

Trust must be earned

# Principal Adverse Impact Statement

2025

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# 1. Summary

Amundi Private Equity Funds (PEF) [LEI: 969500HGDY321R5PAJ83] considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Amundi PEF.

This statement on Principal Adverse Impacts on sustainability factors covers the reference period from 1st of January 2024 to 31st of December 2024.

A summary of Principal Adverse Indicators considered by Amundi is presented in the table below:

Applicable to	Theme	PAI indicator	Number
Investment	Greenhouse gas	GHG emissions	1
companies	emissions	Carbon footprint	2
		GHG intensity of investee companies	3
		Exposure to companies active in the fossil fuel sector	4
		Share of non-renewable energy consumption and production	5
		Energy consumption intensity per high impact climate sector	6
	Biodiversity	Activities negatively affecting biodiversity- sensitive areas	7
	Water	Emissions to water	8
	Waste	Hazardous waste and radioactive waste ratio	9
	Emissions	Additional PAI: Investments in companies without carbon emission reduction initiatives	4 (table 2)
	Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	10
		Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	11
		Unadjusted gender pay gap	12
		Board gender diversity	13
		Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons, and biological weapons)	14
	Human rights	Additional PAI: Lack of a human rights policy	9 (table 3)
Sovereigns &	Environmental	GHG intensity	15
supranationals	Social	Investee countries subject to social violations	16

	Fossil fuels	Exposure to fossil fuels through real estate assets	17
Real Estate	Energy efficiency	Exposure to energy-inefficient real estate assets	18
	Energy consumption	Additional PAI: Energy consumption intensity	19 (table 2)

# 2. Description of principal adverse impacts of investment decisions on sustainability factors

Amundi presents the 2025 version of its Principal Adverse Impact Statement (PAI) for its unlisted activities, real and alternative assets - Private Equity Fund, marking the third year of this disclosure.

This year, we confirm the robustness of our methodology, while making substantial progress on the coverage of our indicators and the monitoring of negative impacts on all our portfolios.

We have seen a clear improvement in the investment coverage rate, with an average increase of +10 points compared to the 2024 coverage rates. This improvement was made possible thanks to the constant commitment of the teams to the investments and management companies throughout the period.

Although this average coverage does not allow us to affirm the representativeness of our results across the portfolio, it nevertheless demonstrates a strengthening of practices and bodes well for a possible constant improvement in the coming years.

# 2.1 Indicators applicable

Adverse sustainability indicator		Metric	Impact year n	Impact year n-1	Explanation	Actions taken, and actions planned and targets set for the next reference period (please refer to 2.3 for additional information)
CLIMATE AND OTH	ER ENVIRONMENT	-RELATED INDICATORS				
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions – tCO <sub>2</sub> eq	30 786,9	31 207		Engagement: part of Amundi's engagement
		Scope 2 GHG emissions – tCO <sub>2</sub> eq	7 619,5	2 644,3	indicators justifies the variations in the indicator in	focusing on transition towards a low carbon economy
		Scope 3 GHG emissions – tCO <sub>2</sub> eq	248 467,4	135 125,6	n compared to n-1.  The total GHG emissions	included under the environmental pillar of Amundi's proprietary ESG model
		Total GHG emissions – tCO₂eq	288 762,8	4 609 169, 5	indicator published in n-1 was found to be wrong and the methodology has since been corrected (i.e. removal of inconsistent underlying data).	
	2. Carbon footprint	Carbon footprint – tCO₂eq/€m invested	266,4	311,4	Coverage rate: 18%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	

3. GHG intensity of investee companies	GHG intensity of inves companies – tCO₂eq/€	HG intensity of investee companies – tCO₂eq/€m revenues		1 966,8	Coverage rate: 19%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.  The total GHG emissions indicator published in n-1 was found to be wrong and the methodology has since been corrected in n.	Engagement: part of Amundi's engagement focusing on transition towards a low carbon economy  ESG score integration: included under the environmental pillar of Amundi's proprietary ESG model
4. Exposure to companies active in the fossil fuel sector	Share of investments active in the fossil fuel		4%	2%	Coverage rate: 19%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on transition towards a low carbon economy  Exclusion Policy: part of Amundi's Exclusion Policy dedicated to coal and to unconventional hydrocarbons
5. Share of non- renewable energy consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources	Non- renewable energy consumptio n	35%	62%	Coverage rate: 17%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on transition towards a low carbon economy  ESG Score Integration: included under the
	compared to renewable energy sources, expressed as a percentage of	Non- renewable energy production	47%	21%	Coverage rate: 19%  The increase in the coverage rate of the indicators justifies the	environmental pillar of Amundi's proprietary ESG model

			total energy sources - %				variations in the indicator in n compared to n-1.	
		6. Energy consumption	Energy consumption in GWh per million	NACE A <sup>1</sup>	23,3	0,0	Coverage rate: 10%	Engagement: part of Amundi's engagement
		intensity per high impact climate	EUR of revenue of investee companies,	NACE B	7 212,8	0,0	The increase in the coverage rate of the	focusing on transition towards a low carbon
		sector	per high impact climate sector –	NACE C	2,7	21,8	indicators justifies the variations in the indicator in	economy
			GWh/€m revenues	NACE D	0,0	0,0	n compared to n-1.	ESG score integration: included under the
				NACE E	18,3	0,5		environmental pillar of Amundi's proprietary ESG
				NACE F	0,0	0,0		model
				NACE G	0,6	0,0		
				NACE H	1,4	4,4		
				NACE L	39,6	83,4		
Biodivers	sity	7. Activities negatively affecting biodiversity- sensitive areas	Share of investments companies with sites/olocated in or near to b sensitive areas where those investee companegatively affect those	operations iodiversity- activities of nies	5%	1%	Coverage rate: 21%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement policy: part of Amundi's engagement focusing on natural capital preservation  Controversy monitoring: screening among a large universe of issuers taking into account flags on biodiversity and land use  ESG score integration: included under the

