



PUBLIC TRANSPARENCY REPORT

2023

Zencap Asset Management

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

Table of Contents

Module	Page
SENIOR LEADERSHIP STATEMENT (SLS)	4
ORGANISATIONAL OVERVIEW (OO)	7
POLICY, GOVERNANCE AND STRATEGY (PGS)	15
FIXED INCOME (FI)	50
SUSTAINABILITY OUTCOMES (SO)	58
CONFIDENCE-BUILDING MEASURES (CBM)	84

SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Zencap AM engages in responsible investment mainly due to its fiduciary duty and its strong convictions of its responsibility to ESG issues, its will to not only reduce risks and negative impacts, to comply to the increasing regulations and to respond to the increasing client demands and pressures from external stakeholders related to ESG topics, but also to seize investment opportunities, to involve our borrowers in the energy and ecological transition, and to generate positive impacts through our financing.

More specifically, through our responsible investment practices, we aim at pursuing several objectives:

- 1) Claim our principles and convictions through our financing and investments. We are convinced that it is our responsibility and our fiduciary duty, as investors and lenders, to direct capital towards virtuous companies and projects, whether they are in possible transition or providing solutions to the energy and ecological transition challenge, and more broadly to the UN's Sustainable Development Goals (SDGs).
- 2) Manage our risks and take informed financing decisions: we strongly believe that responsible investment creates medium- and long-term value for both our investors and our borrowers, through better risk management and anticipation of economic, legislative, social, societal, and environmental changes.
- 3) Reduce negative impacts: we are convinced that the economy can and must reduce its impact on natural resources and focus more on the common good.
- 4) Respond to regulations: we are subject to increasing regulations related to responsible investment, for example, in 2023 (on 2022 data) Zencap AM had the obligation to report to the European "SFDR" regulation.
- 5) Meeting client expectations: backed by the trust of major institutional clients, we have developed an ESG approach that meets both the expectations of our investors and the requirements of the private debt segment. Through both standardised and dedicated reporting, we strive to provide our clients with a transparent and accurate account of the financial and ESG performance of their investments.
- 6) Respond to the growing expectations of our stakeholders (shareholders, investor clients, but also employees, business partners and more generally civil society) by generating positive impacts through our financing as often as possible. We are aware of Zencap AM's responsibility as an investor, of encouraging companies to make progress on societal issues, and providing our funding for the most virtuous projects.

Our approach to responsible investment is based on a structured, committed approach that has been enhanced over the years. It has been defined on the basis of convictions, which we have used to formulate objectives. These objectives are deployed in our strategy and formalised our commitments. Our responsible investment strategy consists in applying complementary approaches at all stages of our investment process:

- Thematic, sectoral, and normative exclusions

- Integration of ESG analysis
 - Engagement with borrowers (such as setting up SLB/SLL, i.e. bonds/loans where the terms and conditions, including the interest rate, vary depending on whether ESG objectives are met).
 - Impact research, and thematic investments (approaches applied to a selection of funds)
- For several years, Zencap AM has strived to financing borrowers with a satisfactory level of ESG maturity, and / or financing issuers with a good potential for improvement on ESG issue.

Some notable investment commitments that we have made are:

- Integrating our ESG approach into all our processes/activities
- Transparency on our practices and results
- Compliance with the PRI's principles
- Becoming a signatory of the Finance for Biodiversity Pledge
- Becoming a signatory of the NZAM initiative

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

The year 2022 was marked by the strengthening of Zencap's ESG approach at all levels.

For example, during the reporting year, we have:

- Refined our ESG analysis and incorporation: we mainly strengthened our climate risk analysis by using online tools, we started to measure our investment biodiversity dependency and impact, and we continued the digitisation of our ESG questionnaires through the online tool Reporting 21.
- Gave a definition of "Sustainable Investment" at Zencap level
- Strengthened our stewardship activities with investees and policymakers: we aim to support borrowers throughout the financing period in improving and transforming their business model with relevant ESG objectives. In this sense, we increased the number of these sustainability objectives linked to a financing indexation mechanism, known as SLB/SLL (sustainability-linked bond/loan). In 2022, 12 financings were made with a SLL/SLB mechanism.
- Increased our collaborative engagements: we were involved in the work of France Invest's Sustainability Commission to harmonise ESG practices between players and promote dialogue between investors, management companies and companies/borrowers. Zencap AM's ESG Head, Raphaël Deléarde, is a member of two France Invest working groups: the GT 7 for ESG Reporting and the GT 8 on "Sustainability loans" which resulted in the publication of a "Best practice Guide for Private Debt Sustainability-Linked Financing" (<https://www.franceinvest.eu/guide-sustainability-linked-loans/>).
- Attained responsible investment certifications: Our ZENCAP INFRA & ENERGY TRANSITION DEBT III (ZID III) fund has been awarded the Greenfin label (renewed annually since January 2019). At its launch in July 2021, the ZENCAP REAL ESTATE DEBT III fund was awarded the "LuxFlag ESG - Applicant Fund Status" label, followed by the "LuxFlag ESG" label in June 2022, renewed in June 2023.

- Improved our corporate governance with the set-up of an ESG committee: Zencap AM's General Management has set up a Sustainable Investment Committee (named "CID"), bringing together our experts and representatives from all our business lines.
- Launched the strengthening of our Climate Policy and our Exclusion Policy: at the end of the year, with the expert consultancy I Care, we launched a more in-depth study of our Climate Policy with a view to aligning Zencap's portfolios with the objectives of the Paris Agreement and our exclusion policy. These policies will come into force during the second half of 2023.
- Successfully launched our thematic and solution fund: ZENCAP EUROPEAN SUSTAINABLE TRANSITION II FPS (ZEST II) (Article 9 SFDR) dedicated to the energy and ecological transition.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

2023 is off to a fast start on responsible investment, we already have:

- Further extended our exclusion policy
- Signed the Finance for Biodiversity Pledge
- Acquired a stake in the CGS institute (Institut de Formation en Comptabilité et Gestion Soutenables), which is working on the holistic, in double materiality, socio-ecological accounting method: CARE.
- Expanded our ESG team with two new hires that joined us early September 2023
- Set up a borrower climate support program as part of our Climate Policy

And we plan in the coming months of 2023 to:

- Launch a new unitranche corporate fund with strong ESG criteria
- Set our targets for alignment with the Paris Agreement
- Strengthen our policy and actions to protect biodiversity

More specifically on our Climate Policy, we plan to make quantified commitments in line with the international objectives of the Paris Agreement to fight climate change. The carbon reduction approach and methods have been formalised, but the targets are still being quantified. As part of this approach, we plan to join the Net Zero Asset Manager Initiative (NZAM), and the ICI (Initiative Climate International) from the 2nd half of 2023 (see details in the section "Strategy for alignment with the international objectives of Articles 2 and 4 of the Paris Agreement").

Then, in 2024, we plan to continue to strengthen all these policies, programs, and actions.

All of our actions are guided by our convictions to have a well-founded ESG approach, by our clients' demand for excellence in this area, and by our desire to support our borrowers in an energy, ecological and fair transition.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Richard JACQUET

Position

Executive President

Organisation's Name

Zencap Asset Management

☒ A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

☐ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

☐ (A) Yes

☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 2,174,851,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 109,000,000.00

Additional information on the exchange rate used: (Voluntary)

1,06725

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	0%	0%
(B) Fixed income	>75%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	>0-10%	0%

(J) Off-balance sheet - (1) Percentage of Internally managed AUM - Specify:

off-balance sheet (internally managed AUM) = Money market + Cash, cash equivalents or overlays

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA 0%

(D) Active – corporate 0%

(E) Securitised >10-50%

(F) Private debt >75%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(D) Fixed income – securitised (1) 0%

(E) Fixed income – private debt (1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

(3) Fixed income - active

(A) Yes, through internal staff	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(G) Fixed income - securitised	<input type="radio"/>	<input checked="" type="radio"/>
(H) Fixed income - private debt	<input checked="" type="radio"/>	<input type="radio"/>

ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions.

