

# PROSPECTUS

*The shares or units of the fund mentioned herein ("the Fund") have not been registered under the US Securities Act of 1933 and may not be offered or sold directly or indirectly in the United States of America (including its territories and possessions), to US persons, as defined in Regulation S ("US persons").*

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## 1. GENERAL CHARACTERISTICS

### Name

GROUPAMA TRÉSORERIE

### Legal form and Member State in which the UCITS was incorporated

French mutual fund (*Fonds Commun de Placement, FCP*).

### Date formed and expected term:

10 October 1989.

This UCITS was initially formed for a 99-year term.

## Summary of the management offer

Unit class	ISIN code	Eligible subscribers	Allocation of distributable income	Base currency	Minimum initial subscription	Initial net asset value*
F2 unit	FR0014006EB1	Reserved for feeder company mutual funds managed by Groupama Asset Management or its subsidiaries that are part of the Savings & Retirement ranges	Distribution and/or Carried forward	Euro	Ten-thousandths of a unit	€100
IC (1)	FR0000989626	Open to all subscribers.	Accumulation	Euro	One thousandth of a unit	€15,244.90
ID	FR0011375567	Open to all subscribers	Distribution and/or carried forward	Euro	One thousandth of a unit	€10,000
M (2)	FR0010875237	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries	Accumulation	Euro	One thousandth of a unit	€1,000
N	FR0013314234	Open to all subscribers	Accumulation	Euro	One thousandth of a unit	€100
P	FR0013065299	Open to all subscribers, particularly intended for institutional investors and large corporates	Accumulation	Euro	€100,000,000 (3)	€100,000
R	FR0013296332	Reserved for investors subscribing via distributors or intermediaries providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients	Accumulation	Euro	One thousandth of a unit	€500

(1) Including all unitholders who subscribed to the Mutual Fund before different unit classes were created

(2) Including all subscriptions processed before 16/07/2017

(3) The minimum initial subscription amount does not apply to entities of the Groupama group

### Place where the latest annual report and interim financial statement may be obtained

The latest annual report and financial statements along with the breakdown of assets will be sent to unitholders within eight working days upon written request to:

Groupama Asset Management, 25 rue de la Ville-l'Evêque, 75008 Paris, France.

These documents are also available on the website [www.groupama-am.com](http://www.groupama-am.com).

### Contact details:

- For legal entities: Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).

- For individuals: Your distributor (Groupama Assurances Mutuelles distribution networks; external distributors approved by Groupama Asset Management)

Further information is available, if required, from Groupama Asset Management's Business Development Department (Sales Office: +33 (0)1 44 56 76 76).

## 2. ADMINISTRATORS

### Management Company

**Groupama Asset Management** – 25 rue de la Ville-l'Evêque, 75008 Paris, France, a portfolio management company authorised by the *Commission des opérations de bourse* (Stock Exchange Committee), now the *Autorité des marchés financiers* (French financial markets authority – AMF) under number GP 93-02 on 5 January 1993.

### Depository – Custodian

**Caceis Bank** – 89-91 rue Gabriel Péri, 92120 Montrouge, France, a credit institution authorised by the CECEI (now the ACPR – French Prudential Supervisory and Resolution Authority) on 1 April 2005.

The custodian's duties, as defined by the applicable regulations, include custody of the assets, checking that the management company's decisions are lawful and monitoring UCI cash flows.

The custodian is independent of the management company.

The description of the delegated custodial duties, the list of representatives and sub-representatives of CACEIS Bank and information relating to conflicts of interest that may result from these delegations are available on the CACEIS website: [www.caceis.com](http://www.caceis.com).

Updated information is made available to investors upon request.

### Clearing house for subscriptions/redemptions:

- **Groupama Asset Management**, for new pure registered units registered from 11/07/2018.

Following collection of these orders, Groupama Asset Management will forward them to CACEIS Bank in its capacity as an affiliate of Euroclear France.

- And, by delegation of the management company, **CACEIS Bank**, for bearer or administered registered units and for pure registered units that were already registered as of 11/07/2018.

### Institutions appointed to receive subscriptions and make redemptions and responsible for respecting the clearing deadlines indicated in the prospectus, by delegation of the management company

**CACEIS Bank**, for bearer or administered registered units and for pure registered units that were already registered as of 11/07/2018.

### Fund accounting:

**CACEIS Bank** is responsible for the UCI's fund accounting, covering the clearance of subscription and redemption orders for units of the UCI. It will process these orders in partnership with Euroclear France, with which the UCI is listed, and manage the UCI's unit issuance account for bearer or administered registered units.

### Statutory auditor

**PWC Audit** - 63, rue de Villiers, 92 200 Neuilly-sur-Seine, France.

### Accounting representative

**CACEIS Fund Administration** – 89-91 rue Gabriel Péri, 92120 Montrouge, France, a credit institution authorised by the CECEI (now the ACPR, French Prudential Supervisory and Resolution Authority) on 1 April 2005.

### Distributors

Groupama Assurances Mutuelles distribution networks (8-10 Rue d'Astorg, 75008 Paris, France) and external distributors approved by Groupama Asset Management.

### **Conflict of interest management policy**

In order to identify, prevent, manage and monitor conflicts of interest that result from delegations, the management company has implemented a conflict of interest management policy available on request from your usual advisor or on the management company's website [www.groupama-am.com](http://www.groupama-am.com).

## **3. MANAGEMENT AND OPERATING PRINCIPLES**

### **3.1. General characteristics**

#### **Characteristics of units**

##### Type of right attached to the unit class:

Each unitholder has a shared ownership right in the UCITS' assets in proportion to the number of units held.

##### Shareholder register and fund accounting:

Fund accounting is provided by the custodian, CACEIS Bank, for administered and bearer units and for pure registered units that were already registered as of 11/07/2018.

Fund accounting is provided by Groupama AM for new pure registered units registered from 11/07/2018.

Unit administration is performed by Euroclear France.

##### Voting rights:

No voting rights are attached to the units, as decisions are made by the management company.

##### Types of units:

Units are registered and/or bearer units.

##### Fractions:

Units may be subscribed or redeemed in exact amounts or ten-thousandths of a unit for I units and in exact amounts or thousandths of a unit for M, N, P and R units.

#### **Financial year end**

The last Paris Stock Exchange trading day in September.

The first financial year end was the last Paris Stock Exchange trading day in March 1991.

#### **Tax treatment**

The UCITS is not subject to corporation tax. In accordance with the principle of transparency, the tax authorities consider the unitholder to be the direct owner of a share of the financial instruments and cash held in the Fund.

