

# PROSPECTUS

*The shares or units of the fund mentioned herein (“the Fund”) have not been registered under the US Securities Act of 1933 and may not be offered or sold directly or indirectly in the United States of America (including its territories and possessions), to US persons, as defined in Regulation S (“US persons”).*

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## 1 GENERAL CHARACTERISTICS

### Name

**GROUPAMA ENTREPRISES**

### Legal form and Member State in which the Fund was incorporated

French mutual fund (*Fonds Commun de Placement – FCP*).

### Inception date and expected term

9 March 1998.

This Fund was initially formed for a 99-year term.

## Summary of the management offer

Units	ISIN code	Eligible subscribers	Allocation of distributable income	Base currency	Minimum initial subscription	Initial net asset value
IC (1) (2)	FR0010213355	Reserved for institutional investors	Accumulation	Euro	1 thousandth of a unit	€152,449.02 (3)
ID (2)	FR0010914978	Reserved for institutional investors	Distribution and/or carried forward	Euro	1 thousandth of a unit	€10,000
M (2)	FR0010693051	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries	Accumulation	Euro	1 thousandth of a unit	€1,000 (4)
N	FR0010288316	Open to all subscribers	Accumulation	Euro	€500	€500
R	FR0013278702	Reserved for investors subscribing via distributors or intermediaries providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients	Accumulation	Euro	1 thousandth of a unit	€500

(1) including all unitholders who subscribed to the Fund before unit classes were created.

(2) including all subscriptions processed before 15/09/2017.

(3) NAV split by 100 on 2 October 2002.

(4) NAV split by 10 on 10 March 2009.

## Address from which the latest annual report and interim financial statement may be obtained

Investors will be sent the Fund's latest annual and interim documents within one week upon written request from the holder to:

Groupama Asset Management, 25 rue de la Ville-l'Evêque, 75008 Paris, France.

These documents are also available on the company's website at [www.groupama-am.com](http://www.groupama-am.com).

### Contact details:

- For corporate and institutional investors: Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).

- For individual investors: your distributor (Groupama Assurances Mutuelles' distribution networks; external distributors approved by Groupama Asset Management).

Additional information, if required, may be obtained from Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).

## 2 ADMINISTRATORS

### Management company

**Groupama Asset Management**, 25 rue de la Ville-l'Evêque, 75008 Paris, France, a portfolio management company authorised by the *Commission des opérations de bourse*, now the *Autorité des marchés financiers* (French financial markets authority – AMF) under number GP 93-02 on 5 January 1993.

### Depository – Custodian

**CACEIS Bank**, 89–91 rue Gabriel Péri, 92120 Montrouge, France, a credit institution authorised by the CECEI (now the ACPR, the French Prudential Supervisory and Resolution Authority) on 1 April 2005.

The custodian's duties, as defined by the applicable regulations, include custody of the assets, checking that the management company's decisions are lawful and monitoring the UCI's cash flows.

The custodian is independent of the management company.

The description of the delegated custodial duties, the list of representatives and sub-representatives of CACEIS Bank and information relating to conflicts of interest that may result from these delegations are available on the CACEIS website: [www.caceis.com](http://www.caceis.com).

Updated information is made available to investors upon request.

### Clearing house for subscriptions/redemptions

- **Groupama Asset Management**, for directly registered units.

Following collection of these orders, Groupama Asset Management will forward them to CACEIS Bank in its capacity as an affiliate of Euroclear France.

- And, by delegation of the management company, **CACEIS Bank** for bearer or administered registered units.

### Institutions appointed to receive subscriptions and redemptions, and responsible for compliance with the clearing deadlines indicated in the prospectus, by delegation of the management company

**CACEIS Bank**, for bearer or administered registered units

### Fund accounting

**CACEIS Bank** is responsible for the UCI's fund accounting, covering the clearance of subscription and redemption orders for units of the UCI. It will process these orders in partnership with Euroclear France, with which the UCI is listed, and manage the UCI's unit issuance account for bearer or administered registered units.

### Statutory auditor

**EY**, Tour First, 1-2 Place des Saisons, 92400 Courbevoie, Paris la Défense 1, France.

### Accounting representative

**CACEIS Fund Administration** – 89–91 rue Gabriel Péri, 92120 Montrouge, France. A credit institution authorised by the CECEI (now the ACPR, the French Prudential Supervisory and Resolution Authority) on 1 April 2005.

### Distributors

Groupama Assurances Mutuelles' distribution networks (8-10 rue d'Astorg, 75008 Paris, France) and external distributors approved by Groupama Asset Management.

### Conflict of interest management policy

In order to identify, prevent, manage and monitor conflicts of interest that result from delegations, the Management Company has implemented a conflict of interest management policy available on request from your usual advisor or on the Management Company's website [www.groupama-am.com](http://www.groupama-am.com).

### 3 MANAGEMENT AND OPERATING PRINCIPLES

#### 3.1 General characteristics

##### Characteristics of units

###### Type of right attached to the unit class:

Each unitholder has a shared ownership right in the Fund's assets in proportion to the number of units held.

###### Shareholder register and liability accounting:

Fund accounting is provided by the custodian, CACEIS Bank, for administered and bearer units.

Fund accounting is provided by Groupama AM for directly registered units.

The Fund is listed on Euroclear France.

###### Voting rights:

No voting rights are attached to the units, as decisions are made by the management company.

###### Types of unit:

Units are registered and/or bearer units.

###### Fractioning:

Units may be subscribed or redeemed in amounts or in ten-thousandths of a unit for IC, ID and N classes.

Units may be subscribed or redeemed in amounts or in thousandths of a unit for M and R classes.

##### Financial year end

The last Paris Stock Exchange trading day in March.

The first financial year end was the last Paris Stock Exchange trading day in March 1999.

##### Tax system

The Fund is not subject to corporation tax. In accordance with the principle of transparency, the tax authorities consider the unitholder to be the direct owner of a share of the financial instruments and cash held in the Fund.

The tax treatment of any capital gains or income from holding Fund units depends on tax provisions specific to the investor's own particular circumstances and/or on the tax provisions in the country where the unitholder resides. We recommend that you seek advice on this matter from your financial advisor.

The French tax system considers a switch from one unit class to another unit class to be a sale subject to capital gains tax.

#### 3.2 Special provisions

##### ISIN codes of the unit classes

IC units	FR0010213355
ID units	FR0010914978
M units	FR0010693051
N units	FR0010288316
R units	FR0013278702

## Classification

### “Short-term money market” UCITS

GROUPAMA ENTREPRISES is a short-term money market fund with variable net asset value (VNAV).

Date of MMF approval: 23 April 2019.

## SFDR classification

This UCITS is a financial product that promotes environmental or social characteristics, or a combination of these characteristics, in accordance with Article 8 of the SFDR.

**Investment in UCIs:** up to 10% of net assets.

## Management objective

The management objective is to outperform the money market rates slightly, after deducting the management fees, over the recommended term of investment.

This objective will be implemented via an active managerial approach that promotes the sustainability of issuers through an analysis of the ESG (environmental, social and governance) characteristics of the securities held in the portfolio.

If money market interest rates are very low, the return generated by the Fund may be insufficient to cover the management fees, in which case the net asset value of the Fund will see a structural decline.

