

SUSTAINABLE IMPACT FRAMEWORK

Financial institutions

Sectors:

- Regional Banks
- Diversified Banks
- Mortgage Finance

Last updated: July 2024

This document is not a promotional communication. This is a methodological document aimed at explaining how Mirova takes into account sustainable development issues in the framework of the environmental, social and governance analysis of each sub-sector of activity.



Table of contents

01

Executive Summary

p.3

04

Appendices

p.17

02

Positive Impact

p.6

05

Disclaimers

p.22

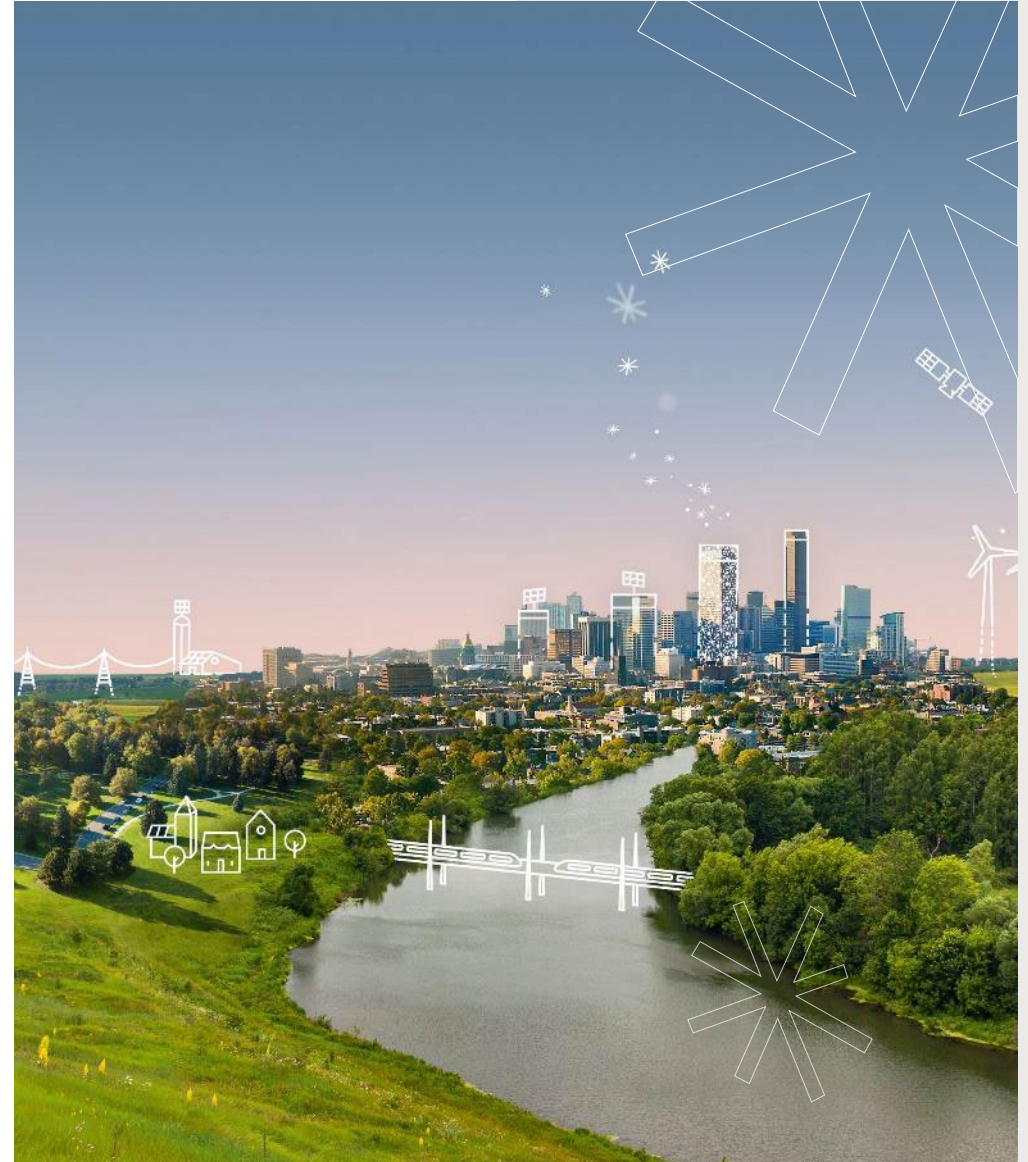
03

ESG risks

p.12



Executive Summary



Financial institutions

The financial sector, and particularly the banking industry, must play a central role in the mobilization of capital to decarbonize the economy and support companies aiming to make progress through their net zero targets. The sector is also in a central position to contribute to the achievement of the Sustainable Development Goals – SDGs.

Women account for around **52% of the workforce** but only 5% of CEOs in the financial industry ¹

Banks can play a role to tackle the world's challenges thanks to the deployment of sound sustainable practices. For instance, financial institutions can support women-owned businesses and entrepreneurs and enhance diversity and inclusion. As an employer, the financial industry can deliver positive social impact by fostering best practices on human capital, fair distribution of value, work life balance and wellbeing for their employees.

5 to 7 trillion USD per year is required to fully decarbonize the economy, estimates UNEPFI²

Banks can provide financial solutions to support capital flows towards low-carbon sectors and other economic activities providing solutions to nature related challenges, such as biodiversity protection or water stress. Banks can contribute through the supply of loans, sustainable bonds and other financial services to sectors or companies providing or enabling sustainable solutions. Banks can also leverage on their loan book and ESG due diligence and sector policies to positively influence clients to adopt impactful decarbonization strategies and sound nature related frameworks.





The 20 largest financial institutions had accumulated **EUR 410 billion** in financial penalties between 2008 – 2020 linked to business ethics and compliance cases system ³

Governance and business ethics are critical for the sector. The credibility and robustness of a financial institution's sustainability strategy is supported by a sound governance structure and the integration of ESG criteria in the top management remuneration framework. We encourage financial institutions to strengthen transparency on policies and processes related to business ethics issues. Building trust is essential for the financial sector to function therefore we expect high compliance and business ethics standards to anticipate and deal with high profile controversies related to market manipulation, fraud, money laundering and tax evasion.