<sup>1</sup> Please refer to European commission NACE codes documentation for additional information

						environmental pillar of Amundi's proprietary ESG model
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average − t/€m invested	2,3	0,7	Coverage rate: 21%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on natural capital preservation  Controversy monitoring: screening among a large universe of issuers taking into account flags on biodiversity and waste  ESG score integration: included under the environmental pillar of Amundi's proprietary ESG model
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average – t/€m invested	18,84	10,1	Coverage rate: 19%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on natural capital preservation  Controversy monitoring: screening among a large universe of issuers taking into account flags on toxic emission, effluents and waste  ESG Score Integration: included under the environmental pillar of Amundi's proprietary ESG model

INDICATORS FOR	SOCIAL AND EMPL	OYEE, RESPECT FOR HUMAN RIG	HTS, ANT	I-CORRI	UPTION AND ANTI-BRIBERY	MATTERS
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises – %	0%	0%	Coverage rate: 22%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Exclusion: issuers that violate, repeatedly and seriously, one or more of the ten principles of the Global Compact, without credible corrective action are excluded  Engagement: part of Amundi's engagement focusing on social cohesion  Controversy monitoring: screening among a large universe of issuers taking into account flags on UN Global Compact breaches
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises – %	47%	67%	Coverage rate: 22%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on strong governance for sustainable development  Controversy monitoring: screening among a large universe of issuers taking into account flags on public policies and governance incidents
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies – %	14%	7%	Coverage rate: 20%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: part of Amundi's engagement focusing on a social cohesion  Controversy monitoring: screening among a large

						universe of issuers taking into account flags on labor relations employee management
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members – %	60%	75%	Coverage rate: 23%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Engagement: making gender diversity mainstream is part of Amundi's engagement policy via the launch in 2020 of the 30% Club France Investor Group which Amundi became cochair
	14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons – %	0%	0%	Coverage rate: 23%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Exclusion policy: controversial weapons are excluded as per Amundi's weapons exclusion policy. As part of our Exclusion Policy, Amundi can engage with specific issuers to confirm their exposure to controversial weapons
INDICATORS APPL	ICABLE TO INVEST	MENTS IN SOVEREIGNS AND SU	PRANATIO	ONALS		
Environmental	15. GHG intensity	GHG intensity of investee countries – tCO₂eq/€m GDP	N/A	N/A	These indicators are not applicable to the scope of Amundi PEF.	ESG Score Integration: part of Amundi ESG sovereign methodology under the environmental pillar
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number	N/A	N/A		Exclusion: Countries with high level of social violations are excluded based on 7 criteria: Arbitrary Arrest and Detention, Child Labour,

		divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law – absolute number and relative number in %	Relative number divided by all investee countries	N/A	N/A		Forced Labour, Freedom of Assembly, Free of Opinion and Expression, Women's and Girls' Rights and Modern Slavery, Countries that are excluded from the investment universe are automatically excluded as well.
INDICATORS APPL	ICABLE TO INVEST	MENTS IN REAL ESTA	ATE ASSETS				
Fossil fuels  Energy efficiency	17. Exposure to fossil fuels through real estate assets  18. Exposure to energy-inefficient real estate assets	Share of investments in assets involved in the estorage, transport or more of fossil fuel – %  Share of investments in inefficient real estate a	extraction, nanufacture n energy-	N/A N/A	N/A N/A	These indicators are not very applicable to the Amundi PEF perimeter. Indeed, investments in real estate assets concern only a small percentage, which are not significant in the scope of Amundi PEF Multigestion (funds of funds).	ESG analysis: ESG analysis during the acquisition and managements phases  ESG scoring methodology: ESG analysis during the acquisition and managements phases
OTHER INDICATOR	S FOR PRINCIPAL	ADVERSE IMPACTS (	ON SUSTAIN	ABILITY F	ACTORS		
Emissions	Investments in companies that have not taken initiatives to reduce their carbon emissions	Share of investment in that have not taken init reduce their carbon en line with the Paris Agre	tiatives to nissions in	40%	35%	Coverage rate: 23%  The increase in the coverage rate of the indicators justifies the variations in the indicator in n compared to n-1.	Commitment: Engagement theme on the transition to a low-carbon economy  ESG Score Integration: Included in the environmental pillar of the proprietary ESG scoring model

Social and employee issues	Excessive CEO Compensation Ratio	Average ratio, within the companies in which we invest, between the total annual remuneration of the highest earner and the median total annual remuneration of all employees (excluding the highest paid person)	248%	210%	Coverage rate: 3% Indicator monitored by Amundi PEF - Impact only.	ESG Score Integration: Included in the social pillar of the proprietary ESG scoring model  Controversy Monitoring: Screening across a broad universe of issuers, taking into account alert levels for UNGC violations
Social and employee issues	Number of days lost due to injury, accident, death or illness	Number of work days lost due to injuries, accidents, fatalities	71,5	562,7	Coverage rate: 8%  Indicator tracked by Amundi PEF - Fund of Funds only.	
Anti-corruption and anti-corruption	Share of holdings in companies without anticorruption policies	Share of investments in entities whose anti-corruption policies are not in line with the United Nations Convention against Corruption	33%		Coverage rate 4% Indicator monitored by Amundi PEF – Midcap only.	

# 2.2 Actions taken during the period and actions planned to avoid or reduce main adverse impacts

Concerning the engagement, the focus should be on continuing the dialogue with issuers on specific topics that have a direct impact on IAPs.

