

Website Product Disclosures further to art. 10(1) of the Sustainable Finance Disclosure Regulation for art. 9 sub-funds

Name: AMUNDI FUNDS MONTPENSIER
GREAT EUROPEAN MODELS SRI

Legal entity identifier: 213800HTVMOYLUK1WB84

No significant harm to the sustainable investment objective

The Sub-Fund invests as a feeder fund in Great European Models SRI (master fund) which has a sustainable investment objective.

The master fund commits to make sustainable investments.

Consideration of issuers present in the fund's portfolio that are not subject to an ESG analysis (excluding UCIs) : all equity investments are subject to ESG analysis.

The master fund is intended to be invested in equities. It is however authorized to make investments in UCIs (up to 10% of the net assets), in debt securities and money market instruments.

Assessment of the "do no significant harm" (DNSH) criterion, is based on:

- SRI analysis in step 1: exclusion of companies involved in controversial activities: arms manufacturing, coal mining, tobacco, adult entertainment, gambling and GMOs;
- Step 2, i.e. the exclusion of companies rated "CCC" or "Vigilance Controverse Rouge" by MSCI ESG Research;
- The consideration of PAIs in a qualitative way in the SRI analyzes of stocks: Montpensier Finance - the management company of the master fund - takes into account the indicators of the Main Negative Impacts in their proprietary analysis of the contribution of companies to environmental and solidarity transitions (Montpensier Impact Assessment - MIA and Montpensier Industry Contributor - MIC), and/or in their analysis of eco-activities which determines the contribution to one or more UN Sustainable Development Goals (SDGs). These indicators vary depending on the sector, industry and region in which each company operates.

Furthermore, Montpensier Finance excludes from the investment universe of labeled funds, securities that are not aligned with certain global standards and conventions, in particular the principles of the United Nations Global Compact (UNGC), the conventions of the International Organization (ILO) and the UN Guiding Principles on Business and Human Rights (UNGPHR).

Sustainable investment objective of the financial product

The Sub-Fund invests as a feeder fund in the master fund which integrates sustainability factors into its investment process, as set out in more detail below and in the "Investment Strategy" section of the Prospectus. The consideration of ESG criteria within the master fund aims to combine financial performance and, as far as possible, the ambition to influence positively issuers in terms of ESG performance by encouraging the companies to progress on the integration of ESG criteria in their

activities, thus promoting good practices.

Investment strategy

Objective: To achieve capital growth over the recommended holding period through investment in Sustainable Investments pursuant to Article 9 of the Disclosure Regulation. Specifically, the sub-fund invests as a feeder fund in the master fund that seeks to outperform its benchmark index, the Stoxx Europe 600 (SXXR) index).

Investments: The sub-fund invests at least 85% of net assets in units of the master fund (Y class). The sub-fund may invest up to 15% in deposits.

The master fund integrates Sustainability Factors in its investment process as outlined in more detail in the Transparency Code which is available on the fund's dedicated page on the management company website www.montpensier.com.

The portfolio of the master fund is exposed to at least 60% in equities from European Union countries. Investments in securities eligible to the French "Plan d'Epargne Action" will represent a minimum of 75% of the assets. Investments in equities of small-cap stocks will be limited to 20% of the assets. The master fund may use derivatives to reduce various risks and to gain exposure (long or short) to various assets, markets or other investment opportunities (including derivatives which focus on equities).

Benchmark : The Stoxx Europe 600 (SXXR) index serves a posteriori as an indicator for assessing the sub-fund's performance. The Master Fund is actively managed and there are no constraints relative to Stoxx Europe 600 (SXXR) index restraining portfolio construction.

Management Process : The master fund's investment manager's strategy is bottom up, favouring the intrinsic choice of securities, i.e. essentially stock picking. It is not a quantitative type of management. The objective of taking ESG criteria into account within the fund is to combine financial performance with the desire to positively influence issuers in terms of ESG performance, by encouraging companies to make progress on integrating ESG criteria into their activities, thereby promoting best practices. The extra-financial approach implemented is presented in the SICAV's Transparency Code available on the website of the master fund's investment manager. The master fund's investment manager's approach is based on identifying investment areas (i.e. sectors or sub-sectors of activity, product or service lines, etc.) that he considers promising in the short, medium or long term. The master fund's investment manager relies on research and analysis of themes or trends that it deems favourable, from a structural or economic point of view, for the development of companies.

The master fund implements a socially responsible investment approach which aims to exclude from the investment universe companies that are not compatible with the extra-financial criteria defined by the management company.

