

# 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 ETAT EURO ISR**

**Legal form and Member State in which the Fund was incorporated:**

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

**Formation date and planned term:**

2 March 2011.

Fund initially formed for a 99-year term.

## Summary of the management offer:

Unit class	ISIN code	Eligible subscribers	Distribution of distributable income	Currency of expression	Minimum initial subscription	Initial net asset value
G	FR0010973123	Reserved for the companies, subsidiaries and regional banks of Groupama Assurances Mutuelles	Accumulation and/or distribution and/or carried forward	Euro	€300,000	€10,000
ID (2)	FR0010973149	Reserved for institutional investors	Distribution and/or carried forward	Euro	One thousandth of a unit	€10,000
IC (2)	FR0011833078	Reserved for institutional investors	Accumulation	Euro	One thousandth of a unit	€10,000
MC (2)	FR0012769404	Reserved for institutional investors except UCIs or mandates managed by Groupama Asset Management or its subsidiaries	Accumulation	Euro	One thousandth of a unit	€100
MD	FR001400C3R9	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries	Distribution and/or Carry forward	Euro	One thousandth of a unit	€100
ND	FR0010973172	Open to all subscribers	Distribution and/or carried forward	Euro	1 unit	€500
NC	FR0012726511	Open to all subscribers	Accumulation	Euro	1 unit	€500
O (1) (2)	FR0010973131	Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries, and belonging to the Opale range	Accumulation	Euro	One thousandth of a unit	€10,000
R	FR0013279536	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 shareholders who subscribed to the Fund before 14/12/2016.

(2) Including all subscriptions made before 19/04/2017.

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

Investors will be sent the Fund's latest annual documents and the composition of the assets within eight business days of requesting them in writing from:

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

The documents are also available on the company's website at [www.groupama-am.com](http://www.groupama-am.com).

### Contact details:

- For corporate and institutional investors: Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).
- For individual investors: your distributor (GROUPAMA ASSURANCES MUTUELLES's 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* now superseded by 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 – the 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 UCIs' 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 pure registered units.

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

- **CACEIS Bank**, by delegation of the Management Company, for bearer or administered registered units.

### Institutions designated to receive subscriptions and redemptions, and responsible for respecting the clearing cut-off time indicated in the prospectus, by delegation of the Management Company:

- **CACEIS Bank**, for bearer or administered registered units.

### Fund accounting

**CACEIS Bank** is responsible for the UCI's fund accounting, which includes 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

**Deloitte & Associés**, 6 Place de la Pyramide – 92909 Paris-La Défense – France

### Accounting manager

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

### Distributors

GROUPAMA Assurances Mutuelles' distribution networks (based at 8-10 rue d'Astorg, 75008 Paris, France) and

external distributors approved by Groupama Asset Management.

### **Conflict of interests 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 interests 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 right of co-ownership to the assets of the Fund in proportion to the number of units held.

##### Shareholder register and fund accounting:

Fund accounting is provided by the custodian, CACEIS Bank.

Unit administration is performed by Euroclear France.

##### Voting rights:

No voting rights are attached to the units, as decisions are taken by the Management Company.

##### Types of units:

Units are registered and/or bearer units.

##### Fractioning:

Units may be subscribed or redeemed in thousandths of a unit.

#### **Financial year-end**

The last Paris Stock Exchange trading day in December.

The first financial year-end was the last Paris Stock Exchange trading day in December 2011.

#### **Tax system**

The Fund 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 gain or income from holding shares of the Fund depends on tax provisions specific to the investor's own particular circumstances and/or on the tax provisions in the country where the investor resides. We recommend that you seek advice from your tax advisor.

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

G unit	FR0010973123
IC unit	FR0011833078
ID unit	FR0010973149
MC unit	FR0012769404
MD unit	FR001400C3R9
NC unit	FR0012726511
ND unit	FR0010973172
O unit	FR0010973131
R unit	FR0013279536

### Classification

**“Bonds and other debt securities denominated in euros” UCITS**

### 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 the net assets.

### Investment objective:

The Fund's investment objective is to seek to outperform its benchmark index, the Bloomberg Euro Aggregate Treasury index (closing price).

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.

### Benchmark index

The benchmark is the Bloomberg Euro Aggregate Treasury index (closing price).

The Bloomberg Euro Aggregate Treasury Index is comprised of public bonds denominated in euros, at a fixed rate, rated “Investment Grade”, from eurozone countries. This index lists government bonds from 17 eurozone countries.

This index is only a point of reference. No mechanism to maintain any level of correlation to it is in place as part of the managerial approach implemented. Nevertheless, the behavioural profile of the portfolio and the index may be comparable in certain market configurations.

## Investment strategy

### Description of the strategies used

#### • Portfolio composition strategy

The Fund's investment strategy consists of using fundamental and discretionary management to select securities in the portfolio based on financial and non-financial convictions.

The Fund's initial investment universe is that of bond debt issued by States, private and quasi-public issuers in OECD countries. Since a sustainable and responsible investment (SRI) fund is involved, the non-financial analysis applied takes into account criteria relating to each environmental, social and governance factor. The Fund seeks to select the highest rated issuers within the investment universe, based on extra-financial criteria (best-in-universe approach).

