of each country is assessed using an internal Sovereign ESG methodology that focuses on measuring governments' efforts to produce and preserve assets, goods, and services with high ESG values, according to their level of economic development. This involves evaluation of a country against a combination of environmental, social and governance factors, which include but not limited to:

- o Environmental: climate mitigation, biodiversity, energy efficiency, land resources, pollution;

- o Social: life conditions, economic inequality, education, employment, health infrastructure, human capital;

- o Governance: business rights, corruption, democratic life, political stability, security.

BNP Paribas Asset Management's Global Sustainability Strategy places a strong emphasis on combatting climate change. Therefore, given the importance of sovereigns in addressing climate change, the internal Sovereign ESG methodology includes an additional scoring component that captures the country's contribution to progress towards the net-zero goals set out in the Paris Agreement. This additional scoring component reflects countries' commitment to future targets balanced by their current policies and their forward-looking physical climate risk exposure. It combines temperature alignment methodology for determining national contributions to climate change with an assessment of the laws and policies countries have in place for addressing climate change.

The investment manager also applies the BNP Paribas Group's sensitive countries framework, which includes restrictive measures on certain countries and/or activities that are considered as being particularly exposed to money laundering and terrorism financing related risks.

Furthermore, the investment manager promotes better environmental and social outcomes through engagement with issuers and the exercise of voting rights according to the Stewardship policy, where applicable.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

D. The Investment Strategy

What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?

The Sub-Fund enforces an “Enhanced Bond” strategy which is an actively managed strategy that seeks a higher return than money market funds while still maintaining a high level of liquidity.

The elements of the investment strategy to attain of the environmental or social characteristics promoted by this financial product as described below are systematically integrated throughout the investment process.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The financial product shall comply with the RBC Policy by excluding companies involved in controversies due to poor practices related to human and labor rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment;

- The financial product shall systematically integrate relevant ESG factors in line with its investment strategy into its investment analysis and decision-making processes.
- The financial product shall have at least 90% of its assets (excluding ancillary liquid assets) covered by the ESG analysis based on the ESG internal proprietary methodology.
- The financial product’s investment universe shall be reduced by a minimum of 20% due to exclusion of securities with low ESG score and/or sector exclusions as per the RBC Policy.
- The financial product shall have the weighted average ESG score of its portfolio higher than the weighted average ESG score of its investment universe.
- The financial product shall invest a proportion of its assets in “sustainable investments” as defined in Article 2 (17) of the SFDR regulation and as disclosed in the asset allocation section below.
- The exclusions covered by the Management Company’s exclusion policy will apply, being (1) Issuers that breach the principles of the UN Global Compact (UNGC), (2) Issuers involved in the manufacture or product life cycle of controversial weapons (such as but not limited to chemical weapons, cluster munitions and landmines); (3) Issuers deriving a certain percentage of their revenue from the production of tobacco or from other type of involvement in the life cycle of tobacco products such as distribution or licencing activities; (4) Issuers that derive a certain percentage of their revenue from thermal coal extraction and/or arctic drilling; and (5) Issuers that contravene the UNGC labour-related principles and International Labour Organisation’s (“ILO”) broader set of labour standards.

What is the policy to assess good governance practices of the investee companies?

The ESG scoring framework assesses corporate governance through a core set of standard key performance indicators for all sectors supplemented by sector specific metrics.

The governance metrics and indicators to assess good governance practices such as sound management structures, employee relations, remuneration of staff and tax compliance include but are not limited to:

- Separation of power (e.g. Split CEO/Chair),

- Board diversity,
- Executive pay (remuneration policy),
- Board Independence, and key committees independence
- Accountability of directors,
- Financial expertise of the Audit Committee,
- Respect of shareholders rights and absence of antitakeover devices
- The presence of appropriate policies (i.e. Bribery and corruption, whistleblower),
- Tax disclosure,
- An assessment of prior negative incidents relating to governance.

The ESG analysis goes beyond the framework to look at a more qualitative assessment of how the insights from our ESG model are reflected in the culture and operations of investee companies. In some cases, the ESG analysts will conduct due diligence meetings to better understand the company's approach to corporate governance.

Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)

The financial product's investment universe is reduced by a minimum of 20% due to exclusion of securities with low ESG score and/or sector exclusions as per the RBC Policy.

Does this financial product consider principal adverse impacts on sustainability factors?

- Yes
- No

The product considers principal adverse impacts on sustainability factors by systematically implementing the sustainable investment pillars defined in the GSS into its investment process. These pillars are covered by firm-wide policies that set criteria to identify, consider and prioritise as well as address or mitigate adverse sustainability impacts caused by issuers. The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which BNPP AM invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the “3Es” (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

Actions to address or mitigate principal adverse sustainability impacts depend on the severity and materiality of these impacts. These actions are guided by the RBC Policy, ESG Integration Guidelines, and Engagement and Voting Policy which include the following provisions:

- Exclusion of issuers that are in violation of international norms and conventions and issuers that are involved in activities presenting an unacceptable risk to society and/or the environment;
 - Engagement with issuers with the aim of encouraging them to improve their environmental, social and governance practices and, thus, mitigate potential adverse impacts;
- In case of equity holdings, voting at Annual General Meetings of companies the portfolio is invested in to promote good governance and advance environmental and social issues;
Ensuring all securities included in the portfolio have supportive ESG research.
- Managing portfolios so that their aggregate ESG score is better than the relevant benchmark or universe.