Internally managed

(G) Fixed income – securitised

We follow two types of regulatory limits, "hard limits" and "soft limits". The "hard limits" are of a legal nature, and are integrated into the fund's legal documentation, notably in the prospectus. Soft limits are not contractual but are formalised internally.

The "hard limits"

- For some corporate funds, e.g. minimum €50m turnover, maximum 4.5x leverage (or Loan to Value pocket).

- For all funds, e.g. exhaustive and nominative list of authorized currencies/countries; diversification limits (Top 1, Top 3, etc.), possibly by sector, by "risk" pockets (e.g.: price Distressed/Credit Distressed/Deep Stress Value); credit quality determined according to internal criteria (no external rating)

Soft limits, e.g.: no more than 20% SCR (Solvency Capital Requirement) on overall credit

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

☒ **(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>10-50%

- ☐ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- ☐ (C) Not applicable; we do not offer products or funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

☒ **(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications**

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>10-50%

- ☐ (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- ☐ (A) Commodity type label (e.g. BCI)
- ☐ (B) GRESB
- ☐ (C) Austrian Ecolabel (UZ49)
- ☐ (D) B Corporation
- ☐ (E) BREEAM
- ☐ (F) CBI Climate Bonds Standard
- ☐ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- ☐ (H) DDV-Nachhaltigkeitskodex-ESG-Impact

- ☐ (I) EU Ecolabel
 - ☐ (J) EU Green Bond Standard
 - ☐ (K) Febelfin label (Belgium)
 - ☐ (L) Finansol
 - ☐ (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
 - ☒ (N) **Greenfin label (France)**
 - ☐ (O) Grüner Pfandbrief
 - ☐ (P) ICMA Green Bond Principles
 - ☐ (Q) ICMA Social Bonds Principles
 - ☐ (R) ICMA Sustainability Bonds Principles
 - ☐ (S) ICMA Sustainability-linked Bonds Principles
 - ☐ (T) Kein Verstoß gegen Atomwaffensperrvertrag
 - ☐ (U) Le label ISR (French government SRI label)
 - ☐ (V) Luxflag Climate Finance
 - ☐ (W) Luxflag Environment
 - ☒ (X) **Luxflag ESG**
 - ☐ (Y) Luxflag Green Bond
 - ☐ (Z) Luxflag Microfinance
 - ☐ (AA) Luxflag Sustainable Insurance Products
 - ☐ (AB) National stewardship code
 - ☐ (AC) Nordic Swan Ecolabel
 - ☐ (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
 - ☐ (AE) People's Bank of China green bond guidelines
 - ☐ (AF) RIAA (Australia)
 - ☐ (AG) Towards Sustainability label (Belgium)
 - ☒ (AH) **Other**
- Specify:

Programme France Assureurs. France Relance Durable

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(H) Fixed income – private debt	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☐ (A) Publish as absolute numbers
- ☒ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☒ (E) Guidelines on sustainability outcomes
- ☒ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☒ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement

- ☒ (K) **Stewardship: Guidelines on engagement with other key stakeholders**
- ☐ (M) Other responsible investment elements not listed here
 - ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☒ (A) **Specific guidelines on climate change (may be part of guidelines on environmental factors)**
- ☒ (B) **Specific guidelines on human rights (may be part of guidelines on social factors)**
- ☒ (C) **Specific guidelines on other systematic sustainability issues**

Specify:

Signature of the Finance for Biodiversity Pledge, and dialogue on biodiversity matters with our stakeholders

- ☐ (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

- ☒ (A) **Overall approach to responsible investment**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

- ☒ (B) **Guidelines on environmental factors**

Add link:

https://www.zencap-am.fr/pdf/politique-climat-et-biodiversite_zencap-AM.pdf

- ☒ (C) **Guidelines on social factors**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

- ☒ (D) **Guidelines on governance factors**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

- ☒ (E) **Guidelines on sustainability outcomes**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

☒ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

https://www.zencap-am.fr/pdf/politique-climat-et-biodiversite_zencap-AM.pdf

☒ **(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

☒ **(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

☒ **(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

☒ **(J) Guidelines on exclusions**

Add link:

https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

☒ **(K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

<https://www.zencap-am.fr/pdf/charte-investisseur-responsable.pdf>

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

https://www.zencap-am.fr/pdf/politique-engagement-et-dialogue_zencapAM.pdf

☐ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

- ☐ **(Q) No elements of our formal responsible investment policy(ies) are publicly available**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

☒ **(A) Yes**

Elaborate:

Our role as asset management is to manage risks for our clients. Our ESG policy is clearly oriented to risk management.

- ☐ **(B) No**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- ☒ (A) Overall stewardship objectives
- ☒ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☒ (D) How different stewardship tools and activities are used across the organisation
- ☒ (E) Approach to escalation in stewardship
- ☐ (F) Approach to collaboration in stewardship
- ☐ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors

(5) >80% to 90%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change (2) for a majority of our AUM

(B) Specific guidelines on human rights (2) for a majority of our AUM

(C) Specific guidelines on other systematic sustainability issues (2) for a majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ (B) Fixed income

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☒ (9) >80% to 90%
- ☐ (10) >90% to <100%
- ☐ (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

All private debt management follows Zencap AM's ESG policy. However, securitization (including platform funds), which obeys completely different management rules to private debt, is not currently included in the scope of our ESG Policy. Securitization and platform funds aggregate large quantities of underlyings; this granularity complicates the collection of information. Despite a real desire to improve on ESG issues, the ESG approach used in the selection of underlyings by managers/servicers is currently limited mainly to the exclusion of sectors.

11% of our Fixed Income assets are securitizations (see OO-16). We have no capacity to engage with the investee and the CLO market (the CLO managers themselves) is today not organized about influence on investees (as they do barely integrate ESG factors in their investment decisions).

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
-----------	-------------------	--------------	------------	------------	------------	---------------

PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1
--------	------	-----	---------------------	--------	----------------------------	---

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☒ (A) Board members, trustees, or equivalent
- ☒ (B) Senior executive-level staff, or equivalent

Specify:

Zencap AM's co-CEO and partner is actively engaged and supervises the ESG strategy. General Management set up a Sustainable Investment Committee ("CID"). Its main role is to discuss developments of the ESG tools, procedures, and policies. CID pre-validates changes or makes recommendations to General Management, which then takes the final decision. The committee has 11 members - all Zencap business lines are represented, including the ESG team, and is chaired by Thomas Piget, co-CEO and partner.

- ☒ (C) Investment committee, or equivalent

Specify:

During investment and credit committees, the conclusion of the ESG analysis conducted as part of the Due Diligence are discussed and taken into account in the investment decision. The Compliance Officer, Risk Management Director and Voting Members of these committees guarantee that ESG elements are evoked and during these committees.

- ☒ (D) Head of department, or equivalent

Specify department:

The Head of Risk Management and the Head of ESG have oversight and accountability for responsible investment as they are responsible for the implementation of the ESG processes, the evolution of the ESG policy and the monitoring of borrowers on ESG aspects.