The tax treatment of any capital gains or income from holding UCITS units depends on tax provisions specific to the unitholder's own particular circumstances and/or on the tax provisions in the country where the unitholder resides. Investors should seek professional financial advice.

The French tax system considers a switch from one unit class to another unit class to be a sale subject to capital gains tax.

### 3.2. Special provisions

#### ISIN codes of the unit classes:

F2 unit	FR0014006EB1
IC unit	FR0000989626
ID unit	FR0011375567
M unit	FR0010875237
N unit	FR0013314234
P unit	FR0013065299
R unit	FR0013296332

#### Classification

##### "Standard money market" UCITS

GROUPAMA TRESORERIE is a standard money market fund with variable net asset value (VNAV).

Date of MMF approval: 23 April 2019.

#### SFDR classification

This UCITS is a financial product that promotes environmental or social characteristics, or a combination of these characteristics, in accordance with Article 8 of the SFDR.

**Investment in UCIs:** up to 10% of net assets.

#### Investment objective

The Fund's management objective is to seek to outperform the money market interest rates slightly, after deduction of management fees, over the recommended term of investment.

This objective will be implemented via an active managerial approach that promotes the sustainability of issuers through an analysis of the ESG (environmental, social and governance) characteristics of the securities held in the portfolio.

If money market interest rates are very low, the return generated by the UCITS may be insufficient to cover the management fees, in which case the net asset value of the UCITS will see a structural decline.

#### Benchmark index

The benchmark index is the capitalised ESTER.

The ESTER (European Short-Term Rate) is the benchmark overnight interbank interest rate for the eurozone market. It is calculated by the European Central Bank.

The UCITS does not seek to replicate the benchmark, but to generate an outperformance. As such, the performance of the benchmark may differ from that of the UCITS. However, the UCITS' market risk is similar to that of its benchmark.

## Investment strategy

### Description of the strategies used

- UCITS strategy:

The main sources of potential performance are:

- Credit sensitivity, which is partly determined by our analysis of changes in risk premiums, the suggested rate of return or the expectation of intervention by central banks.
- Rate sensitivity, which is partly derived from our analysis of the monetary policy of the central banks and of short-term changes in indices.
- Geographic allocation, based primarily on the decisions of internal committees.

- Asset portfolio composition strategy:

The strategy implemented aims to outperform the capitalised ESTER index over the recommended investment period, after deduction of management fees.

It is implemented by combining the traditional financial approach with the integration of extra-financial investment criteria.

The UCITS strategy is constructed based on the analysis of the money market environment using a combination of top-down and bottom-up approaches.

The top-down approach focuses on the analysis of major macro-economic and political trends and how they influence the monetary policy decisions of the central banks, but also developments in the regulatory framework of the UCITS' investment universe.

The bottom-up approach identifies opportunities and risks specific to certain sectors or issuers.

The UCITS' investments are limited to debt with a maximum maturity of two years issued by issuers deemed to be of high credit quality by our Money Market Committee. At the helm of this committee is the Financial Risk and Performance Department, which authorises or disqualifies issuers strictly independently from Management, based in particular on the recommendations of our Research.

The investment universe is that of bond debt issued by private, public and quasi-public issuers in OECD countries. The following types of issuers are authorised:

- Sovereign issues.
- Supranational issues.
- Issues from partly state-controlled or government-guaranteed agencies.
- Private issues.

The selection of issuers that the manager includes in the portfolio is based on his/her own analysis, which may be primarily based on the ability of our internal credit analysis team to evaluate the risk of issuers in the portfolio and on credit quality ratings issued by external entities.

### Integration of ESG criteria:

Since a sustainable and responsible investment (SRI) UCITS is involved, the extra-financial analysis applied to the UCITS takes into account criteria relating to each environmental, social and governance factor. The UCITS seeks to select the highest rated issuers within the investment universe, based on extra-financial criteria (best-in-universe approach).

Various indicators are used to analyse ESG criteria, including:

- Environment: biodiversity, waste management, etc.;
- Social: employee training, supplier relations, etc.;
- Governance: board independence, executive compensation policy, etc.

ESG criteria are taken into account in the portfolio management process in accordance with the following requirements:

1. Stocks belonging to the "Major ESG Risks" list:  
Groupama AM keeps track of a list of securities identified as comprising particularly high ESG risks (the "Major ESG Risks" list). These are companies whose ESG risks could jeopardise their economic and

financial viability, or could have a significant impact on the company's value and brand, thus resulting in a significant loss of stock market value or a significant downgrade by rating agencies.

For securities based on these stocks:

- Investments in securities based on stocks with a maturity of more than one year are excluded from the UCITS.
  - Investments in securities with a maturity of less than one year, issued by companies judged to be of high credit quality by our Money Market Committee are authorised.
2. Exclusion of issuers belonging to the coal sector according to the criteria stipulated in Groupama AM's general policy, which is available at [www.groupama-am.com](http://www.groupama-am.com).
  3. At least 90% of the UCITS' net assets undergo an extra-financial analysis.
  4. An average ESG score for the portfolio that is significantly higher than that of its investment universe (once the bottom 20% of the lowest-rated stocks in the universe are excluded).
  5. A rolling 12-month average carbon intensity level for the portfolio that is below that of the reference universe.  
On average over the year, the portfolio coverage rate of this indicator must be at least 90% for the UCITS' net assets.
  6. Selection of companies having implemented a human rights policy so that there is a greater proportion of these issuers in the portfolio than in the reference universe.  
On average over the year, the portfolio coverage rate of this indicator must be at least 70% for the UCITS' net assets.

Methodological limitations:

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 stocks in which it is invested. The main limitation of this analysis relates to the quality of the available information. Indeed, ESG data is not yet standardised, and our analysis is ultimately based on qualitative and quantitative data provided by the companies themselves, some of which may still be fragmented 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 Fund and its limitations, investors are invited to read the Groupama Asset Management Transparency Code, which is available at [www.groupama-am.com](http://www.groupama-am.com).

#### Integration of the EU Taxonomy:

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the **EU Taxonomy** or the **Taxonomy Regulation**) aims to identify environmentally sustainable economic activities. It identifies these activities based on their contribution to six overarching environmental objectives:

- climate change mitigation,
- climate change adaptation,
- the sustainable use and protection of water and marine resources,
- the transition to a circular economy (waste, reduction and recycling),
- pollution prevention and mitigation, and
- the protection and restoration of biodiversity and ecosystems.