1. McKinsey, 2021. 2. UNEPFI, 2017. 3. Centre for Banking Research – 2021.



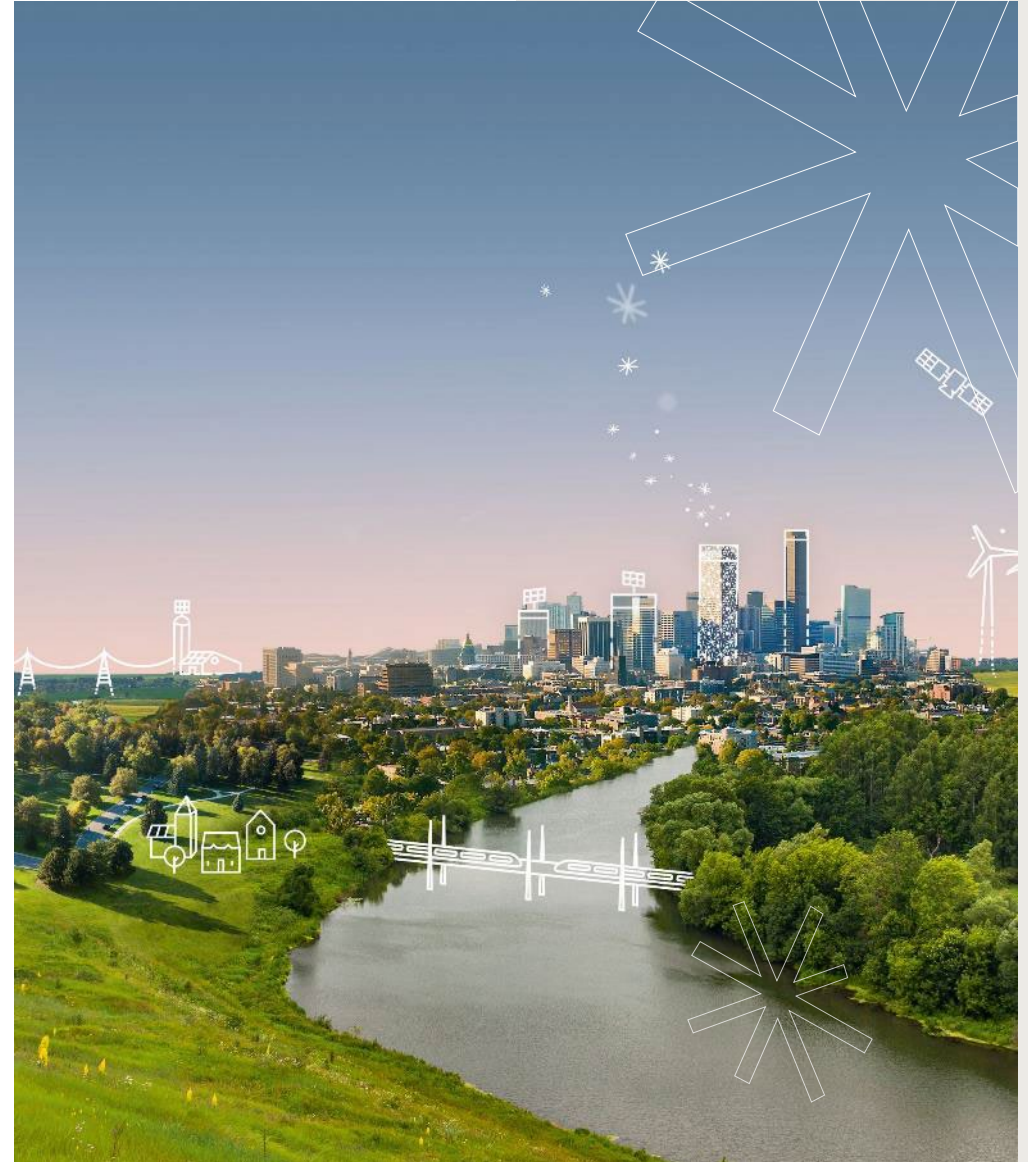
Drivers of contribution and obstruction to sustainability goals

	Activities	Practices
Positive Impact	<p>Sustainable Activities </p> <p>ACCESS TO BASIC NEEDS PRODUCTS AND SERVICES FOR EQUALITY</p> <p>LOW-CARBON ENERGY CLEAN TRANSPORTATION GREEN BUILDING</p>	<p>Advanced Practices </p> <p>HUMAN CAPITAL:</p> <ul style="list-style-type: none"> • Diversity and inclusion • Job quality <p>CLIMATE BIODIVERSITY</p> <p><i>Advanced governance models</i></p>
ESG Risks	<p>Harmful Activities¹ </p> <p><i>No frequent exposure to harmful activities</i></p>	<p>Risk Mitigation </p> <p>BIODIVERSITY & CLIMATE FOOTPRINT</p> <p>PRIVACY PROTECTION PRODUCT RESPONSIBILITY AND DATA PRIVACY & SECURITY LABOR & HUMAN RIGHTS</p> <p>GOVERNANCE :</p> <ul style="list-style-type: none"> • Governance of sustainability • Business ethics • Taxes

1. As defined in: [Minimum standards and exclusions. Mirova](#)



Positive Impact



Sustainable Activities



	CONTEXT	SUSTAINABLE ACTIVITY	IMPACT CRITERIA
SOCIAL OPPORTUNITIES	Financial inclusion is a key enabler to reduce poverty. It offers access to affordable and appropriate financial products and services meeting the needs of targeted individuals and businesses: having a transaction account is the first step, followed by extra payments, savings, credit and insurance tools. Exclusion from basic financial services does not only concern developing countries.	Access to basic needs Companies/projects offering low-cost products and services, enabling the development of local infrastructure and services in underserved regions such as microfinance and access to primary banking services (account, loan, etc.).	Access to financial services and identification of a targeted population. For example, access to financial services targeting people in poverty situation or supporting SME lending owned by women.
	Financial institutions are in a privileged situation to support gender equality via their products and services. Financial institutions are enablers of women's capacity as entrepreneurs. They may also help women in vulnerable situations by mentoring and training on key financial services.	Products and services for equality Companies/projects offering products or services enabling the empowerment of diverse populations, notably women, including tailored banking offerings.	