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(I) Guidelines on managing conflicts of interest related to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Stewardship: Guidelines on engagement with other key stakeholders	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

☒ (A) Yes

Describe how you do this:

The work of our Sustainable Investment Committee (CID) covers the alignment of our practices with our commitments.

- ☐ (B) No
- ☐ (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☒ (A) Internal role(s)

Specify:

ESG pre-screening: conducted by the fund's team and ESG team in the pre deal phase.

ESG due diligence: conducted by the ESG team in close collaboration with the risk management supervisors, and the investment team, which is then discussed during credit and investment committees (in presence of the Head of Investment, Compliance Officer, Risk Management Director, Executive Director & CEO).

Post-investment: ESG monitoring realised by the investment team in collaboration with the ESG team

☒ **(B) External investment managers, service providers, or other external partners or suppliers**

Specify:

- Reporting 21: online tool to fill in Zencap's ESG questionnaires.
- Iceberg Data Lab: external advisor, which provides us with key sustainability KPIs, especially for our Fund ZEST II.
- Ethifinance: independent expert, which verifies objectives set up in the framework of our sustainability-linked bonds/loans.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- **(B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

- **(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Indicate whether these responsible investment KPIs are linked to compensation

- **(1) KPIs are linked to compensation**
- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Qualitative ESG factors (like “follow ESG policy”) are integrated in our compensation policy for our senior executive-level staff. We are currently working on the elaboration of quantitative KPIs to integrate ESG factors in our compensation policy.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input type="checkbox"/>	<input type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="radio"/>	<input type="radio"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☒ (A) Any changes in policies related to responsible investment
- ☒ (B) Any changes in governance or oversight related to responsible investment
- ☒ (C) Stewardship-related commitments
- ☒ (D) Progress towards stewardship-related commitments
- ☒ (E) Climate-related commitments
- ☒ (F) Progress towards climate-related commitments
- ☒ (G) Human rights-related commitments
- ☒ (H) Progress towards human rights-related commitments
- ☒ (I) Commitments to other systematic sustainability issues
- ☒ (J) Progress towards commitments on other systematic sustainability issues
- ☐ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☒ (A) Yes, including all governance-related recommended disclosures
 - ☒ (B) Yes, including all strategy-related recommended disclosures
 - ☒ (C) Yes, including all risk management-related recommended disclosures
 - ☐ (D) Yes, including all applicable metrics and targets-related recommended disclosures
 - ☐ (E) None of the above
- Add link(s):

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

☒ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☒ (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☐ (C) Disclosures against the CFA's ESG Disclosures Standard

☒ (D) Disclosures against other international standards, frameworks or regulations

Specify:

The SDGs for reporting about objectives implemented with borrowers

Link to example of public disclosures

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☐ (E) Disclosures against other international standards, frameworks or regulations

☐ (F) Disclosures against other international standards, frameworks or regulations

☐ (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

☒ (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☐ (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- ☒ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☒ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☒ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☒ (D) Exclusions based on our organisation's climate change commitments
- ☒ (E) Other elements

Specify:

Exclusions based on our organisation's biodiversity protection commitments (our latest exclusion policy -revised in June 2023- includes exclusion of palm oil).

- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- ☐ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
- ☐ (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- ☒ (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(2) Fixed income

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

We prioritise the investees or other entities on which to focus our stewardship efforts based on the materiality of ESG factors on financial and/ or operational performance, and the ESG rating given to the entity (which is based on a thorough ESG due diligence).

- Zencap AM's policy of engagement and dialogue aims at establishing a constructive, long-term and progressive relationship with our borrowers. It includes several dimensions:
- Raising awareness of potential borrowers during the investment process This dialogue, which is initiated during the initial contacts, allows us to raise the borrower's awareness of its key issues, the results of our analysis and, if necessary, the identified areas for improvement.
 - Setting CSR and impact objectives When the context requires and allows it, and systematically for several funds, Zencap AM sets objectives with the borrower. On this occasion, the awareness-raising work goes further, it is a matter of involving the borrower in a constructive progress approach in which he believes.
 - Support and continuous dialogue This dialogue covers governance, business ethics, strategy, financial and non-financial risks, policies, financial and non-financial results, social and environmental impact and reporting. We encourage our borrowers to build a solid CSR approach and to value it, to assess their ability to address societal issues, and to demonstrate transparency through appropriate ESG disclosure and reporting.
 - Monitoring of risks and controversies We are vigilant about new risks and any drift in our portfolio companies. In the event of controversy, Zencap AM will approach the borrower to ask for explanations and to ensure that remedial and/or corrective action are taken.
 - Annual ESG reporting For most of our financing projects, as soon as possible, the borrower commits to provide an annual ESG reporting. That encourages regular exchanges between Zencap AM and the borrower.
 - Review of ESG objectives When objectives are set, they are reviewed with the borrower at least once a year and make it possible to continue quality exchanges while supporting the borrower in its progress.
 - Stakeholder relations We take ESG issues into account in our business relationships.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- ☒ (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- ☐ (B) We collaborate on a case-by-case basis
- ☐ (C) Other
- ☐ (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We mainly collaborate with shareholders / sponsors of our investees. Also, we can take part of collective engagement initiatives with organisms such as PRI, if relevant for Private Debt.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- ☒ **(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**
Select from the list:
 - ☒ 1
- ☒ **(B) External investment managers, third-party operators and/or external property managers, if applicable**
Select from the list:
 - ☒ 3
- ☒ **(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers**
Select from the list:
 - ☒ 5
- ☒ **(D) Informal or unstructured collaborations with investors or other entities**
Select from the list:
 - ☒ 2
- ☒ **(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**
Select from the list:
 - ☒ 4
- ☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Our stewardship activities are conducted during the Due Diligence phase and during the monitoring of the investment.

They are linked to our investment decision making during the Due Diligence phase as they are important constituents of the Due Diligence.

1) Stewardship is fully integrated in our ESG Due Diligence Process

The Due Diligence includes a review of controversies, an in-depth analysis of ESG challenges, sustainability-related risks including climate-related risks and principal adverse impacts on sustainability factors. Stewardship activities are thus a major lever for Zencap to have a better understanding and a more qualitative understanding of the management's perception of ESG aspects, from a more strategic view. Stewardship is also key during the due diligence phase to illustrate and have more details on actions conducted of ESG relevance that have been mentioned either in the ESG questionnaire that was filled, or information identified in the additional documentation (e.g. ESG / Annual Report, ESG policy.). Stewardship provides a qualitative view on the relevance of ESG topics for the potential borrower and can nuance (positively or negatively) an opinion that was built based on documents. It can also be a key moment to understand further developments or innovations linked to ESG that are considered by the borrower but not mentioned in any documentation.

2) Stewardship demonstrates the borrower's mindset with regards to ESG

A potential borrower's reluctance in responding positively to our dialogue demands are mentioned during credit and investment committees and can prevent from investing should ESG be highly material. Indeed, if no sign of willingness to discuss ESG topics with the ESG team is shown, it is understood as a sign that our yearly ESG questionnaire will not be filled and that an improvement on ESG factors during our investment is very unlikely, which is at the opposite of our ESG objective. Indeed, as Zencap aims at accompanying borrowers in improving their ESG performance, the lack of discussion possibilities is an obstacle.

3) Stewardship is necessary to agree on ESG goals

Zencap aims at setting ESG objectives for a majority of its investments and integrating ESG clauses in the documentation (e.g. yearly response to the ESG questionnaire). In order to set relevant and achievable goals, a discussion with the borrower is necessary.