## Benchmark index

The benchmark is the capitalised ESTER index.

The ESTER (European Short-Term Rate) is the benchmark overnight interbank interest rate for the eurozone market. It is calculated by the European Central Bank.

The Fund does not seek to replicate the benchmark but to generate an outperformance. As such, the performance of the index may differ from that of the Fund. However, the Fund's market risk is similar to that of its benchmark.

## Investment strategy

### Description of the strategies used

- Specific Fund strategies:

The main sources of potential performance are:

- credit sensitivity, which is partly determined by our analysis of changes in risk premiums, the suggested rate of return or the expectation of intervention by the central banks;
- rate sensitivity, which is partly derived from our analysis of the monetary policy of the central banks and of changes in short-term interest rate indices;
- geographic allocation, based primarily on the conclusions of internal committees.

- Portfolio composition strategy:

The strategy implemented aims to outperform the capitalised ESTER index over the recommended investment period, after deduction of management fees.

It is implemented by combining the traditional financial approach with the integration of extra-financial investment criteria.

The UCITS strategy is constructed based on the analysis of the money market environment using a combination of top-down and bottom-up approaches.

The top-down approach focuses on the analysis of major macro-economic and political trends and how they influence the monetary policy decisions of the central banks, but also developments in the regulatory framework of the UCITS' investment universe.

The bottom-up approach identifies opportunities and risks specific to certain sectors or issuers.

The UCITS' investments are limited to debt with a maximum maturity of 397 days issued by issuers deemed to be of high credit quality by our Money Market Committee. At the helm of this committee is the Financial Risk and Performance Department, which authorises or disqualifies issuers strictly independently of Management, based in particular on the recommendations of our Research.

The investment universe is that of bond debt issued by private, public and quasi-public issuers in OECD countries. The following types of issuers are authorised:

- Sovereign issues.
- Supranational issues.
- Issues from partly state-controlled or government-guaranteed agencies.
- Private issues.

The selection of issuers that the manager includes in the portfolio is based on his/her own analysis, which may be primarily based on the assessment of our internal credit analysis team, in order to optimise the risk of issuers in the portfolio, and on credit quality ratings issued by external entities.

#### Integration of ESG criteria:

Since a sustainable and responsible investment (SRI) UCITS is involved, the extra-financial analysis applied to the UCITS takes into account criteria relating to each environmental, social and governance factor. The UCITS seeks to select the highest-rated issuers within the investment universe, based on extra-financial criteria (best-in-universe approach).

Various indicators are used to analyse ESG criteria, including:

- Environment: biodiversity, waste management, etc.;
- Social: employee training, supplier relations, etc.;
- Governance: board independence, executive compensation policy, etc.

ESG criteria are taken into account in the portfolio management process in accordance with the following requirements:

1. Stocks belonging to the "Major ESG Risks" list:  
Groupama AM keeps track of a list of securities identified as comprising particularly high ESG risks (the "Major ESG Risks" list). These are companies whose ESG risks could jeopardise their economic and financial viability, or could have a significant impact on the company's, or brand's, value, thus resulting in a significant loss of stock market value or a significant downgrade by rating agencies.  
For securities based on these stocks:
  - Investments in securities based on stocks with a maturity of more than one year are excluded from the UCITS.
  - Investments in securities with a maturity of less than one year, issued by companies judged to be of high credit quality by our Money Market Committee are authorised.
2. Exclusion of sectors deemed to be incompatible with Groupama Asset Management's engagement policy: companies known to be involved in controversial weapons activities (cluster bombs and anti-personnel mines) are excluded from the UCITS' investment scope.
3. Application of Groupama Asset Management's fossil fuel policy: exclusion of companies involved in coal mining and coal-related energy production, and non-reinvestment in unconventional fossil fuels (UFF).
4. At least 90% of the Fund's net assets undergo an extra-financial analysis.
5. An average ESG score for the portfolio that is significantly higher than that of its investment universe (once the bottom 20% of the lowest-rated stocks in the universe are excluded).

6. A rolling 12-month average carbon intensity level for the portfolio that is below that of the reference universe.  
On average over the year, the portfolio coverage rate of this indicator must be at least 90% for the UCITS' net assets.
  7. Selection of companies having implemented a human rights policy so that there is a greater proportion of these issuers in the portfolio than in the reference universe.  
On average over the year, the portfolio coverage rate of this indicator must be at least 70% for the UCITS' net assets.
- Methodological limitations:
- The ESG approach developed by Groupama Asset Management is centred around a quantitative and qualitative analysis of the environmental, social and governance practices of the stocks in which it is invested. The main limitation of this analysis relates to the quality of the available information. Indeed, ESG data is not yet standardised, and our analysis is ultimately based on qualitative and quantitative data provided by the companies themselves, some of which may still be fragmented and heterogeneous. To overcome this limitation, Groupama Asset Management focuses its analysis on the most important aspects of the sectors and companies analysed. For more detailed information on the rating methodology implemented in the Fund and its limitations, investors are invited to read the Groupama Asset Management Transparency Code, which is available at [www.groupama-am.com](http://www.groupama-am.com).

#### Integration of the EU Taxonomy:

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (the **EU Taxonomy** or the **Taxonomy Regulation**) aims to identify environmentally sustainable economic activities. It identifies these activities based on their contribution to six overarching environmental objectives:

- climate change mitigation,
- climate change adaptation,
- the sustainable use and protection of water and marine resources,
- the transition to a circular economy (waste, reduction and recycling),
- pollution prevention and mitigation, and
- the protection and restoration of biodiversity and ecosystems.

To be considered as sustainable, an economic activity must demonstrate that it makes a material contribution to achieving one of the six objectives, without prejudice to any of the other five (the "Do No Significant Harm" principle, hereinafter the **DNSH** principle). The DNSH principle applies only to the underlying investments of the financial product that take account of the European Union's criteria for environmentally sustainable economic activities. The underlying investments of the remaining portion of this financial product do not take account of the European Union's criteria for environmentally sustainable economic activities. For an activity to be considered aligned with the EU Taxonomy, it must also uphold the human and social rights enshrined in international law.

In its investment decisions, the management team shall endeavour to take into account the European Union's criteria for economic activities considered to be environmentally sustainable under the Taxonomy Regulation (EU) 2020/852. Based on the issuer data currently available, the minimum proportion of investments aligned with the EU Taxonomy is 0%.

The underlying investments of the remaining portion of this financial product do not take account of the European Union's criteria for environmentally sustainable economic activities.

- Management style:  
The UCITS takes an active management approach to seek performance close to that of the money market, with market risk comparable to that of its capitalised ESTER benchmark.

### Information regarding the credit quality evaluation procedure

- Description of the scope of the procedure

Groupama AM has a mechanism in place for evaluating credit quality, which is captured within a procedure. These provisions guarantee that the money market funds invest in money market instruments, securitisations and Asset-Backed Commercial Papers (ABCPs) with a positive credit quality evaluation.

This procedure applies to money market instruments issued by private organisations but also by sovereign, semi-sovereign or supranational entities.

- Description of the methodology and agents

The credit quality evaluation is performed entirely independently by the Money Market Committee (Comité Monétaire). This committee, implemented within the management company, is composed of representatives of Money Market Management, Internal Research and the Financial Risk Department. The chairmanship of this committee is held by a member of the Risk Department, who forms a judgement on the credit quality by taking into consideration the different contributions provided.