The actions identified were as follows:

- Proactively resuming engagement with all issuers with whom we have started the Net Zero engagement process where relevant, and adding new issuers as necessary
- Encourage greater disclosure of methane data
- Strengthen our biodiversity commitments in line with our policy on biodiversity and ecosystem services
- Continue to proactively engage on water issues through the collaborative engagement campaign, the Valuing Water Finance initiative
- Continue to develop our commitment to working conditions and human rights

Amundi Private Equity Funds (PEF) is fully in line with the orientations defined by the Amundi Group. At its level, Amundi PEF implements comparable means to prevent or mitigate the main negative impacts identified, in particular through enhanced dialogue with equity investments and management companies, attention to sustainability issues, and a gradual integration of best practices in terms of governance and social responsibility.

In addition, Amundi Private Equity Funds (PEF) conducts an annual ESG reporting campaign covering its entire portfolio, including Amundi PEF MidCap and Amundi PEF Multigestion. This ESG reporting campaign makes it possible to monitor the annual ESG performance of each investment in the portfolio (entities or funds), and to conduct detailed analyses based on ESG roadmaps established with each of the holdings.

This monitoring and support makes it possible, at the scale of the scope covered by Amundi Private Equity Funds, to orient investments towards a sustainability trajectory adapted to each asset, whose approach is based on continuous improvement.

The ESG campaign and roadmaps help to manage and limit the main negative sustainability impacts identified on this perimeter.

# 2.3 Targets

As a member of several international standards and initiatives, Amundi has made commitments and set targets related to Principle Adverse Impacts (PAIs) in order to guide its activities and effectively monitor its evolution. By doing so, Amundi ensures that it remains aligned with the principles and objectives of the PAI reporting and can further track evolutions. For more details on the specific standards and initiatives related to PAIs, please refer to section 5 of this document. Amundi will continue to evolve its approach regarding PAIs in the coming years, according to the scientific reference scenarios and in close connection with its clients' objectives.

# 3. Description of policies to identify and prioritise principal adverse impacts on sustainability factors

# 3.1 Policy priorities

Amundi has made responsible investment one of its founding pillars since it was created in 2010. In 2018, Amundi launched a three-year action plan aimed at integrating ESG into 100% of its open funds under active management. On 8 December 2021, with the aim of further strengthening its commitments, Amundi set up a new **ESG Ambition 2025** plan. This 3-year Action Plan is comprised of an ambitious set of goals that aims to address clients' current and future responsible investing needs. Please find details of our corporate ambitions in the ESG Ambition 2025 brochure.

The following policies support the ESG Ambition 2025 plan and inform Amundi's processes for identifying, monitoring and mitigating the principal adverse impacts deriving from its investment activities.

Amundi will continue to adjust its climate strategy in the coming years, according to the scientific reference scenarios and in close connection with its clients' objectives, both by developing investment solutions to accelerate the transition and by progressively aligning its portfolios with the 2050 neutrality objective.

In addition, a responsible investment policy specific to Amundi Private Equity Funds has also been developed in order to set out the Group's commitments with regard to the specificities of this asset class. It is detailed in the table below:

Amundi Group Policy	Principal adverse impacts - thematic mitigation priorities	Approval and revision process
Amundi Global Responsible Investment Policy 2024	Normative exclusions linked to international conventions: Controversial weapons, UN Global Compact  Sectoral exclusions: Tobacco, Coal, Unconventional Oil and Gas  ESG integration: 38 material ESG issues identified and prioritized per economic sector  Product policies: ESG mainstream, Net Zero, Impact	Policy reviewed by Compliance, Legal, Risk and investment management teams and approved by CRIO <sup>2</sup> Published on 24/03/2025 Updated annually
Amundi Climate Strategy ("Say on climate")	Climate change Energy transition	Voted by General Assembly in 18/05/22
Amundi Voting Policy 2025	Energy transition, and in particular the decarbonisation of our economies  Social cohesion, in particular through controls of the wage balance within the framework of remuneration policies, employee involvement in companies'	Policy reviewed by Compliance, Legal and investment management teams and approved by voting committee Published on 21/03/2025 Updated annually

<sup>2</sup> Chief Responsible Investment Management

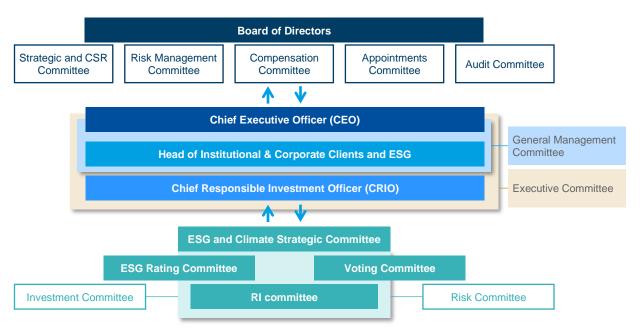
	governance and employee share ownership	
Amundi Private Equity Responsible Investment Policy – July 2023	Normative exclusions: Controversial weapons, UN Global Compact Sector exclusions: Tobacco, Coal, Unconventional Oil and Gas ESG integration: 38 material ESG issues identified and prioritized by economic sector	Policy reviewed by the compliance, legal, risk and investment management teams and approved by the CRIO Published on 07/2023 Ad hoc update
ARA Responsible Investment Charter (Real and Alternative Assets) - April 2025	Normative and sectoral exclusions (see above) ESG Integration Focus on Environment and Carbon Focus on stakeholder engagement	Published on 24/04/2025 Ad hoc update

## 3.2 Policy governance

#### Supervision of the responsible investment strategy by Amundi Board of Directors

The missions of the Board of Directors of Amundi relate to the definition of the strategic orientations of Amundi's activity, while ensuring their operational implementation by the senior management. The responsible investment strategy is therefore fully integrated within the scope of its deliberations and decisions. This role is described in detail in Article 2 of its Rules of Procedure: "It regularly reviews, in connection with the strategy it has defined, the opportunities and risks such as financial, legal, operational, social and environmental risks as well as the measures taken as a result.

#### A dedicated internal organisation to monitor and manage the responsible investment strategy



Within the overall ESG and climate governance, four Responsible Investment Steering Committees have been established and are monitored by one of the members of Amundi' GMC.