SRI analysis of the Fund covers 90% of its net assets and applies to debt securities issued by private and quasi-public issuers. Consequently, 10% of the net assets may not benefit from an ESG qualitative analysis (green bonds) or a quantitative analysis.

State securities are subject to an ESG assessment, as described below.

The Fund's objective is to manage a portfolio comprising a minimum of 50% of its net assets in bonds issued by OECD Member States, supranational organisations or agencies and in secured bonds. Also included may be private-sector corporate securities rated "investment grade" at the time of acquisition (or securities deemed equivalent by the Management Company).

A minimum of 30% of the Fund's net assets will be invested in so-called "green bonds" that may be issued by States and local bodies, agencies, supranational entities and private companies.

The selection of issuers included in the portfolio by the manager is based on their own analysis, which may be based on the expertise of the internal credit analysis team, in order to optimise the risk of the issuers in the portfolio, and on credit ratings issued by external entities.

Should an issue be downgraded, the Management Company will carry out its own analysis of the credit risk associated with the selected instruments and may decide to retain the securities in question or sell them under the best possible conditions and in the best interests of investors.

The Fund's investment strategy is based on five focus areas:

1. Active management of the portfolio's overall sensitivity in particular through the use of derivatives: market expectations of changes in rates are central to the Fund's directional strategy.
2. An allocation across the various OECD countries: the Fund's manager aims to select Member States of OECD countries that will deliver the best performance, for fundamental or technical reasons such as flows of investors and graphical analyses.
3. A curve positioning strategy for each of the States, taking account of expected monetary policy, auction schedules and other flow types.
4. Portfolio diversification through inflation-indexed bonds, national and supranational agencies or covered bonds.
  - Derivative-based strategies enable the Fund's overall exposure to rates to be managed and its curve positioning to be optimised.
  - Inflation-indexed bond allocations capitalise on any expected increases in inflation.
  - Diversification into national and supranational agencies and covered bonds will be included in the portfolio when it is expected that these will outperform government bonds or where particular instances of curve or country arbitrage warrant it.

5. Integration of non-financial analysis criteria within the investment process. The non-financial analysis of securities complements the financial approach described above.

- Non-financial analysis and internal rating of sovereign issuers:

Groupama AM has developed a proprietary methodology for the internal rating of States. This non-financial rating is determined using sustainable development indicators published mainly by the World Bank and Eurostat and sorted into the three major pillars: Environmental (E), Social (S) and Governance (G). For some indicators, the latest published data may date back several years.

This rating methodology seeks to summarise a country's performance in terms of a sustainable development policy. It ranks and rates the States' ability to establish sustainable growth over the long term.

Assessment of the States is carried out according to 35 criteria belonging to the ESG pillars.

The Groupama AM Research Division calculates an ESG score for the States based on a series of indicators evaluating country performance, including:

- Environment: Carbon intensity: Carbon intensity corresponds to the total national emissions, plus the emissions corresponding to the production of all the goods and services imported into the country, as a ratio of GDP;
- Social: Long-term unemployment rate: Percentage of the working population aged 15 to 74 who have been unemployed for 12 months or more;
- Human rights: Freedom of expression and citizenship: Perception of democracy (people's ability to choose their government), freedom of expression, freedom of association and freedom of the media;
- Governance: Corruption control: Perception of corruption in the executive branch, as well as the level of State capture by elites and private interests.

Accordingly, for each of the States covered, a score is awarded against all the indicators for the E, S and G pillars:

- The country that performs the best on a given ESG criterion is awarded a score of 100;
- The country that performs the worst on the criterion is awarded a score of 1;
- The other countries are then positioned on a scale from 1 to 100.

These quantitative ratings are also taken into account in the analysis of green bonds.

- Analysis of green bonds:

In order to meet its sustainable investment objective, the Fund will invest at least 30% of its net assets in "green bonds", described as such by the issuer. An internal analysis will supplement the selection by the manager and validate the environmental benefit of the projects financed by these green bonds. Groupama AM's internal analysis methodology centres around four pillars:

- **Characteristics of the issue:** date, amount and maturity of the issue, traceability and management of funds (funds credited to a separate account, management of unallocated funds, etc.), project selection process (set-up of a specific committee, ESG risk management, and verification of compliance with the criteria set by the "**Green Bond Principles**" issued by the International Capital Market Association, which are as follows:
  - Use of proceeds
  - Process for project evaluation and selection
  - Management of proceeds
  - Reporting
- **Characteristics of the issuer:** qualitative analysis of the issuer's ESG performance (strategy, objectives, CSR policy, controversy analysis, etc.).
- **Environmental quality of projects:** assessment of projects' environmental benefits. Projects must be specifically linked to alternative energies, green buildings, energy efficiency, the circular economy, sustainable transport, agriculture and forestry, or climate change adaptation. Our analysis is based on benchmarks considered to be market standards (currently, the nomenclature and criteria of the Greenfin label).

- **Transparency:** existence and publication of a second opinion, allocation and impact report (analysis of the relevance of the impact indicators selected according to eligible project classes), allocation of funds report, analysis of quality of reporting.