Based on the above approach, and depending on the underlying assets, the financial product considers and addresses or mitigates the following principal adverse sustainability impacts:

Corporate mandatory indicators:

1. GreenHouse Gas (GHG) Emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Activities negatively affecting biodiversity sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Corporate voluntary indicators:

Environment

1. Investments in companies without carbon emission reduction initiatives

1. Lack of a supplier code of conduct
2. Lack of a human rights policy

Sovereign mandatory indicators

1. GHG intensity
2. Investee countries subject to social violations

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: sustainability risk integration and Principal Adverse Impacts considerations.

In addition, information on how the principal adverse impacts on sustainability factors have been considered over the year will be available in the annual report of the financial product.

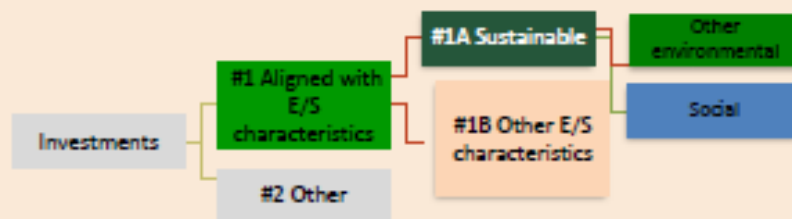
E. Proportion of Investments

What is the planned asset allocation for this financial product?

The investments used to meet the environmental or social characteristics promoted by the financial product in accordance with the binding elements of its investment strategy represent the proportion of assets with either 1) a positive ESG score and either a positive E score or a positive S score or 2) being Sustainable Investment according to the BNPP AM ESG proprietary methodology.

However, the minimum proportion of investments used to meet the environmental or social characteristics promoted by the financial product shall be at least 50% (#1 in the graph below). For the avoidance of doubt, such a proportion is solely a minimum commitment and the real percentage of the investments of the financial product that attained the promoted environmental or social characteristics will be available in the annual report.

The minimum proportion of sustainable investments of the financial product is 30% (#1A in the graph below). The remaining proportion of the investments is mainly used as described below.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

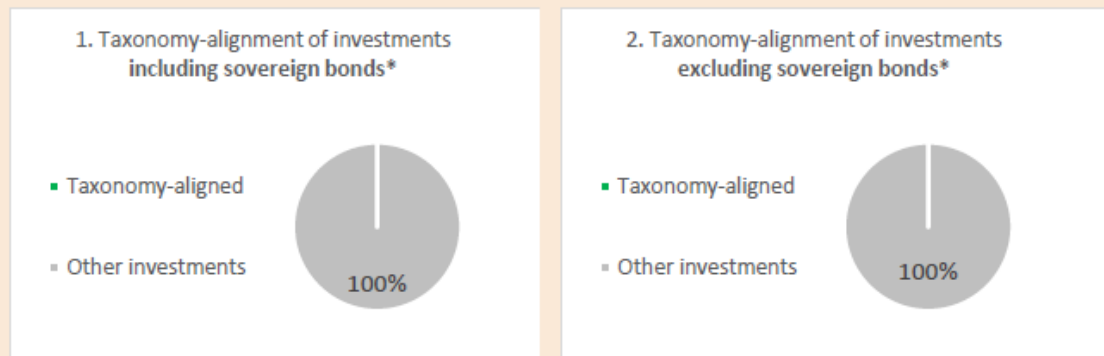
How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Financial derivative instruments may be used for efficient portfolio management and hedging purposes. These instruments are not used to attain the environmental or social characteristics promoted by the product.

What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)

Not applicable.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1%.

The objective of the investment manager is not to prevent the product from investing in taxonomy-aligned activities within the framework of the investment strategy of the product. As such, there is no commitment to invest in activities not aligned with the EU Taxonomy.

What is the minimum share of socially sustainable investments?

The minimum share of socially sustainable investments within the financial product is 1%.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The remaining proportion of the investments may include the proportion of assets that do not attain the following standards established by the investment manager: 1) a positive ESG score and either a positive E score or a positive S score or 2) being Sustainable Investment according to BNPP AM ESG proprietary methodology or instruments which are mainly used for liquidity, such as cash and cash equivalent assets and/or efficient portfolio management, and/or hedging purposes. Those investments are made in compliance with our internal processes, including the risk management policy and the RBC policy when applicable as minimum environmental or social safeguards. The risk management policy comprises procedures as are necessary to enable the assessment for each

financial product of the exposure of that product to market, liquidity, sustainability and counterparty risks.