In this sector, the positive contribution is mainly analyzed through **revenues and asset exposure** but not only. We complement this exposure with a **qualitative review** of the solution's impact. KPIs to assess the level of impact generated can include: **number of users/beneficiaries of the products, the share of revenues in underserved areas, the number of jobs created etc.**

LOW POSITIVE IMPACT

> 10% sustainable activities

MODERATE POSITIVE IMPACT

> 20% to 50% sustainable activities

HIGH POSITIVE IMPACT

> 50% sustainable activities



Sustainable Activities



CLIMATE / BIODIVERSITY	CONTEXT	SUSTAINABLE ACTIVITY	IMPACT CRITERIA
	<p>Curbing the temperature increase to 1.5-2°C to reduce the impact of climate change is the major challenge of the twenty-first century. The financial sector can play a key role in orienting capital flows towards low-carbon sectors positively contributing to the energy transition and other economic activities providing solutions to other environmental challenges such as biodiversity protection.</p> <p>Banks can contribute to the energy transition through an ambitious and comprehensive climate strategy covering the entire energy mix, to align the financings with the Paris Agreement. This can be done through the development of loans, green bonds and other financial services dedicated to sectors or companies providing solutions for the energy transition, today most of the solutions are concentrated in 3 sectors: Low carbon energy, Clean transportation, and Green buildings.</p>	<p>Via the loans, investments and advisory activities, banks support the development of key technologies and infrastructure such as:</p> <ul style="list-style-type: none"> • Low carbon energy: Companies and projects focused on wind, solar, hydro, bioenergy & synthetic fuels, geothermal and other renewables, smart grids and storage and low carbon hydrogen. • Clean transportation: Manufacturers of means of transport for land, air or maritime (such as BEVs, PHEVs, FCEVs, electric two-wheelers, hydrogen-powered planes, methanol-fueled vessels, etc.) as well as essential equipment and services suppliers (such as batteries or fuel cells dedicated to clean transportation, powertrains, etc.). But also, alternative mobility solutions providing low carbon mobility options. Carbon emissions and pollution mitigations and charging infrastructure. • Green buildings: Including advanced building equipment, green real estate and green materials. 	<p>IMPACT CRITERIA</p> <ul style="list-style-type: none"> • Sustainable finance mobilization: loan book exposure to sustainability through GSS Bonds or other types of green assets & loans; • Green Asset Ratio (exposure to European (EU) taxonomy: climate mitigation and adaptation) or other proxies; • Financing of products and services with other high environmental impact • financial institutions exposed to asset management: SRI exposure. For EU companies: SFDR disclosures (Article, 8 and 9).

In this sector, the positive contribution is mainly analyzed through **revenues and loan book exposure** but not only. We complement this exposure with a **relevant impact** to **assess the effectiveness of the solution in truly advancing environmental challenges**.

LOW POSITIVE IMPACT

> 10% sustainable activities

MODERATE POSITIVE IMPACT

> 20% to 50% sustainable activities

HIGH POSITIVE IMPACT

> 50% sustainable activities





CONTEXT

Job quality

The financial industry is a major employer across different economic sectors. Financial, insurance and real estate companies account for 3.1% of all employment across Europe¹. Thus, financial sector companies can play a role towards social impact by fostering best practices on human capital, fair distribution of value, work life balance and wellbeing for their employees. In fact, a sound socioeconomic policy has positive spillovers effects that will enhance productivity of employees, as well as help to retain competent employees.

Diversity & inclusion

Women empowerment in the financial industry shows an encouraging pathway, women held 21% of board seats, 19% of C-suite roles, and 5% of CEO positions in 2021². However, financial institutions need to make additional progress and more in-depth actions. For example, tackling gender pay gap or supporting real gender parity at senior management and leadership positions. Research from the European Banking Authorities (EBA) shows that the gap, although narrowed, is very material at top senior management and board of directors' levels. Women earn on average 9.43% less than their male colleagues³. To perform on the topic, companies should demonstrate an action plan to address the gender pay gap. Unfortunately, according to the EBA³, 27.05% of EU financial institutions have not yet adopted a diversity policy.

ADVANCED PRACTICES

Actions/measures expected:

- **Develop employees' skills recognized on the labor market and anticipate shifts in skills.**
- **Ensure fair remuneration and social benefits are sufficient for good living conditions.**
- **Ensure employee satisfaction and wellbeing.**

Impact indicators examples:

- Training hours per employee, % of workforce trained, average training investment.
- Qualitative analysis of the training offering including, upskilling programs, mentorships focused on young talents, leadership development.
- Creation of internal universities / academies targeting actionable skillsets and accessible to most employees
- Analysis of fairness between employees', executives' and shareholders' remunerations.
- % of global workforce covered by value distribution scheme & collective bargaining agreements
- Existing and effective employees' association mechanisms.
- Workplace wellbeing measures: flexible work arrangements, mental health support, counselling.

- **Improve female and diverse representation especially at management/leadership level.**
- **Ensure equal opportunities and increase awareness to overcome inequalities.**
- **Ensure adapted and flexible career options.**

- Percentage of women in the Executive Committee, difference between women representation in the workforce and Executive Committee, C-Suite female representation (CEO, CFO, CIO, CTO, CCO).
- Wage gap or credible target to reach pay equality & unadjusted pay gap.
- Succession planning including at least one woman as a possible candidate for every senior position.
- Roadmap to improve recruitment of minorities and ensure unbiased recruitment.
- Gender-neutral leave policy.
- Provision of daycare options (affordable and/or paid by the company) and work flexibility options.

LOW POSITIVE IMPACT

- > Advanced practices - Medium Stake* topic
- > Credible strategy to achieve advanced practices

MODERATE POSITIVE IMPACT

- Advanced practices - High Stake* issues





CONTEXT

ADVANCED PRACTICES

CLIMATE

Curbing the temperature increase to 1.5-2°C to reduce the impact of climate change is the major challenge of the twenty-first century. The financial sector can play a key role in orienting capital flows towards low-carbon sectors positively contributing to the energy transition. In addition, financial institutions are feeling regulatory and supervisory pressure to assess and manage climate risks across their financial assets. Central banks and supervision authorities have built stress testing frameworks to assess banks' resilience to climate change. According to the ECB¹, 60% of banks integrated climate stress-testing and risks frameworks are deficient and require an enhancement to fully determine the complete exposure to physical and/or climate transition risks.