Each of the four pillars is assessed according to a three-level rating system: positive/neutral/negative. If the opinion is negative on at least one of the following pillars: issuer characteristics, environmental quality of projects, and transparency, then the bond will not be classed as a green bond according to our internal methodology.

The analysis underpinning this classification is conducted upstream of the investment by Groupama AM analysts. Only bonds described as green bonds in accordance with the internal methodology qualify for investment. If the internal analysis cannot be conducted upstream, it will be conducted no later than one month after the Fund's acquisition of the bond. If the bond is not classed as a green bond, the fund manager agrees to sell the bond within three months of the analysis.

- ESG analysis of private issuers:

To obtain quantitative data on a broad range of issuers corresponding to our investment scope, the manager relies on several external non-financial data providers. This data is reworked internally by the Research team. Groupama AM favours a sectoral approach that is in keeping with the fundamental analysis of companies, by selecting the criteria to be adopted and by defining the weighting associated with each of these criteria according to Groupama AM's analysis of the key ESG issues by sector based on various indicators, including:

-Environment: Carbon intensity, green revenue share (percentage of the company's revenue generated by a technology/activity regarded as favourable to the energy and ecological transition);

-Social: Net job creation, training hours;

-Governance: percentage of companies with a majority independent board of directors or supervisory board.

The Governance pillar still represents one third of the final rating, and the weightings allocated to each criterion for the Environmental and the Social pillars are determined based on:

- the significance of the criterion as regards corporate social responsibility for the sector in question,
- its level of materiality (i.e. its financial and operational impact),
- the quality of available information.

The results of the ESG analysis conducted by Groupama AM have a major impact on the selection of issues held in the Fund's portfolio.

The Fund's portfolio is constructed so as to reflect the clear and tangible ESG commitment of Groupama AM and to meet the following objectives:

- Favouring the most virtuous issuers in terms of ESG practices, with an aim to posting an ESG rating that is greater than that of the portfolio investment universe after eliminating the 20% of the lowest-rated securities.
- Helping to combat climate change through the financing of projects that favour the reduction of greenhouse gas emissions (GHG), by selecting and investing in green bonds.
- Guaranteeing a carbon intensity that is permanently lower than that of the benchmark index. The level of CO<sub>2</sub> emissions per State issuer is an important criterion in selecting securities. The manager seeks to achieve a rolling 12-month average level of CO<sub>2</sub> emissions lower than that of the benchmark index.

The integration of ESG criteria helps to limit the risk of investments negatively affecting other environmental and social objectives. Issuers are selected following a governance analysis.



### 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. For an activity to be considered aligned with the EU Taxonomy, it must also uphold the human and social rights enshrined in international law.

In its investment decisions, the management team shall endeavour to take into account the European Union’s criteria for economic activities considered to be environmentally sustainable under the Taxonomy Regulation (EU) 2020/852. Based on the issuer data currently available, the minimum proportion of investments aligned with the EU Taxonomy 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 Fund will be actively managed and will aim to achieve a performance corresponding to its management objective, taking into account the risk criteria defined at the outset, in accordance with the process.
- Sensitivity range for the Fund and geographical area of issuers:

Interest rate sensitivity range within which the Fund is managed	Geographical area of issuers of securities or the underlying securitisation products	Exposure range to securities for this area*
0 to 12	Any issuer whose issues are denominated in euros	[80% - 110%]
	Any issuer whose issues are denominated in currencies other than the euro	[0% - 10%]

\* excluding exposure via derivatives

- Methodological limitations:  
The ESG approach developed by Groupama Asset Management is centred on a quantitative and qualitative analysis of the environmental, social and governance characteristics of the stocks in which it invests. The main limitation of this analysis relates to the quality of the available information. ESG data is not yet standardised, and our analysis is ultimately based on qualitative and quantitative data issued by the companies themselves, with

some of this data being incomplete and non-homogeneous. To overcome this limitation, Groupama Asset Management focuses its analysis on the most important aspects of the sectors and companies analysed.

At the portfolio level, the limitation identified stems from the fact that issuers are selected according to different approaches: internal qualitative analysis is carried out with regard to green bonds, while quantitative analysis is carried out according to different methodologies with regard to States and companies. However, the overall coherence of the portfolio is ensured through the fact that the selection of issuers in the portfolio is, as a rule, based on their position with regard to environmental issues

For more detailed information on the rating methodology used to assess the Fund and its limitations, investors are invited to refer to the Groupama Asset Management Transparency Code available on the website [www.groupama-am.com](http://www.groupama-am.com).

#### Assets, excluding embedded derivatives

- Debt securities and money market instruments:

- Legal form of the instruments used:

The Fund's assets are composed of fixed-rate bonds, Euro Medium Term Notes (EMTNs), negotiable debt securities, fixed-rate annual interest treasury bills, variable-rate bonds and inflation-indexed bonds, subject to a limit of 110% of the net assets.