F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund:

- The percentage of the Sub-Fund's portfolio compliant with the RBC Policy;
- The percentage of the Sub-Fund's portfolio covered by ESG analysis based on the ESG internal proprietary methodology ;
- The percentage of the financial product's investment universe reduction due to exclusion of securities with low ESG score and/or sector exclusions as per the RBC Policy;
- The weighted average ESG score of the Sub-Fund's portfolio compared to the weighted average ESG score of its investment universe;
- The percentage of the Sub-Fund's portfolio invested in "sustainable investments" as defined in Article 2 (17) of the SFDR regulation

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

The monitoring of environmental or social characteristics for article 8 products is ensured through a dedicated two-layers control framework.

BNP's internal guidelines have been defined and implemented to classify products under article 8 (promotion of environmental and/or social characteristics) of SFDR.

The classification of products in these two categories entails the follow-up of sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product.

On the one hand, investment teams carried out daily controls within Front Office systems to ensure that the features attached to article 8 sustainability indicators are followed-up at all times.

On the other hand, independent risk function also performs second level of controls on a daily basis to spot any breach which are dealt with under an escalation procedure.

G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

BNPP AM is working towards a world where all investing is responsible: investing responsibly is not just about embracing the social values and global concerns the company shares with its clients, it is about investing in a brighter future that delivers long-term rewards for both its clients and future generations.

BNPP AM acknowledges the importance of its role in representing the interests of its clients to the management teams of the companies in which they invest. Being long-term investors enables the development of productive relationships, allowing scope to engage on the issues that are most relevant to the Investment Manager's investment cases.

In 2019, the Investment Manager has enhanced its investment philosophy with the development of a set of six investment beliefs focused on sustainability:

1. BNPP AM are long-term, forward-looking investors:

The Investment Manager analyse the past in order to better anticipate future developments while considering the economic model which will best serve BNPP AM in the long term – one focused on low-carbon, sustainable and inclusive growth.

2. BNPP AM's fiduciary duty is aligned with sustainable investment:

BNPP AM have a duty to their clients to make well-informed investment decisions, taking reputational, operational and financial risks into careful consideration. ESG factors are a key element of this.

3. Stewardship is an opportunity and an obligation:

As long-term investors, BNPP AM believe that they should use stewardship (which encompasses proxy voting, company engagement and policy advocacy), to influence companies and the world for the better. They believe that engagement is generally more effective than exclusion – although divestment can be a last resort.

4. ESG integration helps achieve better risk-adjusted returns:

Sustainability is a long-term driver of investment risks and returns. BNPP AM believe sustainability is imperfectly understood, under-researched and inefficiently priced, with inconsistent levels of disclosure.

Against this background, BNPP AM will make better investment decisions through systematically and explicitly integrating ESG factors into investment analysis and decision-making.

5. A sustainable economic future relies on sustainable investment practices:

The way BNPP AM invest and engage with companies and regulators can help shape the world around us. Managing ESG risks will help promote greater market stability and more sustainable long-term growth while delivering the same, or better, financial returns.

6. Walking the talk is critical to achieving excellence:

As a sustainable asset manager, the Investment Manager's corporate practices and disclosures should match or exceed the standards BNPP AM expect from the entities in which they invest. That is why this is a priority. BNPP AM are exploring how they can integrate sustainability considerations more fully across all aspects of their business, from how they manage both energy use and waste disposal

at their facilities, to gender equality within BNPP AM's workforce, and by providing ample time and opportunity for their employees to engage in volunteer work.

The components of BNPP AM's sustainability approach:

In a fast changing world, BNPP AM's focus is on achieving long-term sustainable returns for clients. In line with this, BNPP AM is committed to integrating sustainability matters across as many strategies as possible.

The BNPP AM 'Global Sustainability Strategy' details the approach to sustainability, setting clear objectives and commitments, and focusing on three key sustainability themes: Energy transition, the Environment and Equality and inclusive growth (the '3Es').

It reinforces the commitment to invest for the long term, engage with companies and regulators to promote best practice, and raise awareness of the role that finance can play in achieving a sustainable world.

The strategy to improve sustainability is built on six pillars, four of which are systematically implemented across BNPP AM'S investment strategies. This approach strengthens the way they invest, including how they generate investment ideas, construct optimal portfolios, control for risk and use their influence with companies and markets. It is designed to respond to the diverse needs of a broad client base while protecting their interests.

The six pillars of BNPP AM's approach:

1. ESG integration

BNPP AM integrate ESG factors throughout their investment processes. From investment philosophy, research and idea generation, to portfolio construction and risk management, as well as engagement, voting, disclosure and reporting.

Examples of guidelines include, but are not limited to:

BNPP AM will not invest in a public entity without an ESG score, or performing qualitative ESG analysis in the absence of an ESG rating;

BNPP AM should aim to hold portfolios with more positive ESG characteristics than their respective investment universe;

As a last resort, BNPP AM may divest from weakly rated entities which do not respond to engagement, and which show no sign that they will place greater emphasis on sustainability considerations in the future;

Holdings of weakly-rated public entities will need to be justified by additional documented qualitative analysis integrating ESG factors;

Some of BNPP AM's financial product should aim to have a lower carbon footprint than their respective investment universe.

2. Stewardship

BNPP AM are committed to their role as an efficient and diligent steward of the assets their clients entrust them with, and since 2012, they have engaged with the companies they invest in on ESG factors, adopting best practices and greater transparency.