#### **ESG and Climate Strategic Committee**

This Committee, chaired by Amundi's CEO, meets every month to set the strategic orientations of the Amundi Group with respect to ESG integration, sustainability and climate, and determine and approve the ESG and climate policies applicable to investments. Its purpose is to:

- Steer, confirm and monitor Amundi's climate and responsible investment strategy;
- Validate the main strategic orientations of the Global Responsible Investment Policy (Sector Policy, Exclusion Policy, Voting Policy, Engagement Policy);
- Monitor key strategic projects.

#### **Voting Committee**

This Committee is chaired by the member of executive management in charge of Responsible Investment supervision. It meets once a year to approve the Voting Policy, monthly and on an ad hoc basis during the rest of the year, with the purpose to:

- Advise on voting decisions at the General Meetings for special cases; members are called upon to give their views in an expert capacity;
- Approve Amundi's Voting Policy (for the entities covered<sup>3</sup>) and its rules of implementation;

<sup>&</sup>lt;sup>3</sup> KBI Global Investors Ltd, Amundi US or Joint ventures voting policies are not under the remit of this committee's supervision. The relevant Joint-Ventures are listed on page 1 of our Global RI policy report.

- Approve specific/local approaches that are not directly covered by the Voting Policy;
- Approve periodic reports on voting disclosures.

#### **ESG Rating Committee**

Chaired by the Chief Responsible Investment Officer, this Committee is composed of senior managers from investment platforms, risk and compliance divisions, and meets every month with the aim to:

- Validate Amundi's standard ESG methodology;
- Review exclusion policies and sector-specific policies and approve their rules of application;
- Review and decide on individual ESG rating issues, and advise on new ESG cases whenever necessary.

#### **Responsible Investment Committee**

Chaired by the Chief Responsible Investment Officer, this monthly committee is composed of senior managers from investment platforms, Responsible Investment, marketing, risk, audit and compliance divisions with the aim of:

- Validating ESG portfolio integration methodologies, either internal (e.g., ESG Mainstream, Net Zero, Impact) or regulatory methodologies (e.g., PAI, Taxonomy);
  - Validating product qualification criteria for ESG Regulatory classification (SFDR, AMF).

In addition, to implement its 2025 roadmap and ensure the achievement of its set objectives, the Amundi Real & Alternative Assets Platform relies on:

Amundi Group's ESG governance, which includes several committees: an ESG and Climate Strategic Committee, an ESG Ratings Committee, an ESG Voting Committee, and an ESG Executive Committee. In addition, Amundi Real & Alternative Assets' dedicated ESG teams and Marketing and Communications teams participate in all working groups established across the group to ensure consistency between the ESG strategy deployed within real assets and that implemented for listed assets.

The ESG governance of the Amundi Real & Alternative Assets Platform consists of:

An ESG team dedicated to the Amundi Real & Alternative Assets Platform: This team works closely with the management and investment teams.

A Real & Alternative Assets Executive Committee dedicated to ESG: The Amundi Real & Alternative Assets Management Committee includes topics related to ESG and the impact on real and alternative assets on its agenda, at least once a quarter.

An ARA ESG Committee: The ARA ESG Committee's objective is to oversee the operational implementation of decisions made by the Amundi ARA Executive Committee, ensure the consistency of ESG projects within the ARA Platform, and monitor the implementation of ESG-related commitments. A Real Estate SRI Committee: The Real Estate SRI Committee aims to centralize topics related to ESG issues (tools, regulations, etc.) in order to establish a roadmap for these themes. The SRI Committee also aims to monitor issues related to obtaining the SRI Label for funds managed by Amundi Real Estate.

A community of ESG Frontrunners: These ESG representatives were identified within the various teams of the Amundi Real & Alternative Assets platform (management, ESG analysis, sales, marketing, legal, etc.) to share ideas on all common topics related to responsible investment and drive collective ambition. Issues related to the Environmental, Social, and Governance pillars are also

integrated into all Investment Committees across Amundi Real & Alternative Assets' six different expertise areas.

#### **Risk controls**

Sustainability risks are integrated into Amundi's internal control and risk management team system. Responsibilities for managing sustainability risks are divided between:

- The first level of control, carried out by the management teams, and;
- The second level of control, carried out by the risk management teams, who check that the funds comply with their ESG objectives and constraints.

Risk management team participates in Amundi's Responsible Investment governance system. They monitor compliance with regulatory requirements and the management of related risks.

ESG constraints are monitored by the risk management teams in the same way as other management constraints. They are based on the same tools and procedures and cover our exclusion policies as well as the eligibility criteria and ESG rules specific to the funds. These constraints are monitored automatically using a proprietary control tool (ALTO Investment Compliance). This tool can be used to trigger

- Pre-trade alerts, which may or may not be blocking, particularly for exclusion policies;
- Post-trade alerts: managers receive notification of any overruns so that they can be rectified quickly.

# 3.3 Methodologies and data sources for the calculation of PAI values

#### **General principles**

In order to disclose metrics that have the closest representation of the sustainability indicators related to adverse impacts at entity level ("Management Company" or "ManCo"), Amundi has adopted two different approaches for the calculation and management of sustainability indicators related to principal adverse impacts, one that is based on all investments related to the entity, and one that it is based on the principle of portfolio covered or relevant portfolio with covered data divided by to the sole assets they relate to.

While Amundi has identified both short- and long-term adverse impacts that are principal to the investment portfolios, the information available for assessing and reporting on the adverse impacts is limited and often lacks standardisation across sectors and regions. Therefore, Amundi's approach to principal adverse impact assessment is applied bottom up at the portfolio level. Moreover, investment portfolios may be exposed to variably acute and chronic adverse impacts depending on companies' sectors and geography.