- Breakdown of private/public debt:

Securities will be selected from sovereign issuers in the OECD, the public sector and similar. Also included may be up to 50% of the net assets of private-sector corporate securities rated "investment grade" at the time of purchase (or securities deemed equivalent by the Management Company).

The selection of issuers included in the portfolio by the manager is based on their own analysis, which may be based on the expertise of the internal credit analysis team, in order to optimise the risk of issuers in the portfolio and on credit ratings issued by external entities.

Should an issue be downgraded, the Management Company will carry out its own analysis of the credit risk associated with the selected instruments and may decide to retain the securities in question or sell them under the best possible conditions and in the best interests of investors.

- Duration

The duration of the selected securities must ensure that the Fund's overall sensitivity is maintained between 0 and 12.

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

The Fund may hold up to 10% of its net assets in units or shares of:

- French or European UCITS,
- French AIFs.

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

External UCIs will be subjected to a close review of their management procedures, performance, risk and any other qualitative or quantitative criteria that allow the short, medium or long-term quality of management to be assessed.

Trackers (listed index entities) may be used.

#### Derivative instruments and securities with embedded derivatives

The use of 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 Fund may also invest up to 100% of its net assets in securities with embedded derivatives. The strategy for

the use of securities with embedded derivatives is the same as that described for derivatives.

These instruments will allow for:

- the Fund's overall exposure to interest rate risks to be increased or decreased;
- arbitrage strategies to be put in place; and,
- the portfolio's exchange rate risk to be fully or partially hedged.

In this respect, they increase management flexibility. Derivatives are therefore used to maximise performance.

The manager may trade in the derivatives detailed in the table below:

Risks in which the manager intends to trade		Types of markets targeted			Types of trades			
Equities		Regulated	Organised	Over the counter	Hedging	Exposure	Arbitrage	Other
Interest rates	X							
Foreign exchange	X							
Credit	X							
<b>Derivative instruments used</b>								
<b>Futures</b>								
- Equities								
- Interest rates		X	X		X	X	X	
- Currencies		X	X		X			
<b>Options</b>								
- Equities								
- Interest rates		X	X	X	X	X	X	
- Foreign exchange				X	X			
<b>Swaps</b>								
- Equities								
- Interest rates				X	X	X	X	
- Inflation				X	X	X	X	
- Foreign exchange				X	X			
- Total return swaps								
<b>Forward currency contracts</b>								
Forward currency contracts				X	X			
<b>Credit derivatives</b>								
- Single entity credit default swaps and basket default swap(s)				X	X			
- Indices								
- Index options								
- Structuring for basket credit derivatives (CDO tranches, iTraxx tranches, FTD, NTD, etc.)								
<b>Other</b>								
- Equity								
<b>Securities with embedded derivatives</b>								
<b>Warrants</b>								
- Equities								
- Interest rates								
- Foreign exchange								
- Credit								
<b>Subscription warrants</b>								
- Equities								
- Interest rates								
<b>EMTN</b>								
- EMTN (structured)				X	X	X		
- Convertible bond		X	X			X		
- Contingent convertible bond (CoCo bonds)								
- Callable or puttable bond		X	X			X		
- Credit Link Notes (CLN)								

- Counterparty selection criteria

Counterparties on over-the-counter instruments (over-the-counter derivatives and effective management techniques) are selected through a specific procedure in force within the Management Company; the main selection procedures relate to their financial solidity, their expertise on the types of transactions envisaged, general contractual clauses and specific clauses relating to techniques for mitigating counterparty risk.

Deposits:

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

Cash borrowings:

On an exceptional and temporary basis, the manager may borrow cash up to the value of 10% of the Fund's net assets from the custodian.

Temporary purchases and sales of securities:

- Types of transactions:
  - Repurchase or reverse repurchase agreements in compliance with the French Monetary and Financial Code
  - Securities lending and borrowing in compliance with the French Monetary and Financial Code
- Types of trades:

They shall mainly aim to allow:

  - The adjustment of the breakdown of sensitivity on the curve
  - Arbitrages of curves
  - The investment of liquidities.
- Types of assets that may be subject to such transactions:
  - Negotiable debt securities
  - Bonds.
- Level of use envisaged and authorised:
  - Temporary purchases of securities:
    - Maximum use: 100% of net assets
    - Expected use: approximately 10% of net assets.
  - Temporary sales of securities:
    - Maximum use: 70% 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, whose registered office is located in a member country of the OECD.

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

Given that the Fund uses derivatives and securities with embedded derivatives and may borrow cash, and undertakes transactions involving temporary purchases and sales of securities, the portfolio's total level of exposure will not exceed 200% of the net assets.

#### **Information relating to the Fund's financial guarantees:**

The GROUPAMA ETAT EURO ISR UCITS complies with the investment rules for financial collateral 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 transactions traded over-the-counter, the Fund may receive securities or cash as collateral. It may receive securities such as corporate bonds and/or government bonds) or cash in the context of temporary purchases and sales of securities and derivatives transactions traded over the counter.

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 custodian 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 guarantees 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 Fund does not offer any capital guarantee.

##### Credit risk:

This is the potential risk that the credit rating of an issuer of securities invested in the portfolio may fall, or that such an issuer may default, which would have an adverse effect on the price of the security and lead to a decline in the Fund's net asset value.