BNPP AM are thoughtful and diligent investors in companies, and have detailed proxy-voting and engagement guidelines on a range of ESG issues.

BNPP AM have three Heads of Stewardship & Engagement roles, for EMEA, the Americas and the Asia Pacific region, who lead their stewardship activities in these regions, including direct corporate engagement and proxy voting, working with policymakers on key issues relating to sustainable finance and investment, and representing BNPP AM in regional ESG investor networks.

Collective engagements:

Recognising that there is a real opportunity to make a difference by sharing knowledge and resources, BNPP AM participates with the wider investment community in a number of ways. For instance, BNPP AM have worked alongside other global investors and publicly supported a series of statements and pledges. BNPP AM also promotes the efficient management of environmental issues, proposing innovative ideas to leading policy makers and contributing to the development of impact investing.

BNPP AM are committed to promoting ESG on an industry-wide scale through the organisation of, or participation in, sustainable investment forums worldwide, and the publication of articles and dedicated newsletters, for instance on BNPP AM's ViewPoint website. In terms of ESG initiatives, BNPP AM currently participate in over 40 collective engagement initiatives.

Individual engagements:

Creating a dialogue with the companies BNPP AM invest in provides them with another opportunity to foster environmentally responsible practices. In particular, BNPP AM strive to engage with the companies they consider being at risk because their practices or strategy might undermine their ability to perform well financially due to their exposure to climate change risks. For example, BNPP AM's engagement strategy aims to improve companies' carbon disclosure, their overall environmental performance, and their understanding of what actions companies are taking to align themselves with the goal of a well below 2°C scenario.

3. Responsible business conduct expectations and product-based exclusions

BNPP AM expect companies to meet their fundamental obligations in the areas of human and labour rights, protecting the environment and ensuring anti-corruption safeguards, wherever they operate, in line with the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises. BNPP AM engage with companies where they fall short, excluding the worst offenders from BNPP AM's investment universe.

BNPP AM have a series of sector policies that set out the conditions for investing in particular sectors, guiding BNPP AM's screening requirements and engagement.

BNPP AM have another set of policies that commit them to exclude particular sectors or activities (tobacco, unconventional oil and gas, coal, controversial weapons or asbestos), as BNPP AM deem them to be in violation of international norms, or to present unacceptable harm to society or the environment, without counterbalancing benefits. These are generally sectors where engagement makes little sense, as creating real impact is likely to be impossible.

BNPP AM's full approach is documented in their RBC Policy (Responsible Business Conduct Policy), available on their website: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com)

4. Forward-looking perspective - the 3E's

BNPP AM have identified three critical pre-conditions for a more sustainable and inclusive economic system:

Energy transition to a low carbon economy;

Environmental sustainability;

Equality and inclusive growth.

Together, these '3Es' represent the pathway to the economic sustainability that enables us, as investors, to safeguard long-term returns.

In considering their approach to these challenging topics, BNPP AM have a range of tools at hand. These include investment, divestment, stewardship and integration:

BNPP AM can invest in the companies and sectors that are part of the solution, encouraging their growth and benefiting from their success through BNPP AM's allocation of capital.

BNPP AM can divest from those companies that BNPP AM believe are at risk from inevitable structural changes, and whose behaviour is too much at variance with BNPP AM's own beliefs and investor preferences.

BNPP AM can exercise investor stewardship – through BNPP AM's proxy voting and engagement activity with companies – and via BNPP AM's discussions with policymakers, regulators and governments.

BNPP AM integrate their knowledge and perspectives on the '3Es' into investment processes across asset classes. This optimises BNPP AM's ability to make well-informed decisions – particularly in a world with imperfect information and varied levels of knowledge – thus helping to protect and enhance investment outcomes for clients.

Together, these steps allow BNPP AM to optimise their portfolio-level decisions, help shape the debate and align BNPP AM's total investments with the economy of the future. To guide BNPP AM's actions over the coming years, BNPP AM have identified a set of targets and key performance indicators for each of the '3Es'. Recognising the importance of getting these aspects right, in most cases BNPP AM take a staged approach to establishing them – measuring first BNPP AM's exposure before committing to targets.

The selection of sub-themes, targets and KPIs described below is the result of a combination of factors. The areas BNPP AM have selected are those where BNPP AM believe BNPP AM can have the biggest impact and apply more leverage to foster change, but also where there are enough data and tools to act, monitor and report.

BNPP AM report on their approach annually in their sustainability report available on [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com).

For further information on BNPP AM's sustainability roadmap, please refer to their Global Sustainability Strategy on their website.

ESG SCORING PROCESS:

In this framework, BNPP AM scores more than 13 000 issuers of securities using a four-step process. The scores are made available internally to facilitate ESG integration, investment stewardship and more.

1- ESG metric selection and weighting

To arrive at ESG scores that provide useful insights, BNPP AM select metrics using three criteria:

- **Materiality:** BNPP AM reward companies that score highly on ESG issues that are material to their business, based on the expertise from BNPP AM's Sustainability Centre as well as frameworks such as SASB and empirical studies.
- **Measurability and insight:** BNPP AM prefer insightful performance metrics over policies or programs.
- **Data quality and availability:** BNPP AM favour metrics for which data is of reasonable quality and readily available so that BNPP AM can compare issuers fairly. BNPP AM use numerous research inputs and data sources (e.g. Sustainalyst, ISS & Trucost) to determine companies ESG scores.

