Product name: GROUPAMA EURO CREDIT SHORT DURATION

Legal entity identifier: 969500KRDM8LRWMDTP22

Environmental and/or social characteristics

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

Does this financial product have a sustainable investment objective?

☐ **Yes**

☒ **No**

☐ It will make a minimum of **sustainable investments with an environmental objective**: N/A

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

☐ It will make a minimum of **sustainable investments with a social objective**: N/A

☒ It **promotes environmental/social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50.0% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☒ with a social objective

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

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

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

The financial product promotes environmental and social characteristics via a management approach that values the sustainability of issuers through an analysis of the environmental, social and governance (ESG) criteria of the securities held in the portfolio.
The analysis of these ESG criteria results in an ESG rating from 0 to 100, which is based on various indicators, including:
-Environmental (biodiversity, waste management etc.);
-Social (employee training, supplier relations etc.);
-Governance (board independence, executive compensation policy etc.).
With this in mind, the financial product implements a best-in-universe approach and also excludes certain securities.
Furthermore, the financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

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

As part of its investment policy, the financial product will report on the following sustainability indicators in order to measure the attainment of each of the environmental or social characteristics it promotes:
- Carbon intensity
- Number of companies invested in with a human rights policy

- Average ESG rating of the financial product compared to the investment universe benchmark index

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

The objectives of the sustainable investments that the financial product partially intends to make are environmental or social objectives.

The investments made contribute to these objectives:

- by selecting companies whose activities contribute positively or very positively to at least one of the 16 Sustainable Development Goals as defined by the UN (SDGs) according to the proprietary approach developed by Groupama AM. This approach is based on data from our MSCI provider.

Companies are analysed for their activities' positive contribution to 16 of the 17 UN SDGs (the SDG Peace, Justice and Strong Institutions is not applicable to companies).

- The company's contribution to an SDG is 'NEUTRAL' if the turnover of the identified sustainable activities is zero;
- The company's contribution to an SDG is 'POSITIVE' if the turnover of the identified sustainable activities is between 1% and 5%;
- The company's contribution to an SDG is 'VERY POSITIVE' if the turnover of the identified sustainable activities is strictly greater than 5%.

Sustainable investments are considered to be investments with a very positive, positive or neutral score.

- by holding green bonds, social bonds or sustainable bonds validated by an internal methodology based on two recognised benchmarks:
  - The transparency requirements of the Green Bond Principles, Social Bond Principles and Sustainable Bond Principles.
  - The classification of eligible activities under the Greenfin label for green bonds.

For more information on our internal methodology, please see our ESG methodology here: https://www.groupama-am.com/en/sustainable-finance

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

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

Sustainable investments in the portfolio shall ensure that they do no significant harm to any sustainable investment objective through:

- The application of ESG and exclusion policies and of Groupama AM policies: the Major ESG Risks list, the fossil fuel policy (coal and non-conventional fossil fuels), the controversial weapons exclusion policy. Consequently, any company featuring on one of these lists is considered non-compliant with the DNSH requirement.
- The application of sectoral exclusions: companies operating in the alcohol, gambling, tobacco and pornography sectors are considered to be non-compliant with the DNSH requirement if more than 5% of their turnover comes from these sectors.
- Incorporating indicators for adverse impacts into the calculation of an issuer's ESG rating.

For green, social and sustainable bonds, this absence of harm is verified through the systematic analysis of the issuer's ESG performance.