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.

Any new issuer is analysed by our financial and credit analysts and then approved by a committee which determines the list of approved issuers.

##### Interest rate risk:

Investors are exposed to interest rate risk: Investors in bonds or other fixed-income securities may experience negative performance due to interest rate fluctuations. Generally, the prices of fixed-income securities rise when interest rates fall, and fall when interest rates rise.

##### Use of derivatives:

The use of derivatives may increase or decrease the volatility of the Fund by respectively increasing or decreasing its exposure. In the event of adverse market developments, the net asset value may fall.

##### Counterparty risk:

Counterparty risk exists and relates to the conclusion of temporary purchases and sales of securities. It consists of assessing the risks for an entity in terms of its commitments with respect to the counterparty with which such transactions have been concluded. This refers, therefore, to the default risk of the counterparty, causing it to default

on payment. This risk is, however, limited by the provision of collateral.

Risks associated with securities financing transactions and the management of collateral:

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

The risks associated with these transactions and with the management of 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 through 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 associated with securities financing transactions:

In the event that a counterparty defaults on a securities financing transaction, this risk will apply to collateral by way of the sale of securities received.

Exchange rate risk:

This is the risk associated with holding securities denominated in a currency other than the euro. Exchange rate risk remains ancillary insofar as the manager uses forward financial instruments to hedge against risk.

Sustainability risks:

Sustainability risks, comprising those on the Major ESG 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. The securities comprising this list are excluded from the Fund.
- Coal policy: the purpose of this policy is to reduce the exposure of the Fund 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.

**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

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**Eligible subscribers and typical investor profile:**

G unit	Reserved for companies, subsidiaries and regional banks of Groupama Assurances Mutuelles.
IC unit	Reserved for institutional investors
ID unit	Reserved for institutional investors
MC unit	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries
MD units	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries
NC unit	Open to all subscribers
ND unit	Open to all subscribers
O unit	Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries, and belonging to the Opale range
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 ETAT EURO ISR mutual fund is aimed at investors seeking an actively managed portfolio of medium-term bonds invested primarily in sovereign, public sector or similar issuers in the OECD and securities issued by private sector companies.

The recommended investment period is more than three years.

Proportion suitable for investment in the Fund: all bond investments are subject to interest rate fluctuations and private corporate issuers carry a risk of default. The amount that might reasonably be invested in the GROUPAMA ETAT EURO ISR mutual fund should be determined with reference to the investor's personal situation. To determine this, investors should take into consideration their personal wealth, their needs at the present time and over the next three years and the level of risk they are willing to accept.

Investors are also advised to diversify their investments sufficiently to avoid being exposed exclusively to the risks of this Fund.

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 risk more effectively and optimise portfolio management by taking market trends into account.



## Income calculation and appropriation methods

G unit	Accumulation and/or 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.
MC unit	Accumulation.
MD units	Distribution. Interim dividend payments are authorised. Option to carry forward earnings in full or in part.
NC unit	Accumulation.
ND unit	Distribution. Interim dividend payments are authorised. Option to carry forward earnings in full or in part.
O unit	Accumulation.
R unit	Accumulation.

## Characteristics of units

	Initial net asset value	Currency of expression	Fractioning
G unit	€10,000	Euro	Thousandths of a unit
IC unit	€10,000	Euro	Thousandths of a unit
ID unit	€10,000	Euro	Thousandths of a unit
MC unit	€100	Euro	Thousandths of a unit
MD unit	€100	Euro	Thousandths of a unit
NC unit	€500	Euro	Thousandths of a unit
ND unit	€500	Euro	Thousandths of a unit
O unit	€10,000	Euro	Thousandths of a unit
R unit	€500	Euro	Thousandths of a unit

**Subscription and redemption procedures:**

	Minimum initial subscription	Subscriptions	Redemptions (1)
G unit	€300,000	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
IC unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
ID unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
MC unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
MD unit	One thousandth of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
NC unit	One unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
ND unit	One unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
O unit	One thousandth of a unit	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) Total redemption of units will only be possible as a quantity and not as an amount.

Orders are executed in accordance with the table below:

D	D	D	D+1 business day	D+3 business days	D+3 business days
Clearing of subscription orders before 11 a.m. (1)	Clearing of redemption orders before 11 a.m. (1)	Execution of the order no later than D	Publication of the net asset value	Settlement of subscriptions	Settlement of redemptions

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

Subscriptions and redemptions are cleared by CACEIS Bank and may be received every bank business day up to 11.00 a.m.:

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

They are executed on an unknown net asset value with settlement on D+3 Euronext Paris.

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. Consequently, these distributors may stipulate an earlier cut-off time of their own, which may precede

the time mentioned above, so that instructions can be sent to CACEIS Bank in time.

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

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

Swing pricing mechanism:

Groupama Asset Management has chosen to implement a swing pricing mechanism pursuant to the procedures recommended by the AFG Charter to protect the UCITS and its long-term investors from the effects of strong inflows or outflows of capital.

