



Candriam article 8 & 9

Thematics strategies

Transparency code

Statement of Engagement

Sustainable & Responsible Investment is an essential part of the strategic positioning and behavior of Candriam. We have been involved in SRI since 1996 and welcome the European SRI Transparency Code.

This is the second transparency code for thematic strategies and the second code for the Climate Action strategy. Our full response to the European SRI Transparency Code can be accessed below and is available in the annual report of the funds and on our website.

Please note that we have also drafted Transparency codes for:

- Article 9 sustainable strategies
- Strategies which invest in sustainable & responsible companies in emerging markets.
- European strategies, which invest in innovative & responsible companies in Europe.
- Other Equities, Bonds & Multi-Assets strategies classified as Article 8.
- Index strategies, which incorporate ESG criteria into their investment process, in accordance with a dedicated index management strategy.
- ETF strategies, which integrate ESG criteria into their investment processes.

The responses to the European SRI Transparency Codes for all the above-mentioned funds are available on our corporate website and our dedicated SRI website: [SRI Publications | Candriam](#).

Compliance with the Transparency Code

Candriam is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. Candriam meets the full recommendations of the European SRI Transparency Code.

December 2023

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1. List of Funds Covered by the Code

Dominant/preferred SRI strategy (Please choose a maximum of 2 strategies)	Asset Class	Exclusions standards* and norms	Labels
<input type="checkbox"/> Best in universe Investment Section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusion <input type="checkbox"/> Impact investing <input type="checkbox"/> Norms-based Screening <input checked="" type="checkbox"/> Sustainability Themed	Passively managed <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing –ESG/SRI benchmark: specify the index tracking Actively managed <input checked="" type="checkbox"/> Shares in a euro area country <input checked="" type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International Shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input checked="" type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input checked="" type="checkbox"/> Human rights <input checked="" type="checkbox"/> Labour rights <input checked="" type="checkbox"/> Gambling <input checked="" type="checkbox"/> Pornography <input checked="" type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input checked="" type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input checked="" type="checkbox"/> OECD Guidelines for MNCs <input checked="" type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Other (please specify) -Conventional and Unconventional oil & gas	<input checked="" type="checkbox"/> French SRI label** <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input checked="" type="checkbox"/> Other (please specify) <i>Towards Sustainability**(BE)</i>

*Exclusions vary across strategies, please refer to question 3.5 for information on specific strategies.

**The list of labelled strategies can be found on the following page according to the country in which you are domiciled.

In accordance with legal requirements, please refer to our website to access information regarding specific funds in our SRI fund range available in your jurisdiction and information on the corresponding Transparency Code:

[Code de Transparence | Candriam](#)

2. General information about the fund management company

2.1. Name of the fund management company that manages the applicant fund(s)

The portfolio management company that manage the applicant funds is the following:

Candriam
Serenity Bloc B
19-21 route d'Arlon
L-8009 STRASSEN
Luxemburg

Please consult our website for further information: www.candriam.com. This code applies to the following thematic strategies managed by Candriam: Circular Economy and Climate Action.

Any question regarding sustainable and responsible investment (SRI) at Candriam can be e-mailed to the following address: [Contact | Candriam](#).

Our assets under management dedicated to ESG-related products have reached €103 billion which represent 74% of our total AUM, as of 30th December 2022.

2.2. What are the company's track record and principles when it comes to integrating SRI into its processes?

Sustainability is rooted in Candriam's operating model and forms a key part of our corporate culture. Our sustainable development strategy leads us to incorporate the overall trends that will shape the world of tomorrow when defining our strategic operational choices. This strategy aims to establish and maintain a balance between, on the one hand, responsible behaviour towards all stakeholders and, on the other, (a) the synergies between our SRI and traditional investment activities, and (b) the determination to run the company in consideration of the Environment and of Society.

Candriam has been managing Sustainable Investments since 1996. As a responsible asset manager for over two decades, we are committed to the continuous development of our long-standing and holistic Environmental, Social, and Governance analysis approaches, and to the on-going expansion of our ESG integration process towards our large range of investment products.

As a sustainable asset manager, Candriam recognizes the importance of taking into account sustainability risks and opportunities in the portfolios it manages and to duly consider sustainability impacts.


Candriam a founding signatory since 2006
25 years track-record in Sustainable Investing

Milestones in Candriam's Environmental, Social, and Governance Investing:

1996 – First Sustainable Equity Fund. In 1996, Candriam's predecessor company, Cordius Asset Management, offered investors our first Sustainable Equity Fund.

2003 – Structured Proxy Voting System Established. Candriam was a pioneer among Belgian investment managers in exercising the voting rights of its clients to improve investment returns. In 2003 we began a systematic and structured proxy voting effort.

2005 – Proprietary Environmental, Social, and Governance research. In 2005, Candriam launched its in-house ESG analysis. Our ESG approach is based on a sophisticated set of ESG factors and performance indicators in six stakeholder domains, which is Investors, Employees, Environment, Suppliers, Customers, and Society, and are the core of Candriam's approach to Sustainable and Responsible investing.

2005 – Engagement Embedded in the Research Process. Our Engagement activities began at the outset of our in-house ESG research in 2005. Engagement arose from our dialogues with companies to obtain additional information. Our direct engagement with companies has grown organically over the years; for Candriam, Dialogue is synonymous with ESG Research.

2006 – Founding Signatory of the UN Principles for Responsible Investing. Candriam was present at the birth of the PRI. Candriam has been participating in industry working groups and sustainable investing organisations since 2003.

2008 – Emerging Markets ESG Investing. We believe that analysing ESG issues in Emerging Markets requires a different approach to accommodate the lower levels of information and transparency, as well as lower levels of issuer and investor experience with ESG factors.

2009 – ESG country framework established. Our analysis of sovereign and related issuers, based on the four pillars of Human Capital, Natural Capital, Social Capital, and Economic Capital.

2010 – ESG Indexed Funds – In 2010, following the controversial armaments exclusions firm-wide, Candriam decided to apply its SRI screening to its indexed fund range

2016 – Engagement: from Initiation to Influence. In 2016, we significantly increased our commitment by dedicating a group of our experienced Sustainable Investing professionals to full-time coordination of our decade-long efforts. Currently, we are putting our Engagement efforts behind three 'Conviction Topics': Corruption, Energy Transition, and Well-Being at Work.



2017 – Responsible Investing in Emerging Market Debt and High Yield Debt. In 2017, our expansion of our ESG included SRI Bond Emerging Markets, and SRI Bond Global High Yield. Five Candriam SRI funds were awarded AFNOR Certifications by the French-government-backed organization, making our High Yield fund the first to receive an SRI label.

2017 – Helping to Train the Next Generation of Responsible Investors – In October 2017, Candriam launched the Academy for Sustainable and Responsible Investing. The Candriam Academy aims to raise awareness, promote education, and improve knowledge of sustainable investing via an innovative and accredited online educational platform.

2018 – Launch of Fossil Free funds. Launch in September 2018 of two Candriam Fossil Free funds to support investors moving towards carbon neutrality.

2018 – Exclusion of Thermal Coal and Tobacco from all investments. In 2018, all Candriam strategies divested from companies with more than 10% of their activities in thermal coal, and from any companies which initiate new thermal coal projects, based both on stranded asset and sustainability considerations. Candriam also divested from any companies with more than 5% of their activities stemming from tobacco. These exclusions demonstrate our commitment to both investment performance and responsibility.

2019 – Launch of Climate Action strategy. Launched in May 2019, the fund invests in companies providing tangible solutions in terms of mitigation and adaptation to Climate Change.

2020 – Launch of Circular Economy strategy. Launched in April 2020, the strategy invests in companies providing solutions/services in the advancement of a more sustainable economic model.

2020 and beyond – Holistic Integration of Sustainability in Finance. In 2020 and beyond, we plan to continue to innovate and develop new sustainable investment solutions, as well as to increasingly integrate ESG risks and opportunities in all our investments, drawing on our more than two decades of experience in sustainable investing.

2021 – Joining the Net Zero Asset Manager Initiative. Candriam Announced on the 1st November 2021 advanced decarbonisation ambition and joins the Net Zero Asset Managers Initiative with the aim to secure a 50% reduction in greenhouse gas emissions across a significant share of its investment portfolio by 2030 and will pursue net zero emissions of its investment portfolio by 2050 or sooner.

2.3. How does the company formalises its sustainable investment process?

Responsible Investment Policy – We have actively incorporated ESG analysis in our investing since 1996.

At Candriam, we believe that a company's long-term value is not purely measurable by purely financial metrics. By evaluating ESG criteria, investors can identify additional factors which affect a company's long-term value.

ESG considerations are central to Candriam's investment philosophy. To this end, Candriam's company-wide controversial activities policy integrates ESG factors including exclusions on controversial weapons, thermal coal and tobacco.

The policy is applicable to all funds for which Candriam has the full discretion as management company and investment manager. Except if otherwise agreed between the relevant parties, the following portfolios are therefore excluded from the scope of this policy:

- Funds for which Candriam is the Management Company but has delegated the investment management activity to another entity.
- Funds for which Candriam is not the Management Company but has received the investment management activity through a delegation by another entity.
- Fund of Funds managed by Candriam where the underlying funds are not managed by Candriam.

For third-party discretionary portfolio mandates, company-wide exclusions are applied if parties so agree. For additional information, please find Company-Wide Exclusion Policy published on our website:

[Exclusion Policy | Candriam](#)

In addition to publishing our Transparency Codes, Candriam formalises its responsible investment process through publishing its Sustainability Risk Policy, followed by its Engagement and Proxy Voting Policies:

[Sustainability Risk Management Policy | Candriam](#)

[Engagement Policy | Candriam](#)

[Proxy Voting Policy | Candriam](#)

Integration of Sustainable Practices at Candriam - Sustainability is embedded in Candriam's business model and forms an essential part of our culture. We are committed to incorporating the global trends that will shape tomorrow's world in our strategic business choices and our daily life. We balance responsible behaviour towards our stakeholders with the synergies between our ESG and traditional financial investment activities, as well as with our role in environmental and societal stewardship.

We offer transparency through our annual review of our own internal Environmental, Social, and Governance practices, and the results are published in our annual Corporate Sustainability Report (CSR). Candriam's CSR lists our concrete achievements and our 'deliverables' in our commitment to develop our own company responsibly. The latest version is available on our corporate website at www.candriam.com.

Commitment at all levels is essential. Our Group Strategic Committee regularly assesses our relevant sustainability challenges to determine how Candriam should manage our stakeholder relations and how we should attune our business model and practices to all of these long-term challenges.