To be considered as sustainable, an economic activity must demonstrate that it makes a material contribution to achieving one of the six objectives, without prejudice to any of the other five (the "Do No Significant Harm" principle, hereinafter the **DNSH** principle). The DNSH principle applies only to the underlying investments of the financial product that take account of the European Union's criteria for environmentally sustainable economic activities. The underlying investments of the remaining portion of this financial product do not take account of the European Union's criteria for environmentally sustainable economic activities. For an activity to be considered aligned with the EU Taxonomy, it must also uphold the human and social rights enshrined in international law.

For this UCITS, the estimated proportion of environmentally sustainable investments as defined in the Taxonomy Regulation is 0%.

The underlying investments of the remaining portion of this financial product do not take account of the European Union's criteria for environmentally sustainable economic activities.

- Management style:

The UCITS takes an active management approach with the aim of outperforming its benchmark.

Information regarding the credit quality evaluation procedure

- Description of the scope of the procedure

Groupama AM has a mechanism in place for evaluating credit quality, which is captured within a procedure. These provisions guarantee that the money market funds invest in money market instruments, securitisations and Asset-Backed Commercial Papers (ABCPs) with a positive credit quality evaluation.

This procedure applies to money market instruments issued by private organisations but also by sovereign, semi-sovereign or supranational entities.

- Description of the methodology and agents

The credit quality evaluation is performed entirely independently by the Money Market Committee (Comité Monétaire). This committee, implemented within the management company, is composed of representatives of Money Market Management, Internal Research and the Financial Risk Department. The chairmanship of this committee is held by a member of the Risk Department, who forms a judgement on the credit quality by taking into consideration the different contributions provided.

The credit quality evaluation is based on a documented proprietary methodology, which is approved by the board of the management company, applied in all situations and reviewed at least annually. This methodology is documented in a detailed procedure, the proper application of which forms part of the Monitoring Plan of the Continuous Monitoring.

The Money Market Committee is responsible for monitoring issuers for as long as the instrument is held or as long as Management expresses a need to do so. A review of the credit quality of issuers takes place at least annually. Furthermore, Groupama Asset Management will continuously monitor agency ratings; in the event of a short-term deterioration of the credit rating of an issuer by two or more ratings, they will generate an internal credit quality revaluation, which may potentially uphold the initial positive rating.

The systematic and consistent evaluation of credit quality is based on the contributions of Management, Internal Research and the Financial and Performance Risk Department. It is based on the following stages:

First stage: When the management wishes to invest in a new issuer, they issue an evaluation request to the Money Market Committee. This request details the instrument concerned and may include, inter alia, an initial analysis of the rating agencies' opinions.

Second stage: Internal Research produces a fundamental analysis of the issuer and/or the guarantor. This analysis is structured around specific criteria that vary according to the type of issuer, for example:

<b>Banks</b>	<b>Non-Financial Businesses</b>
Competitive Positioning	
Profitability	
Growth	
Financial Strength	
Liquidity	
Event Risk	
Governance	
HR	



Societal	
Environment	
Asset Quality	Equity/Balance Sheet
CET1	Goodwill
Leverage Ratio	Debt Structure
Long-Term Refinancing	Off-Balance Sheet
Short-Term Refinancing	Pension Funds

Other criteria may also be used, such as macroeconomic factors, agency ratings or structure-altering actions (acquisition, merger, transfer).

On the basis of these factors, Internal Research draws up a study and issues a recommendation accompanied by a short-term outlook and also, in most cases, by a long-term outlook.

Third stage: The Financial and Performance Risk Department, independent of management, provides a quantitative analysis based on the probability of default in a comparable universe.

Final stage: On the basis of all the factors produced by the various contributors, an employee of the Financial and Performance Risk Department who is a member of the Money Market Committee creates a summarising report, which determines the credit quality rating entirely independently.

If the credit is of sufficient quality, the issuer becomes eligible for the money market portfolios and the Management tool is set to allow the investment.

- Description of the review framework

The credit quality evaluation procedure shall be reviewed annually. This review will consist mainly of verifying the appropriateness of the evaluation criteria used and of the methodology defined above.

Whatever changes are made, this review will form the basis of an update of the procedure and be subject to approval by the General Management.

However, this procedure may be reviewed at any time according to specific events, such as macroeconomic conditions, changes of sources of information, etc. The aim of this review should be to redefine the evaluation criteria or other factors and should generate an update of the procedure and its approval by the General Management. The appropriateness of applying this new methodology to certain existing prior ratings will be assessed on the basis of the outstanding amount concerned.

#### Assets, excluding embedded derivatives

- Debt securities and money market instruments:

The UCITS' assets are invested in bonds and money market instruments from issuers of OECD member countries, which are assessed by the management company as being of high credit quality, and in deposits with credit institutions complying with the following criteria:

Maximum Weighted Average Life <sup>1</sup>	12 months
Maximum Weighted Average Maturity <sup>2</sup>	6 months

<sup>1</sup> Weighted Average Life (WAL): Weighted average of the terms remaining until full repayment of the principal of the securities held by the UCITS.

<sup>2</sup> Weighted Average Maturity (WAM): Weighted average of the terms remaining until the next revision of the money-market rate rather than the time remaining to repayment of the principal.

Maximum residual life of securities and instruments	2 years
Instrument ratings	Eligible assets must be assessed as being of high credit quality by the management company

If the management company's assessment of the credit risk of a security results in a reduction in its credit quality, the management company can decide to transfer this security under optimal conditions in terms of the interests of the holders.

The overall sensitivity of the portfolio is between 0 and 0.5.

- Legal nature of the instruments used:  
The UCITS' assets consist of:
  - Fixed-rate or variable-rate negotiable debt securities:
    - o Negotiable short-term securities
    - o Euro commercial paper
    - o Fixed-rate treasury bills (BTF)
    - o Negotiable medium-term securities with maturity dates appropriate to the recommended investment period.
  - Fixed-rate bonds with residual maturity period of less than or equal to 397 days
  - Adjustable-rate bonds or fixed-rate bonds hedged by a swap contract which may be revised within a maximum period of 397 days with a residual maturity of two years or less
  - Securitisations and Asset-Backed Commercial Papers (ABCPs).

The UCITS may invest in securities denominated in a currency other than the euro but will not be exposed to exchange rate risk since this will be fully hedged using forward financial instruments.