Actions/measures expected:

Robust decarbonization strategy on all three scopes

Impact indicators examples:

- GHG emissions reduction targets on all 3 scopes, focus on loan book emissions, preferably aligned with the SBTi² and effective reduction in emissions.
- Sectorial decarbonization targets focused on highly emitting sectors (NZBA³) and financial material loan book sectors. Sectorial trajectories to be aligned with a NetZero trajectory and recognized framework (IEA⁴-NZA/SBTi).
- Measuring GHG Emissions on all 3 scopes with robust long-term strategy to reduce carbon footprint. GHG accounting to be harmonized with recognized GHG accounting frameworks (PCAF⁵).
- Fully transparent climate reporting, covering both transition and adaptation climate risks. Climate function is integrated within Financial institutions risks function.

BIODIVERSITY

There is increasing evidence that nature and biodiversity are deteriorating at a global scale. The global economy is working outside the safe zone for six of the nine planetary boundaries – processes that are critical for maintaining the Earth's stability. Ecosystem services are not being appropriately priced or the risks assessed and embedded by business and financial institutions. The materialization of nature-based services will affect the value of financial assets, therefore financial institutions are mandated to act and tackle the issue, by enhancing current process, strategies and risks frameworks. Also, they need to mobilize financial resources to those areas of the economy that will generate positive impact to stop nature degradation and biodiversity loss.

Robust biodiversity and nature preservation policy covering dependencies, impacts, risks and opportunities

- Direct involvement of financial institution board members to oversee and monitor nature-related disclosures.
- Policy covering nature-related "Dependencies, Impacts, Risks and Opportunities (DIRO)" and the effects on financial institutions' business models and process: client's due diligence (Banks); and portfolios and ownership (AMs). Encourage financial institutions clients and/or investees to set Science-Based Targets for Nature.
- Disclose the proportion of loans disbursed (% loan book) and portfolios (% of AUM) that are covered by nature-related enhanced due diligence and engagement actions.
- Existing or new instruments for 'nature-positive' solutions.
- Commit to zero deforestation and support this action with clear client and project requirements in relevant sector and commodity policies. Issues can commit to a gradual "Zero deforestation" trajectory.

LOW POSITIVE IMPACT

- > Advanced practices - Medium Stake* topic
- > Credible strategy to achieve advanced practices