The credit quality evaluation is based on a documented proprietary methodology, which is approved by the board of the Management Company, applied in all situations and reviewed at least annually. This methodology is documented in a detailed procedure, the proper application of which forms part of the Monitoring Plan of the Continuous Monitoring.

The Money Market Committee is responsible for monitoring issuers for as long as the instrument is held or as long as Management expresses a need to do so. A review of the credit quality of issuers takes place at least annually. Furthermore, Groupama Asset Management will continuously monitor agency ratings; in the event of a short-term deterioration of the credit rating of an issuer by two or more ratings, they will generate an internal credit quality revaluation, which may potentially uphold the initial positive rating.

The systematic and consistent evaluation of credit quality is based on the contributions of Management, Internal Research and the Financial and Performance Risk Department. It is based on the following stages:

First stage: When the management wishes to invest in a new issuer, they issue an evaluation request to the Money Market Committee. This request details the instrument concerned and may include, inter alia, an initial analysis of the rating agencies' opinions.

Second stage: Internal Research produces a fundamental analysis of the issuer and/or the guarantor. This analysis is structured around specific criteria that vary according to the type of issuer, for example:

<b>Banks</b>	<b>Non-Financial Businesses</b>
Competitive Positioning	
Profitability	
Growth	
Financial Strength	
Liquidity	
Event Risk	
Governance	
HR	
Societal	
Environment	
Asset Quality	Equity/Balance Sheet
CET1	Goodwill
Leverage Ratio	Debt Structure



Long-Term Refinancing	Off-balance sheet
Short-Term Refinancing	Pension Funds

Other criteria may also be used, such as macroeconomic factors, agency ratings, or structure-altering actions (acquisition, merger, transfer)

On the basis of these factors, Internal Research draws up a study and issues a recommendation accompanied by a short-term outlook and also, in most cases, by a long-term outlook.

Third stage: The Financial and Performance Risk Department, independent of management, provides a quantitative analysis based on the probability of default in a comparable universe.

Final stage: On the basis of all the factors produced by the various contributors, an employee of the Financial and Performance Risk Department who is a member of the Money Market Committee creates a summarising report, which determines the credit quality rating entirely independently.

If the credit is of sufficient quality, the issuer becomes eligible for the money market portfolios and the Management tool is set to allow the investment.

- Description of the review framework

The credit quality evaluation procedure shall be reviewed annually. This review will consist mainly of verifying the appropriateness of the evaluation criteria used and of the methodology defined above.

Whatever changes are made, this review will form the basis of an update of the procedure and be subject to approval by the General Management.

However, this procedure may be reviewed at any time according to specific events, such as macroeconomic conditions, changes of sources of information etc. The aim of this review should be to redefine the evaluation criteria or other factors and should generate an update of the procedure and its approval by the General Management. The appropriateness of applying this new methodology to certain existing prior ratings will be assessed on the basis of the outstanding amount concerned.

#### Assets, excluding embedded derivatives

- Debt securities and money market instruments:

The Fund's assets are invested in bonds and money market instruments from issuers in OECD member states assessed as being of a high credit quality by the management company and in deposits made with credit institutions complying with the following criteria:

Maximum Weighted Average Life <sup>1</sup>	120 days
Maximum Weighted Average Maturity <sup>2</sup>	60 days
Maximum residual term of securities and instruments	397 days
Instrument ratings	Eligible assets must be assessed by the management company as being of high credit quality.

<sup>1</sup>Weighted Average Life (WAL) Weighted average of the remaining terms until full repayment of the principal of the securities held by the Fund.

<sup>2</sup>Weighted Average Maturity (WAM) Weighted average of the remaining terms until the next revision of the money market rate rather than the time remaining until repayment of the principal.

If the management company's credit risk assessment of a security leads to its credit quality being downgraded, the management company may decide to sell this security under conditions that are in the best interests of the unitholders.

The Fund's sensitivity to interest rates is within a range of 0 to 0.5.

- Legal nature of the instruments used:  
The Fund may hold both negotiable debt securities and bonds issued in EUR or in any other currency by public or private entities.
  - Fixed-rate or variable-rate negotiable debt securities:
    - Short-term negotiable securities,
    - Euro commercial paper,
    - Fixed-rate treasury bills (BTF),
    - Medium-term negotiable securities with maturity dates appropriate to the recommended investment period
  - Fixed-rate bonds with a residual maturity of less than or equal to 397 days,
  - Variable-rate bonds with a residual maturity of less than 397 days,
  - Securitisations and Asset Backed Commercial Papers (ABCPs).

The Fund may invest in securities denominated in a currency other than the euro but will not be exposed to exchange rate risk since this will be fully hedged using forward financial instruments.

- Breakdown of private/public debt:  
Up to 100% of the Fund may be invested in private and public sector securities.

Exceptionally, the Fund may invest beyond the regulatory limit of 5% of its net assets and invest up to 100% of its assets in money market instruments, securitisations and ABCPs issued or guaranteed individually or jointly by:

- the European Union;
- national authorities (countries or government agencies such as the Republic of Singapore or the Social Security Reimbursement Fund – Caisse d’amortissement de la dette sociale, or CADES), regional authorities (such as the 18 regions or 101 departments of France) or local authorities (such as the Greater Paris Company (Société du Grand Paris), City of Rennes (Rennes Métropole) but also the City of Stockholm) of Member States of the European Union or their central banks;
- the European Central Bank;
- the European Investment Bank;
- the European Investment Fund;
- the European Stability Mechanism;
- the European Financial Stability Facility;
- a central authority or the central bank of an OECD member state (United States, United Kingdom, Switzerland, Canada, etc.) such as the US Federal Reserve (Fed);
- the International Monetary Fund;
- the International Bank for Reconstruction and Development;
- the Council of Europe Development Bank;
- the European Bank for Reconstruction and Development;
- the Bank for International Settlements.

- Rating-based selection criteria:

The Fund is invested in securities assessed by the management company as being of “high credit quality”.

- Duration:

The duration of the securities in the portfolio will be less than 397 days.

- Possession of units or shares in other foreign UCITS, AIFs or investment funds:

The Fund may invest up to 10% of its net assets in units or shares of UCIs.

The UCIs used may be French or European “Short-term money market” UCITS.

The UCIs may be those managed directly or indirectly by Groupama Asset Management.

External UCIs will be subjected to a close review of their management procedures, performance, risk and any other qualitative or quantitative criteria that allow the quality of management to be assessed in the short, medium or long term.

- For each of the above-mentioned classes:

- Holding ranges:

- Debt securities and money market instruments: up to 100% of net assets;
- Securitisations and Asset Backed Commercial Papers (ABCPs): up to 20% of net assets;
- Shares or units of other UCIs: up to 10% of the net assets.

#### Derivatives and securities with embedded derivatives

The use of derivatives and securities with embedded derivatives is authorised subject to a maximum commitment of 100% of the Fund’s net assets and therefore has an impact on both the performance and the investment risk of the portfolio. The strategy for the use of securities with embedded derivatives is the same as that described for derivatives.

These instruments will hedge the portfolio against interest rate and exchange rate risks.