- Breakdown of private/public debt  
The UCITS may be invested in private and public-sector securities.  
Exceptionally, the UCITS may invest beyond the regulatory limit of 5% of its net assets and invest up to 100% of its assets in money market instruments, securitisations and ABCPs issued or guaranteed individually or jointly by:
  - the European Union;
  - national authorities (countries or government agencies such as the Republic of Singapore or the French Social Security Debt Reimbursement Fund – Caisse d'amortissement de la dette sociale, or CADES), regional authorities (such as the 18 regions or 101 departments of France) or local authorities (such as the Greater Paris Company (Société du Grand Paris), City of Rennes (Rennes Métropole) but also the City of Stockholm) of Member States of the European Union or their central banks;
  - the European Central Bank;
  - the European Investment Bank;
  - the European Investment Fund;
  - the European Stability Mechanism;
  - the European Financial Stability Facility;
  - a central authority or the central bank of an OECD member state (United States, United Kingdom, Switzerland, Canada, etc.) such as the US Federal Reserve (Fed);
  - the International Monetary Fund;
  - the International Bank for Reconstruction and Development;
  - the Council of Europe Development Bank;
  - the European Bank for Reconstruction and Development;

- the Bank for International Settlements.

- Ratings-based selection criteria:

The UCITS only invests in assets that have been assessed by the management company as being of “high credit quality”.

- Holding shares or units of other UCITS, AIFs or foreign investment funds:

The UCITS fund may hold up to 10% of its net assets in the following units or shares:

- French or European “Standard money market” and “Short-term money market” UCITS or AIFs.

The UCIs may be those managed directly or indirectly by Groupama Asset Management.

External UCIs will be subject to a close review of their management procedures, performance figures, risk and any other qualitative or quantitative criteria that allow an assessment of management quality in the short, medium and long term.

- For each of the above-mentioned classes:

- Holding ranges:

- Debt securities and money market instruments: up to 100% of net assets;
- Securitisations and Asset-Backed Commercial Papers (ABCPs): up to 20% of net assets;
- Shares or units in other UCITS or AIFs: Up to 10% of net assets.

#### Derivative instruments and securities with embedded derivatives

The use of derivatives and securities with embedded derivatives is authorised subject to a maximum commitment of 100% of the Fund’s net assets and therefore has an impact on both the performance and the investment risk of the portfolio. The strategy for the use of securities with embedded derivatives is the same as that described for derivative instruments.

These instruments will be used to hedge the portfolio against interest rate and exchange rate risks.

The manager may trade in the derivative instruments described in the table below:

Risks in which the manager intends to trade		Types of markets targeted			Types of trades			
		Regulated	Organised	Over-the-counter	Hedging	Exposure	Arbitrage	Other
Equities								
Interest rates	X							
Foreign exchange	X							
Credit risk								
<b>Derivative instruments used</b>								
<b>Futures</b>								
- Equities								
- Interest rates		X	X	X	X			
- Currencies								
<b>Options</b>								
- Equities								
- Interest rates								
- Foreign exchange								
<b>Swaps</b>								
- Equities								
- Interest rates		X	X	X	X			
- Inflation								
- Foreign exchange								

- Total return swaps								
<b>Forward currency contracts</b>								
- Forward currency contracts	X	X	X	X				
<b>Credit derivatives</b>								
- Single entity credit default swaps and basket default swap(s)								
- Indices								
- Index options								
- Structuring for basket credit derivatives (CDO tranches, iTraxx tranches, FTD, NTD, etc.)								
<b>Other</b>								
- Equity								
<b>Securities with embedded derivatives used</b>								
<b>Warrants</b>								
- Equities								
- Interest rates								
- Foreign exchange								
- Credit								
<b>Subscription warrants</b>								
- Equities								
- Interest rates								
<b>Other</b>								
- Structured EMTNs								
- Credit-linked notes (CLN)								
- Convertible bonds								
- Contingent convertible bonds (CoCo bonds)								
- Callable or puttable bonds	X	X	X					X*

\* Bond with an option of early repayment.

- Counterparty selection criteria

Counterparties for over-the-counter instruments (over-the-counter derivatives and effective portfolio management techniques) are selected through a specific procedure applied within the management company: the main selection criteria relate to their financial strength, their expertise on the types of transactions planned, the general contractual clauses and the specific clauses relating to counterparty risk mitigation techniques.

#### Deposits:

Up to 100% of the Fund's net assets may be in the form of deposits with a credit institution based in a Member State of the European Union or in a third country subject to equivalent prudential regulation, with a term of less than 12 months, as a store of cash to be used as needed.

#### Cash borrowings:

The UCITS does not take out cash borrowings. However, if on an exceptional and temporary basis the UCITS is obliged to use the borrowing facility offered by the custodian to cover a potential debit balance incurred for reasons beyond its control or following the exercise of redemption rights, the UCITS will prioritise resolution of this situation, whilst duly taking into account the interests of unitholders.

#### Temporary purchases and sales of securities

- Type of transactions:

- Repurchase or reverse repurchase agreements in compliance with the French Monetary and Financial Code

- Types of trades:

These transactions are mainly carried out within the scope of UCITS cash management.

These are primarily to adjust the portfolio to compensate for variations in assets under management.

- Types of assets that may be subject to such transactions:

- Negotiable debt securities
- Bonds

- Level of use envisaged and authorised:

- Reverse repurchase agreements:
  - Maximum use: 10% of net assets;
  - Expected use: approximately 10% of net assets.
- Repurchase agreements:
  - Maximum use: 10% of net assets;
  - Expected use: approximately 10% of net assets.

- Criteria determining counterparty selection:

These transactions will be concluded with credit institutions with a minimum rating of "Investment Grade" or deemed equivalent by the management company, the registered office of which is located in an OECD member country.

For further information on the conditions of remuneration from temporary sales and purchases of securities, please refer to the "Fees and commissions" section.

As the UCITS uses derivatives and securities with embedded derivatives and may conduct transactions involving temporary purchases and sales of securities, the portfolio's total level of exposure shall not exceed 200% of the net assets.

**Information relating to the UCITS fund's financial guarantees:**

The UCITS GROUPAMA TRESORERIE complies with the investment rules for financial guarantees that are applicable to UCITS and does not apply specific criteria in addition to these rules.

In the context of temporary purchases and sales of securities and derivatives traded over the counter, the UCITS may receive securities by way of collateral (such as corporate bonds and/or government bonds) or cash collateral. The financial collateral received and its diversification will comply with the investment constraints of the UCITS.

Only the cash collateral received will be reused, via reinvestment, in accordance with the rules applicable to UCITS.

All of these assets received as collateral must be issued by high-quality, liquid, diversified issuers with low volatility that are not an entity of the counterparty or its group.

These assets received as collateral will be retained by the depository of the UCITS on specific accounts. Management of margin calls will be undertaken on a daily basis.

The discounts applied to collateral received take into account the credit quality, the price volatility of the securities and the result of stress tests carried out in accordance with the regulatory provisions.

The level of financial collateral and the discount policy are determined in accordance with the regulations in force.