In 2020, we further clarified the firm's sustainability governance:

- **A Strategic Sustainability Committee meet regularly:** the GSC, supported by Candriam's ESG and CSR experts, sets out the strategic orientations for both ESG investing (both product and commercial wise) and CSR.
- **A company-wide Sustainability Risk Committee:** reporting into GSC, assesses corporate reputational & financial risks regarding sustainability including climate risks and defines a controversial Company and Country Watch list for all Candriam's activities.
- **The Proxy Voting Committee:** furnishes strategic guidance on Proxy Voting best practices and monitor Candriam's voting policy.
- **The Candriam Institute for Sustainable Development:** oversees Candriam's Philanthropy and community-impact program, through the support of initiatives in ESG Research & Education and in the Social Impact domain.
- **The ESG Steering:** coordinates the implementation of the strategic ESG Roadmap, relying on several agile investments, operational and IT workstreams.
- **The CSR Steering:** oversees and coordinates the implementation of the CSR Roadmap across the axes of Staff, Clients, Operational Value Chain, Governance and Community.

As an investment manager, we strive to integrate ESG across all processes, offering the best services and products in ESG Investing. As a company, we commit to upholding the highest sustainability standards in every dimension of our business and we believe that our new ESG Governance Framework will allow us to do so in a more efficient manner.

2.4. How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by company?

Candriam considers that a company's long-term value is not solely influenced by financial criteria such as income or growth in the operating margin. By incorporating environmental, social and governance

(ESG) criteria, we identify other factors liable to influence a company's value and competitiveness over the medium and long term. Within the analysis of Environmental factors, we take into account a company's exposure and strategy in terms of Climate Change.

The inclusion of ESG factors rounds out the assessment of risks incurred by issuers. These risks can be broken down into four categories:

- **Operational risk:** risk of losses stemming from a failure or inadequacy in an institution's procedures, staff, internal systems or due to external events.
- **Reputational risk:** risk of loss in enterprise value stemming from the materialisation of a risk, affecting the perception of the company held by its clients, shareholders, counterparties, regulators or investors.
- **Strategic risk:** risk of losses stemming from an actual or potential risk, affecting capital and profit, and resulting from changes in business model or adverse commercial decisions, a lack of responsiveness to a market development, or the inappropriate implementation of decisions.
- **Financial risk:** risks arising from banking and financial activities, predominantly including foreign exchange, interest rate and liquidity risks.

More specifically, climate change is a source of financial and reputational risk for investors. There are two types of climate risks: physical risks and risks associated with a transition to a low-carbon economy.

Physical risks

Physical risks cover immediate material and financial aspects, as well as operational aspects (e.g. production halts, water scarcity) and reputational aspects (e.g. conflicts with local populations, major migratory flows).

Transition risks

Searching for solutions to climate change issues can generate risks and opportunities for some sectors/companies. In particular, these risks cover:

- Changes in prices of energy resources and energy efficiency, with the added drawback of leaving companies with stranded assets:
 - Reduction of renewable energy costs, and increase in supply of renewable energies, have driven down demand for the highest-polluting energies (with coal in the lead).
 - Reserves of the highest-polluting energies may end up never being used, forcing the owners to write them off.
- Changes in anti-pollution tax systems and more restrictive carbon markets, driving up prices of CO2 per metric ton.
- Financing risk for companies active in high-polluting sectors or involved with obsolete energy activities:
 - This risk has arisen due to the growing preference of clients and other stakeholders for energy transition financing and associated risks.

Types of risks

Risks		Operational	Reputational	Strategic	Financial
Climate risk	Physical risks	✓	✓		
	Transition risks - asset value			✓	
	Transition risks - legal and market constraints	✓		✓	✓
	Transition risks - financing/funding		✓		✓

Candriam decided to exclude companies on a firm-wide level displaying more than 5% in thermal coal activities and those launching new projects in order to take into account potential stranded assets linked to climate change.

At Candriam, the inclusion of ESG criteria is the first step in the responsible investment process. Candriam's SRI analysis is designed to select those issuers that best manage the challenges related to sustainable development, including climate change and energy transition.

Furthermore, as described in the previous section, Candriam has implemented a firm wide ESG governance structure to ensure proper oversight and information flow of ESG issues. Climate Risks are analysed by the Sustainability Risk Committee which assesses corporate reputational & financial risks. This committee reports directly into Candriam's Group Strategic Committee.

2.5. How many employees are directly involved in the company's sustainable investment activity?

Across our front office teams, there are approximately 60 employees that are major stakeholders and directly involved in the company's sustainable investment activity.

For more than 20 years now, the company has developed expertise in ESG analysis thanks to its dedicated ESG Team. The team comprises analysts who are sector specialists, sovereign analysis and active engagement activities. The team has developed its own ESG analysis methodology applied to governments, corporations and supranational agencies/organisations.

For the majority of our SRI strategies (i.e. strategies based on our proprietary industry-specific ESG materiality framework), the ESG analysts provide recommendations on issuers that determine the eligibility and, as a consequence, the ESG investment universe for the portfolio manager teams. The portfolio managers then apply their respective investment processes and select issuers from this ESG universe. For specific thematic strategies, the eligibility of issuers is determined in conjunction with the investment teams during dedicated committees.

Furthermore, an ESG Masterclass is organized on a regular basis to provide an extensive understanding of ESG related topics while educating our Portfolio Managers & Analysts to meet their sustainable investment objectives. This unique opportunity has been designed to provide not only training related to sustainability issues, but also information on new ESG developments and sector analysis developed by our dedicated ESG team.

2.6. Is the company involved in any RI initiatives?

General Initiatives	Environmental/ Climate Initiatives	Social Initiatives	Governance Initiatives
<input type="checkbox"/> ECCR – Ecumenical Council for Corporate Responsibility <input checked="" type="checkbox"/> EFAMA RI WG <input type="checkbox"/> European Commission's High-Level Expert Group on Sustainable Finance <input type="checkbox"/> ICCR – Interfaith Center on Corporate Responsibility <input checked="" type="checkbox"/> National Asset Manager Association (RI Group) <input checked="" type="checkbox"/> PRI - Principles For Responsible Investment <input checked="" type="checkbox"/> SIFs - Sustainable Investment Fora <input checked="" type="checkbox"/> Other <i>- Please refer to the section below for further information</i>	<input checked="" type="checkbox"/> CDP – Carbon Disclosure Project (including Climate Change, and Water and Forest programmes) <input type="checkbox"/> Climate Bond Initiative <input checked="" type="checkbox"/> Green Bond Principles <input type="checkbox"/> IIGCC – Institutional Investors Group on Climate Change <input checked="" type="checkbox"/> Montreal Carbon pledge <input checked="" type="checkbox"/> Paris Pledge for Action <input type="checkbox"/> Portfolio Decarbonization Coalition <input checked="" type="checkbox"/> Other: TCFD <i>- Please refer to the section below for further information</i>	<input checked="" type="checkbox"/> Access to Medicine Foundation <input checked="" type="checkbox"/> Access to Nutrition Foundation <input checked="" type="checkbox"/> Accord on Fire and Building Safety in Bangladesh <input checked="" type="checkbox"/> Other <i>- Please refer to the section below for further information</i>	<input type="checkbox"/> ICGN - International Corporate Governance Network <input checked="" type="checkbox"/> Other <i>- Please refer to the section below for further information</i>

As a responsible asset manager, the United Nations Principles for Responsible Investment are an important initiative to support.

We are proud to have been one of the first signatories to the UN-PRI. The PRIs are a voluntary initiative aimed at encouraging investors to include ESG (Environmental, Social & Governance) considerations in their investment decisions.









The most recent version of the PRI Report is available on the PRI website:

[CANDRIAM | Signatory profile | PRI \(unpri.org\)](#)

Candriam has undertaken to observe and promote SRI principles, having signed a number of initiatives applicable to its activities as an investment firm:

Candriam's sustainable commitments

We commit ourselves, as an investor or as a company, to behave in a responsible way. Here below are the statements we have signed or the initiatives we have joined accordingly:

Commitments and Statements signed	ESG	Joined in/ Signed in	Conviction Topics
PRI – Principles for Responsible Investment	ESG	2006	
UNGC Call to Action on anti-corruption	G	2014	
G20 Energy Efficiency Investor Statement	E	2015	
Montreal Carbon Pledge	E	2015	
Paris Pledge for Action	E	2015	
Investor Statement on ESG credit ratings	ESG	2017	
Adhesion to Green and Social Bond Principles	ES	2017	
Tobacco-Free Finance Pledge	S	2018	
The Investor Agenda	E	2018	
Commitment to support a just transition on climate change	ESG	2018	
TCFD supporter	E	2021	
Net Zero Asset Managers initiative (NZAMI)	E	2021	
UK Stewardship Code 2020	ESG	2022 Application, approved in 2023.	

Collaborative Initiatives

We join forces with other investors to secure greater leverage in calling on stakeholders to act responsibly. The table below shows collaborative initiatives active in 2019 but that Candriam had started to support in previous years, their impact and Candriam specific contributions:

Collaborative Initiatives/ Type	ESG	Joined/ Renewed	Candriam Role* and Initiative Trigger	Conviction Topics
Sustainable Stock Exchanges <i>Collaborative Dialogue</i>		2010	Passive Support Thematic	
Access to Medicine <i>Collaborative Dialogue</i>	S	2010	Mix of Support Thematic	
2013 - 22 Bangladesh Investor Initiative <i>Collaborative Dialogue</i>	SG	2013	Mix of Support Thematic	
Fiduciary Duty in the 21st Century Statement <i>Collaborative Statement</i>		2017	Passive Support Thematic	
Climate Action 100+ <i>Collaborative Dialogue</i>	E	2017	Mix of Support Thematic	
Plastic Solutions Investor Alliance <i>Collaborative Dialogue</i>	ES	2018	Mix of Support Thematic	
Investor expectations statement on Sustainable Palm Oil <i>Collaborative Statement</i>		2018	Passive Support Thematic	
Open Letter to index providers on controversial weapons exclusions <i>Collaborative Statement</i>		2018	Passive Support Thematic	
Investor statement to EU Policymakers on the future of corporate reporting <i>Collaborative Statement</i>		2018	Passive Support Thematic	
Making Finance Work for People and Planet <i>Collaborative Statement</i>		2019	Passive Support Thematic	
Implementation of labour rights in Amazon's operations and supply chain <i>Collaborative Dialogue</i>	S	2019	Active Support Exceptional Event / Controversy	
Investor Statement On Turkmen Cotton (SourcingNetwork) <i>Collaborative Statement</i>		2019	Thematic	
2019-2022 Initiative for Pesticide Use Reduction and Safer Chemicals Management - Grocery Retail <i>Collaborative Dialogue</i>	ES	2019	Mix of Support Thematic	
Investor statement on deforestation and forest fires in the Amazon <i>Collaborative Statement</i>		2019	Thematic	