The fund manager may trade in the derivatives and securities with embedded derivatives described in the table below:

Risks in which the fund manager intends to trade		Types of markets targeted			Types of trades			
		Regulated	Organised	Over-the-counter	Hedging	Exposure	Arbitrage	Other
Equities								
Interest rate	X							
Foreign exchange	X							
Credit								
<b>Derivatives used</b>								
<b>Futures</b>								
- Equities								
- Interest rates		X	X	X	X			
- Foreign currencies								
<b>Options</b>								
- Equities								
- Interest rates								
- Foreign exchange								
<b>Swaps</b>								
- Equities								
- Interest rates		X	X	X	X			
- Inflation								
- Foreign exchange		X	X	X	X			
- Total return swaps								
<b>Forward currency contracts</b>								
- Forward currency contracts		X	X	X	X			
<b>Credit derivatives</b>								
- Single-entity credit default swaps and basket default swap(s)								
- Indices								
- Index options								
- Structuring for basket credit derivatives (CDO tranches, iTraxx tranches, FTD, NTD, etc.)								
<b>Other</b>								
- Options on futures								
- Equity								
<b>Securities with embedded derivatives used</b>								
<b>Warrants</b>								
- Equities								
- Interest rates								
- Foreign exchange								
- Credit								
<b>Subscription warrants</b>								
- Equities								
- Interest rates								
<b>Other</b>								
- Structured EMTNs								
- Credit-linked notes (CLN)								
- Convertible bonds								
- Contingent convertible bonds (CoCo bonds)								
- Callable or puttable bonds		X	X	X				X*

\*Bond with an option of early repayment.

- Counterparty selection criteria

Counterparties for over-the-counter instruments (over-the-counter derivatives and efficient portfolio management techniques) are selected through a specific procedure applied within the management company; the main selection criteria relate to their financial strength, their expertise on the types of transactions planned, the general contractual clauses and the specific clauses relating to counterparty risk mitigation techniques.

Deposits:

Up to 100% of the Fund's net assets may be in the form of deposits with a credit institution based in a Member State of the European Union or in a third country subject to equivalent prudential regulation, with a term of less than 12 months, as a store of cash to be used as needed.

Cash borrowings:

The Fund does not take out cash borrowings. However, if on an exceptional and temporary basis the Fund is obliged to use the borrowing facility offered by the custodian to cover a potential debit balance incurred for reasons beyond its control or following the exercise of redemption rights, the Fund will prioritise resolution of this situation, whilst duly taking into account the interests of unitholders.

Temporary purchases and sales of securities:

- Types of transactions:
  - Repurchase or reverse repurchase agreements in compliance with the French Monetary and Financial Code

- Types of trades:

These are primarily to adjust the portfolio to compensate for variations in the assets under management.

- Types of assets that may be subject to such transactions:

- Negotiable debt securities
- Bonds.

- Level of use anticipated and authorised:

- Reverse repurchase agreements:
  - Maximum use: 100% of net assets,
  - Expected use: approximately 10% of net assets.
- Repurchase agreements:
  - Maximum use: 10% of net assets,
  - Expected use: approximately 10% of net assets.

- Criteria determining counterparty selection:

These transactions will be concluded with credit institutions with a minimum rating of "Investment Grade" or deemed equivalent by the management company, the registered office of which is located in an OECD member country.

For further information on the conditions of remuneration from temporary sales and purchases of securities, please refer to the "Charges and fees" section.

As the Fund uses derivatives and securities with embedded derivatives and may use transactions involving temporary purchases and sales of securities, the portfolio's total level of exposure shall not exceed 200% of the net assets.

### **Information relating to the Fund's collateral**

The GROUPAMA ENTREPRISES Fund complies with the investment rules for collateral that are applicable to UCITS funds and does not apply specific criteria in addition to these rules.

The Fund may receive securities (such as corporate bonds and/or government bonds) or cash in the context of temporary purchases and sales of securities and derivatives transactions traded over the counter.

Only the cash collateral received will be reused, via reinvestment in accordance with the rules applicable to UCITS.

All of these assets received as collateral must be issued by high-quality, liquid, diversified issuers with low volatility that are not an entity of the counterparty or its group.

These assets received as collateral will be retained by the custodian of the Fund on specific accounts. Management of margin calls will be undertaken on a daily basis.

The discounts applied to collateral received take into account the credit quality, the price volatility of the securities and the result of stress tests carried out in accordance with the regulatory provisions.

The level of collateral and the discount policy are determined in accordance with the regulations in force.

### **Risk profile**

#### Interest rate risk:

The interest-rate risk associated with money markets is very low. Interest-rate risk is the risk that bond market interest rates may rise, which would cause bond prices to fall and consequently the Fund's net asset value to fall.

#### Credit risk:

This is the potential risk that the credit rating of an issuer of securities invested in the portfolio may fall, or that such an issuer may default, which would have an adverse effect on the price of the security and lead to a decline in the Fund's net asset value.

Credit risk also exists in connection with temporary purchases and sales of securities if, at the same time, the counterparty to these transactions defaults and the issuer of the collateral received declares a default on the debt securities received as collateral.

Credit risk exists, but is minimised by the soundness of our process for managing short-term investments.

#### Risk of capital loss:

Investors will be exposed to the risk of not recovering the full amount of the capital they invest, since the UCITS does not offer any capital guarantee.

### Use of financial derivatives:

The use of derivatives may decrease the volatility of the UCITS (by decreasing its exposure). In the event of adverse market developments, the net asset value may fall.

### Counterparty risk:

Counterparty risk exists and it is linked to temporary purchases and sales of securities. It consists of assessing the risks for an entity in terms of its commitments to the counterparty with which the agreement relating to these transactions has been concluded. This therefore refers to the risk of default by the counterparty, causing it to default on payment, which may lead to a fall in the net asset value of the UCITS. This risk is, however, limited by the provision of collateral.

### Risks associated with securities financing transactions and the management of collateral:

The use of temporary purchases and sales of securities may increase or reduce the Fund's net asset value.

The risks associated with these transactions and with the management of collateral are credit risk, counterparty risk and liquidity risk, as defined above.

Furthermore, the operational or legal risks are very limited due to the appropriateness of the operating process, the custody of collateral received by the custodian of the Fund and the supervision of this type of operation through framework agreements concluded with each counterparty.

Finally, the risk of collateral reuse is very limited since only cash collateral is reused in accordance with the regulations relating to UCITS.

### Liquidity risk associated with securities financing transactions:

In the event that a counterparty defaults on a securities financing transaction, this risk will apply to collateral by way of the sale of securities received and may lead to a decrease in the net asset value of the UCITS.

### Sustainability risk:

Sustainability risks, comprising those on the Major ESG (Environmental, Social and Governance) Risks list, and the fossil fuel policy are taken into account during decision-making as follows:

- Major ESG Risks list: this list comprises companies whose ESG risks could call into question their economic and financial viability, or could have a significant impact on the company's value and brand, thus resulting in a significant fall in market value or a significant downgrade by rating agencies. Investments in securities issued by these companies, with a maturity of more than one year, are excluded from the UCITS.
- Fossil fuel policy: the objective of this policy is to reduce the UCITS' exposure to climate risks, including both physical and transition risks. In order to limit these risks, an excluded stocks list has been defined according to the criteria stipulated in Groupama AM's general policy, which is available at [www.groupama-am.com](http://www.groupama-am.com). These stocks are excluded.