MODERATE POSITIVE IMPACT

- > Advanced practices - High Stake* issues

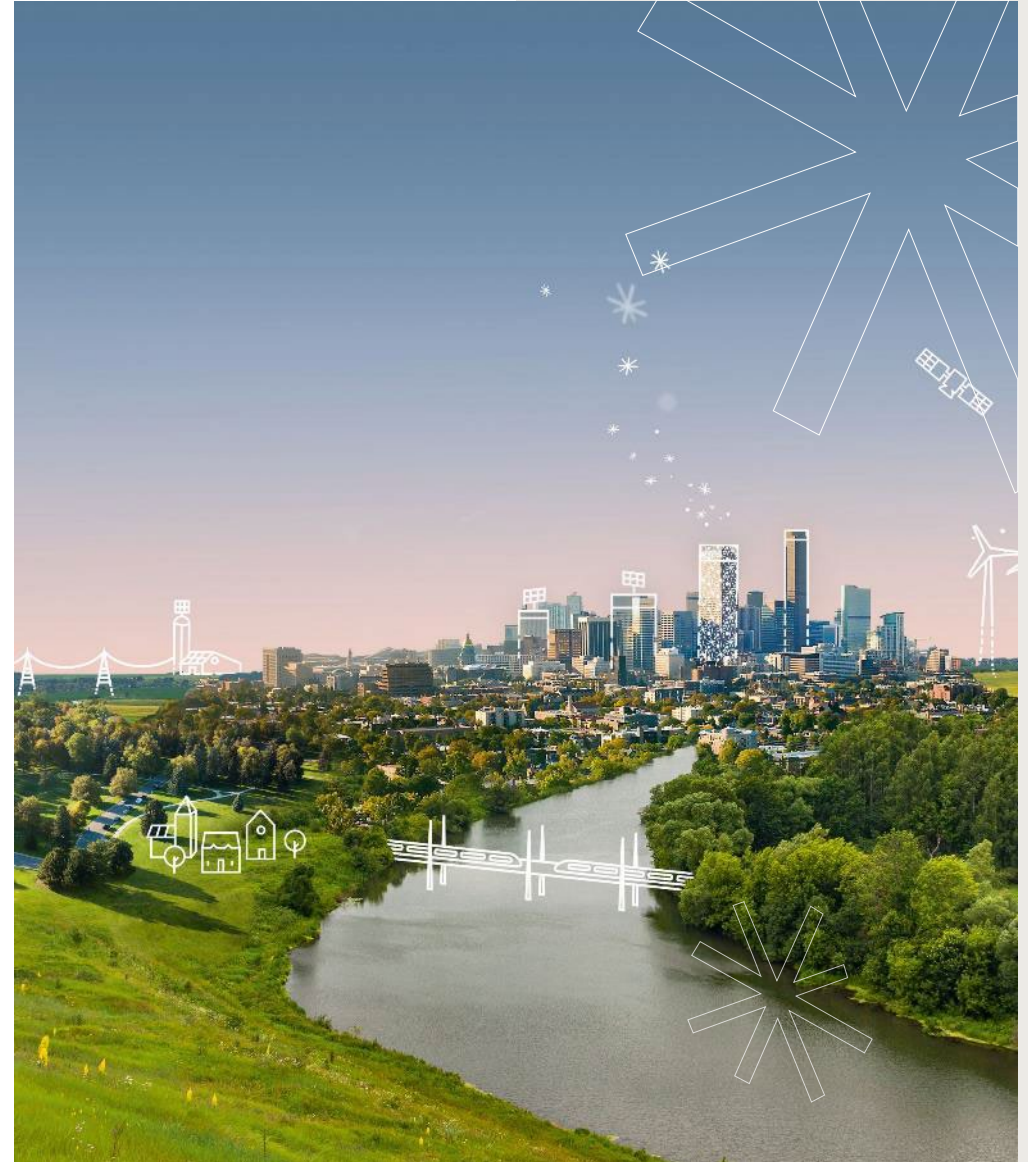


Advanced governance model

CONTEXT	ADVANCED GOVERNANCE MODEL DETAILS	
<p>Mirova aims to promote the development of a corporate vision focused on the creation of collective value over the long term. Corporate governance should be shaped to include the interests of its key stakeholders. We believe that the creation of wealth requires a long-term perspective, which takes into account sustainability issues.</p> <p>Mirova encourages companies to include environmental and social issues in its purpose, and to adapt their articles of association accordingly. We feel that shareholders have a role to play in spreading this vision of what a company should be.</p> <p>Thus, we are promoting the development of a long-term shareholder base, the creation of governing bodies that serve all stakeholders and address CSR¹ issues, the introduction of a compensation policy which is not only fair to its stakeholders, but which also promotes sustainable growth, and -increased transparency and a better quality of both financial and extra financial information, through annual audited reports covering all these issues.</p> <p>Advanced governance practices only foster sustainability but is not a standalone driver of impact.</p>	Practices/measures expected:	Impact indicators examples:
	<p>Commitment to long-term and shared value creation</p>	<ul style="list-style-type: none"> • Demonstrate how value created is shared fairly amongst company stakeholders. • Strive towards the model of a purpose-driven organization or/and a B-Corp organization.
	<p>Integration of stakeholders in the decision-making process</p>	<ul style="list-style-type: none"> • Create of a Sustainable Development Committee or sustainability representative at Board-level, with regular meetings throughout the year. Sustainability items systematically integrated into the board agenda.
	<p>Fair taxes</p>	<ul style="list-style-type: none"> • Provide country-by-country reporting on tax payments.



ESG Risks



Climate & Biodiversity

CONTEXT

According to a research coalition driven by several organizations¹, fossil fuel financing from the world’s 60 largest banks in the world has reached a level of USD \$5.5 trillion in the seven years since the adoption of the Paris Agreement. In 2022, banks allocated and financed more than \$669 billion to the fossil fuels sector. A financial institution playing a major role in financing fossil fuels and lacking a credible material phase out of the sector is clearly in a position that harms the environment as well as society.

At least one million plant and animal species are now threatened with extinction, many within the near future, while wildlife populations have dropped on average by 70% in the past 50 years⁵. Financial institutions need to take action to protect nature and biodiversity which will then ensure a protection for the value of the financial assets they hold.

MINIMUM STANDARDS

Type of ESG Risk:

Climate footprint

Risk assessment indicators examples:

- Exposure to fossil fuel financing over the last 5 years.
- Involvement in severe controversies pertaining to harmful practices to the environment and society.
- Definition of a decarbonization strategy to reduce major sources of emissions, calculation of induced emissions on all scopes.
- Coal, conventional and non-conventional oil and gas sector policies covering assets, and companies' exclusions and phase out for existing loans.

PAI #1

PAI #2

PAI #3

PAI #4

Biodiversity footprint

- Financial institutions should develop a sector policy to incorporate biodiversity and nature related risks into high-risk sectors, including agriculture, forestry, fisheries, energy, and mining.
- Risk framework to integrate recognized data-based tools such as ENCORE² (sector based), IBAT³ (local – projects based) and SPOTT⁴ (for commodity value chain traceability).
- Financial institutions are expected to develop risk management frameworks specifically to track and mitigated the impact for nature related activities like water stress and waste.

PAI #7



Human and labor rights

CONTEXT	MINIMUM STANDARDS	
	Type of ESG Risk:	Risk assessment indicators examples:
<p>The financial sector has recurrently implemented staff reductions and lay offs. Regulatory pressure and digitalization are driving financial institutions to a shift away from labor intensive activities into more data driven process. Therefore, from a sustainability perspective for financial institutions, it is important to establish restructuring policies to prevent unfair dismissals and provide support services for dismissed employees.</p>	<p>Employees' labor rights</p>	<ul style="list-style-type: none"> • Basic measures in place for employees impacted by restructuring (financial severance, re-training, job-search assistance). • Measures to promote fair working conditions and a sustained social dialogue in countries with less stringent regulations. • Anonymous reporting channel to report non-ethical behaviors in the workplace. • Frequency and severity of health & safety accidents (direct workers and contractors) decreasing overtime.
<p>Financial institutions are expected to deploy a credible policy and procedures to avoid or mitigate their exposure to socially harmful activities, such as: alcohol, pornography, gambling, arms trade and the exposure to projects harming local population or human rights violations.</p>	<p>Human rights across lending and financial activities</p>	<ul style="list-style-type: none"> • Policy to exclude the exposure to controversial weapons, such as antipersonnel mines, cluster munitions, biological and chemical weapons, depleted uranium, and nuclear weapons. • Policy to exclude or reduce exposure to sectors related to human trafficking. • Explicit governance structure responsible to manage exposure to critical sectors, including risk management, legal and compliance functions. • Policy to exclude and/or escalation process to mitigate controversies related to breaches on UN Global Compact's principles and/or OECD guidelines for international companies.

PAI #14

PAI #10

PAI #11

PAI #14



Product responsibility and data privacy & security

CONTEXT	MINIMUM STANDARDS	
	Type of ESG Risk:	Risk assessment indicators examples:
<p>Banks are required to implement policies to manage any exposure to harmful practices such as: over-indebtedness of clients under social and economic vulnerability situation; mis-selling of financial products not adapted to clients' needs and knowledge and in breach of financial regulatory rules.</p>	<p>Product responsibility</p>	<ul style="list-style-type: none"> • Exposure to frequent and financially material controversy linked to misselling of products or overindebtedness of clients; • In the case of a controversy, banks are expected to deploy corrective measures including the renewal of the management team, dismissal of involved employees, implementation of additional policies, implementation of control and monitoring system in all geographies.
<p>Financial institutions manage and process an increasing amount of personal data. As several data breaches and growing use of user data show, data and privacy protection are highly material issues for the sector. Companies in the financial industry need to comply with increasing requirements from regulations and at the same time invest to protect data from cyber attacks.</p>	<p>Data privacy & security</p>	<ul style="list-style-type: none"> • Existence of a robust cybersecurity policy and transparency (R&D investments, size of teams, trainings). • Implementation and certification of the information security management system (ISO 27001). • Policy on data security and privacy (type of data and sources of collection, type of use and possible sharing with third parties).



