

Pre-contractual disclosure for the financial products referred to in Article 9,  
paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation  
(EU) 2020/852

Product name: AMUNDI RESPONSIBLE INVESTING - IMPACT GREEN BONDS

Legal entity identifier: 2138002NACS4HW7EIL33

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> 80% <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___ % of sustainable investments <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

### What is the sustainable investment objective of this financial product?

The sustainable investment objective of the sub-fund is to invest in investment-grade green bonds that satisfy the criteria and guidelines of the Green Bond Principles as published by the International Capital Market Association. The environmental impact is calculated on the basis of estimates of greenhouse gas emissions avoided, using tonnes of emissions avoided in CO2 equivalent (tCO2e) as an indicator.

- **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The sub-fund seeks to identify green bonds whose objective is to finance projects generating a positive and measurable environmental impact.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Measurability is expressed as tonnes of CO2 emissions avoided per million euro invested in a year.

In addition to the quantitative and qualitative financial analysis of the bonds likely to make up the portfolio, the selection process envisages an approach aimed at maintaining their environmental qualities based on a multi-pronged analysis:

1. Analysis of the bond's characteristics in terms of:

(i) transparency, via reporting on the tonnes of CO2 emissions avoided per million euro invested in a year;

(ii) the environmental impact of the projects financed (such as the development of recycled products, sustainable management of natural resources etc.);

(iii) integration with the issuer's overall environmental strategy (such as the company's quantified targets for reducing CO2 emissions as part of the overall objective of limiting the rise in temperatures to 1.5°);

(iv) integration with an overall business approach aimed at conceptualising actions and defining environmental best practices (circular economy, development of recycling, waste reduction etc.).

2. selection of business sectors compatible with Amundi's ESG policy, including the defined exclusion rules;

3. analysis of the issuer's ESG fundamentals, to identify issuers who are "best performers" in their business sector on at least one of their material environmental factors.

In order for the issuer to be deemed to be contributing to the sustainable investment objective of the sub-fund, it must be a "best performer" in its business sector on at least one of its material environmental or social factors.

The definition of the term "best performer" is based on Amundi's proprietary ESG methodology, which seeks to measure the ESG performance of investee companies. To be considered a "best performer", an investee company must obtain the highest of the top three ratings (A, B or C, on a scale of A to G) in its sector on at least one material environmental or social factor. Material environmental and social factors are identified at the sector level. The identification of material factors is based on Amundi's ESG analysis framework, which combines non-financial data and a qualitative analysis of the associated sector-based and sustainability themes. Factors identified as material contribute more than 10% to the overall ESG score. For the energy sector for example, the material factors are: emissions and energy, biodiversity and pollution, health and safety, local communities and human rights.

To contribute to the above objectives, the investee company must not have significant exposure to activities that are incompatible with those criteria (e.g. tobacco, weapons, gambling, coal, aviation, meat production, fertiliser and pesticide production, manufacture of single-use plastics).

The sustainability of an investment is assessed at the investee company level.

All of the green bonds selected must satisfy the criteria and guidelines of the Green Bond Principles as published by the International Capital Market Association.

- ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

To ensure that sustainable investments do not cause significant harm (the "do no significant harm" or "DNSH" principle), Amundi uses two filters:

- the first DNSH filter is based on monitoring the mandatory indicators for the Principal Adverse Impacts set out in Table 1 of Annex I of the RTS (e.g. the greenhouse gas or GHG intensity of companies) through a combination of indicators (e.g. carbon intensity) and specific rules or thresholds (e.g. the carbon intensity is not in the bottom decile for the sector). Amundi already takes into account the specific Principal Adverse Impacts in its exclusion policy as part of its Responsible Investment Policy. These exclusions, which are applied in addition to the tests detailed above, cover the following topics: exclusions on controversial weapons, violations of United Nations Global Compact principles, coal and tobacco.

- In addition to specific sustainability factors covered by the first filter, Amundi has defined a second filter which does not take the mandatory indicators for the Principal Adverse Impacts into account, in order to verify that a company does not perform poorly from an overall environmental or social standpoint compared to other companies within its sector. This corresponds to an environmental or social score of E or higher on the Amundi rating scale.

