

# **Transparency Code**

## **AXA WF Global Factors – Sustainable Equity Fund**



This transparency code is based on the format developed and approved by the Board of Eurosif in 2017 and describes the approach in place for the fund AXA WF Global Factors – Sustainable Equity.

### **Statement of Commitment**

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of AXA IM. We have been involved in Responsible Investment since 1998. This is our second statement of commitment for the fund AXA WF Global Factors – Sustainable Equity (01 October 2021 – 30 September 2022).

### **Compliance with the Transparency Code**

AXA IM is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. AXA IM meets the full recommendations of the European SRI Transparency Code.

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## 1. Fund covered by the Code

Fund(s) name(s)	ISR strategy dominant / complementary	Asset class	Benchmark	Exclusion standards and norms	Funds capital as of 30/06/2021	Labels	Links to documents
AXA WF Global Factors – Sustainable Equity	<b>Dominant :</b> Sustainability themed <b>Complementary :</b> Exclusion ESG criteria Engagement	International equities (small/mid/large caps)	MSCI World Index	Controversial weapons Tobacco White Phosphorus weapons Human rights Labour rights Deforestation & Ecosystem Protection CO2 intensive (incl. Coal and tar sands) UN Global Compact breaches Derivatives on soft commodities	US\$ 951.70m	Towards Sustainability (2020) FNG Label (2020)	<a href="#">KIID</a> <a href="#">Propectus</a> <a href="#">Management</a> <a href="#">report</a> <a href="#">Financial and</a> <a href="#">extrafinancial</a> <a href="#">report</a> <a href="#">Documentation</a>

## 2. General information about the Management Company

### 2.1. Name of the fund management company that manages the applicant fund(s):

AXA Funds Management S.A

### 2.2. What are the AXA IM's track record and principles when it comes to integrating SRI into its processes?

AXA Investment Managers has a strong conviction that Responsible Investment is a key driver of value-creation, and our Management Board has therefore decided to progressively integrate Environmental, Social and Governance (ESG) analysis across all asset classes. In that perspective, AXA IM has invested significant resources into building a team of experienced RI professionals acting as a centre of excellence to support the integration of ESG risks and opportunities in the investment processes of our investment teams, working closely with a number of RI specialists within each investment teams.

#### ESG integration across asset classes

- **ESG data:** Portfolio Managers and Financial Analysts are provided with ESG information to ensure ESG risks and opportunities are incorporated in their analysis of a company. This includes:
  - **ESG scores**, which are calculated twice a year using a [proprietary methodology](#) developed and maintained by the Responsible Investment Solutions, Tools and Models team, tested by each investment team and signed-off by the Risk department and before release through a dedicated governance. These scores are then made available to portfolio managers and analysts across the company.
  - **Internal Research:** ESG analysts within the investment teams can support portfolio managers in their analysis of a company. ESG is now incorporated in the work of the credit analysis team.
  - **Internal and External ESG research** (including access to ESG data solutions – including MSCI, Sustainalytics, ISS Oekom and Vigeo). Internal ESG research on themes with a focus on climate change, human capital and health in particular. These analyses are supported by broker research, as well as regular meetings with companies, participation to conferences and industry events.
  - Through our **RI Front Office tool**, Investment teams have access to a wide range of extra-financial data and analysis on environmental, social and governance, 'ESG' factors, across asset classes. More than 70 Environmental, Social and Governance KPIs are integrated in our Front Office tool, including carbon intensity, % of independent directors, employees turnover as well as water intensity. Therefore, it enables our fund managers to:
    - Assess the extra-financial risk of their investments
    - Measure a security performance on ESG indicators
    - Integrate new factors of performance and stock picking into investment process
    - Have access to RI internal and external research
- **Regular training on ESG issues** and on the key elements of our RI framework. This aims at ensuring investment teams have the tools and are empowered to integrate ESG in their daily activities.
- **Exclusion policies:**<sup>1</sup>
  1. We monitor systematically and exclude strong ESG risks (controversial weapons, ecosystem protection & deforestation, soft commodities, climate risks) for all assets under management.
  2. For ESG integrated, ESG Integrated +, Sustainable Investing and Impact funds, we apply an additional screening with the AXA IM ESG Standards focused on tobacco, white phosphorus weapons as well as breach of UN Global Compact (Level 5 controversies on the Sustainalytics' scale) and we monitor with attention low ESG scores, those with an ESG Score below 2 out of 10. Most of these constraints are

<sup>1</sup> All our exclusion policies (RI sectorial policies and ESG Standards) are available on the AXA IM website: <https://www.axa-im.com/responsible-investing/sector-investment-guidelines>

coded to enable a level 2 control performed by an independent “Investment Guidelines” team.

- o **Stewardship strategy:** the strategy is coordinated by the RI Coordination & Governance and the RI Research teams who oversee voting on behalf of our clients, and of defining and coordinating our engagement strategy. Voting is overseen by a Corporate Governance committee which is attended by representatives from both teams as well as from investment teams and implemented in close partnership with the investment teams. Engagement activities are overseen by an ESG monitoring and Engagement committee which meets on a quarterly basis and involves RI professionals and representatives from investment platforms, Risk and Sales teams.

In addition to this, AXA IM manages a range of Sustainable Investing and Impact funds for which the level of ESG integration is even more stringent with specific ESG objectives set which have a significant and engaging impact on the investment process, and regularly monitored. A number of these funds have been awarded a sustainability-related label and, for these funds, a yearly audit is performed by external auditors to ensure adherence with these objectives.

## Corporate Responsibility

We believe that success lies where value creation and growth can be shared by everyone - for our clients, employees, future talent and the communities we serve or who rely on us. Just as we are an active player in responsible investment, with ESG integration embedded across our investment platforms and RI experts, we recognise our role as a business and employer, to hold ourselves to the same high standards of responsibility that we ask of others. We are a member of the Coalition for Inclusive Capitalism, which is a global effort dedicated to promoting and encouraging greater corporate and social responsibility.

Central to our decision making is our Sustainability Forum, led by our Executive Chairman. This is where we shape our vision and convictions for sustainability at AXA IM, across responsible investing and corporate responsibility. For corporate responsibility, our framework is aligned to the United Nations’ Sustainable Development Goals (UN SDG) and based on 3 key pillars:

### 1. People

**We strive for an inclusive work environment built on fairness, equality and wellbeing in which performance and long-term employability can be nurtured.** We use our voice as a leading asset manager, pushing for progress on key topics, such as gender equality. We are members of the 30% Club Investor Groups in France and the UK, which look to increase the representation of women in executive management. We have also signed the Women in Finance charter and achieved the EDGE (Economic Dividends for Gender Equality) certification in recognition of our global commitment to gender equality in the workplace. Looking beyond our business, we have a procurement process in place to ensure that our partners and suppliers act with equal integrity and responsibility on human rights.

