Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Compass Strategy mandate – Growth strategy

Legal entity identifier: 549300UA2M7UCJX8SE64

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.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Did this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It made **sustainable investments with an environmental objective:**___________%	☒ **It promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 16.9% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective and carried out 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	☒ with an environmental objective and carried out in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It made **sustainable investments with a social objective:**_____%	☐ It promoted E/S characteristics, but **did not make any sustainable investments**

It should be noted that as the portfolio is invested solely in funds, the Agent relies on the declaration contained in the EETs - European ESG Templates - of the asset managers in which it invests. As it is not currently a regulatory requirement, the details of the Mandate's investments "with an environmental objective and carried out in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy" were not available during the period.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

The environmental and/or social characteristics ("E/S") promoted by the Mandate consist in investing mainly in a selection of undertakings for collective investment in transferable securities (UCITS) (in particular but not exclusively those of the Crédit Agricole Group) including listed index funds (Exchange Traded Funds or ETFs), classified as Article 8 within the meaning of Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR") including a minimum of sustainable investments within the meaning of SFDR of 10% and/or classified as Article 9 SFDR.

1. E/S characteristics promoted for investments in Internal UCITS

The Internal UCITS (i.e. the UCITS managed by an entity of the Indosuez Wealth Management Group) invested in by the Mandate are subject to a detailed look-through analysis of the ESG profile of the corresponding issuers, by applying the Indosuez Wealth Management Group's ESG rating methodology, as described below.

Evaluation of the ESG rating based on a look-through analysis of the Indosuez Wealth Management Group Internal UCITS

The Indosuez Wealth Management Group draws on the analysis of an external provider, which has dedicated resources and teams with ESG-related experience. The provider assigns monthly ESG ratings to target investments based on the analysis of 37 environmental, social and governance criteria, comprising 16 generic criteria and 21 criteria specific to different sectors and several data providers. The ESG ratings received are converted by applying a rating grid specific to the Indosuez Wealth Management Group on a scale of 0 (lowest rating) to 100 (highest rating).

2. E/S characteristics promoted for investments in External UCITS

Eligible External UCITS and ETFs were selected based in particular on the following criteria:

1. Qualification as an Article 8 fund under the SFDR with a minimum commitment to sustainable investments of 10% within the meaning of the SFDR and/or as an Article 9 SFDR fund.

2. The quality of the ESG analysis of the issuers carried out by the External UCITS and ETF management company using investment due diligence (IDD).

3. Quality of the SFDR-related pre-contractual appendices and non-financial reports (periodic information or other non-financial reports).

4. Consideration of adverse impacts on sustainability.

At 31/12/2024, 91.94% of the Mandate's assets were allocated to investments aligned with the promoted E/S characteristics corresponding to the policies detailed above.

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

- ***How did the sustainability indicators perform?***

Percentage of UCITS classified as Article 8 SFDR with a minimum commitment of 10% sustainable investments within the meaning of the SFDR Regulation and/or Article 9 SFDR: 91.94%

Percentage of sustainable investments: 16.88%

…and compared to previous periods?

These percentages have not been calculated for the previous period.

What were the objectives of the sustainable investments that the financial product made in particular and how did the sustainable investment contribute to such objectives?

For Internal UCITS subject to a look-through analysis:

The objective of the sustainable investments of the Internal UCITS was to invest in issuers with two objectives:

1) to follow best environmental and social practices; and

2) not to generate any products or services that harm the environment or society

It was established that "contributing to long-term sustainability criteria" applicable to issuers meant that they had to be exemplary in their sector in terms of at least one environmental or social factor. The definition of an exemplary issuer in its sector is based on the ESG rating methodology used to measure the ESG performance of the issuer. In order to qualify as "exemplary", an issuer must be part of the top third of the companies in its business sector in terms of at least one environmental or social factor.
An issuer meets these long-term sustainability criteria if, moreover, it is not significantly exposed to transactions that are incompatible with said criteria (e.g. tobacco, weapons, betting, coal, aviation, meat production, fertilisers and pesticide manufacturing, single-use plastic production).