- *How have the indicators for adverse impacts on sustainability factors been taken into account?*

The adverse impact indicators have been taken into account as detailed in the first DNSH filter (Do No Significant Harm): the first DNSH filter is based on monitoring the mandatory indicators for the Principal Adverse Impacts set out in Table 1 of Annex I of the RTS, where reliable data are available through a combination of the following indicators and specific rules or thresholds:

- a CO2 intensity that is not in the bottom decile of companies in the sector (only applies to high-intensity sectors), and
- a board diversity that is not in the bottom decile of companies in its sector, and
- the absence of any controversy regarding working conditions and human rights, and
- the absence of any controversy regarding biodiversity and pollution.

Amundi already takes into account the specific Principal Adverse Impacts in its exclusion policy as part of its Responsible Investment Policy. These exclusions, which are applied in addition to the tests detailed above, cover the following topics: exclusions on controversial weapons, violations of United Nations Global Compact principles, coal and tobacco.

- *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are integrated into Amundi's ESG rating methodology. The proprietary ESG rating tool evaluates issuers using data available from data providers. For example, the model includes a dedicated criterion called "Community engagement and human rights". This is applied to all sectors together with other human rights criteria, including socially responsible supply chains, working conditions and industrial relations.

In addition, controversy monitoring is carried out at least once a quarter and includes companies that have been flagged for human rights violations. When controversies arise, analysts assess the situation and assign a score to the controversy (using the proprietary scoring methodology) to determine the best course of action. Controversy scores are updated quarterly to keep track of trends and remediation efforts.



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

☒ Yes

Amundi takes into account the mandatory indicators for the Principal Adverse Impacts set out in Table 1 of Annex I of the RTS applicable to the UCI's strategy. It relies on a combination of exclusion policies (norm-based and sector-based), the integration of ESG ratings within the investment process, engagement and voting policies:

- Exclusion: Amundi has defined rules for norm-based exclusions, by activity and sector, covering some of the main sustainability indicators listed in the Disclosure Regulation.

- Integration of ESG factors: Amundi has adopted the minimum ESG integration standards applied by default to its actively managed open-ended funds (exclusion of G-rated issuers and best weighted average ESG score above the applicable reference benchmark). The 38 criteria used in Amundi's ESG rating approach have also been designed to take into account the key impacts on sustainability factors, as well as the quality of mitigation.

- Engagement: engagement is an ongoing, targeted process aimed at influencing the activities or behaviour of companies. The aim of engagement can be divided into two categories: engaging with an issuer to improve how it integrates the environmental and social aspects, and engaging with an issuer to improve its impact on environmental, social and human rights issues or other sustainability issues of importance to society and the global economy.

- Voting: Amundi's voting policy is based on a holistic analysis of all the long-term issues that could influence value creation, including material ESG issues (Amundi's voting policy is available on its website).

- Controversy monitoring: Amundi has developed a controversy monitoring system that uses three external data providers to systematically monitor controversies and their level of severity. This quantitative approach is reinforced by an in-depth assessment of each severe controversy by ESG analysts and a periodic review of any developments. This approach is applied to all Amundi funds.

☐ No



### **What investment strategy does this financial product follow?**

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The strategy consists of offering performance linked to the development of the green bond market. The investment universe is composed of green bonds of any currency that meet the Green Bond Principles criteria, and for which the positive impact on the energy transition and the environment can be assessed.

The sub-fund invests 100% of net assets, excluding liquid assets (money market UCIs and cash) in all of the following types of green bonds traded on a regulated market and issued by governments, supranational organisations and private or public companies.

"Green bonds" are defined as debt securities and instruments that finance eligible projects satisfying the criteria and guidelines of the Green Bond Principles (as published by the ICMA).

The sub-fund may invest up to 15% in emerging market bonds and up to 15% in high yield bonds.