The perimeter for the calculation of our PAI has been identified based on the following assumptions:

- Portfolios that we delegate to an external manager are in scope of the PAI statement. Portfolios that we manage by delegation are also in the perimeter of the PAI statement;
- Investments in an internal underlying fund (managed by the same Manco) are not included as the investments made by this internal fund are already included in the scope (to avoid double counting).

Additional information on the calculation methodology can be provided by Amundi on request.

#### Methodology limitation and margin of error

Our methodology limitations are by construction mainly linked to the use of sustainability indicators ("ESG data"). The ESG data landscape is currently being standardized, which can impact data quality; data coverage is also a limitation. Current and future regulations will improve standardized reporting and corporate disclosures on which ESG data rely. We are aware of these limitations, which we mitigate by

a combination of approaches: the use of several data providers, a structured qualitative assessment by our ESG research team of the ESG scores, and the implementation of a strong governance.

Finally, in some specific cases portfolio data may not be easily obtained. Despite our best effort approach to retrieve all necessary figures (see also section below), a lack of data availability may impact a certain portion of our assets. As a result, there is a possibility of a substantial margin of error in our calculations. We encourage stakeholders to exercise caution and consider this potential margin of error when interpreting and utilizing the provided information.

In the context of establishing the report on principal adverse impact indicators, it is important to note that the database used to retrieve the positions held by investment portfolios has been modified in 2023. This database has been enriched with positions held in fund shares throughout the years 2023 and 2024.

#### Best effort approaches to PAI coverage

Data coverage is uneven across principal adverse impact indicators. In the case of indicators with a coverage below 100% (e.g., gender pay gap), Amundi has adopted a reweighting approach across holdings for which data is available. This avoids setting missing data at zero which would "dilute the indicator over all assets". For PAI indicators 8 and 9, we estimated that the data coverage from the providers was too limited to perform the reweighting, thus figures are not extrapolated in the presence of missing data.

For investments in third-party funds, the PAI data source used has been the PAI values reported by the investment managers in their publicly available EET.

Amundi reserves the right to modify this methodology and our data sources in the future.

#### Selection of additional principal adverse impact indicators

Amundi has identified the additional principal adverse impact indicators from Table 2 and 3 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 assessing:

- i) their relevance to Amundi ESG strategic priorities as outlined in the overarching policies described in section 3.1;
- ii) the availability of data for measuring the severity of impact of those risks within the investment universe.

Suppliers and data collection tools for the collection of indicators of principal adverse impacts on our companies and invested funds

Data providers and tools
Reporting 21
Carbometrix
Ethifinance

# 4. Engagement policies and other PAIs levers

As a responsible asset manager, Amundi understands its fiduciary duty as encompassing the need to contribute positively to addressing major socio-economic and environmental challenges in the interests of our clients, our stakeholders and of society. For this reason, Amundi has embraced the concept of "double materiality" around which we build our ESG analysis and rating methodology. This means that not only do we assess the way ESG factors can materially impact the value of companies, but we also assess how the companies impact the environment, and social matters or human rights.

Under the Disclosure Regulation, financial market participants, which consider the principal adverse impacts of investment decisions on sustainability factors at a product level, should disclose in the precontractual information for each financial product, concisely in qualitative or quantitative terms, how such impacts are considered as well as a statement that information on the principal adverse impacts on sustainability factors is available in the periodic reporting. Please refer to products' precontractual documentation and periodic reports for product-level information.

At entity level, Amundi considers PAIs via a combination of approaches that can vary depending on the asset class, investment process or type of strategy and fund range.

## 4.1 Engagement4

Engagement is a continuous and purpose driven process aimed at influencing the activities or behaviour of investee or potential investee companies to improve ESG practices or their impact on key sustainability linked topics. At Amundi, engagement aims to have a tangible impact on the economy, by influencing the activities of investee companies in order to preserve the economic capital as part of our quest to create long-term value for our clients' portfolios. Therefore, it must be result driven, proactive, considering double materiality, and integrated in our global ESG process. This approach applies to all of Amundi's products.

#### 4.2 Vote

Amundi's voting policy responds to a holistic analysis of all the long-term issues that may influence value creation, including material ESG issues. For more information, please refer to Amundi's Voting Policy and Amundi's Voting Report. This approach applies by default to all of Amundi products.

#### 4.3 Exclusion

Amundi has defined normative, activity-based and sector-based exclusion rules covering some of the key adverse sustainability indicators listed by the Sustainable Finance Disclosure Regulation (SFDR). This approach applies to all Amundi funds in scope of Amundi Minimum Standards and Exclusion Policy<sup>5</sup>.

# 4.4 ESG factors integration

Amundi has adopted minimum ESG integration standards applied by default to its actively managed open-ended funds (exclusion of G rated issuers and better weighted average ESG score than the applicable ESG benchmark)<sup>6</sup>. The 38 criteria used in Amundi ESG rating approach were also designed

<sup>4</sup> Additional information regarding engagement at Amundi can be found in our 2024 engagement report

<sup>5</sup> Refer to Amundi Responsible Investment Policy for additional information on the scope of application and always review Funds' offering documents for complete information on ESG integration

<sup>6</sup> Wherever technically feasible: some exceptions are defined to the implementation of the ESG Mainstream objective (Funds for which the active management feature is limited such as Buy and Watch funds or Securitization Undertakings, Real Estate and Alternative funds; Funds not managed on Amundi Investment Platform, and delegated Funds; Funds with high concentration in Index or limited ratable issuers coverage; Fund Hosting products). Refer to Amundi Responsible Investment Policy for additional

to consider key impacts on sustainability factors, as well as quality of the mitigation undertaken are also considered in that respect. All criteria are available in fund managers' portfolio management system.