Our commitment to shared value extends to our local communities, supporting them to similarly grow and prosper. We focus on projects with a tangible societal impact, across education, health and climate change/biodiversity. We have donated 5% of the fees from our Impact Funds to organisations committed to positive change and our Real Assets team recently partnered with IN’LI to construct affordable housing in France, seeking to build 1,500 homes per year, with a target of 25,000 homes by 2030.

Our volunteer community ‘**AXA Hearts in action**’ enables our employees to dedicate their time and expertise to local charities focused on education, social integration and housing. Our employees are currently partnering with 19 organisations across 9 countries. Activities include speaking to secondary school students about our work roles and expertise, sharing our skillset with local charities and fundraising initiatives across our global offices. Our calendar of activity runs all year but culminates with a week for our employees dedicated to Corporate Responsibility, to increase awareness and drive opportunities for engagement and collaboration on priority topics.

### 2. Environment

**As a leading asset manager, we recognise the responsibility and role we must play as an investor in leading the transition to a low carbon economy – notably demonstrated through our membership of the Net Zero Asset Manager initiative.**

Recognising equally our own impact as a business, we are currently working towards a 25% minimum reduction in our own CO2 emissions by 2025, notably across our premises and business travel. We seek alternative approaches that can reduce or offset the environmental impact of our corporate offices through promoting energy and waste management best practices and driving operational efficiencies. We actively measure and manage our environmental

footprint, implementing recycling and saving schemes to include the reduction of paper consumption, waste management and green energy consumption. AXA IM is aligned with RE100, which brings together influential businesses committed to renewable energy and we are currently exploring with AXA Group how we can achieve 100% renewable energy in our European offices by 2025.

### 3. Business resilience and sustainable growth

**We seek to produce a long-term profit in a responsible, resilient and sustainable manner.** As a responsible investor, we actively use company engagement and voting to positively influence the corporate behaviours needed to drive long term sustainable growth. As a business, we similarly work to nurture a relationship of accountability, transparency and trust with our clients, employees and all those who engage and partner with us. Our AXA IM Standards framework details the policies and processes followed by AXA IM, to ensure that we manage risk robustly and run our business ethically and transparently. Our code of conduct includes processes on topics such as anti-bribery, whistleblowing and handling of data, with topics reinforced by regular communication and employee training. From the top management of our organisation to our day to day operations, we seek the responsible way forward.

## 2.3. How does the company formalize its sustainable investment process?

All our RI-related policies are available on the AXA IM website in the [Responsible Investment section](#).

- [AXA IM Responsible Investment policy](#)
- [AXA IM Corporate Governance & Voting policy](#)
- [AXA IM Engagement Policy](#)

## 2.4. How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by AXA IM<sup>2</sup>?

### Scoring Methodologies:

We have developed our proprietary ESG Framework structured around the three pillars E, S and G for corporates and sovereigns. ESG data fed through front office tools help fund managers to assess how companies are mitigating ESG risks and taking advantage of these criteria to improve their competitive position in their own sectors. The methodologies are described further below.

### Internal and External Research:

RI experts' analyses are also supported by broker research, as well as regular meetings with companies, participation to conferences and industry events.

In addition, RI experts are also providing internal ESG research on themes with a focus on climate change, biodiversity, human capital and gender diversity, health and data privacy / cyber security in particular.

### Climate Change research and data:

A package of Environmental KPIs is available in the Front Office tool to allow the full understanding and analysis at issuer level. This leverages our relationship with providers such as Carbon Delta, Trucost, and Beyond Ratings.

## 2.5. How many employees are directly involved in the AXA IM's sustainable investment activity?

AXA IM has invested significant resources into recruiting RI experts and analysts who work with our investment teams to integrate ESG issues into their investment processes. The range of backgrounds includes fund management, sell-side research, quantitative analysis, strategy and project management, in addition to relevant RI experience; ensuring that RI issues are

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<sup>2</sup> Reference to Article 173 of the French TECV Act and the TCFD recommendations (risks and opportunities section)

integrated using an investment-relevant approach. In total, more than 30 employees are involved at full-time in RI / ESG activities. There are other professionals who are not included but whose ESG work is embedded in their day-to-day routine. More specifically, the RI research capabilities are organised as follows, within AXA IM Core:

- A **RI Research team** responsible for thematic research with a focus on climate, biodiversity, human capital & diversity as well as health, nutrition and data privacy, ensuring it translates into implementable investment decisions across platforms. This team also leads shareholders engagement on those themes. Within this team, dedicated RI Analysts are in charge of defining the eligible Green, Social and Sustainability bonds universe. They rely on our proprietary framework notably inspired by the Green and Social Bond Principle (GSBP) and the Climate Bonds Initiative (CBI) Standards.
- A **RI Coordination and Governance team** responsible for transversal RI projects and corporate governance including voting policy on key themes mentioned above. The Active Ownership strategy is built and led jointly with the RI Research team.
- A **RI Solutions, Tools and Models team** dedicated to the development of ESG quantitative solutions. As such, the team has developed a proprietary ESG framework and RI Search platform, providing portfolio managers and analysts with ESG raw quantitative data, KPIs, internal and external research and proprietary ESG scores.
- **ESG specialists within the investment platforms** oversee product development, the operational implementation of ESG processes, building portfolio RI eligible universes and support the integration of ESG criteria and RI approaches within portfolio construction and decision-making processes.
- **ESG analysts integrated within investment teams:** ESG specialists are embedded the investment teams to conduct ESG analysis at the company level, working closely with fund managers. Some Analysts integrate ESG criteria in their financial recommendations, our conviction being that ESG provides a complementary analysis to traditional financial research; these issues may have financial impacts for companies in the short and/or long-term time horizon.
- **Impact analysts integrated within investment teams:** they perform qualitative impact analysis on companies based on five key pillars, reviewing their products or services and operational activities to demonstrates whether a company contributes to the Sustainable Development Goals or to a specific impact.

## 2.6. Is the company involved in any RI initiatives?

As interest in ESG grows among clients and regulators in many geographies, the need for clearer definitions and usable standards is a top priority for the financial industry. This forms another important area for our public policy engagement.

We adopt a selective approach when deciding which initiatives we will participate in or support, focusing on topics and groups where we believe our involvement will have a material impact.