The extra-financial analysis conducted will make it possible to define a list of excluded stocks representing 20% of the investment universe of the master fund.

The non-financial approach implemented is presented in the master fund's Transparency Code available on www.montpensier.com.

The data used is mainly provided by MSCI ESG Research and may be supplemented, modified or updated by Montpensier Finance from other sources.

Investors should note that ESG analysis is not performed to the same standards than for other investments on cash, cash equivalents, and derivatives used for hedging purpose. Thus, the ESG analysis methodology will not include cash, cash equivalents, and derivatives for hedging purpose. All the securities in portfolio, with the exception of the instruments mentioned above, are analyzed using a dual ESG and fundamental approach.

Proportion of investments

The master fund undertakes to have a minimum of 100% Sustainable Investments as indicated in the table below. The investments of the master fund will be used to meet the environmental or social characteristics pursued, in accordance with the binding elements of the investment strategy, when they integrate sustainability factors by excluding any issuer specified in the exclusion list described in the master fund's Transparency Code available on www.montpensier.com. Investors should note that it may not be possible to perform ESG analysis to the same standards as for other investments on cash, cash equivalents and derivatives for hedging purpose.

Monitoring of sustainable investment objective

Controls are implemented at the various stages of order processing and portfolio monitoring:

- Daily : Pre-trade checks via the Alto Investment Compliance constraints engine integrated into the PMS ("Alto") and the EMS ("Order Booking"), blocking upstream any order that would cause a limit to be exceeded, in particular any order of purchase involving a security excluded from the investment universe, and triggering an ad-hoc validation/rejection procedure; Post-trade controls using the Alto Investment Compliance tool, which recapitulate any pre- and post-trades breaches which are analyzed daily by the Operations Department.
- Weekly : for all UCIs directly invested in securities, the Operations Department monitors ESG indicators on a weekly basis (ESG ratings of portfolios, exclusion of controversial weapons, flag controversies, carbon intensity, etc.). This monitoring report is transmitted to managers, SRI analysts, the head of the risk control function and Internal Control;
- Monthly : The Risk Committee reviews on a monthly basis all of the ESG rating monitoring tables for funds invested directly in securities;
- Quarterly : as part of the permanent control plan, Internal Control team carries out, on a quarterly basis, controls relating to the monitoring of ESG ratings (weekly status, monitoring of controversies, etc.) and ratios;
- Six-monthly : as part of the permanent control plan, Internal Control team carries out, on a six-monthly basis, checks relating to the compliance of labeled funds with the requirements of the labels;

- periodically : as part of the periodic control plan, Internal Control team notably carries out controls relating to the system implemented in terms of sustainable finance, and to the compliance of labeled funds with the standards of the label they hold. In addition, labeled funds are also subject to an annual audit by the certifying body, as provided for by the regulations.

Methodologies

Montpensier Finance has developed a proprietary SRI analysis methodology based on a dual approach:

- An analysis of corporate governance using the proprietary "MGF - Montpensier Governance Flag" method, which emphasizes good corporate governance practices, through a methodical, relative and evolving reading grid over time ;
- An analysis of the impact of companies on the environment and society via the proprietary method "MIA - Montpensier Impact Assessment", which is based on the 17 UN SDGs, grouped according to their belonging to the ecological transition or to solidarity transition. Here again, these exclusions are methodical, relative and evolving over time.

As part of fund management, Montpensier Finance has chosen various indicators, with sufficient data coverage, to measure the impact of its ESG selection :

Pillar	Objectives	Proposed indicators
Environmental Performance	Measure the GHG emissions of Scope 1 and 2 investments	Report on GHG emissions scope 1 and 2, direct company emissions, from sources owned or controlled by the company, and indirect emissions, from the consumption of electricity, heat or steam purchased by the company for its activities - in weighted average intensity, i.e. normalized in proportion to turnover (teq CO ₂ /M€ or M\$ of turnover). - Scope 1 and 2 carbon footprint (Tons Emissions / €M invested).
	Measure the GHG emissions of Scope 1 and 2 + Scope 3 Tier 1	Report on GHG emissions scopes 1 and 2 + first-tier suppliers and products sold (teq CO ₂ , or other GHGs if applicable, annual), This measurement constitutes a first approach in the consideration of indirect emissions data in scope 3, taking into account the direct emissions of first-tier suppliers, data which are associated with the goods and services purchased by these companies (excluding purchased electricity).
Social Performance	Identify companies that have made significant job cuts	Have companies made significant layoffs (1,000 employees or 10% of the workforce) in the last three years? Such job cuts can have a significant impact on employee morale and productivity. The companies concerned are identified.