For External UCITS and ETFs:

As External UCITS and ETFs are not subject to a look-through analysis, the Mandate's sustainable investment objectives for the portion invested in these External UCITS may only be monitored on a "best effort" basis, i.e. by demonstrating an improvement in or good prospects for improving their ESG practices and performance over time, taking into account the limit of the approach adopted, bearing in mind that it will depend on the methodologies developed by the management companies of these instruments as to whether such an investment can be qualified as sustainable.

As part of its selection process for External UCITS and ETFs, the Agent (i.e. the manager of the assets of the Mandate) nevertheless ensures that the sustainable investment objectives of these instruments do not deviate significantly from those applicable to the Internal UCITS that are subject to a look-through analysis.

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

- ***How did the sustainable investments that the financial product made in particular not cause significant harm to any environmental or social sustainable investment objective?***

For Internal UCITS:

The DNSH (Do No Significant Harm) principle is tested based on Principal Adverse Impact indicators (such as the intensity of the issuer's GHG emissions) which are measured using a combination of indicators (e.g. carbon footprint) and specific thresholds or rules (e.g. the issuer's carbon footprint cannot be in the lowest decile of the sector). In addition to these criteria specifically established for this test, the Agent took into account certain Principal Adverse Impact indicators in its exclusion policy.

In addition to the sustainability factors covered by the first test, a second test has been defined to verify that the issuer's environmental or social impact is not among the worst in its sector.

For External UCITS and ETFs:

As part of its process for selecting and monitoring External UCITS, the Agent applied its best efforts to ensure that the managers of the External UCITS carried out a DNSH test on investments considered to be sustainable and that these tests were based on the pre-contractual appendices, the periodic disclosure on the UCITS, and any other relevant non-financial reporting.

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

The Internal UCITS took these indicators into account as part of their monitoring processes (e.g., monitoring of the intensity of the issuer's GHG emissions). This monitoring was based on a combination of indicators (e.g., carbon footprint) and specific thresholds or rules (e.g., the target's carbon footprint cannot be in the lower decile of the sector). In addition to these criteria specifically established for this test, the Agent took into account certain Principal Adverse Impact indicators in its exclusion policy.

The way in which External UCITS and ETFs took these indicators into account depended on the due diligence carried out by their management company. Nevertheless, the Agent enquired, on a "best effort" basis, about the policies put in place to take these indicators into account on the basis of, in particular, pre-contractual appendices, periodic disclosure on these UCITS and any other relevant non-financial reporting.

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

Detailed description:

For Internal UCITS for which a look-through sustainability analysis has been carried out, the alignment with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is tested and ensured as part of the sustainable investment identification process. In accordance with its ESG policy and exclusion policy, the Agent reviews companies before including them in the investment universe.

The way in which External UCITS and ETFs comply with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights depends on the due diligence carried out by their management company. As part of the selection and monitoring of External UCITS and ETFs, the Agent enquires, on a "best effort" basis, about the policies implemented to take these principles into account when defining eligible sustainable investments for these instruments, based in particular on pre-contractual appendices, periodic disclosure and any other relevant non-financial reporting.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities.

The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

How did this financial product consider principal adverse impacts on sustainability factors?

The Mandate has considered the Principal Adverse Impacts on sustainability factors as follows:

#	*Adverse sustainability indicator*	***Approach for taking indicators into account***
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS		
1	GHG emissions (scope 1, 2, 3 and total)	ESG rating and voting
2	Carbon footprint	ESG rating and voting
3	GHG intensity of investee companies	ESG rating and voting
4	Exposure to companies active in the fossil fuel sector	ESG rating, voting, and exclusion policy
5	Share of non-renewable energy consumption and production	ESG rating
6	Energy consumption intensity per high impact climate sector	ESG rating
7	Activities negatively affecting biodiversity-sensitive areas	ESG rating and monitoring of controversies
8	Emissions to water	ESG rating and monitoring of controversies
9	Hazardous waste and radioactive waste ratio	ESG rating and monitoring of controversies

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Voting, exclusion policy and monitoring of controversies
11	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Voting and monitoring of controversies
12	Unadjusted gender pay gap	Voting and monitoring of controversies
13	Board gender diversity	Voting[1]
14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Exclusion policy and voting

Indicators applicable to investments in sovereigns and supranationals

15	GHG intensity	ESG rating
16	Investee countries subject to social violations	Exclusion policy

[1] *The voting policy applies to funds managed by IWM but not to discretionary mandates.*

What were the top investments of this financial product?