To learn more on the industry initiatives and public policy consultations we participated to and investor statements we contributed to or supported: [2020 AXA IM Active Ownership and Stewardship report](#).

General Initiatives	Environmental/Climate Initiatives	Social Initiatives
<ul style="list-style-type: none"> <li>○ EFAMA RI WG</li> <li>○ PRI - Principles For Responsible Investment</li> <li>○ SIFs - Sustainable Investment – Research Commission</li> <li>○ GIIN – Global Impact Investing Network</li> <li>○ AFG – Association Française de Gestion</li> </ul>	<ul style="list-style-type: none"> <li>○ Climate Bond Initiative</li> <li>○ Green Bond Principles</li> <li>○ IIGCC – Institutional Investors Group on Climate Change</li> <li>○ Climate Action 100+</li> <li>○ Net Zero Asset Managers Initiative</li> <li>○ One Planet AM Summit</li> </ul>	<ul style="list-style-type: none"> <li>○ 30% Investor Club</li> <li>○ Access to Medicine Index</li> <li>○ Access to Nutrition</li> </ul>



## 2.7. What is the total number of SRI assets under AXA IM?

AXA IM had 23,4 billion euros of Sustainable and Impact Investing Assets as of 31/12/2020, representing 4.3% of our total assets under management. Funds in this category must meaningfully embed sustainability factors into the portfolio construction process. In addition to screening and integration of ESG considerations in the investment decision, they refine the investment universe further by using ESG criteria and/or target the United Nations Sustainable Development Goals . Funds might follow a best-in-universe policy which removes low-ESG-scoring companies, or favour only the very best ESG performers. They might also target a specific KPI such as carbon footprint and adjust portfolios accordingly.

## 3. General information about the SRI fund(s) that come under the scope of the Code

### 3.1. What are the fund aiming to achieve by integrating ESG factors?

As an active, long-term investor, we believe it is our role to incorporate non-financial criteria in the analysis of issuers, and to guide companies towards more responsible behaviour through our stewardship activities.

The integration of ESG factors in the management of the funds in scope responds to this objective, and we believe that the combination of fundamental non-financial factors associated with traditional financial criteria makes it possible to deliver sustainable return over the long-term. A non- financial approach has indeed become necessary in more than one way:

- It contributes to eliminating companies exposing portfolios to ESG risks that ultimately affect financial performance
- Based on the ESG analysis, improve our understanding of the long term issues integrated into the companies' strategy
- It allows to refocus portfolios around companies that have implemented good practices in terms of managing their environmental impacts, governance and social practices
- It can help to improve companies' performance through active dialogue with companies on the management of ESG issues and limits our exposure to reputational risks.

### 3.2. What internal or external resources are used for ESG evaluation of the issuers who make up the investment universe of the funds?

#### Organisation and Framework:

See above on resources dedicated to RI and Governance.

#### Proprietary ESG scoring methodologies:

##### Corporates

AXA IM has defined a comprehensive RI framework which serves as the basis of our analysis of issuers across sectors and regions. This proprietary grid integrates 3 ESG pillars through 6 factors and then 13 sub-factors.

#### Corporate ESG Framework

Environment	Resources and Ecosystems	Use of natural resources in companies' operations and protection of ecosystems by avoiding negative impacts.
	Climate change	Impacts related to companies' activities and products and services that resolve climate change challenges.
Social	Human Capital	Occupational health and safety, attraction power (recruitment) and retention (employee satisfaction), training, social dialogue, freedom of association, labour rights, compensation of employees, career management

<b>Governance</b>	<b>Social Relations</b>	Supply chain management, relations with customers, relations with suppliers, respect of Human Rights, impact on communities, non-discrimination, elimination of child labour.
	<b>Business Ethics</b>	Prevention of corruption and anti-competitive practice.
	<b>Corporate Governance</b>	Disclosure & controls, traditional governance issues including board/management diversity, board independence, separate CEO/Chairman, shareholder rights, executives' pay.

Proprietary ESG scores are computed thanks to a methodology developed and maintained by the RI Solutions, Tools and Models team, and made available to investment professionals throughout the company. To ensure a greater coverage of our asset classes and to supplement our in-house research, we use Raw ESG company/country data from ESG research providers. We cover more than 8,800 companies and 190 countries with our quantitative scoring system replicating the ESG framework detailed above. We aggregate the raw quantitative data (percentage of women on the board, percentage of renewable energy, percentage of training budget / payroll, employment trends etc.) of specialized rating agencies as detailed below. This search is accessible by all managers of AXA IM and is based on a scorecard (scale from 0 to 10) on more than 8,800 companies. The managers have access to the individual scores of each company in the same sector, each dimension E, S, G and the score summarizing the overall rating of the portfolio. An analytical tool is also available to help investment professionals investigate the score of a given issuer and its evolution.

#### External qualitative research

We use the research of ESG specialists like MSCI, Sustainalytics, Vigeo, ISS (proxy voting and UN SDG alignment) to complement the contribution of quantitative ratings. Investment professionals also have access to external qualitative research through brokers, etc.

ESG Data Provider	Expertise	Description	ESG Scores and Company Research	ESG Raw Data & KPIs	Start Date
Sustainalytics	Controversies Analysis	Controversies analysis	✓	✓	11/2012
Vigeo-EIRIS	Strong expertise in social issues and European small & mid cap	Strong expertise in social issues and European small and mid-cap	✓		09/2007 07/2004
GMI – MSCI	Strong expertise in Governance issues	ESG research	✓	✓	04/2004
Trucost S&P	Full range of Quantitative Environmental KPIs	Full range of quantitative environmental KPIs		✓	03/2012
Carbon 4	Offers a climate risk package	Measure the carbon impact of investments	Only used for Green Bonds reporting		01/2017
ISS – Ethix	Offers expertise across a full range of environmental, social and governance (ESG) issues	Ethical filters and controversial weapons	✓		01/2003 02/2011
ISS – Oekom	Expertise in Impact analysis	Impact research and UN SDG alignment assessment	✓		06/2018



<b>Carbon Delta</b>	Expertise in Climate analysis	Climate research for Corporates	✓	✓	11/2018
<b>Beyond Ratings</b>	Expertise in Climate analysis	Climate research for Sovereign	✓	✓	08/2018
<b>Bloomberg ESG</b>	ESG KPIs. Used for investment and reporting purposes	ESG KPIs. Used for investment and reporting purposes.		✓	12/2018
<b>Ethifinance</b>	Strong expertise in European micro and small caps	ESG ratings used for Leverage Loans and private debt asset classes	✓	✓	03/2019
<b>Iceberg Data Lab I Care &amp; Consult</b>	Measurement of investors' investments impact on biodiversity	These two data providers joined forces to develop metric quantifying companies' impact on biodiversity and nature to help investors integrate into risk assessment and research	✓	✓	01/2021

#### Internal Qualitative Research and ESG KPIs integrated in Front Office tools

See above on resources dedicated to the ESG Integration and RI Governance.