If the net amount of subscription or redemption in the Fund exceeds a threshold previously set by Groupama Asset Management, the net asset value of the Fund will be increased or reduced by a percentage intended to offset the costs incurred by the investment or disinvestment of this amount and to ensure that these costs are not charged to the other investors in the Fund.

The triggering threshold and the extent of the swing of the net asset value are specific to the UCITS and are audited quarterly by a "Swing Price" committee. This committee may change the parameters of the swing pricing mechanism at any time, particularly in the event of crisis on the financial markets.

Provision of redemption caps or "gates":

Groupama Asset Management may implement the so-called "gates" to allow redemption requests from UCITS unitholders to be spread over several net asset values if they exceed a certain level, determined objectively.

- Description of the method used:

UCITS unitholders are reminded that the threshold for triggering gates corresponds to the relationship between:

- the difference recorded, on a single clearing date, between the number of UCITS units the redemption of which is requested, or the total amount of these redemptions and the number of UCITS units the subscription of which is requested, or the total amount of these subscriptions; and
- the net assets or the total number of UCITS units.

If the UCITS has several unit classes, the triggering threshold of the procedure will be the same for all UCITS unit classes.

The threshold above which the gates may be triggered is justified by the frequency at which the net asset value of the UCITS is calculated, its management orientation and the liquidity of the assets it holds. This is set at 5% of the net assets of the UCITS and applies to redemptions cleared for all the UCITS assets and not specifically to the UCITS unit classes.

When the redemption requests exceed the threshold for triggering gates, Groupama Asset Management may decide to honour redemption requests beyond the set cap, and to execute in part or in full those orders which might be blocked.

The maximum duration of the application of the gates is fixed at the equivalent of 20 net asset values for 3 months.

- Methods of providing information to unitholders:

In the event the gates system is activated, all UCITS unitholders will be informed by any means, through the website of Groupama Asset Management, [www.groupama-am.com](http://www.groupama-am.com).

UCITS unitholders whose orders have not been executed will be informed as quickly as possible in a specific way.

- Processing of non-executed orders:

Redemption orders will be executed in the same proportions for UCITS unitholders who have requested redemption since the last clearing date. For non-executed orders, these will be automatically carried over to the next net asset value and will not have priority over the new redemption orders placed for execution on the basis of the next net asset value. In any case, redemption orders which are not executed and are automatically carried over may not be revoked by UCITS unitholders.

- Example illustrating the system that has been partially set up:

For example, if the total redemption order of the Fund's units is 10% while the triggering threshold is set at 5% of the net assets, Groupama Asset Management may decide to honour redemption orders up to 7.5% of the net assets (and therefore execute 75% of redemption orders as opposed to 50% if the 5% cap was strictly applied).

### Charges and fees:

#### Subscription and redemption fees

Subscription fees increase the subscription price paid by the investor, while redemption fees decrease the redemption price. Fees paid to the Fund are used to compensate the Fund for the expenses incurred in the investment or divestment of its assets. The remaining fees accrue to the Management Company, distributor, etc.

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
G unit	Net asset value x Number of units or shares	Maximum rate: 4% incl. tax	None	None	None
IC unit	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
ID unit	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
MC unit	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
MD units	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
NC unit	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
ND unit	Net asset value x Number of units or shares	Maximum rate: 2.75% incl. tax	None	None	None
O unit	Net asset value x Number of units or shares	Maximum rate: 4% incl. tax	None	None	None
R unit	Net asset value x Number of units or shares	Maximum rate: 3% incl. tax	None	None	None

### Operating and management fees:

These fees include all those charged directly to the Fund, except for transaction charges. Transaction charges include intermediary fees (e.g. brokerage fees, stock market taxes, etc.) and the transaction fee, if any, that may be charged, particularly by the custodian 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 Fund exceeds its objectives. They are therefore charged to the Fund;
- Transaction fees charged to the Fund;

For more information regarding the ongoing charges invoiced to the Fund, please refer to the “Charges” section of the Key Investor Information Document (KIID).

### IC, ID, MC and MD units:

<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	Maximum rate: 1.00% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Performance fee	Net assets	None
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 instrument type (2)

(1) The UCIs held in the portfolio account for less than 20%.

(2) Refer to the fee scale below: “Transaction fees accruing to the Management Company”

## NC, ND and R units:

Fees charged to the Fund	Base	Rate scale
Financial management fees and administrative fees external to the Management Company (statutory auditor, custodian, distribution, lawyers etc.)	Net assets	Maximum rate: 1.10% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Performance fee	Net assets	None
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 instrument type (2)

(1) The UCIs held in the portfolio account for less than 20%.

(2) Refer to the fee scale below: "Transaction fees accruing to the Management Company"

## G units:

Fees charged to the Fund	Base	Rate scale
Financial management fees and administrative fees external to the Management Company (statutory auditor, custodian, distribution, lawyers etc.)	Net assets	Maximum rate: 0.90% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Performance fee	Net assets	None
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 instrument type (2)

(1) The UCIs held in the portfolio account for less than 20%.