Overall, stewardship is a central element of the due diligence phase as it provides a more qualitative understanding of the ESG approach of the potential borrower including its mindset with regard to these topics. A potential borrower who would refuse to discuss ESG topics could expose the deal to be rejected during the investment committee.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Our stewardship objectives include the possibility to have more details on ESG relevant topics for the borrower and understand its mindset on these topics. During the pre-deal phase, it is also a moment during which improvement on specific topics are defined, leading to the agreement on ESG targets that are set and monitored yearly. The objective for Zencap is both to discuss these topics and understanding whether they are an element of risk or of opportunity for the borrower and how they are managed, as well as to accompany borrowers on an improvement trajectory.

We prioritise the topics addressed based on the sector, the size, the geographic location as well as on the ESG questionnaire that has been filled or on any other document that has been provided. This first layer of analysis enables us to orient the stewardship on the most material ESG topics for the sector and the borrower, to have more details on specific issues raised or actions conducted as well as to have details on the ESG strategy and further innovations or development that are considered.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 38	PLUS	OO 8, OO 5.3 FI	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your internally managed SSA and/or private debt fixed income assets.

(B) Private debt - Approach to escalation

At any stage of the investment process, if there is any doubt or lack of information about any potential controversy, an escalation process is launched leading to potential discussion with the borrower. A dialogue in order to encourage the borrower to improve the situation and coordination with the ESG, RM and investment teams (specific audits may be requested).

If it is before closing time, the potential investment could be dropped.

After the investment, in the event that the dialogue and engagement process does not enable the assets to be realigned with our requirement, Zencap AM may gradually implement the following measures:

- Tougher treatment of any requests from the borrower for a waiver of the finance contracts: financial penalties ("waiver fees") or even refusal,
- Study (by the members of the Investment Committee) of an early exit process and/or sale on the secondary market.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☐ (A) Yes, we engaged with policy makers directly
- ☐ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ **(C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
 - (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☐ (A) We participated in 'sign-on' letters
- ☒ **(B) We responded to policy consultations**
- ☐ (C) We provided technical input via government- or regulator-backed working groups
- ☐ (D) We engaged policy makers on our own initiative
- ☒ **(E) Other methods**

Describe:

We support professional organisations to do so, such as France Invest, AFG, or France Assureurs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☐ (A) We publicly disclosed all our policy positions
☒ (B) We publicly disclosed details of our engagements with policy makers

Add link(s):

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

- ☐ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Carbon emission reduction

(1) Led by

- ☒ (1) Internally led
☐ (2) External service provider led
☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) Environmental factors
☐ (2) Social factors
☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
☒ (2) Fixed income
☐ (3) Private equity
☐ (4) Real estate
☐ (5) Infrastructure
☐ (6) Hedge funds
☐ (7) Forestry
☐ (8) Farmland
☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Objective setting (binding agreement):

Conduct a greenhouse gas balance assessment (scope 1,2 and 3) and set annual reduction targets based on SBTi recommendations.

We will observe the results as of next year.

(B) Example 2:

Title of stewardship activity:

Job creation objective

(1) Led by

● **(1) Internally led**

○ (2) External service provider led

○ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

☐ (1) Environmental factors

☒ **(2) Social factors**

☐ (3) Governance factors

(3) Asset class(es)

☐ (1) Listed equity

☒ **(2) Fixed income**

☐ (3) Private equity

☐ (4) Real estate

☐ (5) Infrastructure

☐ (6) Hedge funds

☐ (7) Forestry

☐ (8) Farmland

☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Objective setting (binding agreement):

Create long-term jobs in france: increase each year (a minimum of 5%) the rate of change change in the permanent workforce.

We will observe the results as of next year.

(C) Example 3:

Title of stewardship activity:

Formalize a business code of ethics

(1) Led by

● **(1) Internally led**

○ (2) External service provider led

○ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

☐ (1) Environmental factors

☐ (2) Social factors

☒ **(3) Governance factors**

(3) Asset class(es)

☐ (1) Listed equity

☒ **(2) Fixed income**

☐ (3) Private equity

☐ (4) Real estate

☐ (5) Infrastructure

☐ (6) Hedge funds

☐ (7) Forestry

☐ (8) Farmland

☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Objective setting:

Formalize a business code of ethics.

(D) Example 4:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☐ (A) Yes, within our standard planning horizon

☒ (B) Yes, beyond our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Transition to a decarbonized and less resource-intensive economy is a risk and opportunity that has been identified.

Physical risks related to climate change have been identified as material, especially with regards to our real estate and infrastructure private debt portfolios.

Besides, our Climate Policy has the objective to align our funds to the Paris Agreement on climate change, and has a planning horizon to 2030, and even to 2050.

☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

☒ (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Climate-related risks and opportunities are analysed for each of our deals, during the ESG Due Diligence. Indeed, sectors that are more exposed to risks relating to the decarbonization of the economy face a more stringent stewardship from Zencap to understand their risk management approach.

As for the product, we have currently two funds dedicated to financing the energy and sustainable transition, the latter being Zencap European Sustainable Transition II (ZEST II). It aims at investing only in infrastructure assets that meet at least two of three sustainability objectives, namely a metric that assesses the environmental contribution (NEC), alignment on a 2°C trajectory and alignment with the EU green taxonomy. The prior fund – Zencap Infrastructure Debt 3 - has obtained the Greenfin label (and we'll apply for ZEST II in 2023 and are confident to get it) and aims at financing the energy transition.

Lastly, we are currently elaborating our climate policy with an expert consultancy firm that is calculating our portfolio's temperature and providing us with guidelines to include climate considerations as mandatory investment criteria.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

☒ (A) Coal

Describe your strategy:

Given the significant contribution of coal combustion to greenhouse gas emissions and other pollutants, Zencap AM has decided to exclude from all of its current and future financings, regardless of geographic region, companies or projects whose activities are related to thermal coal, as described below:

- Any holder of thermal coal mines regardless of size or share of assets.
- Any new project or asset development related to thermal coal: this excludes projects or assets involving the development of new thermal coal mining or transformation capacity, coal-based energy production or dedicated infrastructure related to these projects (e.g. coal-fired power plants, coal-fired heating networks, dedicated transport infrastructure), regardless of the size of the project.
- Any company with existing coal-fired power plants with installed capacity in excess of 2 GW, or any power company whose thermal coal-based generation (or otherwise installed capacity) exceeds 2.5% of the total annual generation mix, unless the company expressly commits to a transformation plan involving compliance with these thresholds within two years and the cessation (not divestment) of all coal-based generation within five years of the grant.
- Any borrower with more than 2.5% of annual revenues or activity directly related to thermal coal (mining services, processing, construction of dedicated infrastructure, etc.), unless the borrower commits to meet this threshold within two years and to fully exit these activities within five years.

- Including the exclusion of any company on the Global Coal Exit List (GCEL) established by the NGO Urgewald, whose criteria are less restrictive than those listed above, unless the company commits to meeting our thresholds within two years and to fully exiting these activities within five years

These thresholds allow for a pragmatic approach while the energy transition is underway. In 2025, thresholds will be lowered. (1GW for installed capacity, 1% for annual generation mix and annual revenue) In 2030, when the energy transition is more advanced, these thresholds will be reduced to 0, meaning that Zencap AM will not provide any financing related to thermal coal.

See more details in our Exclusion & Vigilance Policy on our website: https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

☒ (B) Gas

Describe your strategy:

Zencap AM excludes from its financing companies that generate more than 10% of their revenues from activities directly related to oil extraction, unless the borrower commits to respecting this threshold within two years or if it commits to exit oil within five years. This threshold will be reduced to 0 in 2030.