### 3.3. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

#### ESG scoring

ESG scores are updated every 6 months – with a validation of the ESG Scoring and Quantative methodologies committee which involves investment and risk teams. The list of ESG criteria and the sector weight matrix to be applied to the various sub-criteria E, S and G is reviewed on a regular basis in order to better understand the most significant issues by sector and to identify the data providers that better respond to the sector analysis benchmark. With this in mind, we favour both financial materiality and the impacts generated by companies on the environment, communities and the economy.

#### ESG Analysis

At Rosenberg Equities, we believe that ESG insights enhance our traditional financial analysis. Our fundamental research efforts is aimed at understanding the relationship between ESG concepts and traditional drivers of risk and returns within equities. We aim to improve our fundamental insights through the inclusion of ESG ideas and encode these into our proprietary factor models. Example of these include the use of board diversity to improve our prediction of forward change in earnings quality as our research highlighted that companies with more diverse management boards are typically able to better withstand competitive forces. Similarly, we are also formally including carbon footprint in our modelling of fair value (valuation) of companies as we believe investors are embedding carbon emissions as an expense when evaluating companies. We are also evaluating the use of natural language processing technique to assess the comittment to ESG expressed by companies in their quarterly reporting. Over time, we expect that such research will play a larger role in our investment process.

#### Controversies

Issuers characterized by severe controversies are excluded from the funds in scope, as part of our AXA IM ESG standards. Our analysis of controversies is based on a list provided by an external provider, which is reviewed qualitatively and adjusted as necessary by the ESG Monitoring and Engagement Committee. This list is updated at least on a quarterly basis, and intermediary updates can also be done if required by Newsflow.

### 3.4. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

**ESG scoring**

ESG scores are updated every 6 months – with a validation of the Scoring, Methodology & RI Processes committee which involves investment and risk teams. The list of ESG criteria and the sector weight matrix to be applied to the various sub-criteria E, S and G is reviewed on a regular basis in order to better understand the most significant issues by sector and to identify the data providers that better respond to the sector analysis benchmark. The goal is to have an ESG score that best reflects the beliefs of the ESG analysts of the Responsible Investment team. With this in mind, we favour both financial materiality and the impacts generated by companies on the environment, communities and the economy.

**Controversies**

Issuers characterized by severe controversies are excluded from the Fund, as part of our AXA IM ESG standards. Our analysis of controversies is based on a list provided by an external provider, which is reviewed qualitatively and adjusted as necessary by the ESG Monitoring and Engagement Committee. This list is updated at least on a quarterly basis, and intermediary updates can also be done if required by Newsflow.

**4. Investment process****4.1. How are the results of the ESG research integrated into portfolio construction?**

As part of AXA IM's fiduciary duties to its clients and long term, active investment approach, we have always strongly incorporated broad non-financial criteria and guided companies towards a more responsible behaviour. In addition to adhering to AXA IM overarching ESG integration framework and being part of the related governance sponsored by AXA IM Management Board, each investment platform incorporates ESG in a manner which is relevant for the specific asset class, as described below.

**ROSENBERG – Quantitative equity**

At Rosenberg Equities, ESG insights is not just considered at the portfolio construction stage.

Our research into the link between ESG information and the fundamental drivers of risk and return has been incorporated into the construction of proprietary factors. We aim to improve our modelling of the factors we use through the inclusion of ESG ideas and trends. An example of this is our use of board diversity indicators to improve our prediction of the expected change in earnings quality. Similarly, our analysis the impact of carbon on share price has led us to penalise our fair value estimates of the most carbon intensive companies. Over time, we expect this upstream integration to play a larger role in our investment process

For portfolio construction, we use ESG scores which provide a means to measure and analyse how companies are facing long-term trends. These scores as well as information on carbon emission data, and robust exclusion policies provide us with a comprehensive view of each company ESG attributes. ESG data is integrated into our investment process alongside our estimation of risk and return. To do this Rosenberg Equities uses an optimiser as this allows the portfolio to retain the desired risk/return features we seek while improving the overall ESG profile of the portfolio vs that of its benchmark. This approach ensures, when faced with two stocks of identical risk/return attributes, our optimiser will systematically favour the one with the highest ESG rating, lower carbon footprint, all other considerations being equal.

**4.2. What ESG criteria are taken into account by the fund?**


Funds	ESG Philosophy
<b>AXA WF Global Factors – Sustainable Factors</b>	<p>The AXA WF Global Factors – Sustainable Equity Fund is a global equity solution designed to deliver long-term wealth generation by considering fundamental factors insights alongside ESG considerations.</p> <p>We believe that integrating ESG information into the investment process complements our fundamental factor insights on low volatility and high quality and have assigned the following ESG objectives:</p> <ul style="list-style-type: none"> <li>• a better- ESG score than its universe ;</li> <li>• lower carbon footprint than the benchmark.</li> <li>• avoidance of a number of ESG risks through the application of a robust exclusion policy;</li> </ul> <p>AXA IM ESG scores are used as part of an “ESG ratings upgrade approach” which requires the ESG rating of the Fund to be higher than the rating of the investment universe after omitting the worst 20% of the rated securities from the calculation.</p> <p>Starting from a broad universe of global equity stocks, this approach consists of ranking stocks included in the investment universe and excluding the bottom 20% of the worst rated stocks – then calculate an aggregate ESG score for this adjusted universe.</p> <p>This new aggregate ESG score is an input of the optimisation process and is defined as the minimum requirement which the fund must improve on to meet the desired ESG objective. This process naturally tilts the Fund toward stocks with higher ESG scores against both the adjusted universe and its benchmark index as well as lowers its carbon footprint versus benchmark while maintaining the desired factor exposure.</p> <p>Additional key performance indicators such as carbon internal exclusion lists (AXA IM ESG standards and sectorial policies), and external exclusion lists (derived from the application of ESG labels and exclusions sourced from the Council of Ethics for the Norwegian government pension fund) to provide a holistic view of each company attributes.</p> <p>The ESG scores and KPI data are integrated into our investment processes at the portfolio construction phase. We do this using an optimiser, as this allows the portfolio to retain the desired exposure to low volatility and high earnings quality while improving materially the overall ESG profile of the Fund.</p>

#### Initial screening

As a first step, a screening is done on the investment universe to filter worst ESG players, as described above. These exclusion policies are decided collegially, under the leadership of the dedicated RI experts and in close cooperation with investment platforms. All policies<sup>3</sup> are validated by AXA IM Management Board, and the regular update of exclusion-lists is validated by the ESG Monitoring and Engagement Committee which is attended by RI Experts, investment teams as well as Risk and Compliance teams. The portfolio managers must sell banned securities within a reasonable time frame after each update of the exclusion-lists, taking into account both client constraints and funds’ best interests. Our Investment Guidelines team (“IG”) is monitoring the correct application of the exclusion lists.