(2) Refer to the fee scale below: "Transaction fees accruing to the Management Company"

0 units:

Fees charged to the Fund	Base	Rate scale
Financial management fees and administrative fees external to the Management Company (statutory auditor, custodian, distribution, lawyers etc.)	Net assets	Maximum rate: 0.10% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Performance fee	Net assets	None
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 instrument type (2)

(1) The UCIs held in the portfolio account for less than 20%.

(2) Refer to the fee scale below: "Transaction fees accruing to the Management Company"

- Transaction fees accruing to the Management Company

Transaction fee accruing to the Management Company By type of instrument	Base	Maximum rate and/or scale
Equities and equivalent	Deducted from each transaction	0.10% incl. tax
Convertible bonds	Deducted from each transaction	0.05% incl. tax
Corporate bonds	Deducted from each transaction	0.05% incl. tax
Government bonds	Deducted from each transaction	0.03% incl. tax
Exchange rate, including over the counter (OTC)	Deducted from each transaction	0.005% incl. tax
Interest rate swaps (IRS)	Deducted from each transaction	0.02% incl. tax
Credit default swaps (CDS) and asset-backed securities (ABS)	Deducted from each transaction	0.03% incl. tax
Listed derivatives (per lot)	Deducted from each transaction	€2

Any exceptional legal costs related to recovery of the Fund's 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:

Managers have a list of authorised brokers. A Broker Committee meets every six months to assess managers' evaluations of brokers and the entire value chain (analysts, middle office, etc.) and to justify the inclusion of new brokers and/or the exclusion of others.

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

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

#### **4 COMMERCIAL INFORMATION**

All information relating to the GROUPAMA ETAT EURO ISR mutual fund may be obtained by writing to:

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

The Fund's net asset value is available at [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

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

Subscription and redemption requests are cleared by CACEIS Bank at the following address:

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

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

Further information regarding the way the Management Company takes ESG criteria into account is available in the Fund's 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 funds, as defined by the French Monetary and Financial Code.



## 6 OVERALL RISK

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

## 7 ASSET VALUATION AND ACCOUNTING RULES

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

The accounting currency is the euro.

### 7.1 Valuation methods

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

Securities traded in the eurozone: Last price on the valuation day.

For fixed-income 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 euros at the exchange rate in Paris on the valuation day.

Transferable securities for which a 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 under the responsibility of the UCI's manager or the Management Company.

#### UCI shares and securities

Units or shares of UCIs are valued at their last known net asset value.

#### Negotiable debt securities

Negotiable debt securities (short-term and medium-term marketable securities, bonds issued by financial companies, bonds issued by specialist financial institutions, etc.) are valued in accordance with the following rules:

- On the basis of the actual market price;
- In the absence of a meaningful market price, by applying an actuarial method, the reference rate being that of equivalent issues of securities plus, where applicable, a differential reflecting the intrinsic characteristics of the issuer.

#### Over-the-counter transactions

Transactions concluded on an over-the-counter market, authorised by the regulations applicable to UCIs, are valued at their market value.

#### Futures and options contracts

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

#### 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 income from receivables.

- Financial 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 collateralized instruments.

Generally, financial instruments for which the price has not been recorded on the valuation day or for which the price has been corrected 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.

#### **Valuation methods 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 Fund has adopted a synthetic valuation method).

#### **7.2 Method used to recognise income from fixed-income securities**

Coupons received method.

#### **7.3 Method used to recognise expenses**

Transactions are accounted for excluding costs.

### **8 REMUNERATION**

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

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**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 ETAT EURO ISR**

**Legal entity identifier:**

**969500YV36ZTWT5PYE97**

## 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 **30%** 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 using a management approach favouring the selection of countries with a favourable ESG profile.

The country analysis and rating is based on sustainable development indicators published mainly by the World Bank and Eurostat and sorted into the three major pillars: Environment (E), Social (S) and Governance (G).

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 focus on investing 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 issuers with a policy for the prevention of corruption;
- ESG rating of the UCITS compared with the investment universe benchmark;

● ***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?***

Investments made in green bonds, social bonds or sustainable bonds validated by an internal methodology are taken into account in the fund's sustainable investment share. Four criteria are systematically analysed:

- Characteristics of the issuer;
- ESG performance of the issuer;
- Environmental and/or social quality of the projects financed;
- Transparency provided.



● ***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?***

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

● ***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.

**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 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

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

## 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.

It is based on the following elements:

- For sovereign issuers, Groupama AM has developed a proprietary country rating methodology based on sustainable development indicators published mostly by the World Bank and Eurostat;

These ESG criteria are analysed on the basis of various indicators, including:

- Environment: Carbon intensity corresponds to the total national emissions, plus the emissions corresponding to the production of all the goods and services imported into the country, as a ratio of GDP;
- Social: Long-term unemployment rate: Percentage of the working population aged 15 to 74 who have been unemployed for 12 months or more;
- Human rights: Freedom of expression and citizenship: Perception of democracy (people's ability to choose their government), freedom of expression, freedom of association and freedom of the media.

This rating methodology seeks to summarise a country's performance in terms of a sustainable development policy. It ranks and rates countries' ability to establish sustainable growth over the long term.