Collaborative Initiatives/ Type	ESG	Joined/ Renewed	Candriam Role* and Initiative Trigger	Conviction Topics
CA100 related – Paris Aligned Accounting, Letters to Audit Committees <i>Collaborative Dialogue</i>	E	2019	Mix of Support Thematic	
Climate lobbying, Australian extractive sector-wide Letter <i>Collaborative Statement</i>		2019	Thematic	
CHRB – Investor statement calling on companies to improve Human Rights performance 2020–22 <i>Collaborative Statement</i>	S	2020	Mix of Support Thematic	
Investors Policy Dialogue on Deforestation <i>Collaborative Dialogue</i>	E	2020	Active Support Thematic	
Washing Machine Plastic Microfibre Filters Initiative <i>Collaborative Dialogue</i>	E	2020	Mix of Support Thematic	
Collaborative engagement on Uyghurs slave labour in the supply chain <i>Collaborative Dialogue</i>	S	2020	Mix of Support Exceptional Event / Controversy	
BBFAW Investor Collaboration on Farm Animal Welfare 2021–22 <i>Collaborative Dialogue</i>	ES	2021	Passive Support Thematic	
Access to Nutrition Index 2021 – 2022 <i>Collaborative Dialogue</i>	S	2021	Mix of Support Thematic	
Cumbria Coking Coal Mine project, Letter to the UK Prime Minister <i>Collaborative Statement</i>		2021	Exceptional Event / Controversy	
Barclays / Energy Policy engagement, led by ShareAction <i>Collaborative Dialogue</i>	E	2021	Passive Support Thematic	
CDP – Science Based Target Campaign 2021–22 <i>Collaborative Dialogue</i>	E	2021	Passive Support Thematic	
Investor letter to Global banks on Climate Change & Biodiversity (Shareaction-led) <i>Collaborative Dialogue</i>	E	2021	Mix of Support Thematic	
Corporate Accountability for Digital Rights 2021–22 <i>Collaborative Dialogue</i>	S	2021 Renewal, supported since 2018	Mix of Support Thematic	

X

Collaborative Initiatives/ Type	ESG	Joined/ Renewed	Candriam Role* and Initiative Trigger	Conviction Topics
NEW CDP Forest 2022 <i>Collaborative Dialogue</i>	E	2022 Renewal, supported since 2009 via Forest Footprint Disclosure Project	Mix of Support Thematic	
NEW Sustainable Protein 2022 <i>Collaborative Dialogue</i>	E	2022 Renewal, supported since 2017	Mix of Support Thematic	
NEW Investor Initiative on Responsible Care – UNI Global led <i>Collaborative Dialogue</i>	S	2022	Mix of Support Thematic	
NEW 2022 Australia Sovereign Engagement on Climate <i>Collaborative Dialogue</i>	E	2022	Active Support Thematic	
NEW 2022 UNPRI Tax Reference Group <i>Collaborative Dialogue</i>	S	2022	Mix of Support Thematic	
NEW 2022 Global Investor Statement to Governments on the Climate Crisis <i>Collaborative Statement</i>	ES	2022 Renewal, supported since 2009	Passive Support Thematic	
NEW 30pet Club FR <i>Collaborative Dialogue</i>	SG	2022	Mix of Support Thematic	
NEW WBA Investor Engagement on Ethical AI <i>Collaborative Dialogue</i>	ESG	2022	Mix of Support Thematic	
NEW WBA Investor Statement on Ethical AI <i>Collaborative Statement</i>	ESG	2022	Mix of Support Thematic	
NEW FAIRR Biodiversity – Waste & Pollution <i>Collaborative Dialogue</i>	E	2022	Active Support Thematic	
NEW 2022 PRI Advance – Human Rights <i>Collaborative Dialogue</i>	S	2022	Mix of Support Thematic	
NEW COP15 Statement from the Financial Sector Signatories <i>Collaborative Statement</i>	E	2022	Passive Support Thematic	

*Note: depending on the targets, our support may be active, passive, or lead investor.

Source: Candriam, and individual initiative websites

2.7. What is the total number of SRI assets under the company's management?

Our assets under management dedicated to ESG-related products have reached €103 billion as of 30th December 2022.

2.8. What is the percentage of total SRI assets under the company's management?

Our assets under management dedicated to ESG-related products represent 74% of our total AUM, as of 30th December 2022.

2.9. Which are the SRI funds publicly managed by the company?

[Transparency Code | Candriam](#)



3. General information about the SRI fund(s) that comes under the scope of the Code

3.1. What is (are) the fund(s) aiming to achieve by integrating ESG factors?

Candriam considers that a company's long-term value is not solely influenced by financial criteria such as income or growth in the operating margin. By incorporating environmental, social and governance (ESG) criteria, we identify other factors liable to influence a company's value and competitiveness over the medium and long term, which are not always immediately obvious in traditional financial analyses. External factors such as CO2 costs or health and safety standards affect most companies and issuers, either positively or negatively, when integrated into their economic model. Some factors offer a new opportunity while others are considered a threat to the business model.

Due to the varying nature of each strategy's investment process, the specific objectives of each strategy will vary and are disclosed via the links under the section 2.9 of this transparency code.

For more information, please refer to section 3.1 of the relevant thematic chapter.

3.2. What internal or external resources are used for ESG evaluation of the issuers who makes up the investment universe of the fund(s)?

The ESG Investments & Research Team has developed its own ESG methodology applied to governments, corporations and supranational agencies/organisations. The portfolio managers then apply their respective investment processes and select issuers from this ESG universe. The ESG Analysts use internal and external research to feed their models.

The Team strives to source information from diverse sources as we consider information from different providers to be complementary. This is as a result of providers' varying coverage, methodologies, as well as culture which may ultimately lead to discrepancies in views and final ratings. These different assessments enable our ESG analysts to have a more holistic view of a company.

Please find below an overview of the external ESG data providers used by the Team:

Rating Agencies	Certification	Scope	Types of Screening	Link
Equileap	-	International Companies	Gender equality criteria	https://equileap.org/
Bloomberg	Gender-Equality Index	International Companies	International standardized reporting and disclosure method for workplace gender data.	www.bloomberg.com/GEI
MSCI ESG Research	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria	https://www.msci.com/esg-integration
ISS-Ethix	-	Emerging Markets Companies	Norms-based Criteria	https://www.issgovernance.com/
		International Companies	Screening criteria used to exclude the weapon industry	
S&P Trucost	-	International Companies	Environmental Data Greenhouse gas emissions, energy mix, percentage of exposure to fossil fuels	https://www.trucost.com/
Sustainalytics	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria	https://www.sustainalytics.com/
Wood Mackenzie	-	International Companies	Energy and mining sectors screening used to exclude unconventional extractions and thermal coal	https://www.woodmac.com/
ISS-Oekom	-	International Companies	Sustainable Development Goals measurements	https://www.issgovernance.com/esg/
MapleCroft	-	Sovereign Issuers	Country risk metrics and analysis	https://www.maplecroft.com/
RepRisk	-	Sovereign Issuers	ESG Country risk metrics and analysis	https://www.reprisk.com/
EIU	-	Sovereign Issuers	Country risk metrics and analysis	https://www.eiu.com/n/
			Country energy data	
PRS Group	-	Sovereign Issuers	Quantitative data, political risk and country risk ratings	https://www.prsgroup.com/
Beyond Ratings	-	Sovereign Issuers	ESG performance of economies - Sovereign Credit risk – Climate Objectives Alignment	https://www.beyond-ratings.com/
Carbon4 Finance	-	International Companies	Environmental Data based on energy transition & adaptation to climate change	http://www.carbon4finance.com/

Furthermore, we also source information from academic experts, sector federations, the media, and NGOs. Examples of NGOs used in analysis include:

- **Freedom House:** measure of freedom and democracy, understood via electoral process, political pluralism, functioning government, rule of law etc. (<https://freedomhouse.org/>)
- **Fraser Institute:** measure of human freedom, understood as the absence of coercive constraint (<https://www.fraserinstitute.org/>)
- **Transparency International (CPI):** measure of public sector corruption. (<https://www.transparency.org/>)
- **Environmental Performance Index (EPI):** ranks countries which are best addressing the environmental challenges that every nation faces.
- **Paris Equity Check:** assesses how fair are countries' climate pledges under the Paris Agreement.
- **Ease of Doing Business Index:** ranks countries on their ease of doing business.

Lastly, our ESG analysts obtain information from various International Organizations, which are either an integral part of the ESG Sovereign framework or serve as additional information in analysis. Examples of International organizations including the World Bank, the IMF, the World Health Organization, the UN Programme for the Environment, the International Labour Organisation, the United Nations Development Programme, the United Nations Organisation Food and Agriculture Organisation.



3.3. What ESG criteria are taken into account by the fund(s)?

The ESG approach and thematic framework vary for each strategy. Nevertheless, all thematic strategies comprise the two common pillars:

- **Controversial Activities:** exclusion of companies involved in selected activities that do not embody sustainability.
- **Norms-Based Analysis:** companies that do not uphold the principles of the UN Global Compact are excluded.

For additional information on the other pillars of the ESG approaches, please refer to the dedicated chapters for each specific strategy.

Candriam's products aim to have a long-term positive impacts on key sustainability objectives relating to environmental, social and governance challenges. To evaluate this, Candriam conducts an impact assessment for corporates, based on their "business activities", exposure and contribution to Key Sustainable Challenges (KSC) and the management of their stakeholders. For sovereign issues, we evaluate notably how environmentally efficient countries are in developing their Human, Social, and Economic Capitals.

In order to integrate sustainable characteristics, Candriam's Article 8 products use an investment strategy that aims at reducing ESG risks as well as "Principle Adverse Impacts". To achieve this, the investment strategy employs a disciplined and comprehensive ESG framework. Candriam's proprietary ESG analytical framework for corporates and sovereigns sets clear requirements and minimum thresholds to identify the companies/countries that qualify as sustainable investments.