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is:

Asset allocation describes the share of investments in specific assets.

Largest investments	Sectors	Sub-sectors	Weight	Geographical region
JPMORGAN ETF US RESEARCH EQUITY ESG	Multi-sector	Multi-sector	10.03%	United States
JPMORGAN ETF EUROPE RESEARCH EQUITY ESG	Multi-sector	Multi-sector	8.59%	Europe
ISHARES MSCI EUROPE ESG ENHANCED ETF	Multi-sector	Multi-sector	8.55%	Europe
UBS S & P 500 ESG UCITS ETF	Multi-sector	Multi-sector	7.93%	United States
VONTOBEL SUSTAINABLE ASIAN LEADERS (EX JAPAN)	Multi-sector	Multi-sector	6.74%	International
AMUNDI ETF S & P 500 EQUAL WEIGHT ESG	Multi-sector	Multi-sector	5.84%	United States
INDOSUEZ AMERICA OPPORTUNITIES	Multi-sector	Multi-sector	5.62%	United States
ISHARES EUR GOVT BOND 5-7YR	Sovereign assets	Sovereign assets	4.97%	Europe

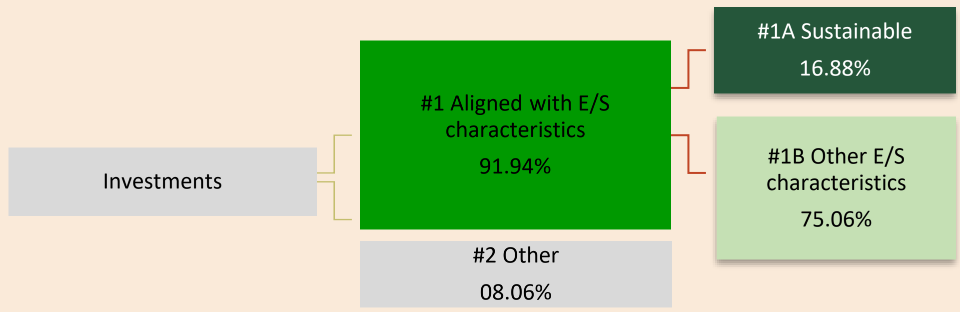
What was the proportion of sustainability-related investments?

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

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

- ***What was the asset allocation?***

91.94% of assets were invested in issuers aligned with the promoted E/S characteristics (#1 Aligned with E/S characteristics); of these investments, those considered sustainable investments accounted for 16.88%. The remaining assets consisted of cash, cash equivalents as well as unscreened investments and were not aligned with the E/S characteristics promoted (#2 Other).



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

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.
The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

- ***In which economic sectors were the investments made?***

As the portfolio is invested solely in UCITS, the look-through by sector was not carried out during this financial year. However, due diligence is carried out on the asset managers of the UCITS in which we invest to ensure that they comply with our exclusion policy, on a "best effort" basis.

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

The Agent has not undertaken to invest the Mandate in sustainable investments within the meaning of the EU taxonomy. The alignment with the EU taxonomy of sustainable investments with an environmental objective of this Mandate has therefore not been calculated.

- ***Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[2]?***

☒ No

- ***What was the share of investments made in transitional and enabling activities?***

The Agent has not undertaken to invest the Mandate in transitional and enabling activities. This proportion has therefore not been calculated.

[2] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

- ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?***

This percentage has not been calculated for the previous period.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

This proportion was 16.88% of the Mandate's assets.

What was the share of socially sustainable investments?

The Agent has not undertaken to invest the Mandate in socially sustainable investments. This proportion has therefore not been calculated.

What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

The "Other" category consisted of unscreened investments for diversification purposes, investments for which all data is not available or cash held in the form of ancillary liquid assets. There were no minimum environmental or social safeguards for such investments.

What actions have been taken to meet the environmental and/or social characteristics during the reference period?

Sustainability indicators were made available in the portfolio management system, allowing the managers to instantly assess the impact of their investment decisions on the portfolio. These ratings were incorporated into the Amundi manager's control framework, with responsibilities split between the first level of control carried out by the investment teams themselves and the second level of control performed by the Risk Management teams, which continuously monitor compliance with the environmental or social characteristics promoted by the product.