There may be several impacts resulting from the emergence of a sustainability risk and they may vary depending on the specific risk, region and asset class. In general, when a sustainability risk occurs for an asset, it will cause a negative impact on the asset or a total loss in its value.

### **Management policy for liquidity risk**

Management of the UCI's liquidity risk is undertaken as part of an analysis and monitoring procedure that relies on internal tools and methodologies in place within Groupama Asset Management.

This procedure has two main components:

- monitoring the portfolio's liquidity profile based on an asset liquidity assessment in view of current market conditions, and
- monitoring the Fund's ability, whether in current or worsening market conditions, to deal with significant redemption scenarios.

## Guarantee or protection

None.

## Eligible subscribers and typical investor profile

IC units	Reserved for institutional investors
ID units	Reserved for institutional investors
M units	Reserved for institutional investors excluding UCIs or mandates managed by Groupama Asset Management or its subsidiaries
N units	Open to all subscribers
R units	Reserved for investors subscribing via distributors or intermediaries providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients

The GROUPAMA ENTREPRISES FCP is intended for investors seeking returns on investment close to those of the money market. This Fund may be used more specifically for short-term investments with a minimum recommended term of investment of one month.

Investment diversification: this should be achieved by investing in different classes of assets (money market instruments, bonds and equities) and in specific sectors and different geographical regions so as to spread risks more effectively and optimise portfolio management by taking market trends into account.

## Distributable Income calculation and appropriation methods

IC units	Accumulation.
ID units	Distribution. Option to pay interim dividends. Option to carry forward earnings in full or in part.
M units	Accumulation.
N units	Accumulation.
R units	Accumulation.

## Characteristics of units

	Initial net asset value	Base currency	Fractioning
IC units	€152,449.02 (NAV split by 100 on 2 October 2002)	Euro	Ten-thousandths of a unit
ID units	€10,000	Euro	Ten-thousandths of a unit
M units	€1,000 (NAV split by 10 on 10 March 2009)	Euro	Thousandths of a unit
N units	€500	Euro	Ten-thousandths of a unit
R units	€500	Euro	Thousandths of a unit



## Subscription and redemption procedures

	Minimum initial subscription amount	Subscriptions	Redemptions (1)
IC units	Thousandths of a unit	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
ID units	Thousandths of a unit	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
M units	Thousandths of a unit	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit
N units	€500	In amounts or in ten-thousandths of a unit	In amounts or in ten-thousandths of a unit
R units	€500	In amounts or in thousandths of a unit	In amounts or in thousandths of a unit

(1) The total redemption of units will only be possible as a quantity and not as an amount.

Orders are executed in accordance with the table below:

D	D	D	D business day	D for IC, ID, N and R units  D+1 business day for M units	D for IC, ID, N and R units  D+1 business day for M units
Clearing of subscription orders before 12 noon (2)	Clearing of redemption orders before 12 noon (2)	Execution of the order no later than D	Publication of the net asset value	Settlement of subscriptions	Settlement of redemptions

(2) Unless you have agreed a specific deadline with your financial institution.

Subscription and redemption requests are cleared and received by CACEIS Bank on each business day until 12.00 noon:

- at CACEIS Bank on behalf of clients for whom it provides custody account-keeping services, for bearer or administered registered units,
- and at Groupama Asset Management for directly registered units.

They are executed at the net asset value that is calculated on the basis of the price of the previous day (D-1) and available on D-1 (at 18.00 at the latest) with settlement on D Euronext Paris for IC, ID, N and R units and on D+1 Euronext Paris for M units.

The net asset value of the UCITS that will be used to execute subscription and redemption requests may be recalculated between the time the requests are submitted and the time they are executed in order to take account of any exceptional market event that occurs in the meantime.

Investors are reminded that, when sending instructions to marketing agents other than the organisations indicated above, they must take into account that the cut-off time for clearing orders imposed by CACEIS Bank also applies to these marketing agents. Consequently, such marketing agents may stipulate their own earlier cut-off time, which may precede the cut-off time mentioned above so that instructions can be sent to CACEIS Bank on time.

The Fund's net asset value is calculated every trading day except for official French public holidays. The reference calendar is that of the Paris stock exchange.

The net asset value may be obtained from: [www.groupama-am.com](http://www.groupama-am.com).

## Charges and fees

### Subscription and redemption fees:

Subscription fees increase the subscription price paid by the investor, while redemption fees reduce the redemption price. Fees paid to the Fund are used to compensate the latter for the expenses incurred in the investment or divestment of the Fund's assets. The remaining fees accrue to the management company, distributor, etc.

Unit class	Base	Subscription fee not accruing to the Fund	Subscription fee accruing to the Fund	Redemption fee not accruing to the Fund	Redemption fee accruing to the Fund
IC units	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 0.50% incl. tax	None
ID units*	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 0.50% incl. tax	None
M units	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 0.50% incl. tax	None
N units	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 0.50% incl. tax	None
R units	Net asset value x Number of units or shares	Maximum rate: 0.50% incl. tax	None	Maximum rate: 0.50% incl. tax	None

Exemptions: The subscription and redemption fees do not apply if the money market UCI invested in is managed by Groupama Asset Management and/or by an associated entity.

### Operating and management fees:

These fees include all those charged directly to the Fund, except for transaction charges. Transaction charges include intermediary fees (e.g. brokerage fees, stock market taxes, etc.) and the transaction fee, if any, that may be charged, particularly by the custodian and the management company.

The following fees may be charged in addition to the operating and management fees:

- outperformance fees. These reward the management company if the Fund exceeds its objectives. They are therefore charged to the Fund;
- transaction fees charged to the Fund.

Regarding charges actually invoiced to the Fund, please refer to the Key Information Document (KID).

### IC, ID, and M units

<b>Fees charged to the Fund</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and fees external to the Management Company (statutory auditor, custodian, distribution and legal fees)	Net assets less units or shares of UCIs	Maximum rate: 0.25% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Outperformance fee	Net assets	None
Transaction fee accruing to CACEIS Bank	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fees	Deducted from each transaction	None

(1) The UCIs held in the portfolio account for less than 10%.

### N units:

<b>Fees charged to the Fund</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and fees external to the Management Company (statutory auditor, custodian, distribution and legal fees)	Net assets less units or shares of UCIs	Maximum rate: 1.00% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Outperformance fee	Net assets	None
Transaction fee accruing to CACEIS Bank	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fees	Deducted from each transaction	None

(1) The UCIs held in the portfolio account for less than 10%.

R units:

<b>Fees charged to the Fund</b>	<b>Base</b>	<b>Rate scale</b>
Financial management fees and fees external to the Management Company (statutory auditor, custodian, distribution and legal fees)	Net assets less units or shares of UCIs	Maximum rate: 0.35% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant (1)
Outperformance fee	Net assets	None
Transaction fee accruing to CACEIS Bank	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax *Depending on complexity
Transaction fees	Deducted from each transaction	None

(1) The UCIs held in the portfolio account for less than 10%.

Any exceptional legal costs related to recovery of the Fund's receivables may be added to the fees detailed above. The contribution to the AMF will also be borne by the Fund.