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

This financial product takes into account the 14 mandatory indicators set out in Table 1 of Annex I to European Commission Delegated Regulation (EU) 2022/1288. It also takes into account two additional indicators: the number of days lost to injuries, accidents, fatalities or illness, and water usage and recycling. The principal adverse impact indicators are taken into account qualitatively or quantitively at various levels of

our sustainable investment approach: the exclusion policy, the analysis of controversies, the engagement policy and the internal ESG analysis methodology. The indicators for adverse impacts 1 to 14, as well as the two additional indicators, are qualitatively taken into account during our ongoing monitoring of controversies. The indicators for adverse impacts 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12 and 13 are qualitatively integrated into the proprietary ESG analysis methodology. PAI 10 on violations of United Nations Global Compact principles and OECD Guidelines for Multinational Enterprises is taken into account through the normative exclusion policy applied to the financial product. PAI 4 is taken into account in our sectoral exclusion and engagement policies. PAI 14 is taken into account in our exclusion policies.
PAI 15 and 16 are qualitatively taken into account during our ongoing monitoring of controversies and are quantitatively integrated into the proprietary ESG analysis methodology.

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

Violations of the principles of the Global Compact, the OECD Guidelines and the lack of a process for monitoring compliance are taken into account in the sustainable investment analysis. They are monitored via the Global Compact score calculated by our ESG data provider. This score is based on an analysis of the controversies of companies in relation to respect for human rights, labour rights, business ethics and respect for the environment.

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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

☒ Yes, in line with the principle of double materiality the principle adverse impacts (hereinafter "PAIs") are taken into account at several levels of the sustainable investment approach: the exclusion policies, monitoring of controversies, the engagement policy and the internal ESG analysis methodology. This consideration helps to limit the environmental and social impacts of investment decisions and makes it possible to monitor sustainability risks to which the portfolio may be exposed.

This financial product takes into account the 14 mandatory indicators set out in Table 1 of Annex I to European Commission Delegated Regulation (EU) 2022/1288. It also takes into account two additional indicators: the number of days lost to injuries, accidents, fatalities or illness, and water usage and recycling. The principal adverse impact indicators are taken into account qualitatively or quantitively at various levels of our sustainable investment approach: the exclusion policy, the analysis of controversies, the engagement policy and the internal ESG analysis methodology. The indicators for adverse impacts 1 to 14, as well as the two additional indicators, are qualitatively taken into account during our ongoing monitoring of controversies. The indicators for adverse impacts 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12 and 13 are qualitatively integrated into the proprietary ESG analysis methodology. PAI 10 on violations of United Nations Global Compact principles and OECD Guidelines for Multinational Enterprises is taken into account through the normative exclusion policy applied to the financial product. PAI 4 is taken into account in our sectoral exclusion and engagement policies. PAI 14 is taken into account in our exclusion policies.

PAI 15 and 16 are qualitatively taken into account during our ongoing monitoring of controversies and are quantitatively integrated into the proprietary ESG analysis methodology.

☐ No

What investment strategy does this financial product follow?

The management process uses a best-in-universe ESG approach. The ESG approach developed by Groupama Asset Management is centred around a quantitative and qualitative analysis of the environmental, social and governance practices of the securities in which it invests.

The analysis of these ESG criteria results in an ESG score from 1 to 100, which is based on various indicators, including:

- Environmental (biodiversity, waste management etc.);
- Social (employee training, supplier relations etc.);
- Governance (board independence, executive compensation policy etc.).

The investment universe is then divided into five quintiles, with each quintile representing 20% of the investment universe in terms of number of securities. The securities rated as Quintile 1 represent the best ESG ratings within the investment universe, while those rated Quintile 5 represent the worst ratings.

The financial product will focus on investing in securities belonging to Quintiles 1 to 4. The selection should result in an average ESG rating for the portfolio that is significantly higher than that of its investment universe.

The main limitation of this analysis relates to the quality of the available information. ESG data is not yet standardised and Groupama Asset Management's analysis is ultimately based on qualitative and quantitative data provided by the companies themselves, some of which may still be incomplete and heterogeneous.

To overcome this limitation, Groupama Asset Management focuses its analysis on the most important aspects of the sectors and companies analysed.

For more detailed information on the rating methodology implemented in the financial product and its limitations, investors are invited to read the methodology document, which is available at www.groupama-am.com.