# 4.5 Controversy monitoring

Amundi has developed a controversy tracking system that uses third-party data from three providers to systematically identify controversies and establish their level of severity on a proprietary scale from 1 to 5 (5 being the highest). This quantitative approach is then supplemented by an in-depth analysis of the scope of controversies deemed to be severe (score of 3 or more), carried out by ESG analysts, and a periodic review of developments. In the most severe and repeated cases, when no credible corrective action is taken, the analyst may propose a downgrade of the company's ESG rating. This may ultimately lead to exclusion from the active investment universe (G rating), which is validated by the ESG Rating Committee.

For Article 8 and 9 actively managed products, Amundi considers all the mandatory PAIs applicable to the products' strategy and relies on a combination of some, or all, of the approaches mentioned above.

For Article 6, Amundi considers PAI 14 in its normative Exclusion Policy on exclusion weapons.

The same approach for PAI consideration applies by default to mandates delegated to Amundi.

The table below details the approach for each PAI that Amundi generally implements at Group level. Specific PAI approaches can also be followed at product level; in such case, the specific approach is also described in the precontractual documentation. Where applicable, PAIs are prioritized given the sustainable objectives or characteristics of the fund, provided that all minimum standards are met.

#### Indicators scope of application

#	Metric	General considerations on the scope of application <sup>7</sup>
1	GHG emissions (Scope 1, 2, 3 and total)	Engagement: active funds and passive funds  Voting: active funds and passive funds  ESG score integration: active funds with ESG rating improvement target <sup>8</sup> and/or selectivity approaches <sup>9</sup> (included under the environmental pillar of Amundi's proprietary ESG model).
2	Carbon footprint	Engagement: active funds and passive funds  Voting: active funds and passive funds  ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
3	GHG intensity of investee companies	Engagement: active and passive funds  Voting: active and passive funds  ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
4	Exposure to companies active in the fossil fuel sector	Engagement: active and passive funds  Voting: active and passive funds  Exclusion Policy (coal and unconventional hydrocarbons): active funds and ESG passive funds (that apply Amundi's Sector Policy).

investment information on the scope of application and always review Funds' offering documents for complete information on ESG integration.

<sup>7</sup> Active funds refer to funds that are actively managed, passive funds refer to funds that are passively managed

<sup>8</sup> Categories of funds which aim to invest in issuers improving their ESG rating over time

<sup>9</sup> ESG criteria are taken into account when selecting issuers to invest in

5	Share of non-renewable energy consumption and production	Engagement: active and passive funds  ESG Score Integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
6	Energy consumption intensity per high impact climate sector	Engagement: active and passive funds ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches.
7	Activities negatively affecting biodiversity sensitive areas	Engagement: active and passive funds Voting: active and passive funds Controversy monitoring: active funds ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
8	Emissions to water	Engagement: active and passive funds Controversy monitoring: active funds ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model).
9	Hazardous waste ratio	Engagement: active and passive funds Controversy monitoring: active funds ESG Score Integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
4 (table 2)	Investments in companies without carbon emission reduction initiatives	Engagement: active and passive funds  Voting: active and passive funds  ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines	Exclusion (UN Global Compact principles): active funds and ESG passive funds (that apply Amundi Exclusion Policy)  Engagement: active funds and passive funds Vote: active funds and passive funds Controversy monitoring: active funds
11	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines	Engagement: active funds and passive funds Vote: active and passive funds  Controversy monitoring: active funds
12	Unadjusted gender pay gap	Engagement: active funds and passive funds Vote: active funds and passive funds Controversy monitoring: active funds
13	Board gender diversity	Engagement: active funds and passive funds  Vote: active funds and passive funds
14	Exposure to controversial weapons	Exclusion: active funds and passive funds  Vote: active funds and passive funds
9 (table 3)	Lack of a human rights policy	Engagement: active funds and passive funds  Vote: active and passive funds

		Controversy monitoring: active funds
15	GHG intensity	ESG score integration: active funds with ESG rating improvement target and/or selectivity approaches (included under the environmental pillar of Amundi's proprietary ESG model)
16	Investee countries subject to social violations	Exclusion: active funds and passive ESG funds <sup>10</sup> .
17	Exposure to fossil fuels through real estate assets	ESG analysis: all assets be subject to an ESG analysis during the investment and management phases
18	Exposure to energy-inefficient real estate assets	ESG score integration: the level of energy performance of each building is taken into account by means of its EPC <sup>11</sup>
19 (table 2)	Energy consumption intensity	ESG score integration: the level of energy performance of each building is taken into account by means of its EPC

These engagement policies will be reviewed and adapted based on PAIs results over each period.

<sup>10</sup> Passive funds classified with an ESG component

<sup>11</sup> Energy performance certificate

# 5. Reference to international standards

Principal Adverse Impacts		Standards, initiatives and public policies relevant to principal adverse impacts <sup>12</sup>
		Paris Agreement on Climate
		Sustainable Development Goals (SDGs)
		EU Taxonomy
		Net Zero Asset Managers Initiative (NZAMI) <sup>13</sup>
	GHG emissions (Scope 1, 2, 3 and total)	Climate Action 100+
	Carbon footprint	Carbon Disclosure Project (CDP)
	GHG intensity of investee companies	Task Force on Climate-related Financial Disclosures (TCFD)
1, 2, 3, 4, 5,	Exposure to companies active in the fossil fuel sector	The Japan TCFD Consortium
6 and 4 (table 2)	Share of non-renewable energy	Montréal Carbon Pledge
(table 2)	consumption and production  Energy consumption intensity per high impact climate sector  Investments in companies without carbon emission reduction initiatives	Portfolio Decarbonisation Coalition (PDC)
		Institutional Investors Group on Climate Change (IIGCC)
		Asia Investor Group on Climate Change (AIGCC)
		Investors for a Just Transition
		China-Singapore Green Finance Taskforce
		Eurosif
		Observatoire de l'Immobilier Durable
		Finance for Biodiversity Pledge
		Farm Animal Investment Risk and Return (FAIRR)
	Activities negatively affecting biodiversity sensitive areas Emissions to water	Investor Action on Antimicrobial Resistance
		CDP Water
7,8,9		CDP Forest
	Hazardous waste ratio	Fondation de la Mer
		Global Impact Investing Network (GIIN)
		Impact Disclosure Taskforce
		Nature Action 100