Income from transactions involving the temporary purchase and sale of securities accrues to the Fund. Charges, costs and fees in respect of these transactions are charged by the custodian and paid by the Fund.

Selection of intermediaries:

Managers have a list of authorised brokers. A Broker Committee meets every six months to assess fund managers' evaluations of brokers and the entire added value chain covering analysts, middle office and so on, and to propose the inclusion of new brokers and/or the exclusion of others.

Based on their expertise, each manager reports on the following criteria:

- Quality of order execution prices,
- Liquidity offered,
- Broker longevity,
- Quality of analysis, etc.

#### **4 COMMERCIAL INFORMATION**

Information relating to the Fund may be obtained by writing to:

Groupama Asset Management  
25, rue de la Ville-l'Evêque, 75008 Paris, France  
or by visiting the website: [www.groupama-am.com](http://www.groupama-am.com)

The net asset value of the Fund is available on the website: [www.groupama-am.com](http://www.groupama-am.com)

The latest annual and interim documents are available to unitholders on request from:

Groupama Asset Management  
25 rue de la Ville-l'Evêque, 75008 Paris, France

Subscription and redemption requests are cleared at the following address:

CACEIS Bank  
89–91 rue Gabriel Péri, 92120 Montrouge, France

Information on environmental, social and governance quality criteria (ESG):

Further information regarding the way the management company takes ESG criteria into account will be available in the Fund's annual report and on the Groupama Asset Management website, [www.groupama-am.com](http://www.groupama-am.com).

## **5 INVESTMENT RULES**

The Fund observes the regulatory ratios applicable to UCITS as defined by the French Monetary and Financial Code (Code monétaire et financier) and those of Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017.

## **6 OVERALL RISK**

The overall risk of this Fund is determined using the commitment approach.

## **7 ASSET VALUATION AND ACCOUNTING RULES**

The Fund complies with the accounting rules prescribed by current regulations, in particular those applying to UCITS.

The base accounting currency is the euro.

The net asset value of the Fund on a given day is calculated on the basis of the previous day's prices. In the event of an exceptional market event, it may be recalculated to ensure there is no possibility of market timing.

### **7.1 Valuation methods**

#### **Securities traded on a French or foreign regulated market, including ETFs**

- Securities traded in the eurozone: Last price on the valuation day.

For interest rate products, the management company reserves the right to use consensus prices when these are more representative of the trading value.

Foreign securities denominated in currencies other than the euro are translated into euros at the exchange rate in Paris on the valuation day.

Securities for which a price has not been calculated on the valuation day are valued at the last officially published price. Securities for which the price has been adjusted are valued at their likely trading price, as determined by the UCI's fund manager or the management company.

#### **UCI shares and securities**

Units or shares of UCIs are valued at their last known net asset value.

### **Negotiable debt securities**

Negotiable debt securities (short-term and medium-term, bills issued by financial institutions, bills issued by specialist financial institutions) are valued according to the following rules:

- on the basis of the actual market traded price;
- if there is no significant market price, by applying an actuarial method, where the benchmark rate is that of issues of equivalent securities plus, where applicable, a difference representing the intrinsic characteristics of the security issuer.

### **Over-the-counter transactions**

Transactions agreed on over-the-counter markets and authorised by the regulations applicable to UCIs are valued at their market value.

### **Futures and options contracts**

- Futures contracts on derivatives markets are valued at the day's settlement price.
- Options on derivatives markets are valued at the day's closing price.

### **Temporary purchases and sales of securities**

- Temporary purchases of securities

Securities received under repurchase agreements or borrowed securities are entered in the long portfolio under "Receivables representing securities received under repurchase agreements or borrowed securities" at the amount provided for in the contract, plus interest receivable.

- Temporary sales of securities

Securities sold under repurchase agreements or loaned securities are entered in the portfolio and valued at their current value.

The debt representing the securities transferred under repurchase agreements such as in the case of loaned securities is entered in the short portfolio at the value set in the contract plus accrued interest. On settlement, the interest received or paid is recognised as income from receivables.

- Collateral and margin calls

Collateral received is valued at the market price (mark-to-market).

Daily fluctuation margins are calculated using the difference between the valuation at market price of collateral provided and the valuation at market price of collateralised instruments.

Generally, financial instruments for which the price has not been recorded on the valuation day or for which the price has been adjusted are valued at their likely trading price, as determined by the SICAV's board of directors or management board or, for mutual funds, by the management company. Such valuations and their supporting documentation are communicated to the statutory auditor during audits.

### **Valuation methods for off-balance sheet commitments**

- Futures contracts are valued at nominal value x quantity x settlement price x (currency)
- Options contracts are valued at their underlying equivalent
- Swaps
  - Asset-backed or non-asset-backed swaps  
Commitment = nominal value + valuation of the fixed-rate leg (if fixed/variable) or the variable-rate leg (if variable/fixed) at the market price.
  - Other swaps  
Commitment = nominal value + market value (if the UCI has adopted a synthetic valuation method).

## **7.2 Method used to recognise income from fixed-income securities**

Accrued interest method.

## **7.3 Method used to recognise expenses**

Transactions are accounted for exclusive of costs.

## **8 REMUNERATION**

Details of the updated remuneration policy are available on the Groupama Asset Management website at [www.groupama-am.com](http://www.groupama-am.com).

\* \* \* \* \*

**Annex level 2** — Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
GROUPAMA ENTREPRISES

**Legal entity identifier:**  
969500SJXDORP37NF565

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?** *[tick and fill in as relevant, the percentage figure represents the minimum commitment to sustainable investments]*

**Yes**                        **No**

It will make a minimum of **sustainable investments with an environmental objective:** \_\_\_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective:** \_\_\_\_\_%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



### What environmental and/or social characteristics are promoted by this financial product?

The UCITS promotes environmental and social characteristics via a managerial approach that promotes the sustainability of issuers through an analysis of the environmental, social and governance (ESG) criteria of the securities held in the portfolio.

The analysis of these ESG criteria results in an ESG rating from 0 to 100, which is based on various indicators, including:

- Environmental (biodiversity, waste management etc.);
- Social (employee training, supplier relations etc.);



- Governance (board independence, executive compensation policy etc.).

With this in mind, the UCITS implements a best-in-universe approach, and also excludes certain securities and establishes an ESG score.

Furthermore, the UCITS does not have a designated reference benchmark tailored to ESG characteristics under the SFDR Regulation.

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

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

As part of its investment policy, the UCITS will report on the following sustainability indicators in order to measure the attainment of each of the environmental or social characteristics it promotes:

- Carbon intensity;
- Number of companies invested in with a human rights policy;
- Average ESG rating of the UCITS compared with its investment universe;
- Minimum percentage of sustainable investments

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The UCI's share of sustainable investments is the percentage of companies that contribute positively to an environmental or social objective, without harming another environmental or social objective, while respecting good governance practices.

Our sustainable investment approach is based on:

1. The positive contribution of companies to the UN Sustainable Development Goals (SDGs). Companies are analysed for their positive contribution to 16 of the 17 SDGs, as SDG 17 (global partnerships) is not applicable to business activities.

Our ESG data provider, Moody's, calculates the contribution to SDGs based on two analyses: Analysis of turnover from business activities (revenue from the supply of sustainable goods/services divided by the company's total revenue). This analysis produces an overall contribution score between 0 and 100%, allowing companies to be categorised into four levels: None/Minor (0–20%)/Significant (20–50%)/Major (50–100%).

