

Responsible Investment Charter



October
2023



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Photography: Floresco Building @myphotoagency

Cover page

Picture 1: The Curve Building

Picture 2 : @gettyimage

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Editorial

Responsible investment was one of Amundi's founding principles when it was established in 2010. In the belief that financial businesses and stakeholders bear a specific responsibility for addressing the major issues we currently face, Amundi intends to play an active role in developing a more sustainable development model at our companies.

Through our responsible approach to investing, we factor environmental, social and governance (ESG) criteria into our investment processes and the way in which we manage assets throughout the entire holding period. We are committed to supporting sustainable transitions through an ambitious engagement policy and sustainable investment strategies, namely by establishing impact funds.



**Our
objective
is twofold**

Creating long-term value for our clients' portfolios;

Driving positive change for society as a whole, by improving the ESG performance of the real estate assets that we manage.

Using an ESG analysis method that is tailored to each strategy, our responsible investment policy covers the six expert areas comprising the Amundi Alternative and Real Assets platform: real estate, multi-management, private debt, private equity, green infrastructure, hedge fund platform.



Enjoy Building @LaurentZylberman

Amundi Alternatives & Real Assets materialize its commitment to responsible investment through 3 axes:



Taking climate action

Tackling climate change is no longer a subject up for debate. It is everyone's responsibility, and will be for decades to come.

As a committed stakeholder, Amundi Alternatives & Real Assets develops solutions to address current climate issues (financing for the energy transition, investments that seek to mitigate or adapt to climate change, etc.).

Increasing transparency

We want our clients and our investors to have full confidence in our ability to invest sustainably. We therefore have a duty to ensure that they are able to understand the actions we take in this area.

That is why we are seeking to quantify our actions through our funds under management, using clear and accurate indicators. Transparency is paramount in responsible investing since, in order to move forward together, we must be able to measure the progress we have made.



Aligning the interests of all stakeholders

We set high standards for ourselves and the companies and projects that we finance as well as for all stakeholders in our ecosystem (suppliers, tenants, property managers, etc.).

We want to work alongside all industry participants to build the framework needed to progress further when it comes to sustainable investment and asset management. Dialogue with, listening to and respect for all our stakeholders are all values of our brand and are key to finding the right incentives to encourage everyone to move in the right direction.



With this in mind, the actions that Amundi Real Estate takes as a subsidiary dedicated to the management of real estate assets, are fully in line with the Amundi responsible investment approach. Amundi Real Estate rigorously factors ESG criteria into the management of its real estate funds and pursues a responsible investment policy that is cemented in the three key Environment, Social and Governance pillars.

Our aim is to actively promote the development of sustainable real estate assets and make a significant contribution to the transition towards a more responsible and greener development model.

To do this, our teams work every day to improve the environmental impact of our activities and to provide the best possible response to the challenges that society is facing today.

The aim of this charter is to describe the driving principles behind our ESG actions from a real estate perspective. ●

The foundations of our approach

After successfully completing our ESG 2018-2021 plan and consolidating Amundi's position as a leader in responsible investing ⁽¹⁾, we set new ESG objectives at the end of 2021 as part of a three-year plan.

The new "Ambition 2025" action plan seeks to take our responsible investment ambitions even further when it comes to our savings products, to get as many companies as possible to commit to defining credible alignment strategies with the Net Zero 2050 transition target, and to ensure that our employees and shareholders are on board with these new ambitions.

For more information : <https://www.amundi.com/globaldistributor/Responsible-Investing/Amundi-s-ESG-Ambition-2025>

We are implementing this policy at Amundi by drawing on an ESG analysis method that is adapted to each strategy. This approach also extends to the Amundi Alternatives & Real Assets division, which encompasses several areas of expertise such as real estate, multi-management, private debt, private equity, green infrastructure and social impact. In order to go even further with our commitment to responsible investing, we formed an internal community in 2021 within the Amundi Alternative & Real Assets (ARA) division. This community brings together employees from various departments such as legal, compliance, investment management, ESG, sales and communication.

Regular meetings are held within the community to discuss regulatory developments and to share best practices and relevant information regarding responsible investing. This internal collaborative forum facilitates a consistent and harmonised ESG approach throughout Amundi Alternative & Real Assets.

You can find out more about the Amundi Alternative & Real Assets policy at: https://www.amundi.fr/fr_instit/Expertises/Amundi-Actifs-Reels

In keeping with the Group's commitments, Amundi Real Estate introduced responsible investment measures as early as 2010. These initiatives underpin our constant focus on reconciling economic performance with the consideration of environmental and social issues. We have provided a timeline of our ESG methodology below.