<sup>12</sup> The table only reflect the most relevant PAIs associated to the different initiatives, please note that some initiatives have a broader coverage

<sup>13</sup> The NZAM has decided in January 2025 to review the initiative's commitments. As a consequence, NZAM is suspending temporarily its assessments of signatory commitment implementation and reporting expectations

10, 11	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines  Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines	UN Global Compact
		OECD Guidelines on Multinational Enterprises
		UN Guiding Principles on Business and Human Rights
		PRI Human Rights Engagement
		Human Rights Reporting and Assurance Frameworks Initiative
	Unadjusted gender pay gap	Workforce Disclosure Initiative (WDI)
12		Platform Living Wage Financials (PLWF)
		The 30% Club France Investor Group
13		The 30% Club Japan Investor Group
	Board gender diversity	The 30% Club Germany Investor Group
		International Corporate Governance network (ICGN)
		France Invest – Equality Charter
14	Exposure to controversial weapons	Ottawa and Oslo treaties
9 (table 3)	Lack of a human rights policy	UN Guiding Principles on Business and Human Rights
15	GHG intensity of investee countries	Paris Agreement on Climate
10		Green bond principles
16	Investee countries subject to social violations	International Bill of Human Rights
17	Exposure to fossil fuels through real estate assets	SFDR regulation
18	Exposure energy-inefficient real estate assets	Energy performance diagnostics (EPC) - calculation methodology is determined by the regulations in each country
19 (table 2)	Energy consumption intensity	

The following paragraphs aim to detail the internationally recognized standards that are the most relevant to act on PAI.

#### Paris agreement: Amundi ESG Ambition 2025 plan

#### PAIs: 1-6 Greenhouse gas emissions

This ESG Ambition 2025 plan aims to tackle climate change which is arguably the greatest challenge of our times. This ambition to deepen ESG integration throughout the whole asset management value chain also reflects increasing ESG commitments by our clients across the world. This new 3-year plan comprises an ambitious set of goals to address their current and future needs.

#### Progress review at end-2024 of our ESG Ambition 2025 plan

Strengthen our range of savings solutions for sustainable development

- 1. Introduce a new environmental transition rating that assesses companies' efforts in decarbonising their operations and the development of their sustainable activities, covering actively managed open funds<sup>14</sup>.
  - The implementation project of a Transition rating assessment for actively managed open funds is currently carried out.
- Offer, in all asset classes<sup>15</sup>, open funds with a Net Zero 2050 investment objective.
  - Four asset classes offer a minimum of one Net Zero 2050 Ambition solution.
- Reach €20bn of assets under management in impact funds.
  - These assets under management rose to €16.1bn at end-2024, compared with €13.2bn at end-2023.
- 4. Ensure that 40% of our ETF range is made up of ESG funds.
  - 37% of the passive fund range is composed of ESG funds, versus 33% at end-2023.
- 5. Develop Amundi Technology's ALTO Sustainability offer.
  - The first module of ALTO Sustainability has been commercialised since 2023 and the second module on climate has been defined for launch in 2025.

#### Amplify our outreach to companies

- 6. Work with 1,000 additional companies to define credible strategies to reduce their greenhouse gas emissions.
  - Our climate engagement plan has been extended to 1,478 new companies, versus 966 at end-2023.
- 7. From 2022, exclude from our portfolios companies that generate over 30% of their activity from unconventional oil and gas sectors<sup>16</sup>.
  - These companies have been excluded from Amundi's investments in 2024, as has been the case since 2022.

#### Set internal alignment goals that match the commitment

- 8. Take into account the level of achievement of these ESG objectives (weighting 20%) in the KPI calculation of performance shares for our 200 senior executives.
  - ESG objectives were incorporated in the annual objectives of 99.6% of portfolio managers and sales representatives and the implementation of the ESG Ambitions 2025 plan accounted for 20% of the criteria supporting the performance share plan awarded to more than 200 Amundi senior executives in April 2024.
- 9. Reduce our own direct greenhouse gas emissions<sup>17</sup> by approximately 30% (vs 2018) per employee in 2025.
  - The action plan to reduce greenhouse gas emissions related to energy (scopes 1 and 2) and business travel (scope 3) has continued. At end-2024, emissions were reduced by 62% by employee compared with 2018.
- Present our climate strategy to shareholders (Say on Climate) at the Annual General Meeting since 2022
  - The progress report reporting on the implementation of the climate strategy was presented to the shareholders at the Annual General Meeting of May 24 2024 and approved at 96.73%.

<sup>&</sup>lt;sup>14</sup> Scope of actively managed open-ended funds when a rating methodology is possible.

<sup>&</sup>lt;sup>15</sup> Real estate, multi-asset, developed market bonds, developed market equities.

<sup>&</sup>lt;sup>16</sup> Scope defined by Amundi's Responsible Investment policy – Non-conventional extraction: oil sands, shale oil and gas.

<sup>&</sup>lt;sup>17</sup> For any Amundi Group entity with more than 100 employees.

Hereunder is additional information regarding methodology used to calculate and define targets, greenhouse gases (GHG) emissions considered, data providers and scenario leveraged:

#### **Methodologies leveraged**

- Net Zero Asset Owner Alliance Target Setting Protocol
- Net Zero Investment Frameworks

#### **GHG** scopes

Scope 1, 2 and 3 upstream (tier 1)<sup>18</sup>

#### **Data providers**

 As part of Amundi proprietary Net Zero framework, two data providers are leveraged: MSCI & Trucost

#### Forward-looking climate scenario

IEA Net Zero Emissions by 2050 – Developed in 2021

#### **United Nations Global Compact (UNGC) and human rights**

#### PAIs: 10-11 and 9 (table 3) Social and employee matters

As an asset manager, we recognize our responsibility to uphold human rights and address human rights abuses in our investment activities. We see human rights violations as a breach of Amundi's investment principles, therefore, we pay particular attention to company exposure to human rights risks.