This score is supplemented by a controversy score based on analysis of the company's involvement in controversial activities. The level of involvement is calculated using the turnover generated from controversial activities or the stage of involvement (production, sale, distribution). The sale and distribution of products and services that account for less than 10% of the company's revenue is considered a minor involvement. If this is above 10%, the involvement is considered major.

The level of involvement penalises the score obtained by the company to varying degrees: Major (-3)/Minor (-2)/None (0).

These two analyses provide an overall contribution that is categorised into five levels: Very positive, positive, neutral, negative, very negative.

Sustainable investments are considered to be investments with a very positive, positive or neutral score.

2. Investments made in green bonds, social bonds or sustainable bonds validated by an internal methodology are also taken into account in the Fund's sustainable investment share.

The internal analysis methodology ensures that these bonds meet our internal requirements in this regard. Through this methodology, we systematically analyse four interdependent and complementary criteria, based on two recognised frames of reference:

The transparency requirements of the Green Bond Principles, Social Bond Principles and Sustainable Bond Principles.

For green bonds, the classification of eligible activities under the Greenfin Label.

Four criteria are systematically analysed as part of our internal methodology:

- Characteristics of the issue;
- ESG performance of the issuer;
- Environmental and/or social quality of the projects financed;
- Transparency.

If any of the following three criteria—the ESG performance of the issuer, the environmental and/or social quality of the projects financed or the transparency—is categorised as negative on analysis the bond will not be validated. Only investments made in green bonds, social bonds or sustainable bonds validated by our internal methodology are taken into account in the Fund's sustainable investment share.

For more information on our internal methodology, please see our ESG methodology here:

[https://produits.groupama-am.com/fre/fr0010288316/\(tab\)/publication](https://produits.groupama-am.com/fre/fr0010288316/(tab)/publication)



● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Sustainable investments that the financial product partially intends to make do not cause significant harm to any other sustainable investment objective because any company that contributes negatively to at least one SDG is not considered to meet the sustainable investment objective.

For green, social and sustainable bonds, this absence of harm is verified through the systematic analysis of the issuer's ESG performance.

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

- ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The mandatory principle adverse impacts (hereinafter “PAIs”) are taken into account at several levels of our sustainable investment approach: the exclusion policy, the engagement policy and the internal ESG analysis methodology.

The indicators for adverse impacts 1, 2, 3, 5, 6, 7, 8, 9, 10 and 11<sup>1</sup> are integrated into our proprietary ESG analysis methodology. PAIs 10 and 11, on violations of the principles of the Global Compact and the OECD Guidelines and the lack of a process for monitoring compliance with these principles and guidelines, are taken into account through a Global Compact score. This score is based on an analysis of the controversies of companies in relation to respect for human rights, labour rights, business ethics and the environment.

PAI 7, on activities negatively impacting biodiversity, is evaluated using a proxy of the biodiversity indicator of our supplier Iceberg Data Lab, in order to be consistent with the impact measures featured in our report under Article 29 of the French Energy and Climate Law. This ESG report is available on our website: <https://www.groupama-am.com/en/sustainable-finance/>.

PAI 4 is taken into account in our exclusion and engagement policies. PAI 14 is only taken into account in our exclusion policy.

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

The proprietary ESG analysis methodology incorporates the mandatory PAIs, including impacts 10 and 11 which relate to violations of the Global Compact principles and the OECD Guidelines and the lack of a process for monitoring compliance with these principles and guidelines.

These PAIs are addressed by the Global Compact score calculated by our ESG data provider. This score is based on an analysis of the controversies of companies in relation to respect for human rights, labour rights, business ethics and the environment.

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<sup>1</sup> The PAIs are detailed and defined in Annex I to Commission Delegated Regulation (EU) 2022/1288 (Tables 1, 2 and 3).

*The EU Taxonomy sets out a “do no significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and that is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.



### **Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

Certain indicators relating to principal adverse impacts are considered throughout the investment process and form an integral part of the ESG methodology adopted by the UCITS. Potential investments will therefore be examined through the analysis of quantitative and qualitative data, in accordance with the investment strategy of the UCITS as described in the relevant section.

An assessment of the principal adverse impacts will be carried out for the UCITS and will be reported annually as part of the UCITS’ periodic report.

No

### **What investment strategy does this financial product follow?**

The management process uses a best-in-universe ESG approach. The ESG approach developed by Groupama Asset Management is centred around a quantitative and qualitative analysis of the environmental, social and governance practices of the securities in which it invests.

The analysis of these ESG criteria results in an ESG score from 1 to 100, which is based on various indicators, including:

- Environmental (biodiversity, waste management etc.);
- Social (employee training, supplier relations etc.);
- Governance (board independence, executive compensation policy etc.).

The investment universe is then divided into five quintiles, with each quintile representing 20% of the investment universe in terms of number of securities. The securities rated as Quintile 1 represent the best ESG ratings within the investment universe, while those rated Quintile 5 represent the worst ratings. The UCITS will focus on investing in securities belonging to Quintiles 1 to 4. The selection should result in an average ESG rating for the portfolio that is significantly higher than that of its investment universe. The weighted average ESG rating of the portfolio will be

higher than the average ESG rating of the investment universe once the bottom 20% of the lowest-rated securities in the investment universe are excluded.

The main limitation of this analysis relates to the quality of the available information. ESG data is not yet standardised and Groupama Asset Management's analysis is ultimately based on qualitative and quantitative data provided by the companies themselves, some of which may still be incomplete and heterogeneous.

To overcome this limitation, Groupama Asset Management focuses its analysis on the most important aspects of the sectors and companies analysed.

For more detailed information on the rating methodology implemented in the UCITS and its limitations, investors are invited to read the methodology document, which is available on the website [www.groupama-am.com](http://www.groupama-am.com).

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

In order to attain the environmental and social characteristics promoted, the investment strategy is based on the following factors:

- Securities belonging to the “Major ESG Risks” list: Groupama Asset Management tracks a list of securities considered to carry significant ESG risks (the “Major ESG Risks” list). These are companies whose ESG risks could jeopardise their economic and financial viability, or could have a significant impact on the company's value and thus lead to a substantial loss of stock market value or a significant downgrade by rating agencies. For securities issued by these companies:
  - Investments in securities issued by these companies with a maturity of more than one year are excluded from the UCITS.
  - Investments in securities with a maturity of less than one year, issued by companies judged to be of high credit quality by our Money Market Committee are authorised;
- Exclusion of sectors deemed to be incompatible with Groupama Asset Management's engagement policy: companies known to be involved in controversial weapons activities (cluster bombs and anti-personnel mines) are excluded from the UCITS' investment scope.
- Application of Groupama Asset Management's fossil fuel policy: exclusion of companies involved in coal mining and coal-related energy production, and non-reinvestment in unconventional fossil fuels (UFF).
- The average ESG rating for the portfolio must be significantly higher than the investment universe: the weighted average ESG rating of the portfolio will be higher than the average ESG rating of the investment universe once the bottom 20% of the lowest-rated securities in the universe are excluded.
- A minimum 20% allocation to sustainable investment, in accordance with the definition of sustainable investment indicated above.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

- The UCITS must also display a performance higher than its benchmark index or investment universe in the following two indicators:
  - Carbon intensity;
  - Number of companies invested in with a human rights policy.