	Measuring the feminization of governance within companies	Identify the percentage of women among the members of Boards of Directors and Supervisory Boards
Governance Performance	Identify companies where the majority of directors are independent	Are the company's directors mostly independent of employees, majority shareholders and governments?
	Identify companies that have integrated the consideration of ESG criteria into compensation of executives	This measure is based on reports published by the companies. It is strictly focused on whether or not these elements are taken into account in the components of variable compensation.
Human Rights Performance	Measuring compliance with the Global Compact	This indicator reflects the company's compliance with the principles of the United Nations Global Compact. A Fail, Watch List or Pass status is set for each value.

For each indicator, the master fund provides:

- Its coverage in number of issuers and assets under management;
- Its scope;
- Its calculation method (indicating any changes in method or scope from one year to another);
- Any difficulties encountered in its definition;
- An analysis of its evolution over the last three years (however, it is accepted that for the first two years during which a fund is certified, the indicators relate respectively only to year N, then N & N-1). The data used to carry out these impact measurements comes from the MSCI ESG database, where necessary supplemented, updated and/or amended by the Montpensier Finance.

As part of the V2 Referential of the SRI label, the portfolio of the master fund must have obtained a better result on at least two indicators compared to the benchmark index or compared to the starting universe. A first indicator with a coverage rate of at least 90% and a second with a coverage rate of at least 70%. In this context, Montpensier Finance has set itself the objective of obtaining:

- a better result on GHG emissions (in the previous table, Environmental Performance, Measure the GHG emissions of investments under scope 1 and 2, in intensity or in absolute terms);
- and better compliance with the UN Global Compact (in the previous table, Human Rights Performance, Measuring Compliance with the Global Compact) for the master fund, compared to its benchmark index, and with a coverage rate of issuers in the portfolio of more than 90% on these indicators.

Data sources and processing

SRI analysis teams, managers and the Operations Department rely on MSCI ESG Research to implement Montpensier Finance's ESG approach. Where appropriate, the analysis conducted by SRI analysts may lead to the implementation of an internal rating for unrated stocks, or to a reassessment of the rating of one or more stocks, if this seems justified. For the quantitative aspects, the SRI managers and

analysts rely on the Operations and Methods Department, which provides first-level weekly control of the quality and completeness of the data. All of the processes for calculating indicators, archiving/traceability and reporting are automated.

Limitations to methodologies and data

Methodological limitations identified by Montpensier Finance:

- Data availability and quality. In its analysis, Montpensier Finance uses in particular elements provided by MSCI ESG Research (supplemented and/or amended if necessary by Montpensier Finance) resulting in part from qualitative and quantitative data published by the companies themselves. The analyzes carried out are therefore dependent on the quality and reliability of this information, which may be incomplete and heterogeneous, the reporting scope of which may vary over time, etc.;
- The elements taken into account in its extra-financial analysis have been chosen by Montpensier Finance within the framework of the proprietary SRI analysis methodology that it has developed, and are, by definition, not exhaustive. In addition, the elements used are updated periodically and can be obsolete between two updates;
- The conclusions of the SRI analysis conducted by Montpensier Finance on a company may change over time, depending on multiple objective and subjective factors. In addition, the occurrence of events, such as a controversy, may lead to an analysis being revised.

Due diligence

Montpensier Finance updates its ESG database every six months, using data provided by MSCI ESG Research, overridden where necessary according to ad hoc analyzes by SRI analysts. Universe values are reclassified. Montpensier Finance then determines profiles that are deemed risky (these profiles are reassessed each semester, and new profiles are identified). Thus a new selection is applied.

In addition, the investment management teams monitor the issuers and the validity of each investment case on an ongoing basis. Thus, the ESG assessment can be revised at any time, such as when controversy arises, for example.

Controversies are tracked weekly via MSCI ESG Research. In addition, alerts have been put in place so that the teams are informed daily of any controversies arising on the securities in the portfolio of the master fund.

Engagement policies

Montpensier Finance's shareholder engagement policy consists of a Voting Policy and an Engagement Policy. These policies are summarized below :

Voting Policy

Exercising voting rights is an important part of dialogue with issuers. Montpensier Finance considers the exercise of voting rights to be an integral part of its management and as having to be exercised in the best interest of unitholders.

Montpensier Finance's voting rights policy aims to promote the long-term value of UCI investments. It encourages the dissemination of best practices in governance and professional ethics.