**Risk profile**

Risk of capital loss:

Investors will be exposed to the risk of not recovering the full amount of the capital they invest, since the UCITS does not offer any capital guarantee.

Interest rate risk:

Investors are exposed to interest rate risk. Interest rate risk is the risk that bond market interest rates may rise, which would cause bond prices to fall and, as a consequence, the net asset value of the UCITS would also fall.

Credit risk:

This is the possibility of a reduction in the credit rating, or the risk of default by the issuer of the securities invested in the portfolio, which may negatively impact the price of the security and thus the net asset value of the UCITS.

Credit risk also exists in connection with temporary purchases and sales of securities if, at the same time, the counterparty for these transactions defaults and the issuer of the collateral received declares a default on the debt securities received as collateral.

Credit risk exists, but is minimised by the soundness of our process for managing short-term investments.

Use of financial derivative instruments:

The use of derivatives may decrease the volatility of the UCITS by decreasing its exposure.

However, this should remain relatively close to its benchmark index, although it may vary from time to time.

In the event of adverse market developments, the net asset value may fall.

### Counterparty risk:

Counterparty risk exists and is associated with temporary purchases and sales of securities. It involves assessing the risks for an entity in terms of its commitments with respect to the counterparty with which the agreement has been concluded. It therefore refers to the risk that a counterparty may default, causing it to default on payment, which may lead to a fall in the net asset value of the UCITS. However, this risk is limited by the provision of financial collateral.

### Risks associated with financing operations on securities and the management of financial collateral:

The use of temporary purchases and sales of securities may increase or reduce the net asset value of the UCITS.

The risks associated with these transactions and with the management of financial collateral are credit risk, counterparty risk and liquidity risk as defined above.

Furthermore, the operational or legal risks are very limited due to an appropriate operating process, the custody of collateral received by the custodian of the Fund and the supervision of this type of operation in framework agreements concluded with each counterparty.

Finally, the risk of collateral reuse is very limited since only cash collateral is reused in accordance with the regulations relating to UCITS.

### Liquidity risk related to securities financing transactions:

In the event of the default of a counterparty to a securities financing transaction, this risk will apply to financial collateral by way of the sale of securities received and may lead to a fall in the net asset value of the UCITS.

### Sustainability risk:

Sustainability risks, comprising those on the Major ESG (Environmental, Social and Governance) Risks list and the coal policy, are taken into account during decision-making as follows:

- Major ESG Risks list: this list comprises companies whose ESG risks could call into question their economic and financial viability, or could have a significant impact on the company's value and brand, thus resulting in a significant fall in market value or a significant downgrade by rating agencies. Investments in securities issued by these companies, with a maturity of more than one year, are excluded from the UCITS.
- Coal policy: the objective of this policy is to reduce the UCITS' exposure to climate risks, including both physical and transition risks. In order to limit these risks, an excluded stocks list has been defined according to the criteria stipulated in Groupama AM's general policy, which is available at [www.groupama-am.com](http://www.groupama-am.com). These stocks are excluded.

There may be several impacts resulting from the emergence of a sustainability risk and they may vary depending on the specific risk, region and asset class. In general, when a sustainability risk occurs for an asset, it will cause a negative impact on the asset or a total loss in its value.

### **Management policy for liquidity risk**

Management of the UCI's liquidity risk is undertaken as part of an analysis and monitoring procedure that relies on internal tools and methodologies in place within Groupama Asset Management.

This procedure has two main components:

- monitoring the portfolio's liquidity profile based on an asset liquidity assessment in view of current market conditions, and
- monitoring the Fund's ability, whether in current or worsening market conditions, to deal with significant redemption scenarios.

### **Guarantee or protection**

None.

**Eligible subscribers and typical investor profile:**

F2 unit	Reserved for feeder company mutual funds managed by Groupama Asset Management or its subsidiaries that are part of the Savings & Retirement ranges
IC unit	Open to all subscribers
ID unit	Open to all subscribers
M unit	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries
N unit	Open to all subscribers
P unit	Open to all subscribers, particularly intended for institutional investors and large corporates
R unit	Reserved for investors subscribing via distributors or intermediaries providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients

The GROUPAMA TRÉSORERIE mutual fund is aimed at investors seeking an investment providing returns close to those of the money market. This UCITS may especially be used for short-term investments with a minimum recommended investment period of three months.

Investment diversification: This is achieved by investing in different classes of assets (money market instruments, bonds and equities) and in specific sectors and different geographical regions so as to spread risks more effectively and optimise portfolio management by taking market trends into account.

**Methods for determining and allocating income**

F2 unit	Distribution. Interim dividend payments are authorised. Option to carry forward earnings in full or in part.
IC unit	Accumulation.
ID unit	Distribution. Interim dividend payments are authorised. Option to carry forward earnings in full or in part.
M unit	Accumulation.
N unit	Accumulation.
P unit	Accumulation.
R unit	Accumulation.



## Characteristics of units

	Initial net asset value	Base currency	Fractioning
F2 unit	€100	Euro	Ten-thousandth of a unit
IC unit	€15,244.90	Euro	Ten-thousandth of a unit
ID unit	€10,000	Euro	Ten-thousandth of a unit
M unit	€1,000	Euro	Thousandths of a unit
N unit	€100	Euro	Thousandths of a unit
P unit	€100,000	Euro	Thousandths of a unit
R unit	€500	Euro	Thousandths of a unit

## Subscription and redemption procedures

	The minimum initial subscription amount is	Subscriptions	Redemptions(1)
F2 unit	€150,000	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
IC unit	One thousandth of a unit	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
ID unit	One thousandth of a unit	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
M unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
N unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
P unit	€100,000,000 (2)	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
R unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit

(1) The total redemption of units will only be possible as a quantity of units and not as an amount.

(2) The minimum initial subscription amount does not apply to entities of the Groupama Assurances Mutuelles group.

Orders are executed in accordance with the table below:

D	D	D	D business day	D for F2, IC, ID, N, P and R units  D+3 business days for M units	D for IC, ID, N, P and R units  D+3 business days for M units
Clearing of subscription orders before 12 noon (3)	Clearing of redemption orders before 12 noon (3)	Execution of the order no later than D	Publication of the net asset value	Settlement of subscriptions	Settlement of redemptions

(3) Unless you have agreed a specific deadline with your financial institution.

Subscriptions and redemptions are cleared by CACEIS Bank and received every banking day until 12 noon:

- at CACEIS Bank for those clients for whom it provides custody-account keeping services, for bearer and administered registered units,
- and at Groupama Asset Management for pure registered units registered from 11/07/2018.