The metrics BNPP AM use are a blend of common and sector-specific.

2- ESG assessment vs. peers

BNPP AM's assessment is primarily sector-relative, reflecting the fact that ESG risks and opportunities are not always comparable between sectors and regions. For instance, health & safety is less important for an insurance company than a mining company.

The 13 000+ companies under coverage are therefore divided into 20 sector groups and 4 geographical areas, leading to 80 ESG scoring peer groups of geographical and sector peers.

Each issuer starts with a baseline 'neutral' score of 50. BNPP AM then sum its score for each of the three ESG pillars – Environmental, Social and Governance. An issuer receives a positive score for a pillar if it performs better than the average of its peer group. If it performs below average, it receives a negative score.

However, two universal issues that impact all companies are not scored relative to peers, introducing a deliberate 'tilt' for the most exposed sectors. These are:

- **Carbon emissions** – As the world faces an absolute carbon emissions problem, BNPP AM implement an absolute carbon emission measure, creating a positive bias towards issuers and sectors with lower carbon emissions.
- **Controversies** – Sectors that are more prone to ESG controversies have slightly lower scores, reflecting increased risk ('headline', reputational or financial risk).

The overall result is a quantitative ESG score that ranges from zero to 99, with the ability to see how each ESG pillar has added to or detracted from the company's final score.

3- Qualitative review

In addition to proprietary quantitative analysis, BNPP AM also integrate information from third-party sources, their Sustainability Centre's in-depth research on material issues (e.g. climate change) and BNPP AM's investment teams' knowledge and interaction with issuers.

4- Final ESG score

Combining both qualitative and quantitative inputs, BNPP AM reach an ESG score ranging from zero to 99, with issuers ranked in deciles against peers. Issuers that are excluded from investment through BNPP AM's Responsible Business Conduct policy are assigned a score of 0.

Going forward, some product intend to invest part of their assets in sustainable investments in the meaning of art.2 (17) of SFDR.

The objectives of sustainable investments are to finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

BNP PARIBAS ASSET MANAGEMENT's internal methodology integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives. A company can qualify as sustainable investment in case it has more than 20% of its revenues aligned with the EU taxonomy. A company qualifying as sustainable investment through this criteria can contribute to the following environmental objectives: sustainable forestry, environmental restoration, sustainable manufacturing, renewable energy, water supply, sewerage, waste management and remediation, sustainable transportation, sustainable buildings, sustainable information and technology, scientific research for sustainable development;
2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets. A company can qualify as sustainable investment in case it has more than 20% of its revenues aligned with the SDGs and less than 20% of its revenues misaligned with the SDGs. A company qualifying as sustainable investment through this criteria can contribute to the following objectives:
 - a. Environmental: sustainable agriculture, sustainable management of water and sanitation, sustainable and modern energy, sustainable economic growth, sustainable infrastructure, sustainable cities, sustainable consumption and production patterns, fight against climate change, conservation and sustainable use of oceans, seas and marine resources, protection, restoration and sustainable use of terrestrial ecosystems, sustainable management of forests, fight against desertification, land degradation and biodiversity loss
 - b. Social: no poverty, zero hunger, food security, healthy lives and well-being at all ages, inclusive and equitable quality education and lifelong learning opportunities, gender equality, women and girls empowerment, availability of water and sanitation, access to affordable, reliable and modern energy, inclusive and sustainable economic growth, full and productive employment and decent work, resilient infrastructure, inclusive and sustainable industrialization, reduced inequality, inclusive, safe and resilient cities and human settlements, peaceful and inclusive societies, access to justice and effective, accountable and inclusive institutions, global partnership for sustainable development;

3. A company operating in high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C. A company qualifying as sustainable investment through this criteria can contribute to the following environmental objectives: GHG emissions reduction, fight against climate change;
4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region. A company with a contribution score above 10 on the Environmental or Social pillar qualifies as best performer. A company qualifying as sustainable investment through this criteria can contribute to the following objectives:
 - a. Environmental: fight against climate change, environmental risk management, sustainable management of natural resources, waste management, water management, GHG emissions reduction, renewable energy, sustainable agriculture, green infrastructure
 - b. Social: health and safety, human capital management, good external stakeholder management (supply chain, contractors, data), business ethics preparedness, good corporate governance

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation “POSITIVE” or “NEUTRAL” from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm “DNSH” principle) and should follow good governance practices. BNP PARIBAS ASSET MANAGEMENT uses its proprietary methodology to assess all companies against these requirements.

More information on the internal methodology can be found on the following website: Sustainability documents - BNPP AM Corporate English (bnpparibas-am.com).