Governance

CONTEXT	MINIMUM STANDARDS	
<p>The credibility and robustness of a financial institution’s sustainability strategy is supported by a comprehensive ESG governance structure and the integration of ESG criteria in the management remuneration. Business ethics is a fundamental issue, and financial institutions must be able to prevent the risk of internal bad practice (corruption, fraud and bribery). Financial institutions must guide their operations, decision making process and interaction with clients with clear ethical principles and compliance with regulation. The goal is to ensure the financial institutions’ credibility and build a business culture guided by trust across all the stakeholders.</p>	Type of ESG Risk	Risk assessment indicators examples
	<p>Governance of sustainability</p>	<ul style="list-style-type: none"> Existing governance structure enabling the mitigation of environmental and social risks. Disclose breakdown of value among stakeholders, improving transparency around employee remuneration and payroll. Integration of ambitious and binding sustainability criteria – assessed through pre-determined, quantifiable metrics– into the variable compensation of top executives. All Board members are trained on sustainability topics. Presence of employee representatives at board level (beyond regulatory requirements). Unadjusted gender pay gap and board gender diversity.
	<p>Business ethics</p>	<ul style="list-style-type: none"> Robust business ethics policies covering anti-corruption, anti-competitive and bribery policies. Evidence of effective whistleblower channels and transparency around cases reported and actions implemented. Transparency about lobbying practices and objectives. Systematic training on company’s and suppliers’ Code of Conduct.
<p>Tax practices</p>	<ul style="list-style-type: none"> Effective tax rate vs. equal statutory tax rate. Absence of controversies or evidence of aggressive tax optimization practices. Estimated exposure to tax havens* or tax non-cooperative jurisdictions with no real activity in the country. 	

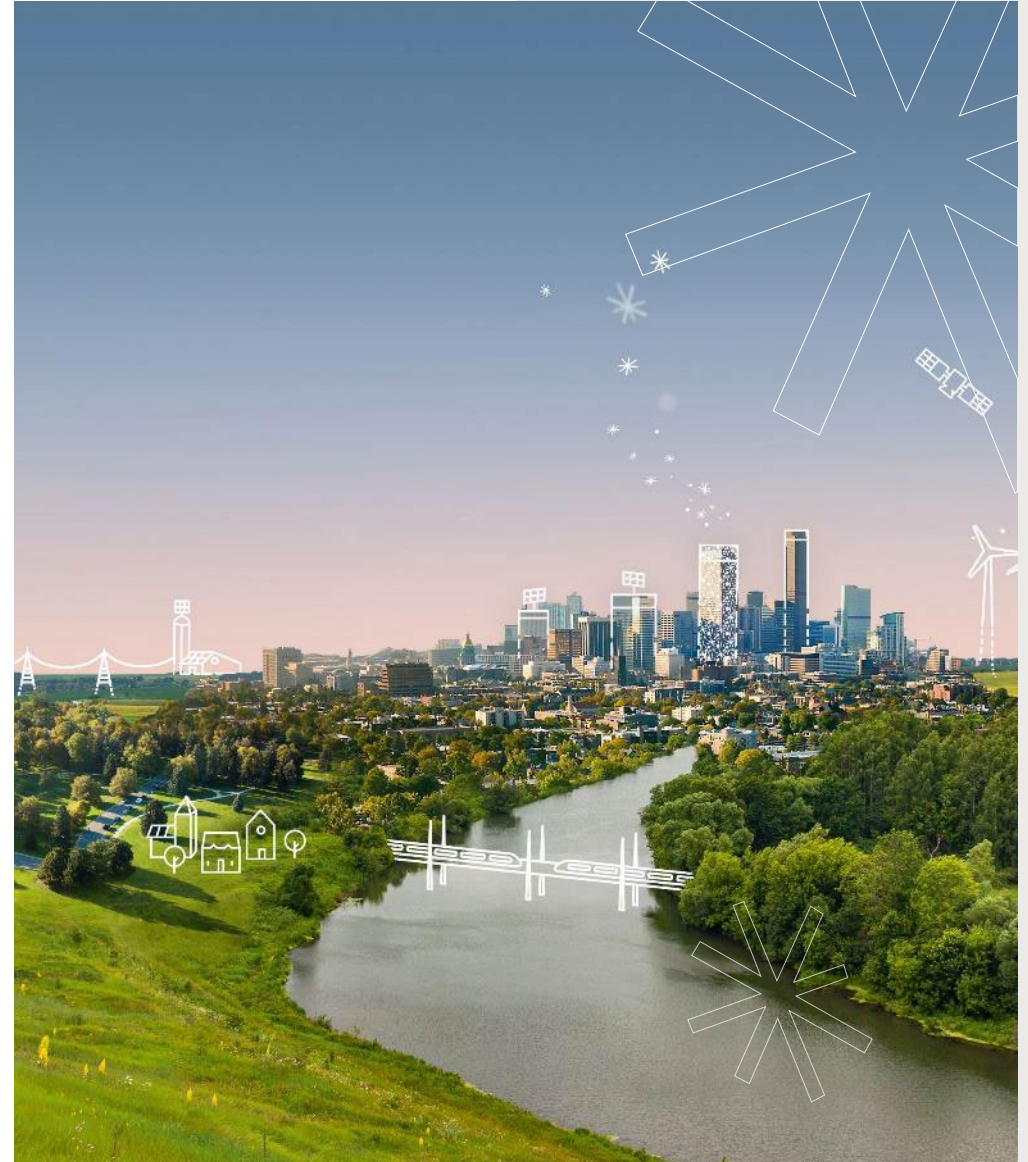
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PAI #13