Additionally, in line with the ARA approach, Amundi Real Estate has set up a specific governance body to oversee responsible investing. ●

The Real Estate SRI Committee

which is tasked with centralising topics relating to ESG themes (tools, regulations, etc.) in order to draw up a roadmap on these themes. The SRI committee is also tasked with monitoring areas that will determine whether or not the funds managed by Amundi Real Estate should be awarded the French 'ISR' responsible investment label.



(1) <https://legroupe.amundi.com/notre-approche-esg#chapter9820>

Timeline of the Amundi Real Estate ESG methodology

2010

As an asset manager that is committed to the development of an ESG approach within its sector of activity, Amundi Real Estate participates in industry working groups set up to discuss such issues.

2012

Amundi Real Estate draws up a responsible investment charter to structure and facilitate the application of ESG criteria to all its business lines. The charter explains how the assessment tool is applied to steer and guide the management of a fund.

2011

Amundi Real Estate implements its first non-financial rating system, hinging on 6 criteria: energy, waste, pollution, health and well-being, water and transport.

2018

The new global climate-related challenges facing the sector prompt Amundi Real Estate to enhance its non-financial rating system by integrating the issues highlighted in the Paris Agreement.

2020

Amundi Real Estate fine tunes this rating system to come into line with the requirements of the 'ISR' sustainable investment label. This involves incorporating a governance focus with criteria such as: the assessment of companies' main service providers and renewable energy use.

This tool results in an "SRI performance" rating (see the section on building assessments).

2022

Launch of Amundi Real Estate's first Net-0 strategy fund.



ESG Team

WHICH IS TASKED WITH :

- Monitoring the completion of ESG scoring for each building,
- Completing the scoring for the main stakeholders (property managers, facility managers, developers, etc.),
- Overall ESG analysis of the funds,
- Monitoring non-financial ratios, particularly regulatory ratios,
- Helping the various teams to satisfy the criteria that must be met to secure SRI labels and to monitor the fund's objectives,
- Providing training to the teams on changes to regulations,
- Annual reporting on the non-financial performance of funds.



Incorporating ESG criteria into real estate asset management



Our responsible investment pledge involves integrating the three Environmental (E), Social (S) and Governance (G) pillars into the methodology we use to analyse ⁽²⁾ and manage real estate assets. This ensures that our assessment of non-financial performance is perfectly adapted to this particular asset class and covers all types of buildings (offices, shops, hotels, etc.).



Environmental Pillar

This involves measuring a building's intrinsic environmental performance, namely its energy performance, carbon emissions and the quality of water distribution installations.



Social Pillar

This involves measuring the quality of a building by assessing the standard of the installations and services intended for its users.



Governance Pillar

This involves measuring the quality of a building's management and of the involvement of key stakeholders in our responsible approach.

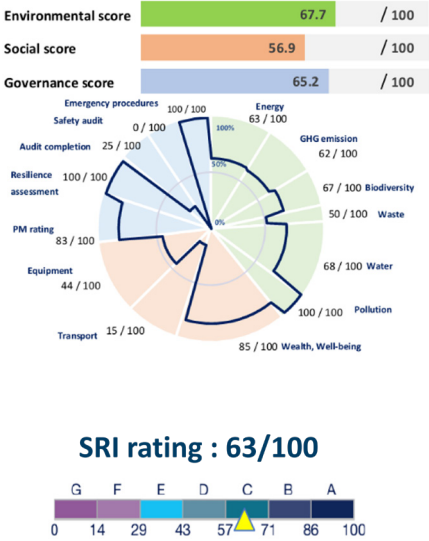
By integrating ESG issues, we want to ensure that our management company is doing business in a responsible manner, is contributing to sustainable growth and the ecological transition and participating in efforts to improve the quality of life of the stakeholders in our real estate projects. We have therefore developed an ESG analysis methodology based on the three key pillars by factoring in the themes that are most relevant to real estate. We will be reviewing this methodology regularly and will update it as needed.

(2). A more detailed description of the rating criteria can be found in the "Methodology" section of this document.



Our ESG rating methodology

Amundi Real Estate has adapted Amundi Group's Responsible Investment policy to make it compatible with the management of real assets (real estate).



Amundi Real Estate ESG scoring system ⁽³⁾ assesses each building according to 14 themes spread over the three E (green), S (orange) and G (blue) pillars. These 14 themes are based on an analysis of 47 criteria within a building. The scores achieved in each theme are aggregated to produce an SRI rating (see image below) ranging from 0 to 100. This rating ranks assets on a scale of A to G, with A being the best possible rating (100).