In accordance with Article 2(17) of the European Union's Sustainable Finance Disclosure Regulation (SFDR). Candriam defines a "sustainable investment" as:

- An economic activity that contributes to an environmental and/or social objective.
- Such investments "do not significantly harm" any other environmental and/or social objective while complying with minimum safeguards, and
- Following the good governance practices

Good governance assessment of investee companies forms an integral part of Candriam's article 8 financial products that promote environmental or social characteristics, and Candriam's article 9 financial products that have sustainable investment as their objective. In addition, whenever article 8 and/or article 9 products invest in an article 6 product, the good governance principle will also apply to all constituents of that specific Article 6 product.

1. Contribution to an environmental and/or social objective/characteristic:

Basic principles of ESG analysis for developed markets corporate issuers

We believe that all companies we invest in must display strong ESG practices. We exclude all companies that do not respect our company-wide exclusion policy and companies that have breached the principles of the United Nations Global Compact. This exclusion filter is coupled with an ESG assessment of companies by their ability to create value by integrating sustainability into their business activities and the interest of stakeholders within their operating and financial managerial processes.

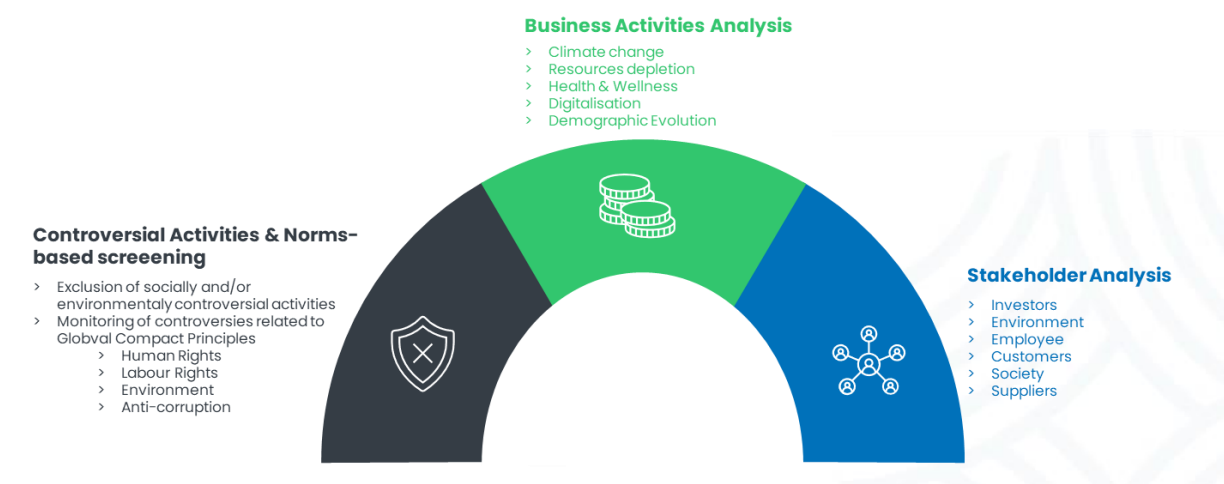
Then, all portfolio managers monitor and take into account the sustainability information that they receive from the ESG team and integrate them into their investment processes and decisions in order to better assess the risks and opportunities for each issuer. This ESG integration approach will impact the fundamental and/or credit analysis of issuers, valuation and/or ultimately impact the final portfolio construction.

The ESG Universe is constructed using proprietary ESG framework comprising the following pillars:

- **Controversial Activities:** exclusion of companies involved in selected activities that do not embody sustainability.

- Norms-Based Analysis: companies that do not uphold the principles of the UN Global Compact are excluded.
- Business Activities Analysis: Companies are exposed to major long-term ESG trends that can strongly influence the environment in which they operate and that may shape their future market challenges and long-term growth. We have identified five key sustainability trends: Climate Change, Resource Depletion, Health & Wellness, Demographic Evolution and Digitalisation.
- Stakeholders Analysis: We evaluate the extent to which each company incorporates the interests of six stakeholders in its long-term strategy: Investors, Employees, Suppliers, Customers, Society and Environment.
- Stewardship: Engagement, Dialogue, and Proxy Voting are central to our investment process in providing additional information on issuers and encouraging best practices.

For further information on our ESG approach, please refer to question 3.5.



2. Do Not Significantly Harm (DNSH):

The principle of “Do Not Significant Harm” (DNSH) under the European Union’s SFDR has key role in the classification of sustainable activities and is linked to the consideration of the Principle Adverse Impacts (PAIs) and the alignment of the investments with the so-called “minimum safeguard”. Candriam integrates the DNSH principle within its proprietary ESG research and analysis through the consideration of the PAIs which are central to our sustainable investment approach. You can find out more on the DNSH consideration on our SRI webpage:

[SRI Publications | Candriam](#)

Principle Adverse Impacts (PAIs):

Principle Adverse Impacts are defined as negative, material or likely to be material effects on sustainability factors that are caused, compounded by or directly linked to investment decisions and advice performed by the legal entity. Candriam considers principle adverse impacts of its investment decisions on sustainability factors as part of its investment due diligence process. We consider PAI at different steps of our ESG research and analysis process, through a wide range of methods and three approach from ESG ratings to negative screening and engagement and voting activities.

At portfolio level, Candriam considers the principal adverse impacts on sustainability factors occurs through one or several of the following means:

- **Monitoring:** evaluation and integration of PAIs in our proprietary ESG framework.
- **Exclusions:** ESG negative screening of corporate and sovereign issuers aim at avoiding investments in harmful activities and practices.
- **Engagement & Voting:** to avoid and/or reduce adverse impacts on sustainability objectives, the financial product also considers adverse impacts in its interactions with companies, through dialogue and voting.

Please find our PAI Consideration at Product Level and our Principal Adverse Sustainability Impacts statement on our webpage:

SFDR Publication | Candriam

Minimum safeguard:

In addition, exclusionary screens, based on norms-based assessment and controversial activities analysis, ensure that minimum safeguards referring to international norms and conventions are in place and that activities that are harmful to environmental or social sustainability are excluded.

3. Good governance:

good governance assessment of investee companies forms an integral part of Candriam’s Article 9 financial products that have sustainable investment as their objective.

Our good governance assessment is based on our ESG Rating Methodology and comprises four pillars (as per the below). In this context, Candriam relies on its norms-based controversy analysis and its Stakeholders’ Investor assessment. Investee companies are only eligible for investment if they pass all elements of this good governance screening/assessment. The four pillars are evaluated as follows:

- Sound management structure: assessed through Candriam’s Norms-based Anti-corruption/governance analysis and Candriam’s Investor Stakeholder Analysis.
- Employee Relations: evaluated through Candriam’s norms-based Labour Rights analysis.
- Remuneration of staff: analysed through the norms-based Anti-Corruption/Governance analysis.
- Tax Compliance: assessed through the Norms-based Anti-Corruption/Governance analysis.

In summary, investee companies that:

- Violates at least one of the four UN Global Compact Principles on Labour and/or the principle on Anti-corruption based on Candriam’s norms-based Controversy Analysis are RED flagged, and, consequently not eligible for investment in Article 9 products.
- Have a score below 10 on the Investor pillar of the Candriam’s Stakeholder analysis are not eligible for investment in Article 9 products.

Our norms-based analysis determines whether an issuer complies to the 10 Principles of the United Nations Global Compact (“UN GC”) for each of the four themes: (1) Human Rights, (2) Labour Rights, (3) Environment, and (4) Anti-Corruption.

Candriam assesses any breach of international standards and principles through internal analysis, combined with, if available, external research. The “breach” analysis/assessment is performed by our ESG analysts and enables Candriam to offer a qualitative review of breaches/violations of those standards to fund managers and financial analysts.

Our analysis assesses the severity of the breach(es) through the following categories:

- Temporal proximity: when and how long?
- Magnitude: financial, environmental or social impact?
- Credibility: allegations or legal proceedings?
- Recurrence: one-off or repeated incidents?
- Reactivity: company’s response?

Based on such information and the evaluation framework described above, the following colour code is given to each of the four themes of the UNGC:

GREEN	No evidence of repeated or significant violations of the global compact Principles
ORANGE	<ul style="list-style-type: none">• Evidence of repeated violations of the global Compact Principles but these do not appear to be significant, or• Evidence of significant violations of the Global Compact Principles but these do not appear to be repetitive, or• Evidence of repeated and significant violations of the global Compact Principles, but the company has taken appropriate corrective measures/actions
RED	Evidence of repeated and significant violations of Global Compact Principles and the organizations has no appropriate response/behaviour.



We consider that a company that takes positive and responsible measures to ensure the avoidance of future potential breaches is considered more favourably than a company that does not acknowledge its responsibility and/or does not take any corrective measures.

The purpose of Candriam's Stakeholder analysis is to assess the ability of an issuer to interact with its different stakeholders and incorporate its stakeholders' interests within its long-term strategy to prevent risks and seize potential opportunities. Candriam has defined 6 key stakeholders:

- Investors
- Employees
- Customers
- Suppliers
- Society
- Environment

The interactions of the investee companies with each of these stakeholders is then assessed through pillars composed of Key Performance Indicators ("KPIs"), as the below example demonstrates. The Investors analysis assesses how an issuer manages its relationship with investors, through 6 pillars and 15 KPIs:

- Strategic Direction: independence Board of Directors, composition Board of Directors, expertise Board of Directors, Track record of the CEO and succession planning
- Avoiding conflict of interest: audit committee independence, audit committee expertise, auditor's independence
- Compensation: remuneration structure, CEO pay ratio evolution, other compensation elements
- Share capital: one share – one vote and anti-takeover mechanisms
- Financial conduct and transparency: fraud and financial misconduct investigations, auditor's opinion, tax evasion
- ESG governance: Board & Management oversight of climate related risks & opportunities

The scoring of investee companies are absolute (they are not made sector relative) and we consider the threshold of a sound management to be minimum 10 (out of 100), any issuer with a score below that threshold is excluded.

Candriam's Engagement and Voting activities in support of Candriam "Good Governance" assessment:

We believe engagement is pivotal to a good governance and thus we conduct an annual pre-AGM (Annual General Meeting of shareholders) campaign. These dialogues focus on the composition and responsibility of the board, as well on the compensation policy of the target companies.

The voting season is also the occasion to foster better corporate governance by voting against the management in case of misalignments with our own good governance definition. Apart from the dialogues and vote, we may also raise our voice on governance matters via questions and/or resolutions co-filing at AGMs. Pre-announcing our voting intentions is also a way to escalate our concerns or commend companies for improvement after respectively unsuccessful or successful engagement. We have formalized these pre-announcements since 2023 ([Pre-declaration of Voting Intentions | Candriam](#)).