PAI #17



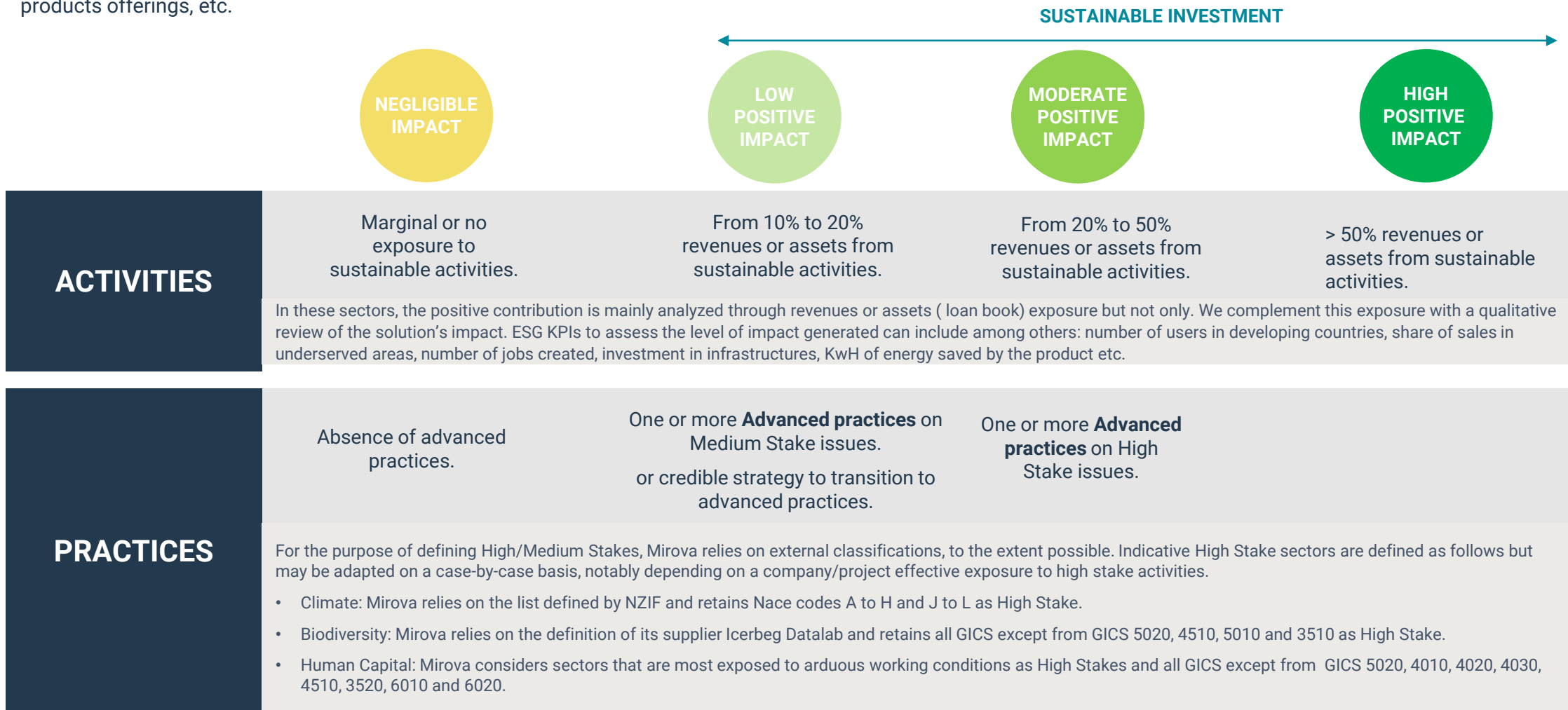
Appendices



Positive Impact

According to Mirova’s internal methodology, contribution to the SDGs can be grouped into two main categories, which are often complementary.

- The “**activities**” i.e. the products and services they offer.
- The “**practices**” i.e. the way operations can contribute to create sustainable and inclusive jobs, or by having strong commitments to net zero targets beyond their green products offerings, etc.



APPENDICES

ESG risks

SECTOR INHERENT RISK LEVEL: LOW/MEDIUM

A financial institution should be able to: Manage ESG risk management approach in place on most material issues socio-economic development, diversity inclusion and corporate misbehavior and discrimination practices. Implement policies and process to manage ESG risk associated to lending, underwriting and advisory activities. Monitor complaints and whistleblowing covering breaches on socio-economic and diversity policies, business ethics and regulatory compliance and high-profile projects negatively affecting the environment. Act on climate transition and physical risks: decarbonization strategy, covering upstream and downstream projects exposure. Management of climate change physical risks across lending activities. Avoid or manage exposure to high-profile controversies covering socio-economic and diversity policies, business ethics and regulatory compliance and high-profile projects negatively affecting the environment.

COMPANY INHERENT RISK LEVEL

A company inherent risk level may differ from the inherent risk level of the sector.

The definition of the company inherent risk level may also be determined by the specificities of the business model, the nature of the activities and their locations as well as that of their suppliers (incl. country specific risks).

MAIN ESG RISKS FACTORS

Climate change:

- Transition risks embedded in loans to the fossil fuel sector (coal, oil and gas).
- Exposure to high profile controversies across loans in sectors harming society, local communities and the environment

Biodiversity footprint:

- Transactions exposed to sectors with high level of potential impact on nature and biodiversity and lending activities into high-risk soft commodities
- Exposure to high profile controversies across loans affected by extreme water use or non well managed waste

Other risks include:

Data security and privacy, Product Responsibility, Labor and Human Rights, Governance of Sustainability, Business Ethics & Tax practices

RESIDUAL ESG RISK LEVEL

SUSTAINABLE INVESTMENT

LOW RESIDUAL RISK

Satisfactory management of the company's or project's main sustainability risks on most material issues.

MEDIUM RESIDUAL RISK

Current management in place does not fully cover all ESG risks but these are considered as moderate and current practices are deemed acceptable.

HIGH RESIDUAL RISK

Companies demonstrating significant mitigation efforts operating in sectors with industry-wide complex and unaddressed challenges - systematically under targeted engagement.

SIGNIFICANT HARM

Not eligible for investment.



Principal Adverse Impact Indicators

ADVERSE SUSTAINABILITY INDICATOR		MOST RELEVANT	THRESHOLDS / CRITERIA
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS			
Greenhouse gas emissions	1. GHG emissions	X	Systematic integration in qualitative internal analysis and systematic engagement with the largest emitters to strengthen their Net Zero commitments.
	2. Carbon Footprint	X	
	3. GHG intensity of investee companies	X	
	4. Exposure to companies active in the fossil fuel sector	X	
	5. Share of non-renewable energy consumption and production		Non applicable
	6. Energy consumption intensity per high impact climate sector		Non applicable
Biodiversity	7. Activities negatively affecting biodiversity sensitive areas	X	Exclusion of companies or projects significantly harming biodiversity sensitive areas.
Water	8. Emissions to water		Systematic integration in qualitative internal analysis and systematic engagement with relevant investee companies on this issue.
Waste	9. Hazardous waste and radioactive waste ratio		
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS			
Social and employee matters	10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	X	Exclusion of companies violating UNGC and OECD principles and monitoring of exposure to violations as part of controversy monitoring process. Systematic integration in qualitative internal analysis.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	X	
	12. Unadjusted gender pay gap	X	Systematic integration in qualitative internal analysis and systematic engagement with relevant investee companies on this issue.
	13. Board gender diversity	X	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	X	Exclusion of companies or projects exposed to controversial weapons leads to and involved in the production of re-exportable weapons.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS			
Human Rights	16. Number of identified cases of severe human rights issues and incidents	X	Systematic integration in qualitative internal analysis and monitoring of exposure to violations as part of controversy monitoring process.
Anti-corruption and anti-bribery	17. Number of convictions and number of fines for violation of anti-corruption and antibribery laws	X	