#### Initial Universe

<sup>3</sup> All our exclusion policies (RI sectorial policies and ESG Standards) are available on the AXA IM website: <https://www.axa-im.com/responsible-investing/sector-investment-guidelines>

Step 1: AXA IM RI Guidelines		
<b>AXA IM RI Sectorial Policies</b> Minimum exclusion policies		<ul style="list-style-type: none"> <li>Controversial Weapons</li> <li>Ecosystem Protection &amp; Deforestation</li> <li>Soft Commodities</li> <li>Climate Risks</li> </ul>
<b>AXA IM ESG Standards</b> Exclude non ESG-compliant exposures		<ul style="list-style-type: none"> <li>Severe Controversies (Level 5 controversies)</li> <li>White Phosphorus</li> <li>Tobacco</li> <li>ESG Low Quality (ESG Scores &lt;2)</li> </ul>
Step 2 : External Guidelines		
<b>Towards Sustainability Label</b>		<ul style="list-style-type: none"> <li>Unconventional and Conventional weapons</li> <li>Coal</li> <li>Unconventional and Conventional Oil &amp; Gas</li> <li>Electricity Generation</li> <li>Nuclear Energy</li> <li>Tobacco</li> <li>UNGC Violations</li> </ul>
<b>FNG Label</b>		<ul style="list-style-type: none"> <li>Fossil fuels</li> <li>Nuclear Energy</li> <li>Countries</li> <li>Weapons</li> <li>Tobacco</li> <li>Norm-based criteria</li> </ul>
<b>Council of Ethics for the Norwegian government pension fund</b>		<ul style="list-style-type: none"> <li>Ethical exclusions</li> </ul>

#### 4.3. What principles and criteria linked to climate change are taken into account in fund(s) and integrated into portfolio construction?<sup>4</sup>

AXA IM's climate change strategy relies on screening, integration in portfolio construction, decision-making and management processes, and stewardship – which are all relevant for the management of the funds in scope:

##### Screening:

All AXA IM's portfolios exclude companies most exposed to coal-related activities, in the belief that this contributes to de-risking our portfolios on the long-term, that it is consistent with our ESG integration process, and that it contributes to the global transition to a low carbon economy. As such, AXA IM considers that investment in companies involved in coal production or in using coal for its business ("Excluded Companies") representing more than 30% of their revenue should be avoided, as well as those whose revenues are derived from the extraction or transport of oil sands for at least 20% of their revenues.

AXA IM also formally committed in 2020 to exit all coal investments in OECD countries by the end of this decade, and throughout the rest of the world by 2040. This commitment will be implemented over time, using exclusion but also engagement approaches. Aligned with this commitment, we reinforced our Climate Risks policy by strengthening our exclusion criteria, as described in section 4.e.

##### Integration in portfolio management and reporting:

<sup>4</sup> Reference to Article 173 of the French TECV Act see paragraphs 3 and 4 of Article D.533-16-1 of Chapter III of the French Legal Code): <https://www.legifrance.gouv.fr/affichCodeArticle.do?cidTexte=LEGITEXT000006072026&idArticle=LEGIARTI000031793697>

- Carbon Footprint measurement is part of AXA IM ESG reporting generic offering and has been implemented since 2015.
- As part of our climate change strategy, we have made available a number of training, tools and indicators to help further integrate climate risks and opportunities in portfolio management. This relies on qualitative analysis, as well as on some quantitative data, thanks to new partnerships developed with Climate experts including Carbon Delta and Beyond Ratings. The management teams are being trained to carry out these analyses themselves. They allow us to identify valuable investment opportunities as well as the riskiest assets.
- ESG reporting for the funds in scope includes a number of Climate-related KPIs, reflecting this commitment, and the inclusion of these considerations in portfolio management activities. This reporting is being reinforced.

#### **Stewardship:**

- Through our proxy voting and engagement activities we aim to use our influence as investors to encourage companies to mitigate key environmental and social risks relevant to their sector. As a large investor we believe we have a key role to play in limiting global warming to a 1.5°C scenario, and we took the commitment to support the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C, by joining the Net Zero Asset Managers initiative. Given the systemic nature of climate change, we believe investors need to come together and use their collective influence to bring about necessary change. This engagement encourages corporations to improve disclosure on their carbon risk resilience strategies as the world shifts to a low carbon economy. Improved disclosure of strategy and scenario planning is an important tool in terms of enabling investors to assess the risks and opportunities associated with climate change and helps us make better informed decisions on behalf of our clients.
- As stated in our corporate governance policy, we support those shareholder proposals that call for increased disclosure and other clearly defined climate-related resolutions. This applies to the funds in scope.
- We actively participate in several coalitions of investors such as the Institutional Investors Group on Climate Change (IIGCC), the Carbon Disclosure Project (CDP) or the Principles for Responsible Investment (PRI) to challenge companies on their actions and their level of preparation on climate change.

#### **4.4. Has the ESG evaluation or investment process changed in the last 12 months?**

##### **Sectorial and Normative Exclusions**

In 2020, AXA IM took the decision of strengthening its Climate Risks policy, which is applied to funds in scope, with the following exclusion criteria:

- A new ban on power generation companies with more than 10GW of installed coal-based power production;
- Development of coal capacities with a more stringent threshold resulting in the exclusion of companies with coal power expansion plans of over 300MW (vs 3000MW previously). In addition, mining companies developing new coal mining and coal industry partners developing significant new coal assets are now excluded. This rule out investments in most new coal projects around the world.

In June 2021, we extended our existing Palm Oil policy with a more comprehensive approach to Ecosystem Protection & Deforestation. In addition to exclude companies involved in unsustainable palm oil production, including land rights conflicts and illegal logging issues, we now ban companies which face significant land use controversies and are responsible for biodiversity loss in relation to soy, cattle and timber. We also reinforced our engagement approach with companies involved in those issues, to help change and improve practices.