They are executed at the net asset value that is calculated on the basis of the price of the previous day (D-1) and available on D-1 (at 6:00 pm at the latest) with settlement on D Euronext Paris for IC, ID, N, P and R units and with settlement on D+3 Euronext Paris for M units.

The net asset value of the UCITS that will be used to execute subscription and redemption requests may be recalculated between the time the requests are submitted and the time they are executed in order to take account of any exceptional market event that occurs in the meantime.

Investors are reminded that when sending instructions to distributors other than the institutions indicated above, they must take into account the fact that the cut-off time for clearing imposed by CACEIS Bank applies to these distributors. As a result, these distributors may apply their own deadline, earlier than the time mentioned above, to allow them to meet their order-transmission deadline with CACEIS Bank.

The Fund's net asset value is calculated every trading day except for official French public holidays. The reference calendar is that of the Paris Stock Exchange.

The net asset value may be obtained from the following website: [www.groupama-am.com](http://www.groupama-am.com).

## Charges and fees

### Subscription and redemption fees:

Subscription and redemption fees increase the subscription price paid by the investor, or reduce the redemption price. Fees paid to the UCITS are used to compensate the UCITS for the expenses incurred in the investment or divestment of the UCITS' assets. The remaining fees accrue to the management company, marketing agent, etc.

		Charges borne by the investor, collected at the time of subscription or redemption			
Unit class	Base	Subscription fee not accruing to the Fund	Subscription fee accruing to the Fund	Redemption fee not accruing to the Fund	Redemption fee accruing to the Fund
F2 unit	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 4% incl. tax	None
IC unit*	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 4% (taxes included)	None
ID unit*	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 4% (taxes included)	None
M unit	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 4% (taxes included)	None
N unit	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 4% (taxes included)	None
P unit	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 0.50% (taxes included)	None
R unit	Net asset value x Number of units or shares	Maximum rate: 0.50% (taxes included)	None	Maximum rate: 4% (taxes included)	None

\*Option to subscribe through a contribution of securities.

**Exemptions:** The subscription and redemption fees do not apply if the money market UCI invested in is managed by Groupama Asset Management and/or by an associated entity.

#### Operating and management fees:

These fees include all those fees charged directly to the UCITS, except for transaction charges. Transaction charges include intermediary fees (e.g. brokerage fees and stock-market taxes) and the transaction fee, if any, that may be charged, particularly by the depositary and the management company.

The following fees may be charged in addition to the operating and management fees:

- performance fees. These reward the management company if the UCITS exceeds its objectives. They are therefore charged to the UCITS;
- transaction fees charged to the UCITS.

For information regarding the charges actually charged to the UCITS, please refer to the Key Information Document (KID).

F2 units:

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and administrative fees external to the management company (statutory auditor, custodian, distribution, lawyers etc.)	Net assets less units or shares of UCIs	Maximum rate 0.15% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant*
Transaction fee accruing to the custodian	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *depending on complexity
Transaction fee accruing to the management company	Deducted from each transaction	By type of instrument (incl. tax): Equities and similar: max. 0.1% Bonds and similar: max. 0.03% Futures and options: max. €1 per lot
Performance fee	Net assets	None

IC, ID and P units:

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and external management fees not related to the management company (statutory auditor, custodian, distribution, lawyers, etc.)	Net assets deducted from Fund units or shares	Maximum rate 0.30 % (taxes included)
Maximum indirect fees (management fees and charges)	Net assets	Not significant*
Transaction fee accruing to the custodian	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fee accruing to the management company	Deducted from each transaction	By type of instrument (taxes included): Equities and similar: max. 0.1% Bonds and similar: max. 0.03% Futures and options: max. €1 per lot
Outperformance commission	Net assets	None

\*The UCIs held in the portfolio account for less than 10%.

M unit:

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and external management fees not related to the management company (statutory auditor, custodian, distribution, lawyers, etc.)	Net assets deducted from Fund units or shares	Maximum rate 0.20 % (taxes included)
Maximum indirect fees (management fees and charges)	Net assets	Not significant*
Transaction fee accruing to the custodian	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fee accruing to the management company	Deducted from each transaction	By type of instrument (taxes included): Equities and similar: max. 0.1% Bonds and similar: max. 0.03% Futures and options: max. €1 per lot
Outperformance commission	Net assets	None

\*The UCIs held in the portfolio account for less than 10%.

N unit:

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and external management fees not related to the management company (statutory auditor, custodian, distribution, lawyers, etc.)	Net assets deducted from Fund units or shares	Maximum rate 0.60% (taxes included)
Maximum indirect fees (management fees and charges)	Net assets	Not significant*
Transaction fee accruing to the custodian	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fee accruing to the management company	Deducted from each transaction	By type of instrument (taxes included): Equities and similar: max. 0.1% Bonds and similar: max. 0.03% Futures and options: max. €1 per lot
Outperformance commission	Net assets	None

\*The UCIs held in the portfolio account for less than 10%.

R unit:

<b>Fees charged to the Fund</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and administrative fees external to the management company (statutory auditor, custodian, distribution, lawyers, etc.)	Net assets deducted from Fund units or shares	Maximum rate 0.25% (taxes included)
Maximum indirect fees (management fees and charges)	Net assets	Not significant*
Transaction fee accruing to the custodian	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fee accruing to the management company	Deducted from each transaction	By type of instrument (taxes included): Equities and similar: max. 0.1% Bonds and similar: max. 0.03% Futures and options: max. €1 per lot
Outperformance commission	Net assets	None

\* The UCIs held in the portfolio account for less than 10%

Any exceptional legal costs related to recovery of the UCITS' receivables may be added to the fees detailed above.

The contribution to the AMF will also be borne by the Fund.

Income from transactions involving the temporary purchase and sale of securities accrues to the Fund. Charges, costs and fees in respect of these transactions are charged by the custodian and paid by the Fund.

Selection of intermediaries:

Fund managers have a list of authorised intermediaries. A broker committee meets every six months to review the assessments issued by managers and the entire value-adding chain (analysts, middle office, etc.), and may suggest, with supporting arguments, the inclusion of new intermediaries or the exclusion of some.

Based on their expertise, each manager reports on the following criteria:

- Quality of order execution prices
- Liquidity offered
- Intermediary's longevity
- Quality of analysis, etc.

#### 4. COMMERCIAL INFORMATION

Information relating to the Fund may be obtained by writing to:

Groupama Asset Management  
25 rue de la Ville-l'Evêque, 75008 Paris, France  
or by visiting the following website: [www.groupama-am.com](http://www.groupama-am.com)

The net asset value of the UCITS is available on the following website: [www.groupama-am.com](http://www.groupama-am.com)

The latest annual and interim documents are available to unitholders on request from:

Groupama Asset Management  
25 rue de la Ville-l'Evêque, 75008 Paris, France

Subscription and redemption requests are cleared at the following address:

CACEIS Bank  
89-91 rue Gabriel Péri, 92120 Montrouge, France

Information on environmental, social and governance criteria (ESG):

Additional information on the management company's implementation of ESG criteria is available in the UCITS' annual report and on the Groupama Asset Management website, [www.groupama-am.com](http://www.groupama-am.com).