In summary, to be considered a sustainable investment:

- A company must be part of our eligible corporate universe. Our eligible corporate universe consists of those companies that have an ESG rating from ESG 1 to ESG 5 (up to ESG 6 for emerging markets and high yield universe) and pass the corporate exclusionary screens;
- A country must be part of our eligible sovereign universe. Our eligible sovereign universe consists of those countries that are not excluded by our in-depth negative sovereign screening and that are in the top 75% of countries by sovereign ranking.

In addition, ESG criteria is also taken into account in the investment process by leveraging on Candriam's proprietary ESG approach. For additional information on ESG integration, please refer to section 4.1.

For information regarding specific KPI's applicable to the funds, please refer to the table available under the respective link under Section 1 - Fund Covered by the Code.

3.4. What principles and criteria linked to climate change are taken into account in the Fund(s)?

All thematic strategies include climate-related controversial activities exclusions. In addition, depending on the strategy, climate change considerations may be embedded in the ESG analytical framework.

For further information, please refer to section 3.4 in the dedicated chapters for each specific strategy.

3.5. What is the ESG analysis and evaluation methodology of the fund manager/fund management company (how is the investment universe built, what rating scale is used etc.)?

Please find below further information on the **norms-based and controversial activities analysis**, which are fully common pillars to our thematic strategies. In addition, all of the strategies incorporate aspects of **our proprietary ESG corporate framework** either through or a dedicated ESG approach based on the same underlying pillars and/or ESG integration.

For additional information on the other pillars of the ESG approaches, please refer to the dedicated chapters for each specific ESG approach.

Controversial Activities

A company's exposure to controversial activities is evaluated according to several parameters covering the following variables:

- **Type of involvement:** the type of involvement (direct or indirect) is taken into account for each company evaluated (owners and operators, manufacturers and producers, retailers and suppliers, product suppliers or providers of support services, etc.).
- **Degree of involvement:** this is based on an approach in terms of level of involvement and applied to all types of controversial activities. Production capacities or income stemming from such activities are generally used as key indicators.
- **Responsible policy:** in addition to the type and degree of involvement, it is important to look at how the company addresses and perceives its potentially controversial activities. Consequently, the presence (or absence) of an appropriate, targeted responsible policy is critical to the purpose of this analysis. This type of policy acknowledges the company's involvement in a controversial activity, but also the existence of systems and practices designed to ensure that the activity is carried out responsibly.

However, any companies exposed to the weapons industry are permanently excluded from the universe if:

- They are involved in the manufacture or sale of anti-personnel mines, cluster bombs, depleted uranium weapons and/or chemical, nuclear or biological weapons, regardless of the income generated.
- Derive more than 5% of their total sales/revenues from the production, manufacturing, trade, testing or maintenance of white phosphorous weapons; the 5% threshold is adopted in order to acknowledge the fact that phosphorous is a dual use substance.
- Generate more than 3% of their revenues from the manufacture or sale of conventional weapons.

The exclusion thresholds for exposure to other controversial activities are shown in the table below:

For resources used for specific strategies, please refer to question 3.2 in the specific thematic chapter.

Level 2 Exclusions		Level 3 SRI Exclusions
Controversial Armaments	Any involvement in : anti-personal landmines, cluster bombs, depleted uranium, chemical, biological, and/or nuclear weapons, and white phosphorus	
Thermal Coal	<ul style="list-style-type: none"> 5% revenue threshold Companies developing new projects 	
Tobacco	<ul style="list-style-type: none"> Production: any involvement Distribution: 5% revenue threshold 	
Conventional armaments	<ul style="list-style-type: none"> 3% revenue threshold 	
Corporate Activities in Oppressive Regime	<ul style="list-style-type: none"> 10% revenue threshold (unless plans to exit or suspension of activities) Engagement triggered between 5% and 10% revenue exposure 	
Adult Content	<ul style="list-style-type: none"> 5% revenue threshold 	
Alcohol	<ul style="list-style-type: none"> 10% revenue threshold 	
Animal Testing	<ul style="list-style-type: none"> No responsible policy and no legal requirement to test 	
Gambling	<ul style="list-style-type: none"> 5% revenue threshold 	
GMO	<ul style="list-style-type: none"> 10% revenue threshold 	
Electricity Generation		<ul style="list-style-type: none"> Companies with new coal or nuclear-based projects Carbon intensity above 354gCO₂/kWh <i>If carbon intensity data is not available No Paris-aligned commitment</i> <p>Companies without new sustainable energy-based project</p>
Nuclear Power		<ul style="list-style-type: none"> Producers/Distributors that: <ul style="list-style-type: none"> are not RSPO members and derive between 0% and 5% of their revenues from palm oil with less than 20% of this oil being RSPO-certified palm oil, and that have no deforestation policy; or are not RSPO members and derive more than 5% of their revenues from palm oil with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy. Buyers that: <p>are not RSPO members and whose revenues are dependent on palm oil for more than 5%, with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy.</p>
Oil & gas		<ul style="list-style-type: none"> Unconventional oil & gas: <ul style="list-style-type: none"> 5% revenue threshold Companies developing new projects Conventional oil & gas <ul style="list-style-type: none"> 5% revenue threshold
Mining	UN Guiding Principle, OECD	

¹ Threshold applies regardless of carbon intensity

² Controversial activity also applicable to the Global Demography strategy

For further information on Candriam's Exclusion policy, please refer to:

[Exclusion Policy | Candriam](#)

Norms-Based Analysis

The norms-based analysis determines whether a company complies with the 10 principles of the United Nations Global Compact for each of the main categories: Human Rights (HR), Labour (L), Environment (ENV) and Anti-Corruption (COR).

PILLARS	UNGC PRINCIPLES <i>Businesses should</i>
HUMAN RIGHTS	① Support and respect the protection of internationally proclaimed Human Rights ② Make sure that they are not complicit in human rights abuses
LABOUR STANDARDS	③ Uphold the freedom of association and the effective recognition of the right to collective bargaining ④ Eliminate all forms of forced and compulsory labour ⑤ Abolish the child labour ⑥ Eliminate discrimination in respect of employment and occupation
ENVIRONMENT	⑦ Support a precautionary approach to environmental challenges ⑧ Undertake initiatives to promote greater environmental responsibility ⑨ Encourage the development and diffusion of environmentally friendly technologies
ANTI-CORRUPTION	⑩ Work against corruption in all its forms, including extortion and bribery

Information regarding actual, suspected and/or related incidents or breaches of international standards are collected through external research combined with internal analyses performed by our SRI analysts.

After identifying any breaches of the Global Compact principles, the analysis uses several parameters to evaluate the severity and magnitude of the breaches:

- Temporal proximity: when did the incident happen and how long did it last?
- Magnitude: what financial costs and environmental damage are related to the incident?
- Credibility: does the incident involve allegations, legal proceedings?
- Recurrence: is this a one-off incident or is there proof of repeated incidents over a given period?

Emphasis is also placed on a company's response when an incident occurs. A company that takes positive, responsible measures to ensure that such a breach does not happen again is considered more favorably than a company that does not acknowledge its responsibility and/or does not take any corrective measures.

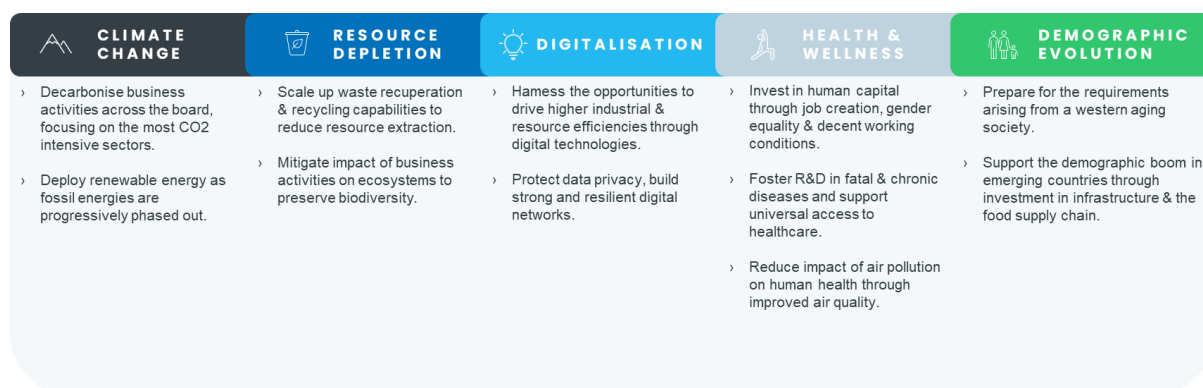
Based on this information and in accordance with the evaluation framework described above, the colour code is determined as follows for each of the four main categories.

GREEN	No evidence of repeated or significant violations of the global compact Principles
ORANGE	<ul style="list-style-type: none"> • Evidence of repeated violations of the global Compact Principles but these do not appear to be significant, or • Evidence of significant violations of the Global Compact Principles but these do not appear to be repetitive, or • Evidence of repeated and significant violations of the global Compact Principles, but the company has taken appropriate corrective measures/actions
RED	Evidence of repeated and significant violations of Global Compact Principles and the organizations has no appropriate response/behaviour.

In order to successfully pass the norms-based analysis filter, issuers must not have been attributed a "red" in any of the four fields. Companies are permanently – monitored and continuously updated.

ESG Proprietary Framework Business Activities Analysis

Companies are exposed to major long-term ESG trends that can strongly influence the environment in which they operate and that may shape their future market challenges and long-term growth. We have identified five key sustainability trends:



We group companies based on the industry or sector in which each company operates, its geographic location, business model. We determine the degree to which each industry group is exposed to the five major development challenges, and score them from 0 to +100.

We assess a company exposure, through its revenue generation, assets, CAPEX etc., to five key sustainable challenges: Climate Change, Resource Depletion, Health & Wellness, Demographic Evolution and Digitalisation.