##### **ESG Scoring methodologies**

We have improved our ESG Scoring methodologies over the last months:

- In 2020, we strengthened our scoring methodology to reward companies and sovereigns that participate in the transition to a low-carbon economy through green bond issuances. Green bonds issuances may benefit from a bonus depending on the qualitative analysis opinion based on our proprietary green bond framework.

- Developed since 2010 by AXA IM, we have revamped our proprietary ESG sovereign model in 2020 towards industry standards, simplicity, best practices and to capture new trends and ESG related challenges for sovereigns. Main improvements were to increase the number of country groups used in the best-in-class approach and rescaling mechanism (inspired from the ESG corporate model) to not penalize emerging countries compared to developed countries.
- Early 2021, we have consolidated our Corporate ESG scoring methodology to improve the coverage on small and mid-caps. Thanks to EthiFinance, specialised on the ESG Scoring of SMEs and mid-size companies listed on European markets, and their Gaia database, we are able to calculate an ESG score for more than 300 additional companies.
- Since March 2021, we deployed the issuance bonuses' process already applied to green bonds to social and sustainability bonds. For Sustainability bonds, the bonus is distributed between the E and S pillars based on the Green and Social share of the bond.

#### Fund Investment process

Funds	Description
AXA WF Global Factors – Sustainable Equity	Since 10 <sup>th</sup> April 2021, to comply with the 2020-03 position of the AMF Doctrine, the Fund applies an ESG 'rating upgrade' approach, which requires the ESG rating of the Fund to be higher than the rating of the investment universe after omitting the worst 20% of the rated securities, excluding liquid assets held on an ancillary basis and Solidarity Assets.

#### 4.5. Does the fund use derivative instruments?

The fund can use derivative instruments for currency hedging purpose at shareclass level.

#### 4.6. Does the fund invest in mutual funds?

The prospectus of the fund permits the use of mutual funds but it is not our policy to do so.

### 5. Active Ownership Strategy

#### 5.1. How does your firm engage with issuers on ESG consideration?

At AXA IM, we have implemented a comprehensive active ownership strategy – engagement and voting - where we act as stewards of investments made on our clients' behalf. In particular, we believe that a proper consideration of relevant Environmental, Social and Governance (ESG) criteria impact the long-term sustainability of companies' performance and we seek to take action to ensure that positive outcomes can be achieved for our clients and wider societal stakeholders. As such, the overarching objective of AXA IM's Active Ownership strategy is to use our clients' investor rights to protect their investments by raising issues of concern that may have a material impact on the company's performance and investor value in the medium- to long-term. Our active ownership philosophy is as follows:

- o **We are proactive:** We identify material ESG factors and strive to engage companies before concerns materialise and harm investors. We commit our efforts to those ESG issues which we consider to be the most strategically and financially material for long-term investors. These are climate change, biodiversity, human capital management, public health, data privacy and corporate governance.
- o **We are research-driven:** As a truly active investment manager, we conduct in-depth analysis of companies as well as the broader macroeconomic backdrop and of ESG factors which shape investment outcomes. Our engagement and voting activities are built on the knowledge and insights we have developed.



- **We create impact:** Investors can drive impact in their investment activities by pressing for change at corporations – influencing the way they behave and do business. We focus our engagement where we believe it could have the greatest impact as well as an alignment with UN SDG targets.
- **We are an industry leader:** Taking a bold stance on difficult issues and committing resources to delivering engagement outcomes helps us reach our goals for clients and society in the long term. We also seek to work collaboratively with other investors to achieve shared objectives.
- **We are transparent:** We are committed to providing regular reporting on active ownership.

## 5.2. Are investment teams involved in your Engagement strategy?

We commit our efforts to those ESG issues which we consider to be the most strategically and financially material for long-term investors. These are climate change, biodiversity, human capital management, public health, data privacy and corporate governance. Our engagement strategy is mainly proactive. We identify material ESG factors through our research and seek to engage companies before concerns materialise and harm investors. RI Analysts within the RI Coordination & Governance and the RI Research teams will engage in a pro-active fashion on their respective ESG areas of expertise with clearly defined objectives to our engagement. There are two main approaches in place to facilitate pro-active engagement:

- **Focus list:** Every year, the AXA IM establishes a list of companies (“the focus list”) for which intense engagement is expected with clearly defined engagement objectives. The list is extracted from a broader engagement universe put together by investment platforms and the engagement/voting team, based on various inclusion criteria. This is the priority list for which there are regular individual engagement meetings, updates and progresses. In 2020, the Focus List constitutes of 40 global companies across sectors – many of which are major bond issuers.
- **Thematic projects:** In addition to the focus list, the engagement team also runs a number of projects on specific themes. These projects cover a wider universe of companies in any relevant market, sector or asset class. On average 20-40 companies will be targeted on a specific ESG angle. There can be overlap with companies on the focus list. Current 2020 projects include Climate Change with State Owned Energy Companies, Gender Diversity in laggard markets, Biodiversity in Agricultural Supply Chains, Drug Pricing, Data Privacy in technology companies.

## 5.3. Can investment teams express their views on the voting policy?

AXA IM has a clearly defined corporate governance policy, available on its website, which has been developed and evolved over time in order to ensure investee companies adhere to the highest standards of good corporate governance. Our voting strategy focuses on board independence, corporate ethics, environmental risks & climate-related disclosure, labour rights and executive pay, alongside with broader ESG topics. To improve governance standards, we recently reinforced our Voting policy by introducing a new target related to diversity. From 2021, AXA IM will target listed companies in developed market economies where at least one-third of the Board of Directors is not gender diverse. AXA IM has and will continue to push all companies, in both developed and emerging markets, to disclose and report against their executive committee gender diversity policy and targets. The RI Coordination & Governance team co-ordinates and ensures the exercise of our votes are done in a timely manner and according to AXA IM’s corporate governance policy and in coordination with portfolio manager views. Our Voting Policy is reviewed annually and signed off by the Corporate Governance Committee. The Committee comprise representatives of investment teams, who bring their hands-on investment perspective to the Committee’s deliberations, Compliance, Middle Office and members of the RI Research and RI Coordination and Governance teams.

## 5.4. Does the fund engage in securities lending activities?

If the fund participates in stock lending, the stocks are systematically recalled for the exercise of voting rights. A specific process has been put in place, described in our Corporate Governance & Voting policy.

## 6. ESG Performance and Impact Measurement

### 6.1. How is the ESG quality of the fund(s) assessed?

The ESG quality of the fund in scope is monitored through the ESG scoring of the portfolios – which is regularly monitored by the portfolio managers. The score is established based on AXA IM proprietary scoring methodologies, leveraging inputs from leading ESG data providers such as MSCI ESG, Sustainalytics and Vigeo. The ESG score is calculated on a scale of 0 to 10 (0 for the worst score, 10 for the best score) from the using a predefined weighting by sector for the each of the different E, S and G sub factors.