See more details in our Exclusion & Vigilance Policy on our website: https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

☒ (C) Oil

Describe your strategy:

• Conventional oil

Zencap AM excludes from its financing companies that generate more than 10% of their revenues from activities directly related to oil extraction, unless the borrower commits to meeting this threshold within two years or to exit oil within five years.

Zencap AM excludes from its financing companies that generate more than 5% of their revenues from activities directly related to indirect activities such as pipelines and other infrastructures related to oil, unless the borrower commits to meeting this threshold within two years or to exit oil within five years.

This threshold will be reduced to zero in 2030.

• Unconventional oils (shale oil and gas, oil sands) and wells in the Arctic or in deep waters

Zencap AM excludes financing companies whose activity is directly linked to the extraction of shale oil or shale gas, the extraction or exploitation of oil sands or the exploration, extraction or exploitation of oils from drilling in the Arctic or in deep waters.

See more details in our Exclusion & Vigilance Policy on our website: https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

☒ (D) Utilities

Describe your strategy:

This economic sector (Energy production) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

See more details in our Exclusion & Vigilance Policy on our website: https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

☒ (E) Cement

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ **(F) Steel**

Describe your strategy:

This economic sector (Metal & Mining) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

☒ **(G) Aviation**

Describe your strategy:

This economic sector (Transportation) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

☒ **(H) Heavy duty road**

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ **(I) Light duty road**

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ **(J) Shipping**

Describe your strategy:

This economic sector (Transportation) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

☒ **(K) Aluminium**

Describe your strategy:

This economic sector (Metal & Mining) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

☒ **(L) Agriculture, forestry, fishery**

Describe your strategy:

This economic sector (Transportation) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

Furthermore, regarding some specific sub-sectors:

Palm oil :

The production and distribution of palm oil are considered to be controversial activities due to the massive deforestation caused by its cultivation, and the consequences of this deforestation on the fauna, flora, activities and lifestyles of indigenous populations.

To help combat deforestation, Zencap AM applies exclusion filters to companies considered to be :

- Producers who cultivate plantations and harvest the fruit used to produce palm oil-based products and
- Distributors (wholesalers) distributing palm oil-based products (i.e. crude, refined, bleached and deodorised palm oil).

The exclusion thresholds applicable to producers and distributors are as follows (cumulative thresholds):

- Palm oil production or distribution turnover greater than or equal to 5% of total turnover, and
- Proportion of RSPO-certified palm oil less than 80% of total sales of palm oil produced/distributed, and
- Proportion of RSPO16-certified palm oil at the most demanding levels (Segregated or Identity Preserved) less than 50% of total palm oil sales produced/distributed.

Tobacco:

Given the cost that tobacco represents for society (human cost, health cost), Zencap AM excludes from its financing all companies that produce tobacco (at the 1st euro of turnover). Zencap AM also excludes all companies that produce alternative smoking products (e.g. electronic cigarettes, vaporisers).

Zencap AM also excludes from its financing companies whose business activity (more than 10% of turnover) is significantly linked to the trade or distribution (suppliers, retailers, distributors & wholesalers) of tobacco or alternative products.

☒ **(M) Chemicals**

Describe your strategy:

This economic sector (Chemical) is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

☒ **(N) Construction and buildings**

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ **(O) Textile and leather**

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ **(P) Water**

Describe your strategy:

Specific attention during the ESG due diligence process and monitoring

☒ (Q) Other

Specify:

Telecommunications & numerical technologies

Describe your strategy:

This economic sector is part of our Vigilance sector policy.

Zencap AM's due diligence policy targets sectors where the materiality of climate issues is recognised as particularly high. Seven sectors are therefore subject to increased scrutiny at the time of the financing decision, as well as close monitoring throughout the life of the financing.

If a company operates in a sector listed in this vigilance policy, its "climate materiality" criterion within the "Climatrix" is automatically classified as "high" (the most important level). As a result, a special financing process is adopted, which also depends on the borrower's maturity and capacity for dialogue (see Climate Strategy document).

- (R) We do not have a strategy addressing high-emitting sectors

Provide a link(s) to your strategy(ies), if available

https://www.zencap-am.fr/pdf/politique-exclusion_zencapAM.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)

☒ (B) Yes, using the One Earth Climate Model scenario

☒ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

☒ (D) Yes, using other scenarios

Specify:

Zencap AM commissioned at the end of 2022, I Care, an independent consultancy specialising in environmental issues, to analyse the carbon profile of portfolios and to help Zencap AM set decarbonisation targets for 2030, and to formalise the policies, methods and tools needed to achieve this goal.

The objective of reducing carbon intensity will apply to all our portfolios across all our strategies: companies (SMEs/ETIs), property assets and infrastructure. For example, 100% of our private debt portfolios will be covered by our reduction targets. The greenhouse gas emission reduction trajectories used in this work are defined on an annual basis.

The construction of a climate trajectory is a complex exercise that requires adaptation to the specific characteristics of the portfolio. In order to arrive at a forward-looking estimate of our reduction targets, the expected reductions in tCO₂eq/M€ of sales by 2030 were projected by aggregating sectoral data.

To do this, the work was based primarily on the sectoral decarbonisation trajectories of the International Energy Agency (IEA), which were supplemented by the scenarios of the One Earth Climate Model (OECM), the French NDC (the National Low Carbon Strategy or SNBC) and the Carbon Real Estate Monitor (CRREM) for property assets, where applicable.

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

☒ **(A) Yes, we have a process to identify and assess climate-related risks**

(1) Describe your process

Climate-related risks are assessed in a qualitative manner, by identifying the risks that might be posed for borrower by the transition to a low carbon economy and by physical risks and the risk managed response. For each Due Diligence conducted, we identify physical, transition and legal risks that might affect the supply, the production, the distribution of the products or the product's life. This double entry table provides information whether risks exist and if they are managed or not.

Transition risks are assessed by the analyst during the ESG Due Diligence, which includes a KPI in the questionnaire related to the borrower's assessment of transition risks. The response can be subject to discussion during the dialogue conducted. The identification of transition risks (including reputational, legal, shift in demand) is achieved by the analyst based on market expertise.

Physical related risks are subject to a KPI in our ESG questionnaire and mentioned during the dialogue phase and also reviewed using open-source data.

(2) Describe how this process is integrated into your overall risk management

Once risks are identified and categorized according to our classification (exposure to risk and risk management), any risk that is considered as material and not managed will be discussed during investment committees.

☒ **(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

Should a risk be considered too high and not managed, it could be a reason for not investing. These highly material yet unmanaged risks can also be a reason for the integration of clauses in the documentation, such as the deployment of an in-depth risks analysis and an adapted response, but also guarantees with regards to the insurance covering the assets.