As part of the implementation of the principles of responsible investment, investment managers are recommended to vote at as many Meetings as possible for which they believe they have the necessary information to participate in the vote, subject to technical impossibilities preventing them from participating in the vote.

To exercise the voting rights attached to the securities held by the UCIs, the investment managers rely on the principles set out in the recommendations published by ISS Governance, in its Sustainability policy.

Montpensier Finance has subscribed to an ISS Proxy Research Services, which provides research and voting recommendations, based on an in-depth, independent and objective analysis of the resolutions proposed to the shareholders' vote. ISS Governance publications are governed by the conflict of interest risk prevention policy implemented by ISS Governance.

The ISS scope covers all the companies appearing in the portfolios of UCIs managed by Montpensier Finance.

In accordance with professional ethics, the investment managers perform their duties completely independently, particularly vis-à-vis the issuers, and in the exclusive interest of unitholders. Investment managers are particularly sensitive to resolutions that could harm the interests of shareholders.

The complete voting policy is available on the Montpensier Finance website:

https://www.montpensier.com/sites/default/files/public/documents/politique_vote.pdf

The latest report on the exercise of voting rights is available on our website:

https://www.montpensier.com/sites/default/files/public/documents/exercice-droits-de-vote_rapport.pdf

Reports specific to each labeled equity fund on the exercise of voting rights are available on the dedicated pages for each of these UCIs on the Montpensier Finance website.

Engagement policy

Montpensier Finance supplements its voting policy with an Engagement Policy.

The universe of companies on which the investment managers are invited to focus their engagement approach is made up of companies that have an ESG rating deemed insufficient, or likely to be exposed to ESG controversies, in order to encourage them to improve their practices on environmental, social and corporate governance issues, which are factors of sustainable performance.

The approach implemented by Montpensier Finance falls within the framework of the 17 UN Sustainable Development Goals.

Investment Managers are invited to raise any question or subject of attention with companies during their contacts, in particular when ESG issues appear to be insufficiently taken into account or reported. The investment managers, assisted by SRI analysts, conduct a positive and constructive medium-long-term dialogue with the companies in the portfolio.

This dialogue can take several forms:

- Contacts with the company
- Sending of the voting intentions of the managers to the Company, prior to the holding of the General Meeting.

In addition to the engagement initiatives that are conducted directly, usually with Small and Medium Values, Montpensier Finance participates in collective "pool" engagement actions, implemented by ISS as part of its ISS ESG program, for Great Values.

This commitment aims to:

- Encourage companies to implement a better ESG approach;
- Encourage companies to better communicate on their ESG practices.

The full engagement policy can be viewed on the Montpensier Finance website:

https://www.montpensier.com/sites/default/files/public/documents/politique_engagement.pdf

The latest engagement report is available on our website:

https://www.montpensier.com/sites/default/files/public/documents/engagement_rapport.pdf

Controversies ESG alert thresholds applied by Montpensier to each portfolio

Additional exclusions are applied according to different ratings established by MSCI ESG:

- Securities whose MSCI ESG ratings are equal to CCC are excluded from the investment scope. Indeed, these ratings are assigned to companies with the worst environmental, social or governance attributes among their peers. We have therefore chosen to exclude them.
- At the same time, exclusions linked to the occurrence of controversies are also put in place. Controversies are tracked weekly via the MSCI ESG Controversies search. Securities subject to a "Red" controversy are excluded from the investment universe. Among these "Red" controversies, we find in particular companies that are not in line with the United Nations Global Compact (Human Rights, Labor Rights, Environment and Corruption).

If applicable, the ad hoc analysis carried out by SRI analysts may lead to the implementation of a rating for unrated securities, or to the reassessment of the rating of one or more securities, if this seems justified. Similarly, the ad hoc analysis, carried out by SRI analysts, can lead to a reassessment of the level of controversy, if this also seems justified.

If a stock previously in the portfolio sees its ESG rating downgraded or is the subject of a controversy excluding the stock from the investment universe, the SRI analysts will carry out an ad hoc analysis, and according to the conclusions of this analysis, the investment manager will, if necessary, sell all or part of the line in question, in the interests of holders, depending on market conditions. Controversies are tracked weekly. In addition, alerts have been put in place so that the teams are informed daily of any controversies arising on the securities in the portfolio.

Designated reference benchmark

The master fund does not use a specific index designated as a reference to determine whether this financial product is aligned with the environmental or social characteristics that it promotes.

www.montpensier.com