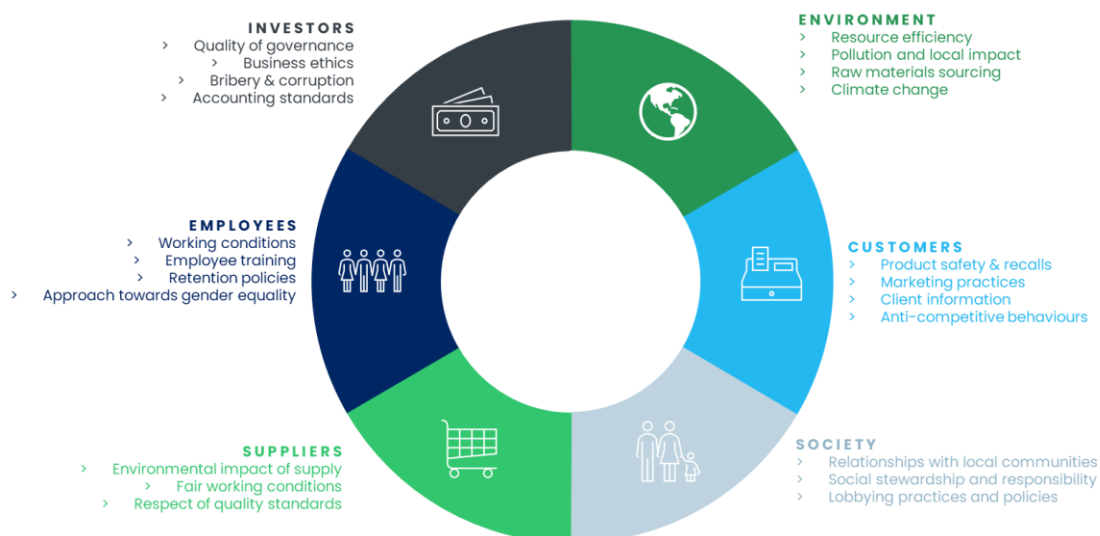
For example, within the Mining sector, steel receives a more negative score on "Resources Depletion" than do metals of the platinum group; while within the Food sector, companies producing healthy products receive a more positive score than junk food.



For each company, the score is the weighted average of the five key sustainable challenges, ranging from 0 to +100. A lower score reflects the company's lower exposure to these major challenges.

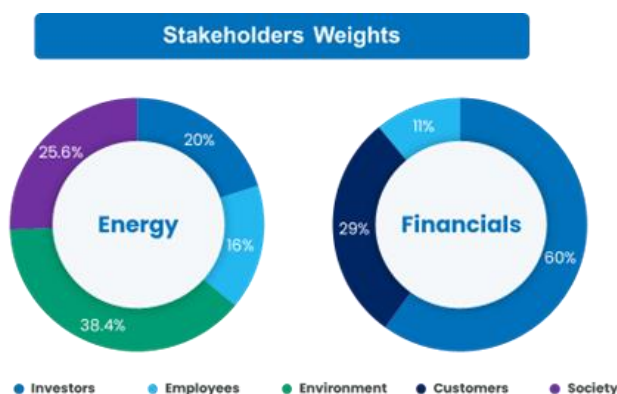
Stakeholder Analysis

Relationships with stakeholders give rise to opportunities as well as risks, and are therefore determinants of long-term value. We evaluate the extent to which each company incorporates the interests of stakeholders in its long-term strategy. We have identified six categories of stakeholders:



We determine the relevance of each category based on qualitative and quantitative data. For instance, we may look at the degree of attention paid to shareholders; the frequency of certain events such as accidents and fines; the tangible or intangible financial impact of ESG issues, and the outlook and

prospects for a company to improve or deteriorate in these measures. Based on the relevance, we determine weights for each category.



For example, in the energy sector, we place a strong weight on the Environment, in Financials for the banking sector; we place more emphasis on Investors. Within the broad categories, we also assign weight by materiality. For Energy, within the category of 'relations with employees', we stress health and safety; for Financials, within the category of 'relations for investors', we emphasize corporate governance.

For Financials we place special emphasis is given to governance in the stakeholder management analysis. Governance is one of the most important issues for financial institutions. We assess this aspect by analyzing the following:

- Board structure: Independence, expertise of directors, etc.
- Auditors' rotation (mitigates conflict of interest)
- Remuneration: is the remuneration aligned?
- Share capital (avoiding share dilution)

Furthermore, as part of our governance assessment, we incorporate the UNEP FI Principles. We verify if a bank is a signatory of the UNEP FI to assess its commitment towards the ESG issues. Although this is not a hard criterion for exclusion, we believe that banks that have committed to these principles are more prone to display stronger ESG practices.

A single category can be represented by different indicators, depending on their relevance to the sector in question. For example, the category "health and safety" of employees is primarily assessed by looking at safety conditions on oil platforms in the Energy sector, whereas, in the Software sector, it would be assessed by looking at workplace stress and ergonomics indicators.

For each theme addressed, the ESG analysis evaluates the strategies implemented by the company (relevance of the strategy developed, human and material resources allocated, pro-activity and follow-up) as well as the company's performances in each category relative to its competitors and the major trends in the sector.

The combination of this evaluation and the weightings for each category of stakeholder relations obtained from Stakeholder analysis give the overall Stakeholder score (weighted average of the six individual stakeholder relations scores) for each company. The company's score ranges from 0 to 100.

ESG score

The final ESG score of each issuer, which ranges from 0 to 100, is the combination of the Business Activities and the Stakeholders Analysis scores.

A more fundamental analysis, called "ESG Conviction", may supplement our ESG analysis which uses a more materiality-based approach. This analytical framework focuses on the most relevant ESG risks and opportunities to which issuers are exposed in order to select those best positioned in terms of sustainability. Issuers are scored against material KPIs to determine the final ESG score and eligibility. The "ESG Conviction" analysis is applied as a complement to our current process to enrich certain fundamental and active ESG investment strategies.

Since the ESG Conviction framework uses a more in-depth building block to enrich our analysis, the resulting rating, from ESG1(best) to ESG10 (worst) will be the final ESG rating.

3.6. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

Our ESG universe is updated on a monthly basis taking into account the latest data from external providers.

Each sector and country are periodically analysed by assessing the evolution of sustainability trends, as well as the relevance and materiality of each model or framework used.

The goal is to ensure that the models used by the analysts optimally reflect the sustainable development risks and opportunities affecting the sector in question. Companies are continuously monitored, and the sector is reviewed at least twice a year.

If there is a major event that may affect the rating assigned to a company (i.e. merger and acquisition, scandal, sustainability controversy etc.) or country (i.e. war, natural disaster, coup d'Etat, etc.), the ESG analyst will launch an alert on the issuer.

There are several types of alerts that can be considered:

- SRI Monitoring Alert (for information only): This alert explains how the ESG team assessed the incident or controversy, even if there is no immediate change in the decision about the company's eligibility.
- SRI Alert: This alert means that the portfolio manager will no longer be able to add to his position in this issuer. The output of an SRI Alert can be:
 - An immediate change in the final decision on the company's eligibility criteria (from "eligible" for an SRI portfolio to "non-eligible"). In this case the portfolio manager must sell the position within a one-month period.
 - No immediate change in the final decision on the company's eligibility, but there is a high probability that there will be a change in the near future following the result of the analysis. No immediate selling is required. Within the following three months of the alert, the company will be reviewed according to the new information. A longer period for the revision is allowed when justified by objective reasons, such as, on-going dialogue with the company or awaiting the result of a lawsuit.

For the Circular Economy and Climate Action strategies, there is an additional layer of monitoring of the eligible universe that is conducted by its dedicated Committee. Due to the concentrated nature of the universes, the Circular Economy and Climate Action Committee members are able to efficiently monitor all the issuers in the portfolio on a frequent basis and make any adjustments to the portfolio if required. For the Oncology strategy, a specific and dedicated monthly review process of the eligible universe has been implemented to ensure an additional layer of ESG quality monitoring.

4. Investment Process

4.1. How are the results of the ESG research integrated into portfolio construction?

Candriam's ESG investment process is a two-step process that first of all calls for the definition of the eligible investment universe, followed by a financial selection which includes ESG considerations to select issuers within the eligible ESG universe. Any investment outside the ESG universe is prohibited. The selection of ESG issuers is confirmed by the ESG team on a monthly basis, and on a one-off basis in exceptional circumstances.

When there is a change in the ESG universe and an issuer is excluded, the approach consists in excluding this issuer from the SRI portfolios within a period of one month. Depending on market conditions, rare exceptions may be granted by the CIO, RM & the Global Head of ESG Investments & Research in order to accommodate, for example, a potential liquidity issue.

The Risk Management department ensures that all securities in the portfolios comply with the ESG universe.

The financial selection of issuers from within this ESG universe is based on financial analysis and the optimal management of risks and opportunities of the portfolio.

ESG considerations are taken into account within the individual investment processes. Our ESG integration approach leverages on the frameworks and analysis conducted by the ESG Team. The analysis and views resulting from the ESG analysis are embedded in our financial frameworks. The consideration of ESG aspects in the financial framework will impact the final issuer score/color and valuation for our equity strategies. To this end, integrating ESG considerations will ultimately impact the construction of the final portfolio.

ESG Integration for Equity Strategies

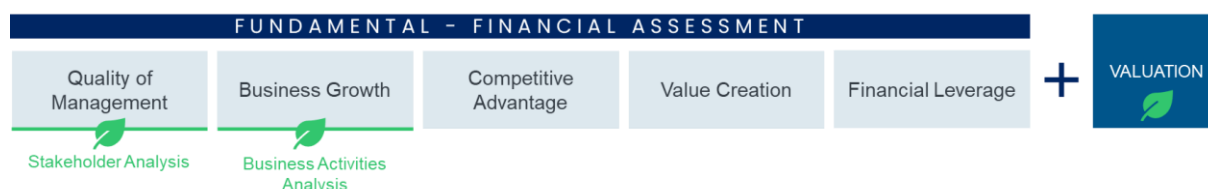
At Candriam, we integrate ESG information and analysis into equity investment decisions in order to better assess the risks and opportunities that stem from the business activities and operations of companies. Respecting and preserving the distinct nature of each philosophy and approach across our range of fundamental, thematic and emerging markets funds, Candriam's fundamental equity investment strategies are impacted at each of the following levels: Eligible Universe, Fundamental Analysis, Valuation and Portfolio Construction.

Subsequent to definition of the eligible universe by the ESG Analysis (cfr. 3.5 of the specific thematic chapters), ESG criteria is embedded into the investment process as follows:

Fundamental Analysis

Candriam's fundamental analysis is based on five pillars: Quality of Management, Business Growth, Competitive Advantage, Value Creation and Financial Leverage. Each of these pillars receives a colour/score that determines the final assessment of a company.