This assessment provides a comprehensive view of a building's performance. It is useful to estimate and plan any work that will need to be done on a building to significantly improve its environmental, social and governance performance, and to ascertain the building's chances of securing an SRI label or certification. ●

(3). Assessment methodology, 2021 version

The summary of the audit conducted on each asset includes the following:

An asset profile containing all the information needed to identify it



The latest known environmental performance: energy, carbon emissions and water. This performance data will be based on the consumption readings for the building

An assessment of regulatory risk that reflects the asset's compliance with the applicable environmental regulations



A carbon footprint assessment (scopes 1 to 3)⁽⁴⁾ that reflects the financial risks associated with the asset's exposure to future carbon taxation based on its current carbon footprint

The risks associated with a loss of biodiversity through a calculation of the proportion of planted areas in order to assess the impact of land take



(4) Source : Base Taloen de l'Observatoire de l'Immobilier Durable
 Scope 1 : relates to the building's direct GHG emissions: combustion from fixed sources (fuel oil, gas, fuel for boilers) and mobile sources (company vehicle fleet) and refrigerant leaks.
 Scope 2 : relates to indirect emissions associated with the production of electricity, heat or imported steam for heating, air conditioning or lighting.
 Scope 3 : relates to non-energy emissions linked to the entire value chain such as services, employee travel, waste management, etc.

Our asset assessment process involves the following

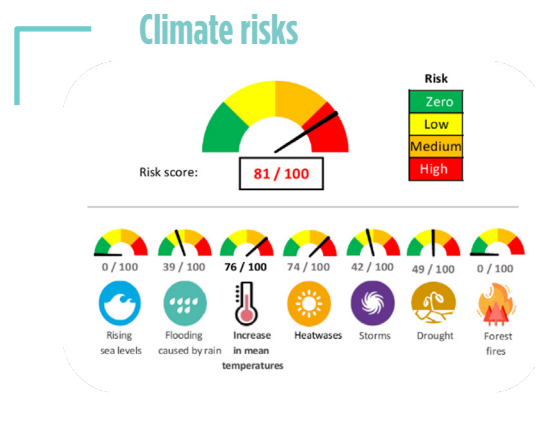
7 steps

1. Process is triggered by the asset manager or investor
2. Information is shared with the PMs and technical advisors
3. Request for information from tenants via the PMs
4. Documentation is processed
5. Asset inspection (systematic in France and, if needed, abroad)
6. Study is submitted to Amundi Real Estate (within 4 weeks)
7. Repeat analysis at least every 3 years or whenever an asset undergoes a major change

The ESG team will be informed of the rating when all these steps have been completed. Before a final investment decision can be made, the ESG team will issue an opinion on the non-financial performance of the target asset and its compatibility with the ESG ambitions of the acquiring fund.

In addition to this rating, we assess seven of the main climate change-related physical risks to which real estate assets are exposed. These physical risks are determined based on the outcome of three analyses

- a. The geolocation of the asset to determine its exposure to climate change
- b. The ability of the asset to withstand climate change through its installations
- c. Any aggravating factors that may be situated within the building's immediate environment





ESG issues integrated into our activities

L'Académie building

Applying our tools to asset management

Our asset managers use this ESG analysis tool in their decision-making process. It is useful to weigh up the pros and cons of investing in an asset based on the three ESG pillars and hence to determine an action plan to help improve an asset's performance in these areas. By repeating the analysis over time, an asset manager can monitor the implementation of these actions and measure their impacts. By closely managing and acquiring a precise understanding of the characteristics of each building, our asset managers are best placed to comprehend and identify avenues for improvement.



Applying our tools to fund management

Through mapping, we can consolidate ESG data on assets at fund level, making it a useful steering and decision-making tool for fund managers when it comes to determining the most suitable asset strategy and asset allocation.

This tool is used to guide the funds' strategy when new products are launched, particularly when it comes to ascertaining the qualities and performance of the assets to be acquired by these funds. By helping to determine areas for improvement in buildings, our tool quantifies the financial drivers of progress through a multi-year works plan. This also facilitates their integration into a fund's business plan, making it easier, in turn, to steer performance.

Lastly, it can measure the ability to improve "green" non-financial performance and the responsible behaviour of the assessed funds. This is a major advantage for investors, as it enables them to assess a fund's ESG qualities.