Once issuers have been identified as a Sustainable Investment, the regulation requires an assessment that the issuer does not significantly harm (DNSH) any other environmental or social objectives and follows good governance practices. Therefore, the following exclusion filters have been added. Issuers should:

1. Not significantly harm any other environmental or social objective: DNSH is identified in the following ways:

-Companies involved in large scale controversies could be seen as detracting from environmental and social goals regardless of their positive contributions. BNPP AM uses controversy data provided by Sustainalytics.

-do not have a weak ESG score: issuers which are ranked decile ten against their peer group in BNPP AM’s internal ESG scoring framework cannot be considered as “Sustainable Investments”.

-not be included on BNPP AM’s watchlist: BNPP AM’s Responsible Business Conduct policy establishes a watchlist of issuers that are at risk of breaching ESG standards and with whom BNPP AM engage in a dialogue to encourage improvements. An issuer included in BNPP AM’s watchlist cannot be considered as “Sustainable Investments”.

2. follow good governance practices : BNPP AM uses its proprietary ESG scoring methodology which is split out into an Environmental, Social and Governance score. Issuers with a Governance score below 10, are removed and are not considered as “Sustainable Investment”.

As per the clarifications on the ESAs’ draft RTS under SFDR published on June 2nd, 2022, the use of the Principal Adverse Sustainability Indicators (PASI) is mandatory to demonstrate that an investment does not significantly harm any other environmental or social objectives. All the 14 mandatory PASI and BNPP AM’s 3 selected voluntary PASI for Corporates are covered in BNPP AM’s Sustainable Investment definition via the following channels:

·Several PASI are taken into account via [BNPPAM’s approach to ESG integration](#). For instance, carbon emissions and board gender diversity are integrated factors in BNPP AM’s ESG scoring model which underpins the E and S pillar inclusion criteria in BNPP AM’s Sustainable Investment definition.

·Several PASI are taken into account via BNPPAM’s [RBC policy](#) e.g. coal and other fossil fuel involvement and controversial weapon involvement. BNPP AM’s RBC policy is applied universally across their portfolios and assesses/excludes companies before they can be considered Sustainable Investment

·BNPP AM’s DNSH and good governance screen in their Sustainable Investment definition considers additional PASI, through the exclusion of companies involved in large scale controversies, the exclusion of issuers with a weak ESG Score (decile 10), and the exclusion of issuers that are watchlisted as per BNPP AM’s RBC policy.

·Overall, the PASI are closely related to BNPP AM’s internal ESG integration criteria in portfolios (through BNPP AM’s RBC and indicators used in the ESG scoring methodology).

·In addition, the sustainable investments made by articles 8 and/or 9 products consider and address or mitigate all the 14 mandatory corporate PASI, BNPP AM’s 3 selected voluntary corporate PASI and the two sovereign PASI based on the combination of the different pillars of BNPP AM’s [Global Sustainability Strategy](#). For more details please refer to their public PASI disclosure statement [here](#).

BNPP AM has developed its own methodology to identify financial products promoting social or environmental characteristics. A company qualifies as promoting social or environmental characteristics if:

- It has been identified as a Sustainable Investment

Or

- It has an ESG score above 50 and the contribution score to the Environmental or Social pillar is above. BNPP AM’s proprietary ESG scoring methodology further details how issuers ESG performance are rated.

H. Data Sourcing and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

With respect to market data providers, BNPP AM select them using a two-step due diligence process. BNPP AM’s Quantitative Research Group begins by analyzing providers’ data sets, which includes

examining the coverage of data and its quality, and a statistical review of estimation methodologies, among other items. At the same time, the Sustainability Centre performs a qualitative review of methodologies used and the relevance of selection criteria.

Once BNPP AM have selected a provider, the data sets are usually automatically uploaded to their IT systems. BNPP AM's market data team oversees governance related to the relationship with the provider, and as part of this process, BNPP AM perform an annual review of BNPP AM's market data contracts. ESG brokers are selected, monitored and assessed through a formal process organized by BNPP AM's External Brokers department and formalized once a year by the Global Brokers Committee.

BNPP AM's external specialized providers and what they offer are as follows:

- Sustainalytics provides BNPP AM with raw data metrics that BNPP AM use selectively to feed BNPP AM's ESG scoring model. BNPP AM also use this provider for UNGC analysis and controversies offerings.
- S&P Trucost, CDP, Bloomberg, 427, TPI, SBTi and Climate Action 100+: BNPP AM use these data providers for BNPP AM's climate change and physical risk analysis. Bloomberg and S&P Trucost also provide BNPP AM with corporate Scope 1 & 2 carbon emissions data.
- CDP, S&P Trucost, Forest 500, TRASE, SPOTT, FAIRR, and Iceberg Data Lab provide BNPP AM with water, deforestation and biodiversity metrics BNPP AM use to assess and report on the biodiversity footprints of BNPP AM's portfolios and holdings.
- ISS and Proxinvest provide BNPP AM with their governance research and data to feed BNPP AM's ESG scoring model.
- Beyond Ratings provides BNPP AM with data and research used in BNPP AM's ESG sovereign research and scoring framework.
- ESG and mainstream brokers provide BNPP AM with research papers and other market information.
- Factset provides BNPP AM with financial and enterprise value data
- Bloomberg provides BNPP AM with EU Taxonomy alignment rate data that BNPP AM use as part of BNPP AM's Sustainable Investment definition
- BNPP AM has partnered with Matter to create a revenue-based SDG-alignment model for corporates leveraging Factset Hierarchy data which is used as part of the Sustainable Investment definition.
- CDP, Bloomberg, S&P Trucost, Factset, Sustainalytics & ISS is also used to source various Principle Adverse Impact (PAI) indicators.