(2) Describe how this process is integrated into your overall risk management

The ESG "expert" team is member of the RM team.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

☒ (A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

☒ (1) Metric or variable used

- ☐ (2) Metric or variable used and disclosed
- ☐ (3) Metric or variable used and disclosed, including methodology

☒ (B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

☒ (1) Metric or variable used

- ☐ (2) Metric or variable used and disclosed
- ☐ (3) Metric or variable used and disclosed, including methodology

☐ (C) Internal carbon price

☒ (D) Total carbon emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☐ (2) Metric or variable used and disclosed
- ☒ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☒ (E) Weighted average carbon intensity

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☐ (2) Metric or variable used and disclosed
- ☒ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☒ (F) Avoided emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☒ (2) Metric or variable used and disclosed
- ☐ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☒ (G) Implied Temperature Rise (ITR)

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☒ (2) Metric or variable used and disclosed
- ☐ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☒ **(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

☒ **(1) Metric or variable used**

- ☐ (2) Metric or variable used and disclosed
- ☐ (3) Metric or variable used and disclosed, including methodology

☒ **(I) Proportion of assets or other business activities aligned with climate-related opportunities**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☐ (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☐ (J) Other metrics or variables

☐ (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☐ (A) Scope 1 emissions

☐ (B) Scope 2 emissions

☒ **(C) Scope 3 emissions (including financed emissions)**

(1) Indicate whether this metric was disclosed, including the methodology

- ☐ (1) Metric disclosed

☒ **(2) Metric and methodology disclosed**

(2) Provide links to the disclosed metric and methodology, as applicable

<https://www.zencap-am.fr/pdf/rapport-ESG-2023.pdf>

☐ (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☒ (B) The UNFCCC Paris Agreement
- ☒ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☒ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☒ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☐ (G) The International Bill of Human Rights
- ☒ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (I) The Convention on Biological Diversity
- ☐ (J) Other international framework(s)
- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)
- ☐ (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☒ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☒ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☒ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- ☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☐ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☐ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☒ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☒ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ **(A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes**

Explain how these activities were conducted:

We take into account the region of operations and guarantees provided to ensure respect of human right in countries that could be at risk. Also, our controversy analysis aims at covering any aspect of ESG relevance including the respect of human rights and of the conventions of the international labour organisations.

Additionally, Principal adverse indicators related to these issues are assessed as part of the Due Diligence and are monitored on an annual basis as part of ESG questionnaire sent to the borrower/issuer and/or its shareholders or sponsors. The following indicators are included in the questionnaire:

- o Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- o Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- o Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

☐ (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

☐ (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

☐ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

o (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ **(A) Workers**

Sector(s) for which each stakeholder group was included

- ☒ (1) Energy
- ☒ (2) Materials
- ☒ (3) Industrials
- ☒ (4) Consumer discretionary
- ☒ (5) Consumer staples
- ☒ (6) Healthcare
- ☒ (7) Finance
- ☒ (8) Information technology
- ☒ (9) Communication services
- ☒ (10) Utilities
- ☒ (11) Real estate

☒ **(B) Communities**

Sector(s) for which each stakeholder group was included

- ☒ **(1) Energy**
- ☒ **(2) Materials**
- ☒ **(3) Industrials**
- ☒ **(4) Consumer discretionary**
- ☒ **(5) Consumer staples**
- ☒ **(6) Healthcare**
- ☒ **(7) Finance**
- ☒ **(8) Information technology**
- ☒ **(9) Communication services**
- ☒ **(10) Utilities**
- ☒ **(11) Real estate**

☒ **(C) Customers and end-users**

Sector(s) for which each stakeholder group was included

- ☒ **(1) Energy**
- ☒ **(2) Materials**
- ☒ **(3) Industrials**
- ☒ **(4) Consumer discretionary**
- ☒ **(5) Consumer staples**
- ☒ **(6) Healthcare**
- ☒ **(7) Finance**
- ☒ **(8) Information technology**
- ☒ **(9) Communication services**
- ☒ **(10) Utilities**
- ☒ **(11) Real estate**

☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

☒ **(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

We analyse the corporate disclosure provided during our due diligence phase and classify information as positive elements or risk drivers, based on a qualitative analysis.

☒ **(B) Media reports**

Provide further detail on how your organisation used these information sources:

Media reports are used as part of our controversy analysis and can help us identify any element on the borrower that might trigger a risk of negative outcome. Our controversy analysis ranks the intensity of the controversy and its frequency.

☒ **(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

NGOs Reports are used as part of our controversy analysis and can help us identify any element on the borrower that might trigger a risk of negative outcome. Our controversy analysis ranks the intensity of the controversy and its frequency.

- ☐ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank
- ☐ (E) Data provider scores or benchmarks
- ☐ (F) Human rights violation alerts
- ☐ (G) Sell-side research
- ☐ (H) Investor networks or other investors
- ☐ (I) Information provided directly by affected stakeholders or their representatives
- ☐ (J) Social media analysis
- ☐ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

- ☐ (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities
- ☐ (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

☒ **(C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year**

Explain why:

We did not identify any negative outcome with regards to human right violation or affecting negatively human rights.

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

(4) Private debt

(A) Yes, our investment process incorporates material governance factors (1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors (1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons (1) for all of our AUM

(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion ○

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors ○

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

(4) Private debt

(A) We incorporate material environmental and social factors



(B) We incorporate material governance-related factors



(C) We do not incorporate material ESG factors for the majority of our fixed income investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

(4) Private debt

(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)

(1) for all of our AUM

(B) Yes, we have a framework that differentiates ESG risks by sector

(1) for all of our AUM

(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector



(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 5	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your organisation incorporate material ESG factors when selecting private debt investments during the due diligence phase?

☒ **(A) We use a qualitative ESG checklist**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(B) We assess quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(C) We check whether the target company has its own responsible investment policy, sustainability policy or ESG policy**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(D) We hire third-party consultants to do technical due diligence on specific material ESG factors where internal capabilities are not available**

Select from dropdown list:

- ☐ (1) in all cases
- ☐ (2) in a majority of cases
- ☒ **(3) in a minority of cases**

☒ **(E) We require the review and sign-off of our ESG due diligence process by our investment committee, or the equivalent function**

Select from dropdown list:

- ☒ **(1) in all cases**
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ **(F) We use industry-recognised responsible investment due diligence questionnaire (DDQ) templates**

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases

☒ (G) We use another method of incorporating material ESG factors when selecting private debt investments during the due diligence process

Specify:

We have created our own methodology which is based on industry recognised responsible investment due diligence questionnaires (GRESB/France Invest/France Assureurs requirements) and have additional KPIs, enabling us to have a tailored questionnaire.

Due to the various types of actors we deal with (small and mid-corporates, real estate promoters, infrastructures, real estate assets), we have built different questionnaires that match the borrower's specificities. Also, we favour a trajectory of continuous improvement and not only performance, hence we include more space for qualitative comments and additional information for the borrower to fill.

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in a majority of cases
- ☐ (3) in a minority of cases
- ☐ (H) We do not incorporate material ESG factors when selecting private debt investments during the due diligence phase

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

(3) Private debt

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(B) We make a qualitative assessment of how material ESG factors may evolve

(1) for all of our AUM

(C) We do not incorporate significant changes in material ESG factors

o

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

(4) Private debt

(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations

(1) for all of our AUM

(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits

(1) for all of our AUM

(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors

(3) for a minority of our AUM

(D) We use another method of incorporating material ESG factors into our portfolio's risk management process

(3) for a minority of our AUM

(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process

o

(D) We use another method of incorporating material ESG factors into our portfolio's risk management process - Specify:

For our ZEST II fund, we measure for each deal the following key indicators:

- The portfolio's implicit temperature (temperature indicator), which measures its alignment with the Paris Agreement through carbon emissions of its investments according to a 2°C scenario in 2050.
- The Net Environmental Contribution, a metric that measures the impact of an economic activity considering multi-environmental criteria (NEC should be positive).
- The Green Share, i.e., the percentage of economic activities aligned with the European Taxonomy, which measures the portfolio's contribution to the energy and ecological transition (≥50%)

For our Fund "ZID III", we monitor the share of the Fund aligned with the Greenfin Label.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(4) Private debt

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings



(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents



(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities



(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents ☒

(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion ☐

(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process ☐

PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 13	CORE	OO 21	N/A	PUBLIC	Performance monitoring	1

During the reporting year, how did your organisation incorporate material ESG factors when monitoring private debt investments?