Applying our tools to investment/disposal

Any investment opportunity involves prior due diligence carried out by our acquisition teams. These due diligence procedures relate to the asset itself, but also to the main counterparties involved in the deal. Where an asset has yet to be built (off-plan acquisition) or where other major works are involved, a plan analysis is carried out to determine the asset's future ESG performance. A further analysis is conducted one year after construction has been completed to verify the assumptions that were applied. Where an existing building is being acquired, technical and environmental due diligence is carried out to identify and control existing pollution risks or to assess the feasibility or make a technical and financial assessment of the works that will need to be carried out for the building to attain the level of performance sought by the fund.

With this in mind, our tool is used as much for selecting assets to be acquired as it is for identifying assets that need work. It can also be used as part of a divestment process to identify the worst performing assets in our funds or those that are no longer in line with the proprietary fund strategy. ●



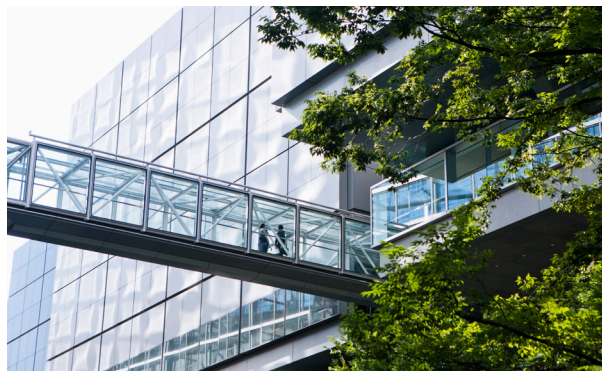
Partner engagement policy

An engagement policy is in place for the main stakeholders in a building. This essentially involves an assessment of the practices of the various stakeholders involved. Amundi Real Estate has pledged to score all stakeholders by 2024 at the latest.

Find out more about the Amundi Real Estate engagement policy on the management company's website at "www.amundi-immobilier.com".

This policy is reflected in the implementation of a Supplier Charter that assesses the counterparty's ability to contribute to an improvement in industry practices.

All service providers (property managers - "PM", facility managers - "FM", developers) are required to sign the Supplier Charter in order to keep or enter into a new contract. The Supplier Charter hinges on 11 principles that reflect CSR (Corporate Social Responsibility) fundamentals in the real estate sector.



This Supplier Charter is accompanied by a questionnaire designed to assess key stakeholders' ESG approaches to each of the 11 principles of the Charter, resulting in a score out of 20.

This questionnaire is part of a committed and responsible approach and is intended as a vehicle for progress, dialogue and innovation for everyone. The aim of the questionnaire is not to impose additional constraints on the various stakeholders but rather to help them incorporate the ESG criteria highlighted in the supplier charter into their day-to-day management. The questionnaire includes the following types of questions:

Question - Principle 3: "What percentage of employees have completed training in the structure's anti-corruption policies and procedures?"

Question - Principle 4: "Have you formalised a responsible procurement policy?"

Question - Principle 7: "As part of the works, renovation, restructuring or demolition operations carried out on Amundi Real Estate's behalf, do you promote the channelling of your waste and materials into the circular economy?"

Question - Principle 8: "Have you introduced services at buildings to promote user well-being?" ●

FACILITY MANAGERS AND PROPERTY DEVELOPERS

Amundi Real Estate provides a copy of the supplier charter and the appropriate questionnaire to all its facility management and property development service providers. By accepting the charter, they pledge to uphold it. A score is then calculated for each service provider based on their answers to the questionnaire.

PROPERTY MANAGERS

Amundi Real Estate provides a copy of the supplier charter and the appropriate questionnaire to all its property management service providers. By accepting the charter, they pledge to uphold it. The answers to the questionnaire completed by each property manager are used to determine a score and pinpoint any areas for improvement. Any property manager who wishes can ask Amundi Real Estate to help them define areas for improvement so that they can adopt more socially-responsible and greener practices.



Our fund-based approach

Coeur Défense 2 building

Overarching Approach

The Amundi Real Estate Responsible Investment process ⁽⁵⁾ is applied for each real estate asset ⁽⁶⁾ under management with the exception of funds whose majority investor have expressed the wish to develop an alternative strategy. Every Amundi Real Estate asset under management undergoes ESG analysis and the results are then monitored over time.

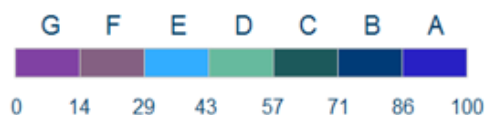
Using the tools described above, a number of criteria can be applied to draw up an ESG assessment of a building, so as to determine its overall performance and identify any possible levers for improvement.

The score out of 100 assigned to each asset as part of our ESG assessment described above is transformed into a rating that can range from A to G, with A being the best. The range [0; 100] is divided into seven equal ranges (see the cursor below).