Amundi's parent company, Crédit Agricole, is a signatory of the UN Global Compact and Amundi endorses it through its normative exclusions and controversy monitoring methodology. Please refer to Amundi's 2024 Global Responsible Investment Policy for more detail about the scope of application.

Amundi considers that to qualify as Sustainable Investment, among other criteria, investment should pass the two Do Not Significantly Harm tests ("DNSH Test") below:

- 1. The first DNSH Test relies on the monitoring of specific Principal Adverse Impacts. In order to pass the test, a company should:
  - Have a CO2 intensity which does not belong to the last decile compared to other companies within
    its sector (only applies to high intensity sectors) (unit: tCO₂e/M€¹9 revenues, source: Trucost);
  - Have a Board of Directors' diversity which does not belong to the last decile compared to other companies within its sector (unit: %, source: Multisource);
  - Be cleared of any severe controversy in relation to work conditions and human rights (unit: yes or no, source: MSCI and Sustainalytics);
  - Be cleared of any severe controversy in relation to biodiversity and pollution (unit: yes or no, source: MSCI and Sustainalytics).

Amundi already considers specific principal adverse impacts within its Exclusion Policy as part of its Global Responsible Investment Policy. These exclusions, which apply on top of the tests detailed above, cover the following topics: exposure to controversial weapons (PAI 14), violations of UN Global Compact Principles (PAI 10), and coal & unconventional fossil fuel (PAI 4)<sup>20</sup>.

2. Beyond the specific sustainability factors covered in the first test, Amundi implements a second DNSH Test in order to verify that the company does not belong to the worst performers on environmental or social matters compared to the other companies within its sector. The approach relies on Amundi's ESG scoring methodology. Amundi has set a threshold for this test that corresponds approximately to excluding the worst ~7% on environmental or social performance pillars across each sector. Using Amundi's ESG scoring methodology, this means that a company should have an environmental and or a social score better or equal to E.

In addition to research and monitoring, Amundi exercises leverage with issuers through engagement. Human rights engagement follows a two-pronged approach. First, we aim to engage proactively with

<sup>18</sup> Only accounting for emissions linked to tier 1 supplier

<sup>19</sup> Tons of carbon dioxide equivalent per million euros

<sup>20</sup> The remaining Principle Adverse Impact are not included yet in the DNSH test because of a lack of good quality data or because of a limited coverage

companies on identification and management of human rights risks. Second, we can engage reactively when an abuse or allegation occurs. In this case, we would seek to ensure that companies are taking appropriate measures for effective remediation.

#### **Finance for Biodiversity Pledge**

#### **PAI: 7 Biodiversity**

As a financial institution, Amundi recognizes the need to protect biodiversity and reverse nature loss in this decade. As such, in 2021 Amundi joined the Finance for Biodiversity Pledge, an unprecedented coalition of 194 signatories representing over €23 trillion in AUM across 29 countries as of 2025<sup>21</sup>. The pledge is a commitment of financial institutions to protect and restore biodiversity through their finance activities and investments.

This initiative brings together financial institutions from around the globe, committing to protect and restore biodiversity through their finance activities and investments. Amundi represented the signatories with a speech at the High-Level Segment of the Fifteenth United Nations Conference on Biodiversity (COP15) to call on global leaders to protect and restore biodiversity.

Amundi initiated a biodiversity strategy dedicated engagement in 2021. This engagement aims to drive greater awareness and action on nature across a range of sectors where material links to nature are high have been targeted including companies exposed to nature related controversies or flagged in our Biodiversity & Ecosystem Services.

In 2024, Amundi engaged with 759 companies on natural capital preservation, a 23% increase from 2023 and more than double the number from 2022. Within these engagements, many either ask companies to take steps to analyse and report on their relationship to nature including mapping out their impacts, dependencies, and associated risks and opportunities or focus on specific impact drivers of biodiversity loss. By better understanding their links to nature and the related financial materiality, companies can take essential actions to better address identified risks and mitigate their impacts. Details of our engagement with issuers can be found in our 2024 engagement report<sup>22</sup>.

Amundi also expanded its efforts on biodiversity in 2023 in part due to the establishment of its new biodiversity policy<sup>23</sup>. The policy focuses on companies with high exposure to biodiversity harming activities that are either lacking sufficient processes/disclosure or have been involved in serious controversies.

<sup>21</sup> Finance for Biodiversity Pledge website as of April 2025

<sup>22</sup> Engagement report 2024

<sup>23</sup> https://about.amundi.com/files/nuxeo/dl/c44a7bb2-813b-4346-96e0-e3d695241d9b

# 6. Historical comparison

Amundi presents the 2024 version of the Principal Adverse Impacts (PAI) statement, marking our third year of this statement Amundi presents the 2025 version of the Statement on Principal Adverse Impacts (PAI) indicators, marking our third year of this statement.

This year, we are confirming the transparency efforts and the robustness of our methodology, while making substantial progress on the coverage of our indicators and the reduction of negative impacts on all our portfolios.

For reference, at the end of 2023, Amundi had a 0.06% exposure to companies active in the coal sector. We have also implemented methodological changes to ensure that the results reflect our activities.

Given the current regulatory framework, which is limited in prescribing the methodologies to be adopted, and the ongoing efforts of data providers to refine certain measures, it is important to note this year that ISPs 1, 2, 3, 8, 9, 15 and 4 (Table 2) are not comparable to the previous year's data. The changes in these indicators reflect the methodological adjustments made.

Further information on the evolution of each indicator is available in the table in section 2.1. in the "Explanation" column.