☒ (A) We used a qualitative ESG checklist

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (B) We assessed quantitative information on material ESG factors, such as energy consumption, carbon footprint and gender diversity

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (C) We hired third-party consultants to do technical assessment on specific material ESG factors where internal capabilities were not available

Select from dropdown list:

- ☐ (1) in all cases
- ☐ (2) in the majority of cases
- ☒ (3) in the minority of cases

☒ (D) We used industry body guidelines

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☒ (E) We used another method to incorporate material ESG factors into the monitoring of private debt investments

Specify:

We have created our own methodology which is based on industry recognised responsible investment ESG questionnaires (GRESB/France Invest/France Assureurs requirements) and have additional KPIs, enabling us to have a tailored questionnaire.

Due to the various types of actors we deal with (small and medium corporates, real estate promoters, infrastructures, real estate assets), we have built different questionnaires that match the borrower's specificities. Also, we favour a trajectory of continuous improvement and not only performance, hence we include more space for qualitative comments and additional information for the borrower to fill.

Select from dropdown list:

- ☒ (1) in all cases
- ☐ (2) in the majority of cases
- ☐ (3) in the minority of cases

☐ (F) We did not incorporate material ESG factors when monitoring private debt investments

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

☒ (A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☐ (1) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (2) The UNFCCC Paris Agreement
- ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☒ (5) The EU Taxonomy

- ☐ (6) Other relevant taxonomies
- ☐ (7) The International Bill of Human Rights
- ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

- (2) Classification of sustainability outcome
- ☒ (1) **Environmental**
 - ☐ (2) Social
 - ☐ (3) Governance-related
 - ☐ (4) Other
- (3) Sustainability outcome name
- Climate adaptation/mitigation
- (4) Number of targets set for this outcome
- o (1) No target
 - o (2) One target
 - (3) **Two or more targets**
- ☒ (B) **Sustainability outcome #2**
- (1) Widely recognised frameworks used to guide action on this sustainability outcome
- ☐ (1) The UN Sustainable Development Goals (SDGs) and targets
 - ☒ (2) **The UNFCCC Paris Agreement**
 - ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - ☐ (5) The EU Taxonomy
 - ☐ (6) Other relevant taxonomies
 - ☐ (7) The International Bill of Human Rights
 - ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - ☐ (9) The Convention on Biological Diversity
 - ☐ (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
- ☒ (1) **Environmental**
 - ☐ (2) Social
 - ☐ (3) Governance-related
 - ☐ (4) Other
- (3) Sustainability outcome name
- Alignment of GHG emissions to Paris Agreement
- (4) Number of targets set for this outcome
- o (1) No target
 - o (2) One target
 - (3) **Two or more targets**
- ☐ (C) Sustainability outcome #3
- ☒ (D) **Sustainability outcome #4**
- (1) Widely recognised frameworks used to guide action on this sustainability outcome
- ☐ (1) The UN Sustainable Development Goals (SDGs) and targets
 - ☐ (2) The UNFCCC Paris Agreement
 - ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - ☐ (5) The EU Taxonomy
 - ☐ (6) Other relevant taxonomies
 - ☐ (7) The International Bill of Human Rights
 - ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - ☐ (9) The Convention on Biological Diversity
 - ☒ (10) **Other international, regional, sector-based or issue-specific framework(s)**

(2) Classification of sustainability outcome

☒ (1) **Environmental**

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Positive Net Environmental Contribution (NEC)

(4) Number of targets set for this outcome

o (1) No target

● (2) **One target**

o (3) Two or more targets

☒ (E) **Sustainability outcome #5**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ (1) **The UN Sustainable Development Goals (SDGs) and targets**

☐ (2) The UNFCCC Paris Agreement

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☒ (1) **Environmental**

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Sustainable consumption and production patterns

(4) Number of targets set for this outcome

o (1) No target

o (2) One target

● (3) **Two or more targets**

☒ (F) **Sustainability outcome #6**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ (1) **The UN Sustainable Development Goals (SDGs) and targets**

☐ (2) The UNFCCC Paris Agreement

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☐ (1) Environmental
- ☒ (2) **Social**
- ☐ (3) Governance-related
- ☐ (4) Other

(3) Sustainability outcome name

Gender equality and empowerment of all women and girls

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☐ (2) One target
- ☒ (3) **Two or more targets**

☒ (G) **Sustainability outcome #7**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☒ (1) **The UN Sustainable Development Goals (SDGs) and targets**
- ☐ (2) The UNFCCC Paris Agreement
- ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☐ (5) The EU Taxonomy
- ☐ (6) Other relevant taxonomies
- ☐ (7) The International Bill of Human Rights
- ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☐ (1) Environmental
- ☐ (2) Social
- ☒ (3) **Governance-related**
- ☐ (4) Other

(3) Sustainability outcome name

Improvement of firm's governance

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☐ (2) One target
- ☒ (3) **Two or more targets**

☒ (H) **Sustainability outcome #8**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☒ (1) **The UN Sustainable Development Goals (SDGs) and targets**
- ☐ (2) The UNFCCC Paris Agreement
- ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☐ (5) The EU Taxonomy
- ☐ (6) Other relevant taxonomies
- ☐ (7) The International Bill of Human Rights
- ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☐ (1) Environmental
- ☐ (2) Social
- ☐ (3) Governance-related
- ☒ (4) Other

(3) Sustainability outcome name

CSR policy

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☐ (2) One target
- ☒ (3) Two or more targets

- ☐ (I) Sustainability outcome #9
- ☐ (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	Climate adaptation/mitigation
(1) Target name	See methodology
(2) Baseline year	
(3) Target to be met by	
(4) Methodology	Different targets adapted to each borrower: each borrower involved has its own targets
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(A2) Sustainability Outcome #1: Target details

(A2) Sustainability Outcome #1: Climate adaptation/mitigation

(1) Target name See Methodology

(2) Baseline year

(3) Target to be met by

(4) Methodology Different targets adapted to each borrower: each borrower involved has its own targets

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	Alignment of GHG emissions to Paris Agreement
(1) Target name	See Methodology
(2) Baseline year	
(3) Target to be met by	
(4) Methodology	Different targets adapted to each borrower: each borrower involved has its own targets
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

(B2) Sustainability Outcome #2: Target details

(B2) Sustainability Outcome #2:	Alignment of GHG emissions to Paris Agreement
(1) Target name	See Methodology
(2) Baseline year	
(3) Target to be met by	

(4) Methodology	Different targets adapted to each borrower: each borrower involved has its own targets
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4:	Positive Net Environmental Contribution (NEC)
(1) Target name	See Methodology
(2) Baseline year	
(3) Target to be met by	
(4) Methodology	Different targets adapted to each borrower: each borrower involved has its own targets
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5: Sustainable consumption and production patterns

(1) Target name Local purchase

(2) Baseline year 2022

(3) Target to be met by 2030

(4) Methodology Adjusted according to the borrowers

(5) Metric used (if relevant) Cf. ESG report

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(E2) Sustainability Outcome #5: Target details

(E2) Sustainability Outcome #5:	Sustainable consumption and production patterns
(1) Target name	Reduce food waste
(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	Adjusted according to the borrowers
(5) Metric used (if relevant)	Cf. ESG Report
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

(F1) Sustainability Outcome #6: Target details

(F1) Sustainability Outcome #6:	Gender equality and empowerment of all women and girls
(1) Target name	Gender equality
(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	French Gender Equality Index