Useful Resources

SFDR

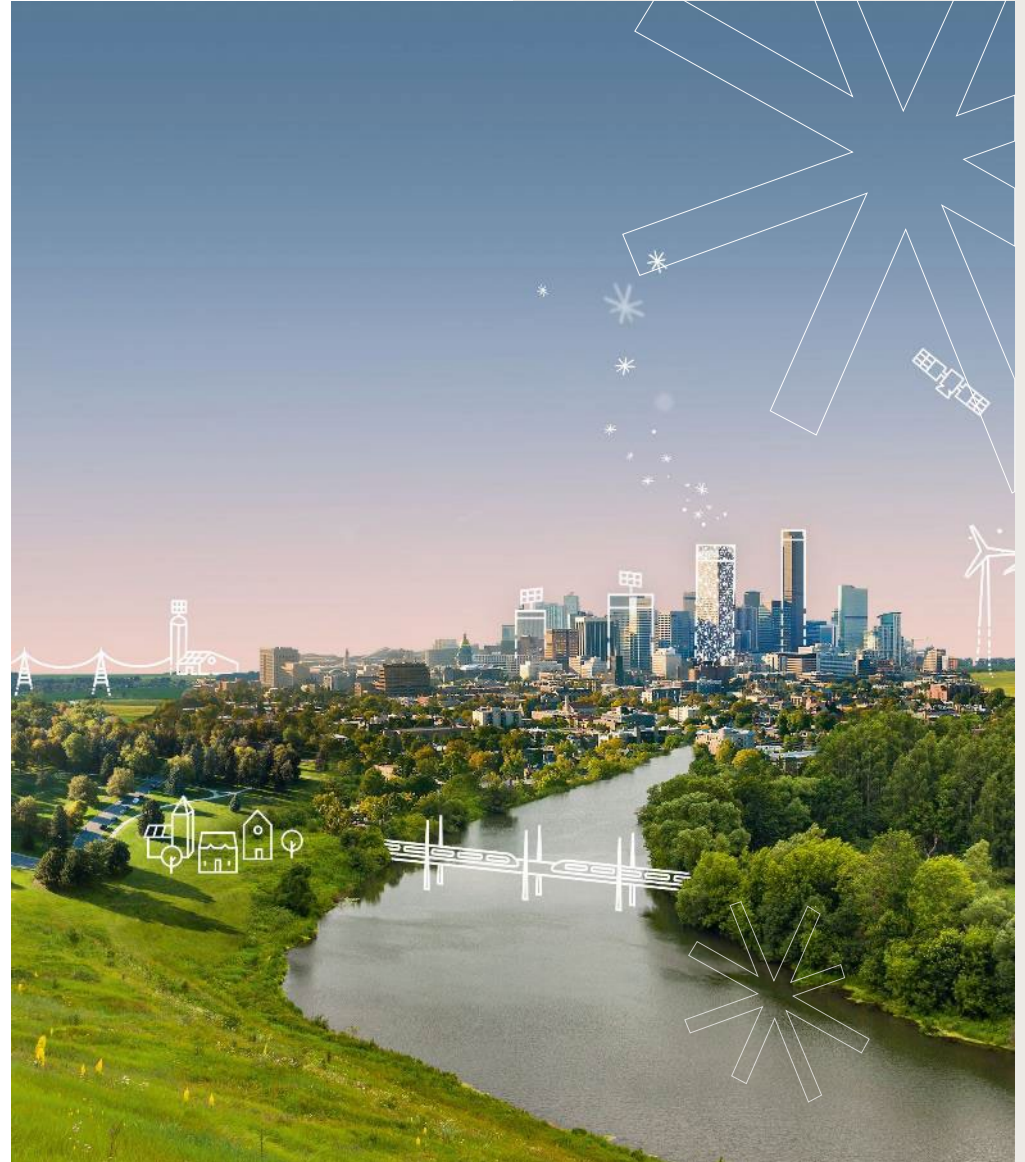
- [Sustainable Finance Disclosure Regulation \(SFDR\): positioning of Mirova Funds](#)
- [Description of the principal adverse impacts on sustainability factors](#)

POLICIES AND METHODOLOGIES

- [Our approach to impact](#)
- [Our approach to impact & ESG assessment](#)
- [Minimum standards](#)
- [Voting and Engagement policies](#)
- [Temperature alignment of listed investment portfolios](#)
- [Transparency codes](#)
- [Our Taxonomy for Sustainable Solutions](#)



Disclaimer



MAIN RISKS

ESG Investing Risk & Methodological limits

By using ESG criteria in the investment policy, the relevant Fund's objective would in particular be to better manage sustainability risk and generate sustainable, long-term returns. ESG criteria may be generated using Mirova's proprietary models, third party models and data or a combination of both. The assessment criteria may change over time or vary depending on the sector or industry in which the relevant issuer operates. Applying ESG criteria to the investment process may lead Mirova to invest in or exclude securities for non-financial reasons, irrespective of market opportunities available. ESG data received from third parties may be incomplete, inaccurate or unavailable from time to time. As a result, there is a risk that Mirova may incorrectly assess a security or issuer, resulting in the incorrect direct or indirect inclusion or exclusion of a security in the portfolio of a Fund.

Sustainability risks

The Sub-Funds are subject to sustainability risks as defined in the Regulation 2019/2088 (article 2(22)) by environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

Sustainability Risks are principally linked to climate-related events resulting from climate change (i.e. Physical Risks) or to the society's response to climate change (i.e. Transition Risks), which may result in unanticipated losses that could affect the Sub-Funds' investments and financial condition. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks. Sustainability factors consist in environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters (the "Sustainability Factors"). Portfolio investment process includes binding and material ESG approach to focus on well rated securities from an ESG viewpoint in order to mitigate potential impact of Sustainability Risks on portfolio return. More information on the framework related to the incorporation of Sustainability Risks is to be found in the sustainability risk management policy of the Management Company on its website.





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Portfolio Management Company - Anonymous Company RCS Paris No.394 648 216

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59, Avenue Pierre Mendes France 75013 Paris Mirova is an affiliate of Natixis

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[Website](#) – [LinkedIn](#)

NATIXIS INVESTMENT MANAGERS

French Public Limited liability company RCS Paris n°453 952 681

Registered Office: 59, avenue Pierre Mendès- France 75013 Paris

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