The investment process identifies the best opportunities in terms of financial outlook and ESG characteristics, particularly environmental characteristics. The selection of securities using Amundi's ESG rating methodology and the assessment of their contribution to environmental objectives is designed to avoid the adverse impacts of investment decisions on the sustainability factors associated with the environmental nature of the sub-fund. In addition to using Amundi's ESG rating, the ESG investment research team assesses, wherever possible:

- (i) any views of third parties or other types of certification, such as Climate Bond Certification (CBI);
- (ii) whether the issuer is involved in severe ESG controversies; and
- (iii) whether the projects to be financed by the green bond contribute to the issuer's broader efforts to facilitate the energy and/or environmental transition.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The Sub-fund first applies the Amundi exclusion policy, which includes the following rules:

- legal exclusions on controversial weapons (anti-personnel mines, cluster bombs, chemical weapons, biological weapons, depleted uranium weapons etc.);
- companies that seriously and repeatedly contravene one or more of the ten principles of the Global Compact, without credible corrective action;
- the Amundi Group sector exclusions on coal and tobacco; (details of this policy can be found in the Amundi Responsible Investment Policy available at [www.amundi.fr](http://www.amundi.fr)).

The sub-fund invests 100% of its assets in green bonds (excluding liquid assets). At least 50% of these green bonds have an ESG rating between A and D. Issuers with an ESG rating of F or G are excluded.

At least 90% of the securities held in the portfolio are subject to a non-financial analysis.

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

The management team applies Amundi's ESG rating methodology. The rating is based on a proprietary ESG analysis framework which takes into account 38 general and sector-based criteria, including governance criteria. For the governance aspect, Amundi assesses the issuer's ability to provide an effective

**Good governance**  
practices include sound management structures, employee relations, remuneration of staff and tax compliance.

corporate governance framework to ensure that it achieves its long-term objectives (e.g. maintaining the issuer's value over the long term). The governance sub-criteria taken into account are: the board structure, audit and control, remuneration, shareholders' rights, ethics, tax practices and ESG strategy.

Amundi's ESG rating scale consists of seven ratings, ranging from A to G, where A is the best rating and G is the worst. G-rated companies are excluded from the investment universe.

Each corporate security (shares, bonds, single-issuer derivatives, ESG shares and bond ETFs) included in the investment portfolios has been assessed for good governance practices by applying a filter for compliance with United Nations Global Compact (UNGC) principles to the issuer in question. This assessment is performed on an ongoing basis. Every month, Amundi's ESG Rating Committee reviews the lists of companies in breach of the UNGC and therefore downgraded to a G rating. Investment is systematically withdrawn from G-rated securities within 90 days.

This approach is supplemented by Amundi's stewardship policy on engagement and voting.



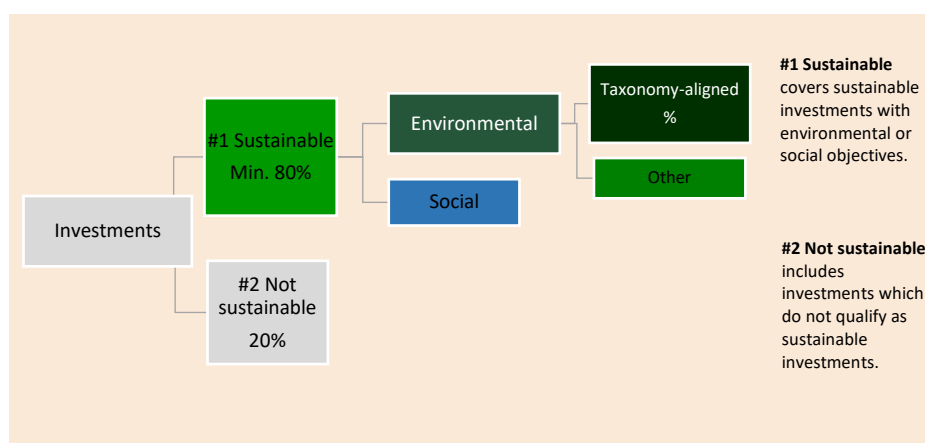
**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies;
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy;
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

### What is the asset allocation and the minimum share of sustainable investments?

The sub-fund is committed to having a minimum of 80% sustainable investments. The remaining assets consist of liquid assets and instruments held for liquidity and portfolio risk management purposes.



- **How does the use of derivatives attain the sustainable investment objective?**

Derivatives are not used to attain the sustainable investment objective.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035.