A number of KPIs are reported in the ESG report of the fund which is available externally, these indicators are described in section 4.f.

#### ESG Indicators for Corporates

ESG KPIs	Definitions
<b>Carbon Footprint (in CO<sub>2</sub>e Tons/Mns \$ revenue)</b>	Data provided by TRUCOST S&P. The amount of carbon dioxide equivalent released into the atmosphere as a result of the activities of a particular organization and first tier indirect (GHG emissions from operations that are owned or controlled by the company & from its direct suppliers. As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".
<b>Water intensity (in m3/Mns \$ revenue)</b>	Data provided by TRUCOST S&P. Calculated as sum of direct cooling + direct process + purchased. As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".
<b>% of Independent directors on board</b>	Data provided by Bloomberg. As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".
<b>% Women on board</b>	Data provided by Bloomberg. As the KPI is for the corporates its coverage is on "Corporates (bonds & equities)".
<b>Total Hours Spent by Firm – Employee Training</b>	Based on companies' own reported data, provided by Bloomberg. As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".
<b>% of Employee Turnover</b>	Based on companies' own reported data, provided by Bloomberg. It is the number of employees that left the company within the past year expressed as a percentage of the average total number of employees. As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".
<b>% severe UNGC controversies</b>	Data provided by Sustainalytics. The controversies ranks are: severe > high > significant > moderate > low > cleared. View the principles of the framework here: <a href="https://www.globalcompact.ca/about/ungc-10-principles/">https://www.globalcompact.ca/about/ungc-10-principles/</a> (*United Nations Global Compact). As the KPI is for the corporates, its coverage is on "Corporates (bonds & equities)".

### 6.2. What ESG indicators are used by the fund(s)?<sup>5</sup>

An ESG report on the fund is produced regularly, containing a number of E, S and G KPIs, as well as details on the ESG score of the fund and the voting report. These KPI/ESG scores are compared to those of the Fund benchmark.

Fund(s)	ESG KPIs	Calculation methods	Definitions
AXA WF Global Factors Sustainable Equity	ESG Score	AXA IM Proprietary ESG Scoring methodology	The ESG 'rating upgrade' approach requires the ESG

<sup>5</sup> Reference to Article 173 of the French TECV Act

		rating of the Fund to be higher than the rating of the investment universe after omitting the worst 20% of the ESG rated securities
		The amount of carbon dioxide equivalent released into the atmosphere as a result of the activities of a particular organization and first tier indirect (GHG emissions from operations that are owned or controlled by the company & from its direct suppliers.
	Carbon Intensity	CO2e Tons/Mns \$ revenue

### 6.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?<sup>6</sup>

Our ESG Scoring Methodology covers more than 8,800 issuers, and in certain cases, funds in scope invest in companies which do not have a quantitative ESG score. A qualitative analysis is performed, as described in the approaches above, to ensure there is no severe ESG risk attached to the issuer. At all times the fund(s) follows the Label ISR rule and has a coverage of at least 90% in ESG analysis, and 100% for funds awarded with the Towards Sustainability Label.

### 6.4. Is a part of the fund(s) invested in entities pursuing strong social goals/social enterprises?

This is not an identified focus of the fund in scope, however one of the dimensions of AXA IM's RI strategy is to ensure our investments can have a positive impact on society. In that perspective, we have developed a partnership with ISS Oekom to measure the alignment of our investments with UN SDGs, with reporting on alignment to be available for clients for selected SDGs on selected funds, starting in 2019.

## 7. Transparency

### 7.1. What communication resources are used to provide investors with information about the SRI management of the fund(s)?

AXA IM attaches great importance to communicating as transparently and comprehensively as possible to its clients in order to provide them with all the elements of analysis and assistance in understanding responsible investment.

All the main financial and non-financial information relating to ESG funds is available on our local websites in accordance with the regulations governing UCIs and Article 173 of the Transition Ecologique et Energétique law. We make available to our clients, on an ad hoc basis, the ESG report of our portfolios including ESG score as well as key ESG performance indicators.

At the level of the management company

The following contents are available on the website([www.axa-im.com](http://www.axa-im.com)):

<sup>6</sup> Reference to Article 173 of the French TECV Act and the TCFD recommendations (delivering on investor and stakeholder demands for climate-related information)

- [PRI Annual Report](#)
- [Annual stewardship report](#)
- [AXA IM RI policy](#)
- [AXA IM Corporate Governance and Voting policy](#)
- [AXA IM Engagement policy](#)
- [AXA IM sectorial exclusion and ESG Standards policies](#)
- [Carbon footprint of AXA IM \(TCFD – Art 173 combined annual report\)](#)
- [Full voting records](#) (updated on a quarterly basis) – statistics at country and sectors level as well as vote against management rationale

#### At the fund level

The following contents are available on the local websites in “Literature” section of funds’ individual pages

(<https://www.axa-im.com/fund-centre>):

- Transparency code (i.e. this document)
- Voting Report (for equity and multi asset funds only) – with number of AGMs voted and rationales for any vote against the management
- ESG Report
- Engagement Report
- Legal documentation (prospectus, KIID, annual reports, semi-annual reports)
- Monthly: comments from the portfolio manager, integrated reporting within B to B and B to C