Please note that corporate Scope 1 & 2 carbon emissions data sourced by Trucost contains some estimated values.

I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

Despite the rapid increase in availability in recent years, ESG data is still relatively immature in particular when compared to mainstream financial data. Data availability presents an array of limitations in data processing and methodology development:

- Due to lack of significant historical data, it is common to observe methodologies and/or models being developed without or with limited back testing.
- ESG scores can be affected by data availability and companies with lower data availability are more likely to be assigned an “average” score.
- The assessment of the EU Taxonomy and SDG alignment of economic activities of some issuers is not taken into account in the datasets BNPP AM are currently using. Therefore, a complementary fundamental analysis process has been developed to complement BNPP AM’s current EU Taxonomy and SDG datasets.

An extra-financial approach may be implemented in a different way by management companies when setting investment management objectives for financial products, in particular in view of the absence of common or harmonized labels at European Level. This also means that it may be difficult to compare strategies integrating extra-financial criteria to the extent that the selection and weightings applied to select investments may be based on metrics that may share the same name but have different underlying meanings. In evaluating a security based on the extra-financial criteria,

the Investment Manager may also use data sources provided by external extra-financial research providers. Given the evolving nature of extra-financial field, these data sources may for the time being be incomplete, inaccurate, unavailable or not updated. Applying responsible business conduct standards as well as extra-financial criteria in the investment process may lead to the exclusion of securities of certain issuers. Consequently, the Sub-Fund's performance may at times be better or worse than the performance of comparable funds that do not apply such standards. In addition, the proprietary methodologies used to take into account ESG non-financial criteria may be subject to reviews in the event of regulatory developments or updates that may lead, in accordance with the applicable regulations, to the increase or decrease of the classification of products, of the indicators used or of the minimum investment commitment levels set.

Finally, BNPP AM have embraced BNPP AM’s role as a ‘future maker’, using their ability to engage with companies and their investments to tackle three key issues: Energy transition, Environmental sustainability, and Equality & inclusive growth. These ‘3Es’ participate to the mitigation of sustainability risks by guiding BNPP AM’s strategic research, stewardship and thematic investing innovation. In 2022, BNPP AM published their net zero roadmap and the biodiversity footprint of their Corporates investments. BNPP AM’s ESG Research findings leverage multiple sources in order to enhance data coverage and analysis. BNPP AM’s ESG research is independent, not limited to ESG data providers and completed by direct contact and engagement with issuers. In addition, BNPP AM’s data strategy is designed to build historical datasets whilst BNPP AM strive to constantly assess the rapidly evolving ESG data landscape. These objectives provide BNPP AM with the necessary tools to further improve BNPP AM’s methodologies and overall data capabilities.

J. Due Diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

BNPP AM performs an ESG analysis on the underlying assets through its proprietary ESG score composed of environmental, social and governance indicators. This ESG score is part of the investment decision process of the portfolio manager. Controls are carried out by the fund manager to ensure that commitments related to this ESG score are respected at any time. Independent controls are also carried out by the Risk function of BNPP AM to identify any potential breach which would be remedied following an escalation process.

BNPP AM apply a layer of data quality and control to the underlying metrics BNPP AM source from third parties to narrow BNPP AM's focus to the indicators that BNPP AM deem to have sufficient coverage, quality and insight. When ESG updates are performed each ESG Sector Analyst performs quality and coherence controls on the main changes of companies in their sector.

K. Engagement Policies

Is engagement part of the environmental or social investment strategy?

Yes

If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

Voting and engagement are key components of BNPP AM's Global Sustainability Strategy and their investment decisions. Together, voting and engagement form one of the six pillars of BNPP AM's approach to sustainable investment and are fully embedded in BNPP AM's Global Sustainability Strategy (GSS).

To ensure that these activities are effective, consistent and supportive of BNPP AM's overall objectives as fiduciaries, they are not only rooted in BNPP AM's GSS, but are amplified in their Stewardship Policy and their Governance and Voting Policy, each reviewed annually, revised as needed, and approved by the Sustainability Committee and the Proxy Voting Committee.

BNPP AM's voting and engagement activities inform their investment decisions on a day-to-day basis, within the framework of their GSS and ESG integration guidelines. Similarly, BNPP AM's engagement informs their ESG analysis and ratings of issuers.

BNPP AM use three tools — voting, engagement and public policy advocacy — to encourage companies to improve their performance and accountability on sustainability topics, and to urge policymakers to deliver legislation, regulation and standards that foster sustainable, equitable development. These activities help BNPP AM to better manage ESG risks in the near and long term, enhance BNPP AM's knowledge and understanding as an investor and generate positive impact — all of which benefit their clients.

