



EDMOND  
DE ROTHSCHILD

# TRANSPARENCY CODE ISR AFG-FIR / EUROSIF

EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE CREDIT  
EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE EQUITY  
EDR SICAV TRICOLORE RENDEMENT  
EDR SICAV GREEN NEW DEAL  
EDR FUND HEALTHCARE  
EDR FUND INCOME EUROPE  
EDR FUND CHINA  
EDR FUND HUMAN CAPITAL  
EDR INDIA  
EDR SICAV TECH IMPACT

27/05/2021

## STATEMENT OF COMMITMENT

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of Edmond de Rothschild Asset Management (France). We have been involved in SRI since 2007 and welcome the European SRI Transparency Code. This is our second statement of commitment and covers the period from 01.08.2021 to 31.07.2022. Our full response to the European SRI Transparency Code can be accessed below and is available in the annual report of the retail funds and on our website.

## COMPLIANCE WITH THE TRANSPARENCY CODE

Edmond de Rothschild Asset Management (France) 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. Edmond de Rothschild Asset Management (France) meets the full recommendations of the European SRI Transparency Code.



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Paris 01.08.2021

Jean Philippe Desmartin  
Head of Responsible Investment

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## 1. LIST OF FUNDS COVERED BY THE CODE

EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE CREDIT

EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE EQUITY

EDR SICAV TRICOLORE RENDEMENT

EDR SICAV GREEN NEW DEAL

EDR FUND HEALTHCARE

EDR FUND INCOME EUROPE

EDR FUND CHINA

EDR FUND HUMAN CAPITAL

EDR INDIA

EDR SICAV TECH IMPACT

**NAME OF THE FUND: EDR SICAV GREEN NEW DEAL**

<b>Dominant/ preferred SRI strategy</b>	<b>Asset class</b>	<b>Exclusions standards and norms</b>	<b>AUM 30.04.2021</b>	<b>Other labels</b>	<b>Links to relevant documents</b>
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input checked="" type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input checked="" type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking <p><b>Actively managed</b></p> <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation  <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Oil sand / oil fracking  <input checked="" type="checkbox"/> Oil	€ 52,85 Mio	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>-KIID - Prospectus  <a href="http://medianet.edmond-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-GR-NE-DE_de.pdf">http://medianet.edmond-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-GR-NE-DE_de.pdf</a></p> <p>- Fact Sheet - Portrait  <a href="https://funds.edram.com/en/edr-sicav---green-new-deal-FR0013428927">https://funds.edram.com/en/edr-sicav---green-new-deal-FR0013428927</a></p> <p>Transparency Code  <a href="https://www.edmond-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-Green-New-Deal.pdf">https://www.edmond-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-Green-New-Deal.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a>  <a href="https://www.edmond-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EdR SICAV Euro Sustainable Equity					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input checked="" type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input checked="" type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Porno-graphy <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Oil Sand/ Oil Fracking <input checked="" type="checkbox"/> Oil	€ 502,39 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input checked="" type="checkbox"/> febelfin (Belgian ESG label) <input checked="" type="checkbox"/> Label Climetrics	<p>- KIID</p> <p>- Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_SH%20EUROPE%20SRI_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_SH%20EUROPE%20SRI_de.pdf</a></p> <p>- Monthly reporting  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010505578_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010505578_de.pdf</a></p> <p>- Portrait  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20EUROPE%20SRI_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20EUROPE%20SRI_de.pdf</a></p> <p>- Annual Report  <a href="https://funds.edram.com/en/edr-sicav---euro-sustainable-equity-FR0010505578">https://funds.edram.com/en/edr-sicav---euro-sustainable-equity-FR0010505578</a></p> <p>- Financial and non-financial reporting  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-performance-extra-financiere-euro-sustainable-growth.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-performance-extra-financiere-euro-sustainable-growth.pdf</a></p> <p>Corporate presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a></p> <p>- SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nac-haltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nac-haltigen-investments</a>  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EDR SICAV Euro Sustainable Credit					
Dominant/pref erred SRI strategy	Asset class	Exclusions standards and norms	AUM per 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Class Investment section <input type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input checked="" type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/enga- gement <input checked="" type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking <p><b>Actively managed</b></p> <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input type="checkbox"/> International shares <input checked="" type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Contro- versial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Porno-graphy <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input type="checkbox"/> Other (please specify)	€ 275,7 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>- KIID - Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-SIGN-EUR-IG_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-SIGN-EUR-IG_de.pdf</a></p> <p>- Monthly Report  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010789313_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010789313_de.pdf</a></p> <p>-Portrait  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_EDR-SIGN-EUR-IG_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_EDR-SIGN-EUR-IG_de.pdf</a></p> <p>-Annual Report  <a href="https://funds.edram.com/en/edr-sicav---euro-sustainable-credit-FR0010172767">https://funds.edram.com/en/edr-sicav---euro-sustainable-credit-FR0010172767</a></p> <p>Transparency report  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-ESC.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-ESC.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmen/informationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmen/informationen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a>  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EDR India					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Porno-graphy <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input type="checkbox"/> Other (please specify)	\$ 96,28 Mio	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>- KIID</p> <p>- Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20INDE_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20INDE_de.pdf</a></p> <p>-Monthly Reporting  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010479931_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010479931_de.pdf</a></p> <p>-Fund Portrait  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20INDE_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20INDE_de.pdf</a></p> <p>- Annual Report  <a href="https://funds.edram.com/en/edmond-de-rothschild-india-FR0010479931">https://funds.edram.com/en/edmond-de-rothschild-india-FR0010479931</a></p> <p>Portfolio inventory  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-inventaire-EdR-India.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-inventaire-EdR-India.pdf</a></p> <p>- Voting Report  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdR-India.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdR-India.pdf</a></p> <p>-ESG Process  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdR-India.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdR-India.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmen/informationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmen/informationen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a></p> <p><a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EDR Fund China					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.202 1	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input checked="" type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking <p><b>Actively managed</b></p> <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions	\$ 621,5	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>-KIID - Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20CHINE_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20CHINE_de.pdf</a></p> <p>-Annual Report -Monthly Report  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU1160365091_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU1160365091_de.pdf</a></p> <p>-Fund Portrait  <a href="https://funds.edram.com/en/edmond-de-rothschild-fund-china-LU1160365091">https://funds.edram.com/en/edmond-de-rothschild-fund-china-LU1160365091</a></p> <p>-Portfolio Inventory  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-inventaire-portefeuille-EdRF-China.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-inventaire-portefeuille-EdRF-China.pdf</a></p> <p>SRI Process  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRF-China.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRF-China.pdf</a></p> <p>Voting report  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdR-China.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdR-China.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a></p>