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

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

In order to attain the environmental and social characteristics promoted, the investment strategy is based on the following:

- Exclusion at management company level:

- Exclusion of securities belonging to the "Major ESG Risks" list: Groupama Asset Management tracks a list of securities considered to carry significant ESG risks (the "Major ESG Risks" list). These are companies whose ESG risks could call into question their economic and financial viability or could have a significant impact on the value of the company and thus lead to a substantial loss in the value of their stock or a significant downgrade by the rating agencies;

- Application of Groupama AM's sector-specific policies on controversial weapons and fossil fuels. Securities involved with controversial weapons and the coal sector are excluded under the criteria set out in our policy. Securities involved in the production of unconventional fossil fuels cannot be reinvested under the criteria set out in our policy.

- Application of the normative exclusions regarding tax non-cooperation, corruption and money laundering in accordance with Groupama AM's AML-CFT policy

- Exclusion at the portfolio level:

- Minimum sustainable investment share of 50%, in accordance with the aforementioned definition of sustainable investment.

The process of selecting securities in the portfolio must result in a minimum screening and monitoring rate of 90% of the portfolio's ESG ratings, excluding cash, derivatives and money-market UCIs.
The financial product will also have to outperform its benchmark or investment universe for the following two indicators:
- Carbon intensity
- Number of companies invested in with a human rights policy.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The investment strategy does not aim to reduce the financial product's investment universe. The financial product's investment strategy ensures that the financial product achieves an ESG rating higher than that of its investment universe once the bottom 20% lowest-rated securities in the universe are excluded on the basis of the ESG rating and all the exclusions applied by the Fund.

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

To ensure that companies invested in comply with good governance practices, the financial product uses an internal analysis methodology that takes into account good governance criteria defined in its ESG approach, as described in the section on its investment strategy.
The criteria taken into account include, for example:
- Percentage of independent members of the board of directors
- Integration of ESG criteria within executive compensation
- Existence of a CSR committee within the board of directors
- Corruption prevention policy and existence of controversies
- Responsible lobbying practices and existence of controversies
- Government efficiency
- Regulatory quality, rule of law, corruption control, freedom of expression and gender equality.

What is the asset allocation planned for this financial product?

Within the portfolio:
- The minimum proportion of investments contributing to the environmental and social characteristics promoted by the UCITS is 90% (#1 below), excluding money market UCIs, sovereign bonds (excluding Green Bonds), derivatives and cash.
- The minimum proportion of sustainable investments is 50% (#1A below).
- The minimum proportion of Taxonomy-aligned investments is 0%.
- The minimum proportion of sustainable investment meeting an environmental objective is estimated at 0%, considering the difficulty of separating environmental SDGs from social SDGs.
- The minimum proportion of sustainable investment meeting a social objective is estimated at 0%, considering the difficulty of separating environmental SDGs from social SDGs.

Investment share #2 Other is obtained by the following calculation: Investment (100%) – #1 Aligned with E/S characteristics.
The total net assets are used as the basis for calculating the share of sustainable investments.