The securities held in the portfolio indicate a minimum screening and monitoring rate of 90% of the portfolio's ESG ratings, excluding cash and money-market UCIs.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

● ***What is the policy to assess the good governance practices of the investee companies?***

To ensure that companies invested in comply with good governance practices, the UCITS uses an internal analysis methodology that takes into account good governance criteria through its ESG approach, as described in the section on its investment strategy.

The criteria taken into account include:

- The percentage of independent members of the board of directors;
- The integration of ESG criteria within executive compensation;
- The existence of a CSR committee within the board of directors;
- A corruption prevention policy and the existence of controversies;
- Responsible lobbying practices and existence of controversies.

**Good governance**  
practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**What is the asset allocation planned for this financial product?**

Within the portfolio:

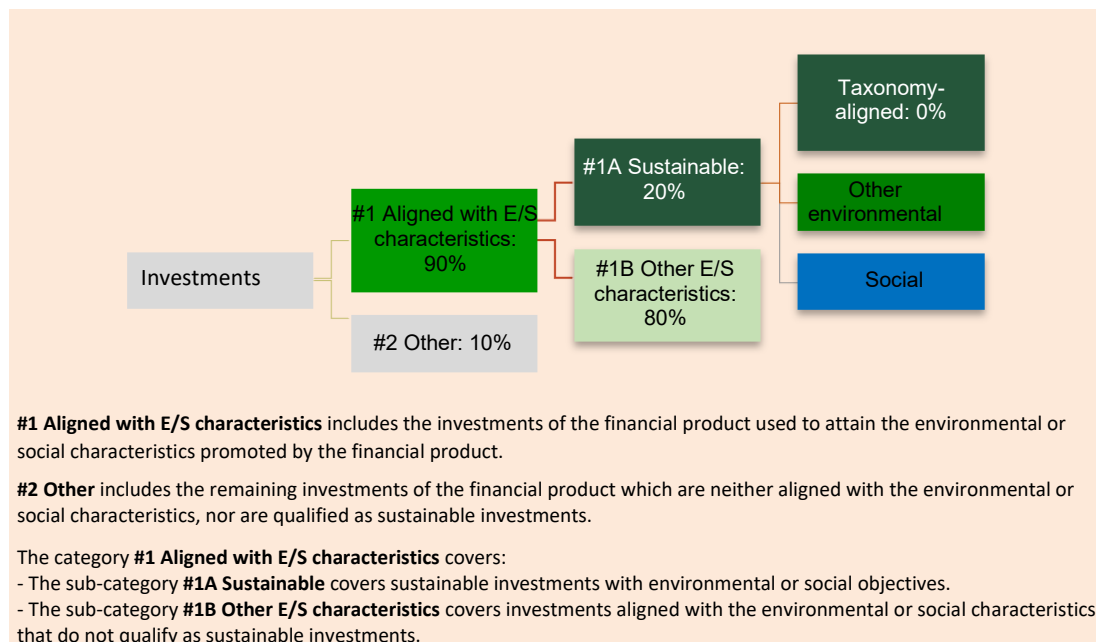
- The minimum proportion of investments contributing to the environmental and social characteristics promoted by the UCITS is 90% (#1 below), excluding money-market UCIs and cash.
- The share of investments not aligned with the environmental or social characteristics (#2 below) is 10%.
- The minimum proportion of sustainable investments is 20% (#1A below).
- The minimum proportion of investments aligned with the non-sustainable environmental or social characteristics (#1B below) is 70%, excluding money-market UCIs and cash.
- The minimum proportion of Taxonomy-aligned investments is 0%.

The total net assets are used as the basis for calculating the share of sustainable investments.

**Asset allocation**  
describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies;
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy;
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.

In order to comply with the EU taxonomy, the criteria for **fossil gas** include emission limits and a switch to renewable energy or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.



### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 20% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU<sup>2</sup> taxonomy<sup>1</sup>?**

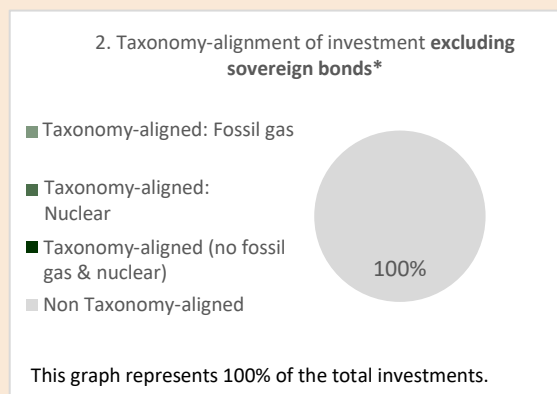
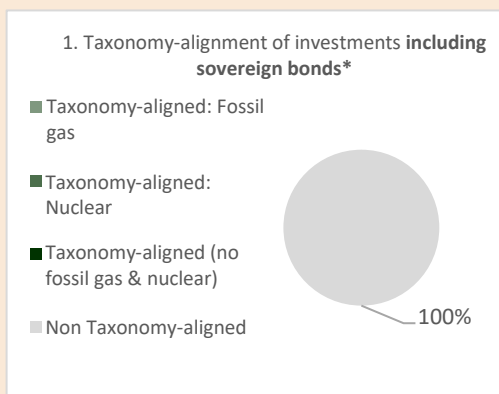
Due to the complexity of data collection and the lack of data from companies in target markets for Taxonomy-aligned activities, we are currently unable to communicate this information. Groupama AM does its best to collect the data needed to respond regarding Taxonomy-aligned activities.

- Yes
- In fossil gas     In nuclear energy
- No

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

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

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

<sup>2</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do no significant harm to any EU Taxonomy objective — see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



● **What is the minimum share of investments in transitional and enabling activities?**

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 20% sustainable investments. However, the UCITS is not committed to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy, nor is it committed to making a minimum share of investments in transitional and enabling activities.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 20% sustainable investments. At this stage, the portfolio allocation specifically addressing an environmental objective is difficult to determine, as part of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identifies activities that contribute to environmental and social issues without distinction.



**What is the minimum share of socially sustainable investments?**

The UCITS promotes environmental and social characteristics and is committed to making a minimum of 20% sustainable investments. At this stage, the portfolio allocation specifically addressing a social objective is difficult to determine, as part of the SDGs, such as SDG 11 (Sustainable Cities and Communities), identifies activities that contribute to environmental and social issues without distinction.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

The “#2 Other” category consists of issuers or securities without a rating due to a lack of sufficient ESG data but for which the UCITS’ exclusion policies apply. This category also includes money-market UCIs and cash held as ancillary liquidity.

With the exception of SRI money-market UCIs managed directly by Groupama Asset Management, no minimum environmental or social safeguards are implemented for investments included in the category.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

Not applicable

- ***How does the designated index differ from a relevant broad market index?***

Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable



#### **Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
[https://produits.groupama-am.com/fre/content/download/281047/4992150/version/1/file/FR0010288316\\_GROUPAMA+ENTREPRISES.pdf](https://produits.groupama-am.com/fre/content/download/281047/4992150/version/1/file/FR0010288316_GROUPAMA+ENTREPRISES.pdf)