#### 5. INVESTMENT RULES

The Fund complies with the regulatory ratios applicable to UCITS, as defined by the French Monetary and Financial Code, and those of Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017.

#### 6. OVERALL RISK

The overall risk of this Fund is determined using the commitment approach.

#### 7. ASSET VALUATION AND ACCOUNTING RULES

The Fund complies with the accounting rules prescribed by current regulations, in particular those applying to UCITS.

The base accounting currency is the euro.

The net asset value of the UCITS on a given day is calculated on the basis of the previous day's prices. In the case of an exceptional market event, it may be recalculated to ensure there is no market timing.

##### 7.1 Valuation methods

**Securities traded on a French or foreign regulated market, including ETFs:**

- French, Eurozone and foreign equities traded on the Paris Stock Exchange: Last price on valuation day.

For interest rate products, the management company reserves the right to use consensus prices when these are more representative of the market value.

Foreign securities denominated in currencies other than the Euro are converted into Euro at the exchange rate in Paris on valuation day.

Transferable securities for which the price has not been calculated on the valuation day are valued at the last officially published price. Securities for which the price has been adjusted are valued at their probable market value, as determined by the AIF's manager or the management company.

### **UCI shares and securities**

UCI units or shares are valued at their last known net asset value.

### **Negotiable debt securities**

Negotiable debt securities (short-term and medium-term, bills issued by financial institutions, bills issued by specialist financial institutions) are valued according to the following rules:

- on the basis of the actual market-traded price;
- in the absence of a meaningful market price, by applying an actuarial method, where the benchmark rate is that of issues of equivalent securities plus, where applicable, a difference representing the intrinsic characteristics of the security issuer.

### **Futures and options contracts**

- Firm futures contracts on derivatives markets are valued at the previous day's settlement price.
- Options on derivatives markets are valued at the previous day's closing price.

### **Over-the-counter transactions**

Transactions agreed on over-the-counter markets and authorised by the regulations applicable to UCIs are valued at their market value.

### **Temporary purchases and sales of securities**

- Temporary purchases of securities  
Securities received under repurchase agreements or borrowed securities are entered in the long portfolio under "Receivables representing securities received under repurchase agreements or borrowed securities" at the amount provided for in the contract, plus interest receivable.
- Temporary sales of securities  
Securities sold under repurchase agreements or loaned securities are entered in the portfolio and valued at their current value.  
The debt representing the securities transferred under repurchase agreements such as in the case of loaned securities is entered in the short portfolio at the value set in the contract plus accrued interest. On settlement, the interest received or paid is recognised as interest on receivables.
- Collateral and margin calls  
Collateral received is valued at the market price (mark-to-market).  
Daily fluctuation margins are calculated using the difference between the valuation at market price of collateral provided and the valuation at market price of collateralised instruments.

Generally, financial instruments for which the price has not been recorded on the valuation day or for which the price has been adjusted are valued at their likely trading price, as determined by the SICAV's board of directors or management board or, for mutual funds, by the management company. Such valuations and their supporting documentation are communicated to the statutory auditor during audits.



## 7.2 Valuation method for off-balance-sheet commitments

- Futures contracts are valued at nominal value x quantity x settlement price x (currency).
- Options contracts are valued at their underlying equivalent.
- Swaps:
  - Asset-backed or non-asset-backed swaps  
Commitment = nominal value + valuation of the fixed-rate leg (if fixed/variable) or the variable-rate leg (if variable/fixed) at the market price.
  - Other swaps  
Commitment = nominal value + market value (if the UCI has adopted a synthetic valuation method).

## 7.3 Method used to recognise income from fixed-income securities

Accrued coupons method.

## 7.4 Method used to recognise expenses

Transactions are accounted for exclusive of costs.

## 8. REMUNERATION

Details of the updated remuneration policy are available on the Groupama Asset Management website at [www.groupama-am.com](http://www.groupama-am.com).

\* \* \* \* \*

**Annex level 2** - Pre-contractual disclosure for the financial products referred to in Article 8, paragraph 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**

**GROUPAMA TRESORERIE**

**Legal entity identifier:**

969500EF3AHVV19XPX21

## 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.

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

**Does this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*

**Yes**

**No**

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

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

It will make a minimum of **sustainable investments with a social objective: \_\_\_ %**

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15% 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**



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

The UCITS promotes environmental and social characteristics via a managerial 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 UCITS implements a best-in-universe approach and also excludes certain securities.

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 UCITS will invest in securities belonging to Quintiles 1 to 4.

Furthermore, the UCITS does not have a designated reference benchmark tailored to ESG characteristics under the SFDR Regulation.

**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 UCITS 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 UCITS compared to the UCITS benchmark and the reference universe;
- Percentage of investments in companies exposed to one of the sectors or activities covered by the UCITS's exclusion policy;
- Percentage of investments in companies exposed to sectors or activities deemed to be incompatible with Groupama Asset Management's engagement policy.

● ***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?***

To measure the attainment of its sustainable investment objective, the UCITS uses indicators regarding the contribution of business activities to the UN Sustainable Development Goals (SDGs). Companies are analysed for their positive contribution to 16 of the 17 SDGs, as SDG 17 (Global Partnerships) is not applicable to business activities. This contribution, evaluated by our ESG data provider, may be strongly positive, positive, neutral, negative or strongly negative. The UCITS's share of sustainable investment is the percentage of companies that contribute very positively or positively to one of the 16 UN SDGs without contributing negatively or very negatively to any of the other SDGs. At this stage, the portfolio allocation specifically addressing an environmental or social objective is difficult to determine, as some of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identify activities that contribute to environmental and social issues without distinction.



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

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

Sustainable investments that the financial product partially intends to make do not cause significant harm to any other sustainable investment objective because any company that contributes negatively to at least one SDG is not considered to meet the sustainable investment objective.

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

Adverse impact indicators are integrated within our proprietary ESG analysis methodology, as explained in the question concerning ESG strategy.

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

The proprietary ESG analysis methodology incorporates the mandatory Principal Adverse Impacts, including Principal Adverse Impacts 10 and 11 that relate to violations of the principles of the Global Compact and the OECD Guidelines and the lack of a process for monitoring compliance with these principles and guidelines.