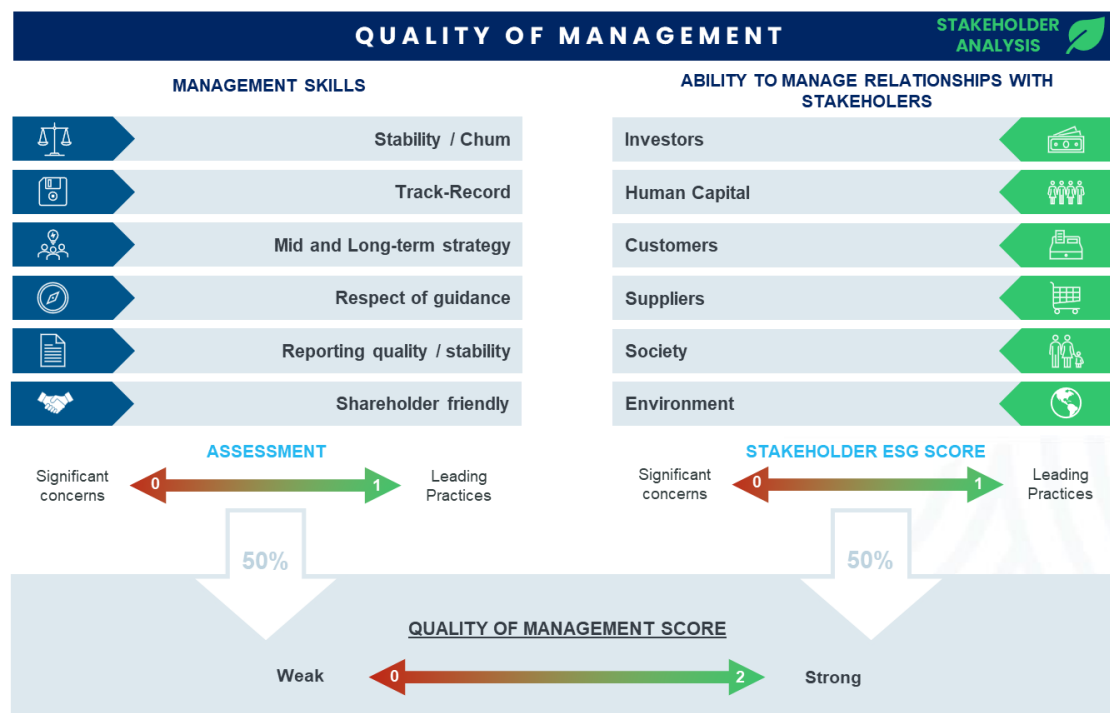
Candriam's fundamental equity strategies take into account the "Business Activities Analysis" and "Stakeholder Analysis" scores in fundamental analysis and "Company Valuation" as follows:



Quality of Management

In order to obtain a holistic view on the overall governance and soundness a company's management, we assess a company's relationships with several stakeholders by considering and integrating qualitative ESG information and quantitative ESG scores that result from the ESG stakeholder analysis. Further to the assessment of strategy, stability, track record, corporate communication and other financial criteria, we assess the Management team on its relationships with its stakeholders.

The ESG Stakeholder analysis is taken into account in the Quality of Management assessment. If the company 'stakeholder' score belongs to the worst rated ESG companies, the 'Quality of Management score' cannot be 'green'.

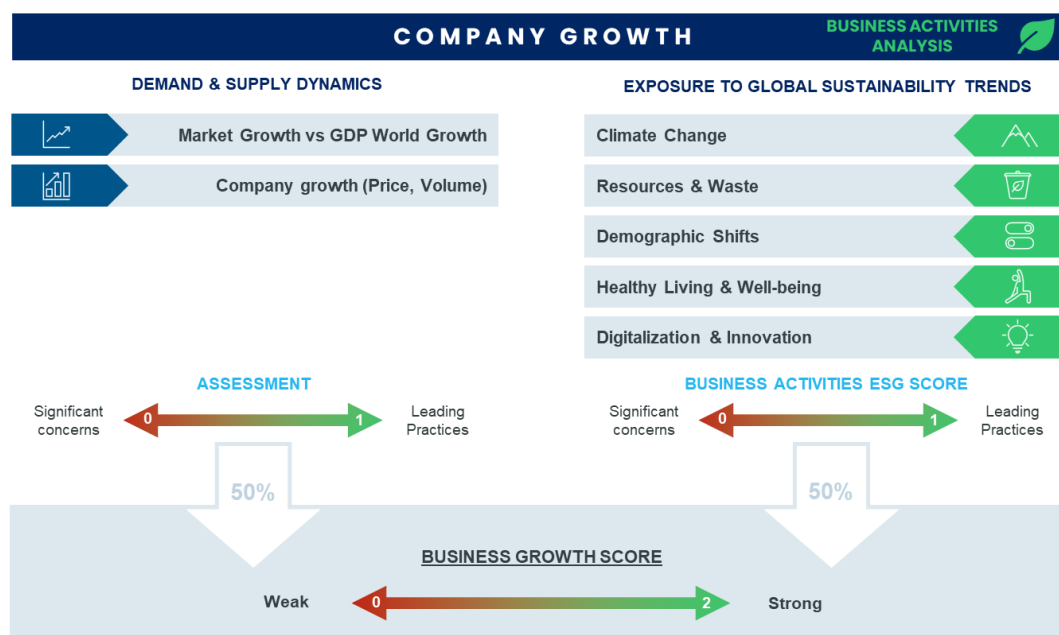


Company growth

The ESG analysis of issuers' business activities is taken into account when assessing company growth. Candriam has identified the key long-term sustainability trends that have a significant influence on the environment in which companies operate, on future market challenges, and on their long-term growth and prosperity.

The five major sustainability trends illustrated above are analyzed to assess growth potential in conjunction with other key market drivers and regulatory risk.

Specifically, we examine supply and demand dynamics, but also market drivers, the outcome of ESG analysis of business activities and any regulatory restrictions, with the aim of defining the overall score for the pillar.



Competitive Advantage

We perform an intrinsic analysis of products and services, R&D, customer support, and other areas relevant to the company's business, including opportunities and risks resulting from sustainability regulation considerations.

We use the Porter concepts to analyse the competitive position of the company in its industry, such as the threat of new entrants, threat of substitutions, and the bargaining power of suppliers and customers. We check potential constraints resulting from sustainability regulation and assess their impact on the competitive advantage of the company, as well as risks and opportunities including barrier to entry.

For instance, given the ambitious climate objectives of many countries across the globe, there has been a strong emergence of regulations and legislations pertaining to emissions, pollution, amongst other environmental considerations. To this end, we expect companies that have business activities that positively contribute to those environmental objectives to outperform in the long run.

This analysis leads to a qualitative view which is taken into account in our overall assessment in this pillar.

Final Fundamental Assessment

For each criterion, companies receive one of the following scores or colors: 0/Red (weak), 1/Orange (medium) or 2 /Green (strong quality). All the five scores are then compiled in order to get a global score/colour grade of the companies which determine the "quality score" of a company: "High Quality" (Green), "Satisfying Quality" (Orange) and "Low Quality" (Red).

The ESG assessment is a contributing factor to determine the final colour/score of a company, which in turn will determine the weighting of this position in the final equity portfolio.

- **Company Valuation:** We further evaluate the dynamics of their profitability and growth, the liquidity of the equity, and valuation. Our valuation is predominantly based on DCF models using at least five years of projected Free Cash Flow, based on our internal projections. We adjust the discount rate based on the final score/colour of a company which takes into account ESG criteria. For example, for green companies, we reduce the discounting rate within our DCF. This modification has a significant impact on the DCF- valuation.
- **Portfolio Construction:** Within the eligible universe, the process is mainly colour-based, bottom-up stock selection; weightings in the portfolio are function of the global colors of the companies. The sector weight deviations from the benchmark are not a strategic objective; they result from our convictions on individual stocks, with top-down sanity checks and other deviation boundaries.

The weight is significantly impacted by the colour grade (including the ESG score), and the upside potential derived through our valuation analysis (that takes the ESG score into account as well).

We favor companies that are 'green' in all aspects. An 'orange' company will have a lower weight and 'red' companies are in principle excluded, or extremely reduced, depending on the process.

4.2. Does (do) the fund(s) use derivative instruments?

Pursuant to the Prospectus, the fund may use derivatives. However, the use of derivatives is not an integral part of the strategies.

In the ESG Risk Policy, the general principle on the use of derivatives is that it can only be used to cover positions. No net short positions are authorized, except in exceptional cases where adequate hedging cannot be achieved due to lack of instrument coverage.

For all derivative transactions, the fund is required to use as counterparty, only those financial institutions that comply with the principles of the United Nations Global Compact, as described in Section 2 of Question 3.5 of this Code at the time of the transaction.

Please find below our standard policy on derivative instruments as defined by the ESG Risk Policy:

- **Interest rate futures:** management of the funds in question involves the regular use of interest-rate futures based on government bonds belonging to the SRI universe, to adjust the portfolio's duration (upward or downward) across the different segments of the yield curve. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.
- **Interest-rate swaps:** management of the funds in question may involve the use of interest-rate swaps in order to trade a fixed rate for a variable rate, if the counterparty belongs to the SRI universe. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.
- **Equity swaps:** these transactions are permitted, provided that the index or basket of shares meets the criteria of the SRI universe.
- **Credit derivative indices:** management of the funds in question may involve the temporary use of credit-derivative indices, in cases where the funds must quickly adjust their exposure to the markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.
- **Credit Default Swaps (CDS):** the funds in question may use CDS on an SRI issuer in the portfolio if the counterparty to the transaction is a financial institution that also belongs to the SRI universe. As both the issuer subject to the CDS and the counterparty to the transaction belong to the SRI universe, these transactions have no impact on the fund's ESG quality.
- **Equity index futures:** management of the funds in question may involve the temporary use of equity index futures, in cases where the funds must quickly adjust the portfolio's exposure to the equity markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.
- **Forwards:** forwards are exclusively used to quickly adjust the portfolio's exposure to foreign exchange risk in the event of strong market fluctuations or a major change in the portfolio's composition. These transactions, which have no impact on the fund's ESG quality, have to be done with a credit institution that is part of the SRI universe.
- **Listed options / OTCs on individual equities or on bond issuers:** these options are valid provided the issuers are in the SRI universe.

Please note that investments in commodities as well as forward contracts on commodities are forbidden.

5. ESG Controls

5.1. What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?

At Candriam, several departments are in charge of internal control: risk management, internal audit and compliance.

Each department is independent of the Fund Management Department and is placed directly under the authority of Candriam's Group Strategic Committee.

The risk management department ensures that the securities making up the portfolios comply with the eligible universe.

One of the tools used by this department is the constraints server, a tool that combines all the constraints and limits required to manage the investment funds. It contains regulatory and contractual constraints as well as internal limits and constraints used to prevent operational errors. Constraints are applied, for example, to the:

- ESG investment universe
- List of authorised investments
- Potential ratios (liquidity, dispersion) defined
- Main regulatory constraints applicable to the fund
- "List of credit warnings" and "list of equity warnings"

Once the constraints have been configured in the constraints' server, any order entered by the portfolio manager is immediately checked against them before the order is sent to the markets (ex-ante control). The portfolio manager is alerted in the event of a breach of constraint.