The ESG analysis results in a score of 1 to 100 for all countries belonging to this investment universe (with 100 being the best). The ESG investment universe is selected from a range of debt issuers with an ESG rating.

These quantitative ratings are also taken into account in analysing green bonds.

- For corporate issuers, 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 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.).

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 focus on investing 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 fund will invest at least 30% of its net assets in “green bonds”.

An internal analysis confirms the environmental benefit of the projects financed by the green bonds invested. Groupama AM’s internal analysis methodology centres around four pillars:

- Characteristics of the issue,
- Characteristics of the issuer,
- Environmental quality of the projects,
- Transparency.

Our analysis is based on benchmarks considered to be market standards (currently, the nomenclature and criteria of the Greenfin label).

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.

At the portfolio level, the limitation identified stems from the fact that issuers are selected according to different approaches: internal qualitative analysis is carried out with regard to Green Bonds, while quantitative analysis is carried out according to different methodologies with regard to States and businesses. However, the overall coherence of the portfolio is ensured through the fact that the selection of issuers in the portfolio is, as a rule, based on their position with regard to environmental issues

For more detailed information on the rating methodology used to assess the UCITS and its limitations, investors are invited to refer to the methodology document available on 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:

- 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 30% allocation to sustainable investment, in accordance with the definition of sustainable investment indicated above.
- Minimum investment of 30% of assets in green bonds. It involves bonds that finance energy transition specifically to projects linked to alternative energies, green buildings, energy efficiency, the circular economy, sustainable transport, agriculture and forestry or climate change adaptation.

The securities in the portfolio have a minimum screening and monitoring rate of 90% of the portfolio’s ESG ratings.

The UCITS must also display a performance higher than its benchmark index or investment universe in the following two indicators:

- Carbon intensity.
- Issuers having a policy for the prevention of corruption.

- ***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 the countries invested in comply with good governance practices, the UCITS uses an internal country analysis methodology that takes into account good governance criteria through its ESG approach. The criteria

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



analysed include government efficiency, regulatory quality, rule of law, corruption control, freedom of expression and gender equality.

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;
- Responsible lobbying practices and the existence of controversies.



**Asset allocation**

describes the share of investments in specific assets.

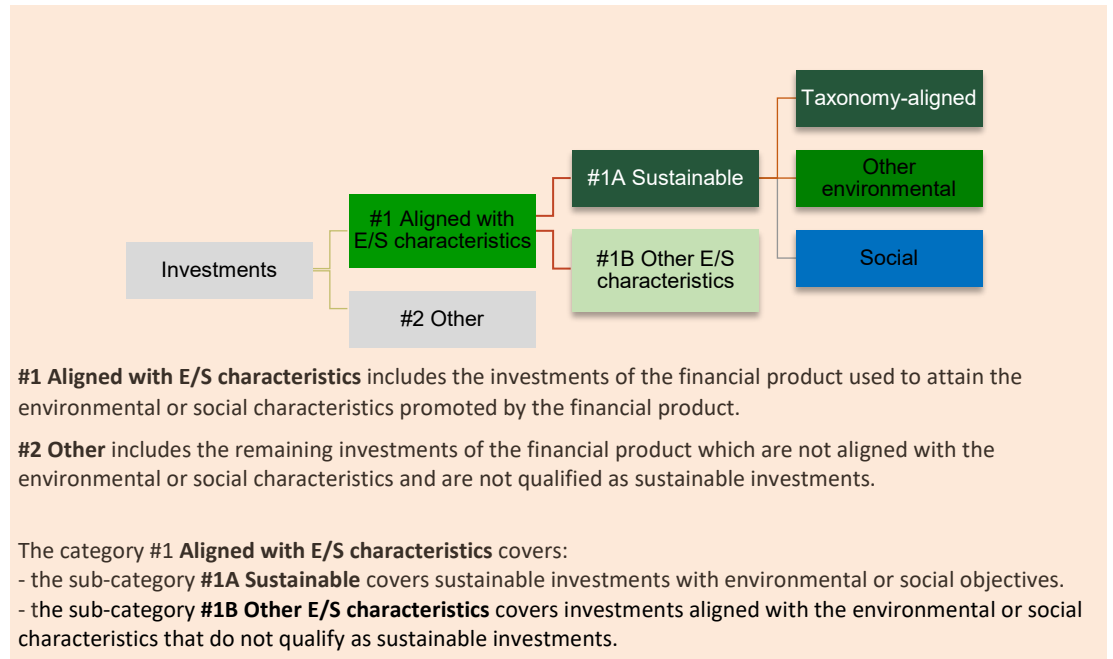
**What is the asset allocation planned for this financial product?**

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 30% (#1A below).
- The minimum proportion of Taxonomy-aligned investments is 0%.
- The minimum proportion of sustainable investment for a an environmental objective is estimated at 30%.
- The minimum proportion of sustainable investment meeting a social objective is estimated at 0%, considering the difficulty of separating environmental SDGs from social SDGs.

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.



- **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?**

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 30% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

### 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 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 30% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy, nor is it committed to making a minimum share of investments in transitional and enabling activities.



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 30% 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 30% 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.



**Where can I find more online product specific information?**

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