Liability risk is built into BNPP AM's controversy tracking tool. Thus, all companies are monitored via a permanent flow of information from relevant sources (brokers, public data, media, etc.). In the event of controversy, ESG analysts may trigger a special monitoring procedure (by setting up a specific list). Portfolio managers are therefore alerted and any new purchase or increase in positions in this

monitored security is prohibited until a new ESG recommendation is provided by ESG analysts. This process allows BNPP AM to maintain a maximum alert level when a controversy arises.

The more controversies a company faces, the greater the reputational risk for BNPP AM's funds. All controversies are classified from level 1 (least serious) to level 5 (most important). The classification takes into account the impact of the incident (severity and number), the level of recurrence, responsibility and exceptionality, response and management by the company. A company is automatically penalized if it faces one or more level 3 or higher controversies.

If the controversy is extremely serious or has particularly negative consequences, the company could be excluded from BNPP AM's investment universe. In addition, sectors most exposed to ESG controversies and scandals have structurally weaker ESG results in their rating system.

GOVERNANCE AND VOTING PRINCIPLES:

The following principles describe BNPP AM's expectations of the public companies in which BNPP AM invest. BNPP AM believe that Environmental, Social and Governance (ESG) issues impact the value and reputation of entities in which BNPP AM invest, in addition to driving systemic risks and opportunities. BNPP AM are therefore committed to incorporating ESG standards into BNPP AM's investment processes and voting criteria, in the long-term interests of their clients. These principles act as a guiding framework by which BNPP AM executes its ownership responsibilities.

1. FOCUS ON LONG-TERM SUSTAINABLE VALUE CREATION

Management bodies play a critical oversight role to ensure that companies deliver long-term sustainable value, meaning value that can be sustained over the long term, in line with the interests of society and the environment. Corporate governance practices should keep the board's attention focused on this goal with a clear strategy that takes into account all key stakeholders. Boards should maintain an open dialogue with investors and be prepared to discuss their long-term plans for sustainable value creation.

2. PROTECT SHAREHOLDER RIGHTS

Shareholders play a key role in BNPP AM's system of corporate accountability and value creation. BNPP AM's rights as shareholders allow BNPP AM to take action to defend the interests of their clients, when companies underperform expectations. It is therefore critical that shareholder rights be preserved and, where necessary, strengthened:

- Companies should ensure that the rights of all investors are protected and should treat investors equitably, notably by respecting the principle of one share - one vote - one dividend.
- All shareholders should be given the opportunity to vote on all decisions concerning fundamental corporate changes.
- Capital increases should be carefully controlled to minimize dilution of existing shareholders.
- Anti-takeover devices should not be used.
- Shareholders should have opportunities to address material concerns, including through direct access to the proxy to nominate directors and through the submission of shareholder proposals.

3. ENSURE INDEPENDENT, EFFECTIVE AND ACCOUNTABLE BOARD STRUCTURE

There should be a sufficient counter-balancing structure at the board and its committees with a strong presence of qualified, engaged and independent directors to allow for effective oversight of management, with independent leadership. Formal evaluation of the board, executive sessions and succession plans should be in place. Directors should be elected annually, by a majority vote of shareholders. Board composition should include the expertise necessary to understand and address emerging risks facing the company and its key stakeholders.

4. ALIGN INCENTIVE STRUCTURES WITH LONG-TERM INTERESTS OF STAKEHOLDERS

Executive compensation plans should be aligned with the long-term performance of the company, and should discourage irresponsible risk-taking, strengthen employee loyalty, take into consideration their impact on inequality and aim to foster inclusive growth. They should include non-financial targets, including those relating to the key sustainability risks and opportunities presented by the company's business model. Compensation programs should not restrict the company's ability to attract and retain talented executives, and should respect best market practices. They should be disclosed to shareholders in a clear and thorough way, and be subject to shareholder approval.

5. ENSURE RESPECT FOR SOCIETY AND THE ENVIRONMENT

Long-term sustainable returns depend upon proactive and effective management of ESG risks and opportunities to ensure that growth does not come at the expense of social and environmental health and stability. As a sustainable investor, BNPP AM expect companies to understand the risks they face and the risks they create, as well as the opportunities that better ESG performance might bring to their businesses, and to act responsibly towards all stakeholders. All companies should strive to meet high corporate governance, environmental and social standards to protect stakeholders' long-term interests.

6. DISCLOSE ACCURATE, ADEQUATE, AND TIMELY INFORMATION

Companies should ensure that timely and accurate disclosure is made on financial and operating results, ownership issues, lobbying activities and performance on key ESG issues, including full disclosure of greenhouse gas emissions and commitments to combat climate change. Corporate reporting should aim to provide investors with an accurate and holistic view of foreseeable risks to the company, as well as the company's contribution to the health and stability of key social and environmental systems. Annual audits of the financial statements carried out on behalf of shareholders by independent external auditors should be required for all companies.

L. Reference Benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

Yes

No

How is that index designated as a reference benchmark aligned with the environmental or social characteristics promoted by the financial product? (including the input data, the

methodologies used to select those data, the rebalancing methodologies and how the index is calculated)

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

How does the designated index differ from a relevant broad market index?

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.