The Internal Audit Department carries out inspections and subsequently advises as necessary to ensure the performance and effective implementation of the internal control system in force. The inspection missions represent the lion's share of the audit department's work and aim to provide the Executive Committee with an objective and independent assessment of a particular domain (function, process, system,...).

6. Impact measures and ESG reporting

6.1. How is the ESG quality of the fund(s) assessed?

The ESG quality of the fund is assessed through internally developed ESG scores based on our proprietary ESG model (business activities analysis, stakeholder analysis, controversial activities, and norms-based analysis). The scores are measured against the fund's benchmark. We track the ESG quality using an overall ESG score as well as E, S and G scores, as illustrated below:

ESG Score – Companies (0-100)

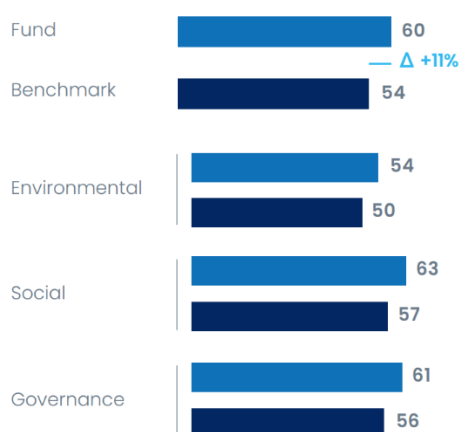


Image provided for illustrative purposes only.

6.2. What ESG indicators are used by the fund(s)?

The following ESG indicators are available for our Thematic strategies (except for strategies launched in 2021):

- **Carbon Footprint:** Carbon Footprint Metrics of an investment portfolio refers to measurement of greenhouse gas (GHG) emissions by summing the proportional GHG emissions of the underlying holdings, proportional to the share of ownership. For further information on the carbon footprint, please refer to the Appendix.
- **Water Consumption (not applicable for Oncology Impact):** Measures the asset weighted water consumption of a portfolio normalized per million \$ invested (expressed in cubic meters water / million \$ invested). Data sourced from “Trucost”, does not include the supply of drinkable water and the wastewater that enters in the company’s facility to be treated.
- **Energy Mix:** The Energy Mix of a portfolio refers to the mix (percentage wise) of underlying energy sources used to generate electrical power by the underlying utility companies within a portfolio.
- **Waste Production (not applicable for Oncology Impact):** Measures the asset weighted waste production of a portfolio normalized per million \$ invested (expressed in tons of waste / million \$ invested). Data sourced from “Trucost”, waste production data includes landfill waste, incinerated waste and nuclear waste.
- **Women on Boards:** Asset weighted Percentage of Female Board Members at the companies held in portfolio.
- **Independent Board of Directors:** Asset weighted Percentage of Independent Board Members at the companies held in portfolio.
- **Collective bargaining agreements:** This indicator provides an assessment of the extent that company’s employees are covered by collective bargaining agreements within the underlying companies of the portfolio.
- **UN Sustainable Development Goals (not yet available for Oncology Impact):** The sustainability Development Goals (SDGs) are a collection of 17 global goals set by the United Nations General Assembly in 2015, to be achieved by year 2030. Through their activities, companies can directly contribute to the achievement of a number of these goals; by means of

their employment policies, products and services, governance and by the way they integrate environmental and social goals into their operations.

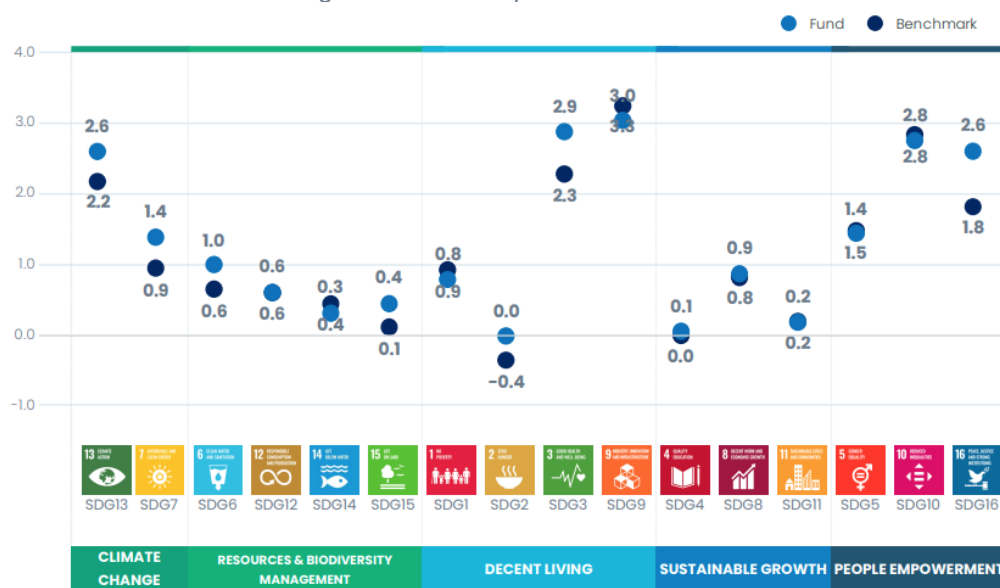


Image provided for illustrative purposes only.

- **Real Life Impacts:** We aim to go beyond transparency by providing investors with a better understanding of impact indicators. We seek to bring these indicators to life in a more comprehensive manner for investors by providing real life examples of their contribution, as illustrated.



Image provided for illustrative purposes only.

- **Emissions savings:** The Saving per 1 million € invested indicator is based on the difference in Carbon Emissions between the Fund and the Reference Index. It compares this difference to the equivalent emissions from both commercial flights and family cars. For commercial flights, it is expressed in the number of return-flights from Brussels to New York in economy class. For family cars, it is expressed in the number of cars based on 13 000 km per year by cars emitting 120g CO2 per km on average (Source: Eurostat).
- **Water savings:** The Saving per 1 million € invested indicator is based on the difference in Water Consumption between the Fund and the Reference Index. It compares this difference to the equivalent consumption from both the average household and number of showers. For households, it assumes an average daily consumption of 144 litres per person with 2.3 person per household. For showers, it assumes an average consumption of 40 litres per shower.

For the Oncology, Robotics and Global Demography strategies, the following indicators are available:

- Carbon Footprint
- Energy Mix
- Women on Boards
- Independent Board of Directors
- Collective bargaining agreements
- Real Life Impacts -- Emissions savings

In the context of the French government's SRI label (section 6 of the SRI Label guidelines), please find below the results for each of the labelled strategies on the environmental, social, governance and human rights pillars:

[Label ISR Indicators | Candriam](#)

6.3. What communication resources are used to provide investors with information about the SRI management of the fund(s)?

The documents and information on our strategies address the ESG quality of the portfolio via:

- The fund's investment strategy.
- The selection of the largest exposures in terms of securities in the portfolio, as described in the fund report.

Please find below examples of additional documents published on an annual basis. The Stewardship report incorporating Engagement and Proxy Voting reviews can be viewed on Candriam's website:

[Annual Engagement & Voting Report | Candriam](#)

Details of **votes cast** can be viewed on our website at the following link:

[ISS Voting Dashboard | Candriam](#)

Candriam's Corporate Social Responsibility Report, can be viewed at the following link:

[CSR Report | Candriam](#)

For any request on research available to investors/savers or the breakdown of the securities in the portfolios, please contact [Contact | Candriam](#).

6.4. Does the fund management company publish the results of its voting and engagement policies?

Yes, the company publishes the results of its voting and engagement policies.

Please refer to question 6.3. for the links to our publications.

7. Appendix

Additional information – Carbon Footprint

tCO₂-eq: Carbon dioxide (CO₂) is the most common GHG emitted by human activities, in terms of the quantity released and the total impact on global warming. As a result the term “CO₂” is sometimes used as a shorthand expression for all greenhouse gases. A portfolio’s carbon footprint is measured in tons of carbon dioxide equivalent (tCO₂-eq) which allows to bundle the various greenhouse gas emissions in a single number. For any quantity and type of greenhouse gas, CO₂-eq signifies the amount of CO₂ which would have the equivalent global warming impact. Scope 1, 2 and 3: The international GHG Protocol classifies a company’s GHG emissions into three ‘scopes’:

- Scope 1 emissions are direct emissions from owned or controlled sources.
- Scope 2 emissions are indirect emissions from the generation of purchased energy.
- Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions.

All Carbon Footprint Metrics analysed in our reporting are based on both Scope 1 and Scope 2 data sourced from the specialist data-provider “Trucost”. Good quality Scope 3 data currently does not exist because of the complexity to measure and control upstream and downstream value chain data. That also entails that so-called ‘avoided emissions’ are excluded from the Carbon Foot-printing analytics.

Carbon Footprint Metrics: One can distinguish between four Carbon Footprint Metrics:

(1) Total Carbon Emissions: measures the total GHG emissions of a portfolio in the most literal sense by summing all the GHG emissions of the underlying holdings, proportional to the share of ownership. The dependence of this measure to a portfolio’s specific size makes this metric of limited usefulness for benchmarking and comparison purposes.

(2) (Normalized) Carbon Emissions: measures the asset weighted carbon emissions of a portfolio normalized per million USD invested (expressed in tCO₂-eq / million USD invested).

(3) (Normalized) Carbon Intensity: measures the asset weighted carbon emissions of a portfolio normalized per million USD of revenue (expressed in tCO₂-eq / million USD revenues). This metric provides an indication of the amount of GHG emitted by the holdings in a portfolio to generate 1 million USD of revenue.

(4) The Weighted Average Carbon Intensity (WACI): is the sum product of the portfolio’s holdings weights and Carbon Intensities, where holdings’ Carbon Intensities are calculated as the company’s total carbon emissions divided by the company’s total revenues.



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Candriam consistently recommends investors to consult via our website www.candriam.com the key information document, prospectus, and all other relevant information prior to investing in one of our funds, including the net asset value ("NAV") of the funds. This information is available either in English or in local languages for each country where the fund's marketing is approved.

Specific information for Swiss investors: The appointed representative and paying agent in Switzerland is RBC Investors Services Bank S.A., Esch-sur-Alzette, Zürich branch, Bleicherweg 7, CH-8027 Zurich. The prospectus, the key investor information, the articles of association or as applicable the management rules as well as the annual and semi-annual reports, each in paper form, are made available free of charge at the representative and paying agent in Switzerland