For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The sub-fund currently has no minimum commitment to sustainable investments with an environmental objective aligned with the EU Taxonomy.

The sub-fund does not commit to making Taxonomy-compliant investments in activities related to fossil gas and/or nuclear energy, as illustrated below. However, as part of its investment strategy, it may invest in companies that are also active in these sectors. Such investments may or may not be aligned with the Taxonomy.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

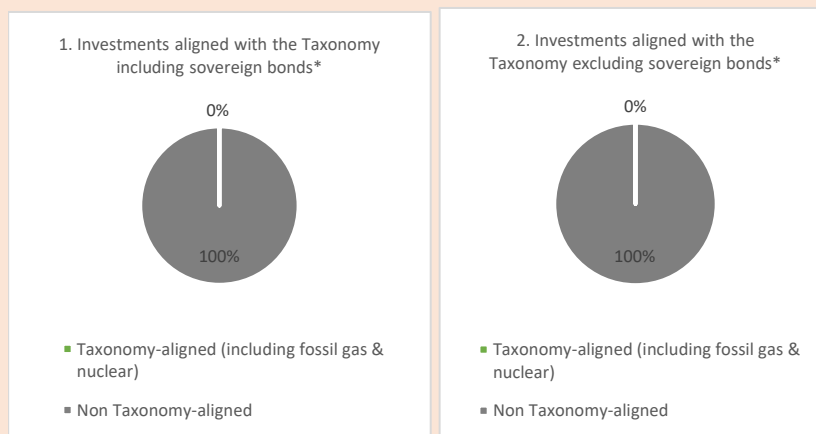
☐ Yes

☐ In fossil gas

☐ In nuclear energy

☒ No

*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 investments in transitional and enabling activities?**

The sub-fund has no commitment to a minimum proportion of investments in transitional and enabling activities.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



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

The sub-fund currently has no minimum commitment to sustainable investments with an environmental objective not aligned with the EU Taxonomy.



### What is the minimum share of sustainable investments with a social objective?

The sub-fund has no minimum share of sustainable investments with a social objective.



### What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

Derivatives and liquid assets (money market UCIs and cash) are included under “#2 Not sustainable”. Derivatives do not contribute to the sustainable investment objective; they are used for hedging and/or risk exposure (exchange rates etc.). Liquid assets are used for cash management, to cover subscriptions/redemptions.



### Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

The reference benchmark, the Bloomberg MSCI Global Green Bond Index Total Return Index Value Hedged EUR, includes environmental characteristics in its components. It is therefore aligned with the investment objective and the environmental characteristics promoted by the portfolio.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

The reference benchmark, the Bloomberg MSCI Global Green Bond Index Total Return Index Value Hedged EUR, aims to represent the performance of the investment strategy.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The strategy aims to finance the energy transition by investing in green bonds that have a positive and measurable impact on the environment and that comply with the transparency recommendations of the Green Bond Principles (GBPs) issued by the International Capital Market Association (ICMA).

As such, alignment with the index methodology is important because the index relies on two index providers recognised for their bond index and ESG analysis expertise, respectively. Using the ICMA's GBPs, MSCI's ESG research makes it



possible to filter for green bonds in the vast universe of self-labelled green securities.

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

The strategy is to invest in green bonds from all geographical areas; it is denominated in euro and hedged against currency risk.

The designated index (GBGLTREH) is representative of this investment universe because it is the index in euro hedged against currency risk.

The parent index (Bloomberg MSCI Global Green Bond Unhedged Total Return Index; "GBGLTREU") is representative of a global universe of green bonds, not hedged against currency risk.

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

The Bloomberg MSCI Global Green Bond Index is administered by MSCI.

Information on the complete building methodology is published and available on the following website:

[https://www.msci.com/documents/10199/242721/Barclays MSCI Green Bond Index.pdf/6e4d942a-0ce4-4e70-9aff-d7643e1bde96](https://www.msci.com/documents/10199/242721/Barclays_MSCI_Green_Bond_Index.pdf/6e4d942a-0ce4-4e70-9aff-d7643e1bde96)



**Where can I find more product-specific information online?  
More product-specific information can be found on the website:**

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