These Principal Adverse Impacts are addressed by 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, in accordance with which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives, and which is accompanied by specific EU criteria.*

The 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.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



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

Yes

Certain indicators relating to principal adverse impacts are considered throughout the investment process and form an integral part of the ESG methodology adopted by the UCITS. Potential investments will therefore be examined through the analysis of quantitative and qualitative data, in accordance with the investment strategy of the UCITS as described in the relevant section.

An assessment of the principal adverse impacts will be carried out for the UCITS and will be reported annually as part of the UCITS's periodic report.

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.

These ESG criteria are analysed on the basis of 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 UCITS will invest in securities belonging to Quintiles 1 to 4. The selection should result in an average ESG score for the portfolio that is significantly higher than that of its investment universe. The weighted average ESG rating for the portfolio will be higher than the average ESG rating of the investment universe once the bottom 20% of the lowest-rated stocks in the investment universe are excluded.

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 UCITS and its limitations, investors are invited to read the methodology document, which is available at the website [www.groupama-am.com](http://www.groupama-am.com).

- ***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 factors:

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

- 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;
- Exclusion of sectors deemed to be incompatible with Groupama Asset Management’s engagement policy: both companies involved in coal mining and coal-related energy production and companies known to be involved in activities involving controversial weapons (cluster bombs and anti-personnel mines) are excluded from the UCITS’s investment scope.
- The average ESG rating for the portfolio must be significantly higher than the investment universe: the weighted average ESG rating of the portfolio will be higher than the average ESG rating of the investment universe once the bottom 20% of the lowest-rated securities in the universe are excluded.
- A minimum 15% allocation to sustainable investment, in accordance with the definition of sustainable investment indicated above.
- The UCITS must also exhibit performance greater than its benchmark index or investment universe in the two following indicators.
  - Carbon intensity;
  - Number of companies invested in with a human rights policy.

The securities held in the portfolio indicate a minimum screening and monitoring rate of 90% of the portfolio’s ESG ratings, excluding cash and mutual funds.

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

Not applicable.

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

To ensure that companies invested in comply with good governance practices, the UCITS uses an internal analysis methodology that takes into account good governance criteria through its ESG approach, as described in the section on its investment strategy.

The criteria taken into account include:

- The percentage of independent members of the board of directors;
- The integration of ESG criteria within executive compensation;
- The existence of a CSR committee within the board of directors;
- A corruption prevention policy and the existence of controversies;

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

- Responsible lobbying practices and the existence of controversies.



## What is the asset allocation planned for this financial product?

Within the portfolio:

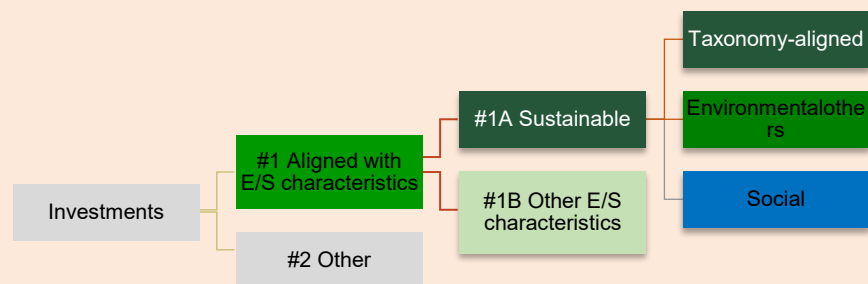
- The minimum proportion of investments contributing to the environmental and social characteristics promoted by the UCITS is 90% (#1 below), excluding mutual funds and cash.
- The minimum proportion of sustainable investments is 15% (#1A below).
- The minimum proportion of Taxonomy-aligned investments is 0%.

### Asset allocation

describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a percentage of:

- the **turnover**, in order to reflect the share of revenue derived from the green activities of investee companies;
- **capital expenditure** (CapEx), in order to show the green investments made by investee companies, e.g. for a transition to a green economy;
- **operational expenditure** (OpEx), so as to reflect the 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 not aligned with the environmental or social characteristics and are not 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?**

Not applicable.



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

- **Does the financial product invest in activities related to fossil gas and/or nuclear energy in compliance with EU taxonomy<sup>1</sup>?**

We do not have the data we need to respond at this point.

Yes

Fossil Gas  Nuclear energy

No

To comply with EU taxonomy, criteria for **fossil gas** consist of limitations on emissions and a transition to renewable energy or to low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include complete safety and waste management rules.

<sup>1</sup> Fossil gas and/or nuclear-related activities only are compliant with European Taxonomy in that they contribute to limiting climate change (“climate change mitigation”) and do not significantly impair European Taxonomy objectives - see the explanatory note on the left. The full criteria for fossil gas and nuclear energy-related economic activities in compliance with EU taxonomy are defined in the Delegated Regulation (EU) 2022/1214 of the Commission.

**Enabling activities**

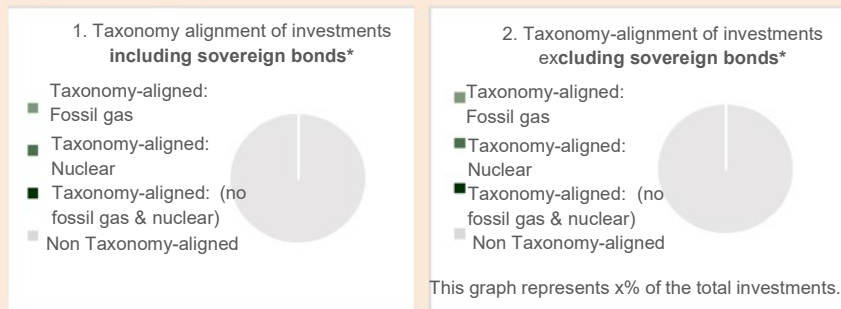
directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities**

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

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 15% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

*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 in sovereign bonds.*



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.

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

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 15% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

The symbol represents environmentally sustainable investments 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 UCITS promotes environmental and social characteristics and is committed to making a minimum of 15% sustainable investments. At this stage, the portfolio allocation specifically addressing an environmental objective is difficult to determine, as some of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identify activities that contribute to environmental and social issues without distinction.



**What is the minimum share of socially sustainable investments?**



The UCITS promotes environmental and social characteristics and is committed to making a minimum of 15% sustainable investments. At this stage, the portfolio allocation specifically addressing a social objective is difficult to determine, as some of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identify 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 score due to a lack of sufficient ESG data but for which the fund exclusion policies apply.



**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?**

Not applicable.

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



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More product-specific information can be found on the website:  
<https://www.groupama-am.com/fr/finance-durable/>