(5) Metric used (if relevant)	Cf. ESG Report
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

(F2) Sustainability Outcome #6: Target details

(F2) Sustainability Outcome #6:	Gender equality and empowerment of all women and girls
(1) Target name	Women in management
(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	Adjusted according to the borrowers
(5) Metric used (if relevant)	Cf. ESG Report
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(G1) Sustainability Outcome #7: Target details

(G1) Sustainability Outcome #7: Improvement of firm's governance

(1) Target name Business ethics

(2) Baseline year 2022

(3) Target to be met by 2030

(4) Methodology Adjusted according to the borrowers

(5) Metric used (if relevant) Cf. ESG Report

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(G2) Sustainability Outcome #7: Target details

(G2) Sustainability Outcome #7: Improvement of firm's governance

(1) Target name Integrate independent members in the Board

(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	Adjusted according to the borrowers
(5) Metric used (if relevant)	Cf. ESG Report
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

(H1) Sustainability Outcome #8: Target details

(H1) Sustainability Outcome #8:	CSR policy
(1) Target name	Build a CSR roadmap
(2) Baseline year	2022
(3) Target to be met by	2030
(4) Methodology	Adjusted according to the borrowers
(5) Metric used (if relevant)	Cf. ESG Report
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

(H2) Sustainability Outcome #8: Target details

(H2) Sustainability Outcome #8: CSR policy

(1) Target name Maintain and/or improve the Ecovadis assessment

(2) Baseline year 2022

(3) Target to be met by 2030

(4) Methodology Adjusted according to the borrowers

(5) Metric used (if relevant) Cf. ESG Report

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- ☐ (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- ☐ (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- ☐ (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- ☒ (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
 - ☐ (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1: Climate adaptation/mitigation

Target name: See methodology

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(A2) Sustainability outcome #1:

(A2) Sustainability outcome #1:	Climate adaptation/mitigation
Target name:	See Methodology
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2:	Alignment of GHG emissions to Paris Agreement
Target name:	See Methodology
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(B2) Sustainability outcome #2:

(B2) Sustainability outcome #2:	Alignment of GHG emissions to Paris Agreement
Target name:	See Methodology
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(D1) Sustainability outcome #4:

(D1) Sustainability outcome #4:	Positive Net Environmental Contribution (NEC)
Target name:	See Methodology

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(E1) Sustainability outcome #5:

(E1) Sustainability outcome #5: Sustainable consumption and production patterns

Target name: Local purchase

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(E2) Sustainability outcome #5:

(E2) Sustainability outcome #5: Sustainable consumption and production patterns

Target name: Reduce food waste

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(F1) Sustainability outcome #6:

(F1) Sustainability outcome #6: Gender equality and empowerment of all women and girls

Target name: Gender equality

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(F2) Sustainability outcome #6:

(F2) Sustainability outcome #6:	Gender equality and empowerment of all women and girls
Target name:	Women in management
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(G1) Sustainability outcome #7:

(G1) Sustainability outcome #7:	Improvement of firm's governance
Target name:	Business ethics
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(G2) Sustainability outcome #7:

(G2) Sustainability outcome #7:	Improvement of firm's governance
Target name:	Integrate independent members in the Board
Does your organisation track progress against your nearest-term sustainability outcome targets?	(1) Yes

(H1) Sustainability outcome #8:

(H1) Sustainability outcome #8:	CSR policy
Target name:	Build a CSR roadmap

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(H2) Sustainability outcome #8:

(H2) Sustainability outcome #8: CSR policy

Target name: Maintain and/or improve the Ecovadis assessment

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1: Climate adaptation/mitigation

(1) Target name See methodology

(2) Target to be met by

(3) Metric used (if relevant)

(4) Current level or amount (if relevant) Different targets adapted to each borrower: level/amount depending on each borrower

(5) Other qualitative or quantitative progress

(6) Methodology for tracking progress	Annual review
---------------------------------------	---------------

(A2) Sustainability outcome #1: Target details

(A2) Sustainability outcome #1:	Climate adaptation/mitigation
---------------------------------	-------------------------------

(1) Target name	See Methodology
-----------------	-----------------

(2) Target to be met by	
-------------------------	--

(3) Metric used (if relevant)	
-------------------------------	--

(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
---	---

(5) Other qualitative or quantitative progress	
--	--

(6) Methodology for tracking progress	Annual review
---------------------------------------	---------------

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	Alignment of GHG emissions to Paris Agreement
---------------------------------	---

(1) Target name	See Methodology
-----------------	-----------------

(2) Target to be met by	
-------------------------	--

(3) Metric used (if relevant)	
-------------------------------	--

(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
---	---

(5) Other qualitative or quantitative progress	
--	--

(6) Methodology for tracking progress	Annual review
---------------------------------------	---------------

(B2) Sustainability Outcome #2: Target details

(B2) Sustainability Outcome #2:	Alignment of GHG emissions to Paris Agreement
(1) Target name	See Methodology
(2) Target to be met by	
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4:	Positive Net Environmental Contribution (NEC)
(1) Target name	See Methodology
(2) Target to be met by	
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5:	Sustainable consumption and production patterns
(1) Target name	Local purchase
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(E2) Sustainability Outcome #5: Target details

(E2) Sustainability Outcome #5:	Sustainable consumption and production patterns
(1) Target name	Reduce food waste
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(F1) Sustainability Outcome #6: Target details

(F1) Sustainability Outcome #6:	Gender equality and empowerment of all women and girls
(1) Target name	Gender equality
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(F2) Sustainability Outcome #7: Target details

(F2) Sustainability Outcome #7:	Gender equality and empowerment of all women and girls
(1) Target name	Women in management
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(G1) Sustainability Outcome #7: Target details

(G1) Sustainability Outcome #7:	Improvement of firm's governance
(1) Target name	Business ethics
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(G2) Sustainability Outcome #8: Target details

(G2) Sustainability Outcome #8:	Improvement of firm's governance
(1) Target name	Integrate independent members in the Board
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(H1) Sustainability Outcome #8: Target details

(H1) Sustainability Outcome #8:	CSR policy
(1) Target name	Build a CSR roadmap
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

(H2) Sustainability Outcome #8: Target details

(H2) Sustainability Outcome #8:	CSR policy
(1) Target name	Maintain and/or improve the Ecovadis assessment
(2) Target to be met by	2030
(3) Metric used (if relevant)	Cf. ESG Report
(4) Current level or amount (if relevant)	Different targets adapted to each borrower: level/amount depending on each borrower
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Annual review

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
 - Select from drop down list:
 - ☒ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☐ (B) Stewardship: engagement with external investment managers
- ☒ (C) Stewardship: engagement with policy makers
 - Select from drop down list:
 - ☐ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☒ (D) Stewardship: engagement with other key stakeholders
 - Select from drop down list:
 - ☐ (1) Individually
 - ☒ (2) With other investors or stakeholders
- ☐ (E) Capital allocation
 - ☐ (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☒ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- ☐ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- ☒ (A) Policy, governance and strategy
Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☒ (2) Processes internally audited
 - ☐ (3) Processes and data internally audited
- ☒ (D) Fixed income
Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☒ (2) Processes internally audited
 - ☐ (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

Our head of compliance and internal control is in charge to lead regular controls on our ESG process and our ESG policies.

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

☒ **(A) Board, trustees, or equivalent**

Sections of PRI report reviewed

- (1) the entire report

☒ **(2) selected sections of the report**

☒ **(B) Senior executive-level staff, investment committee, head of department, or equivalent**

Sections of PRI report reviewed

☒ **(1) the entire report**

- (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year