Each of these ranges represents a letter from A to G. A score of less than 14 equates to a G rating and a score of 86 or more equates to an A rating.

This Responsible Investment Charter applies to all funds that are managed internally, as well as to third-party funds where such a request has been made by a client/investor. The ESG rating methodology does not apply to tax SCPIs (sociétés civiles de placement immobilier - real estate investment companies).

Except assets or portfolios undergoing a switch process. ●



A dynamic approach

We apply our Responsible Investment process throughout the life cycle of a building:



Hekla building
@Thierry Lewenberg-Sturm

During the day-to-day management phase:

the rating is reviewed every three years, or whenever the building undergoes a major change.

On acquisition:

our audit tool measures assets' ESG performance so that any F- or G-rated asset can be excluded. This procedure is subject to regular checks.



Max & Moore building @vero

(5). This Responsible Investment Charter applies to all funds that are managed internally, as well as to third-party funds where such a request has been made by a client/investor. The ESG rating methodology does not apply to tax SCPIs (sociétés civiles de placement immobilier - real estate investment companies).
(6). Except assets or portfolios undergoing a switch process.



Specific approach

Through its asset management processes, Amundi Real Estate encourages its investors to implement strategies for their real estate funds that actively consider ESG parameters. Some funds also lead more committed strategies, as reflected in the likes of the 'ISR' responsible investment label for real estate funds, impact investing strategies, net zero, etc., which aim to improve the ESG performance of the assets held and hence of the fund as a whole. This leads to investment solutions that address the current challenges facing society.

The specific manner in which these strategies are applied are described in the documentation for each of the relevant funds. ●

LABEL ISR IMMOBILIER

- By securing the 'ISR' label, a fund is able to provide investors with assurance that the fund managers take ESG themes into due consideration.
- SRI certification is not the only strategy pursued for real estate funds.



The creation of a “health” fund in October 2022 by Amundi Real Estate, aimed at building up a portfolio of real estate assets in connection with the healthcare, well-being and dependency sector, primarily in France and the euro area

The creation of Amundi Real Estate’s first Net-0 fund. The fund is committed to a strategy that is compatible with carbon neutrality on a global level by adopting measures to promote a drastic reduction in greenhouse gas emissions by the fund’s assets



REQUIREMENTS

1

Define and communicate the targeted goals by taking ESG criteria into consideration

2

Introduce a methodology to analyse assets ESG performance in the acquisition phase and throughout the holding period. détention

3

Explain how the results of the ESG analysis are factored into investment and asset management decisions

4

Implement the means and tools needed to get all stakeholders on-board with the approach

5

Communicate with transparency on the strategy and the results

6

Introduce a measurement and monitoring system to assess the impacts of the strategy being pursued. mise en œuvre

Source: SRI certification, OID 2020



A photograph of a modern, multi-story atrium with a glass and steel structure. The space is bright and airy, with a large indoor garden visible through the windows. The garden features various green plants, including tall grasses and large-leafed tropical plants. The floor is highly reflective, mirroring the structural elements of the atrium. The text "Our pledges and our contributions to industry bodies" is overlaid in a teal color on the lower half of the image.

Our pledges and our contributions to industry bodies

Amundi Real Estate is a signatory to the engagement charter that the French association of real estate investment companies (ASPIM) has drawn up to promote the development of an SRI approach in real estate investing. **Amundi Real Estate has also been an active participant in the ASPIM working group for the creation of the 'ISR' responsible investment label.**

It is also a founding member of **France's green building observatory (Observatoire de l'Immobilier Durable - OID)**. The OID serves as a forum to promote the emergence of sustainable practices in French real estate. It brings private and public stakeholders together to form a shared vision centred around its mission statement: "Thinking responsible real estate".

Alongside this, Amundi Real Estate has introduced a biodiversity focus into its Responsible Investment policy by becoming a patron and a partner of the "Biodiversity Impulsion Group" (<https://biodiversity-impulsion-group.fr/initiative-big/>).



At the same time, Amundi Real Estate is a supporter of the European Sustainable Real Estate Initiative (ESREI), a programme championed by the OID aimed at bringing together European industry players to move forward on ESG issues and discuss the regulatory response across Europe.

The management company is also a member of the **association BBKA (low carbon building label)**. The BBKA label is awarded to buildings with an exempted carbon footprint. Using independent certified measurements, it quantifies and rewards reductions in a building's carbon footprint over its entire life cycle (construction-operation-end-of-life-carbon storage) through the introduction of sustainable low-carbon practices. ●



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October 2023

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