#### **Zoom on Article 173 reporting**

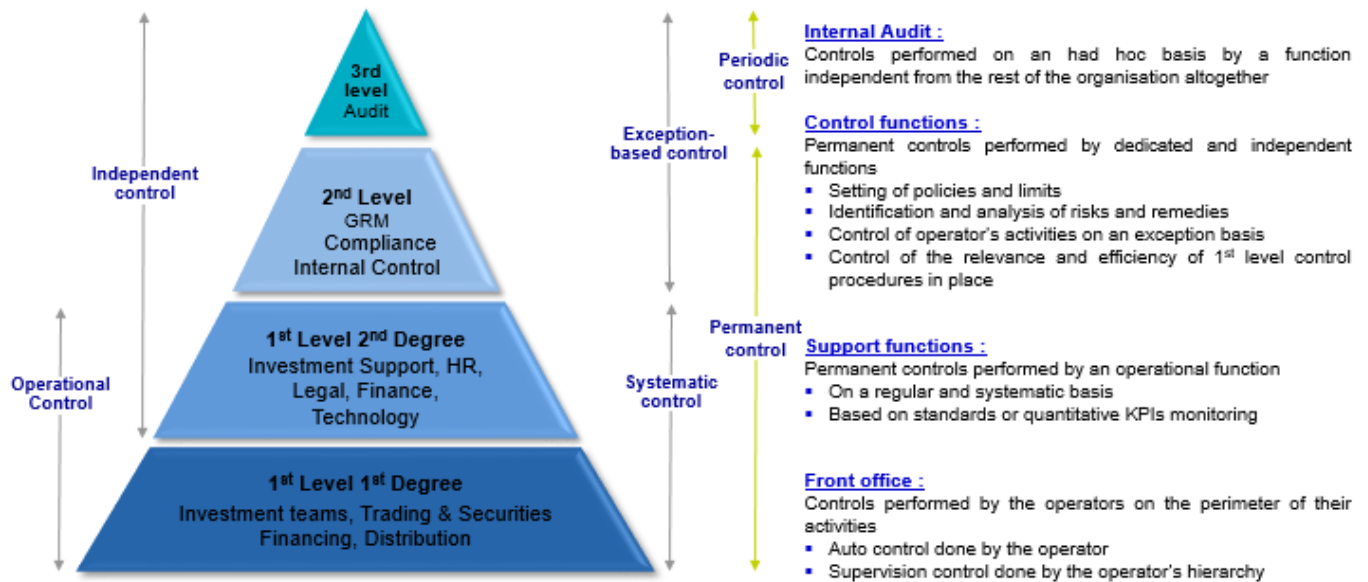
In line with the article 173, we keep ESG reporting available to our clients for all funds marketed in France, which allows clients to have additional information on the ESG performance of their portfolio, to know the ESG issues of the main positions of their portfolio and evaluate the evolution of ESG indicators. We have also enriched our reporting with a climate section that details the CO2 emissions associated with investments held in the portfolio as well as the contribution of companies to activities that promote energy transition. Identifying the most exposed companies will help establish a dialogue between issuers and clients about the possibility of repositioning towards a less carbon-intensive economy.

### **7.2. Does the fund management company publish the results of its voting and engagement policies?**

AXA IM Stewardship report is available on our [website](#). In addition, the results of voting activities for the fund in scope fund are available on our [Fund Centre](#). Moreover, [our Full Voting records](#) are accessible to the public and detail how we voted at General Meetings of companies held on our clients’ behalf.

## **8. ESG controls**

### **8.1. What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?**



Pre-trade controls are performed by the business teams themselves. The COO ensures that fund managers divest all investments in restricted companies and do not invest in restricted companies as long as there are restricted or absent new instruction.

Our Investment Guidelines team ("IG") is monitoring the correct application of the exclusion list with pre-trade and post-trade monitoring systems. Following the update of the eligible universe, the portfolio manager divests from stocks taking into account both a client's as well as fund's best interest. These ban lists are integrated into our Front Office tools. Regularly, through the integration of a wide range of ESG KPIs into our Front Office tools, investment teams are able to analyse and monitor each individual holding and the portfolio positioning on ESG factors and ESG related metrics.

In addition, the Compliance department performs ad hoc controls on the work performed by the Investment Guidelines team. Periodic controls are also carried out by the internal Audit department.

The ESG and Climate topics are covered by AXA IM's control framework, with responsibilities spread between the first level of controls performed by the business and second level of controls performed by dedicated teams. The Compliance and Risk Management teams are part of the RI governance committees. They oversee the adherence to regulatory requirements and management of risks related to these topics, through control plans which covers RI-related processes.

At AXA IM, the Compliance department is in charge of monitoring regulatory changes and works closely with investment teams as well as responsible investment professionals and Risk Management department. Moreover, as part of the sustainability-related regulatory changes, AXA IM has launched several working group that are in charge to monitor regulatory changes related to responsible investment, to define our position, set up action plans and to adapt our commercial offer. In addition, we participate and share our views with industry bodies such as the EFAMA and regulators.

## **Appendix 1 - European SRI Transparency Code: Reminder of context**

The European SRI Transparency Code (the Code) focuses on SRI funds distributed publicly in Europe and is designed to cover a range of assets classes, such as equity and fixed income.

All information pertaining to the European SRI Transparency Code can be found at the following website: [www.eurosif.org](http://www.eurosif.org). The Code comes with a Guidance Manual for fund managers on how to best use and respond to the Code.

### **REVISION OF THE CODE**

In 2017 the Code was updated to better reflect the continuing evolution of the European SRI market. A Working Group was set up to facilitate revision of the Code in line with the latest developments in the industry and in view of the latest work carried out by experts at the European and global level.

Applications to sign up to the Code will now be in line with key elements of the recommendations made by the Task Force on Climate-related Financial Disclosures (TCFD), Article 173 of the French TECV Act and the latest recommendations made by the High-Level Group of Experts on Sustainable Finance (HLEG) in its final report published in January 2018. Questions that are specifically designed to reflect those recommendations/legislation are indicated in the Code with footnotes.

### **TWO KEY MOTIVATIONS UNDERPIN THIS CODE**

- The opportunity for retail SRI funds to provide clarification to investors and other stakeholders about their SRI approach in an easily accessible and comparable format.
- Proactive strengthening of self-regulation to contribute to the development and promotion of SRI funds by setting up a common framework for transparency best practices.

### **GUIDING PRINCIPLE**

Signatories to the Code should be open and honest and should disclose accurate, adequate and timely information to enable stakeholders, especially consumers, to understand the ESG policies and practices of the fund.

### **COMMITMENTS BY SIGNATORIES**

- The order and exact wording of the questions should be followed;
- Responses should be informative and clear, and the resources and methodologies used should be described in as much detail and as precisely as possible;
- Funds should report data in the currency that they use for other reporting purposes;
- Reasons preventing the fund from providing all or part of the information to a given question should be clearly stated and, in such cases, signatories should state when they will be able to answer the question;
- Responses should be updated at least on an annual basis and should have a precise publication date;
- Responses to the Code should be easily accessible from the website of the fund and/or of the fund manager. In any case, signatories *should make it clear where to find the information required by the Code*;
- Signatories are solely responsible for the answers to the questions and should state this in their response.



## Disclaimer

This document is intended solely for information purposes pursuant to Article 173 of Law No. 2015-992 of 17 August 2015 relating to the energy transition for green growth and does not constitute investment research or financial analysis in relation to transactions in financial instruments pursuant to Directive MiFID 2 (2014/65/EU) nor does it constitute an offer on the part of AXA Investment Managers or its affiliates to buy or sell investments, products or services and should not be regarded as a solicitation, investment advice or legal or tax advice, an investment strategy recommendation or a personalised recommendation to buy or sell financial securities.

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