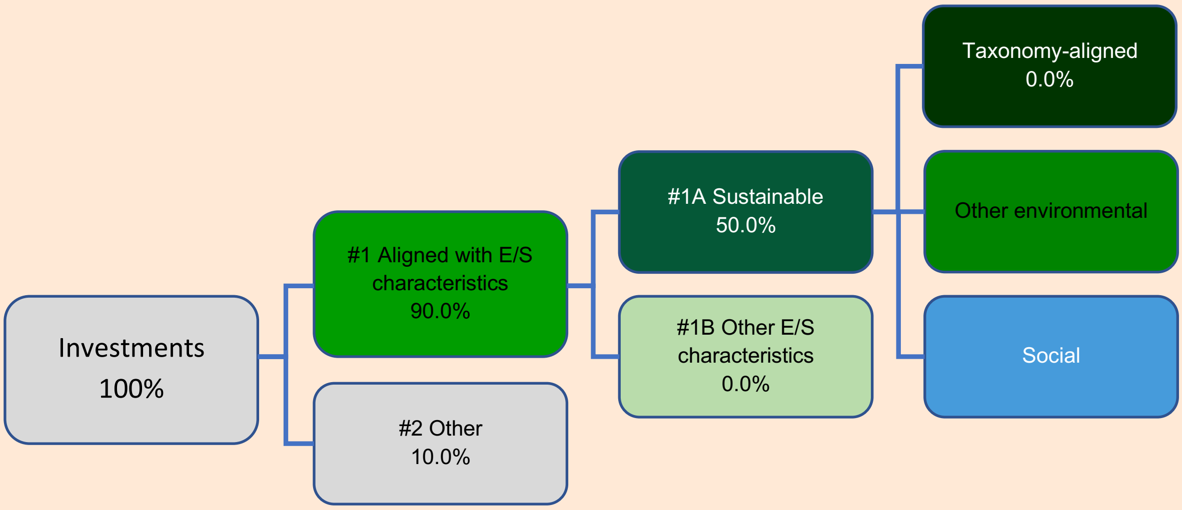
Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



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

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

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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

Derivatives are not intended to contribute to the environmental or social characteristics promoted by the financial product.

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

The financial product promotes environmental and social characteristics and is committed to making a minimum of 50% sustainable investments. However, the financial product is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

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

☐ Yes

☐ In fossil gas ☐ In nuclear energy

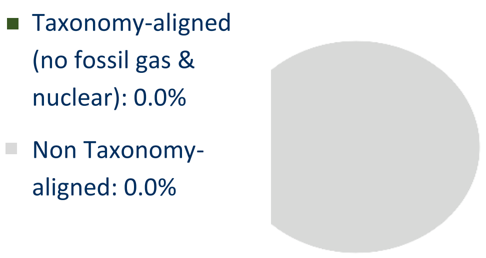
☒ No

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

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

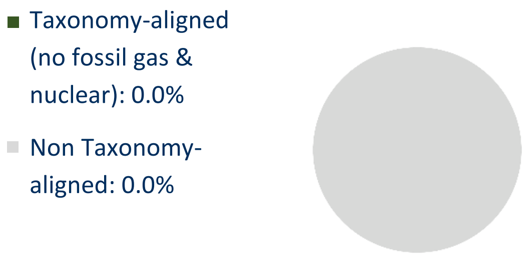
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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

1. Taxonomy-alignment of investments **including sovereign bonds***



2. Taxonomy-alignment of investments

excluding sovereign bonds*



This graph represents 100.0% of the total investments.

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

What is the minimum share of investments in transitional and enabling activities?

The financial product is not committed to making a minimum share of investments in transitional and enabling activities.

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

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

The financial product promotes environmental and social characteristics and is committed to making a minimum of 50% sustainable investments. At this stage, the portfolio allocation specifically addressing an environmental objective is difficult to determine, as part of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identifies activities that contribute to environmental and social issues without distinction.

What is the minimum share of socially sustainable investments?

The financial product promotes environmental and social characteristics and is committed to making a minimum of 50% sustainable investments. At this stage, the portfolio allocation specifically addressing a social objective is difficult to determine, as part of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identifies activities that contribute to environmental and social issues without distinction.

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

The “#2 Other” category consists of issuers or securities without a rating due to a lack of sufficient ESG data but for which the financial product’s exclusion policies apply. These investments are part of a portfolio diversification strategy. This category also includes money-market UCIs and cash held as ancillary liquidity. With the exception of SRI money-market UCIs managed directly by Groupama Asset Management, no minimum environmental or social safeguards are implemented for investments included in the “#2 Other” category.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

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

The financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

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

The financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

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

The financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

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

The financial product does not have a designated reference benchmark tailored to ESG characteristics under the SFDR.

Where can I find more product-specific information online?

More product-specific information can be found on the website: https://www.groupama-am.com/fra/fr/particulier/products/