**Name of the fund: EdR SICAV Tech Impact**

<b>Dominant/ preferred SRI strategy</b>	<b>Asset class</b>	<b>Exclusions standards and norms</b>	<b>AUM 30.04.202 1</b>	<b>Other labels</b>	<b>Links to relevant documents</b>
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input checked="" type="checkbox"/> Exclusions <input checked="" type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking <p><b>Actively managed</b></p> <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Oil, Oil Sand, Oil Fracking	€ 94,95 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>- KIID - Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDRS-TEC-EQ_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDRS-TEC-EQ_de.pdf</a></p> <p>Monthly report  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0013488244_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0013488244_de.pdf</a></p> <p>- Fund Portrait  <a href="https://funds.edram.com/en/edr-sicav---tech-impact-FR0013488244">https://funds.edram.com/en/edr-sicav---tech-impact-FR0013488244</a></p> <p>-SRI Process  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRS-Tech-Impact.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRS-Tech-Impact.pdf</a></p> <p>-Voting Report  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRS-Tech-Impact.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRS-Tech-Impact.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a></p> <p><a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EdR Fund Human Capital					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input checked="" type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input checked="" type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Oil, Oil Fracking / Oil Sand	€ 6,4 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>- KIID  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/KIID_LU2221885713_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/KIID_LU2221885713_de.pdf</a></p> <p>- Prospectus            - Fund Portrait  <a href="https://funds.edram.com/en/edmond-de-rothschild-fund-human-capital-LU2221884823">https://funds.edram.com/en/edmond-de-rothschild-fund-human-capital-LU2221884823</a></p> <p>SRI Process  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRF-Human-Capital.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-process-gestion-ISR-EdRF-Human-Capital.pdf</a></p> <p>Voting Report  <a href="https://www.edmond-de-rothschild.com/Pages/PageNotFound.aspx?requestUrl=http://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRF-Human-Capital.pdf">https://www.edmond-de-rothschild.com/Pages/PageNotFound.aspx?requestUrl=http://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRF-Human-Capital.pdf</a></p> <p>ESG Reporting &amp; KPIs  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-reporting-esg-impact-EdRF-Human-Capital.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-reporting-esg-impact-EdRF-Human-Capital.pdf</a></p> <p>-Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmen/uber-uns/gruppe</a></p> <p>-SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a>  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a></p>

Name of the fund: EDR Fund Income Europe					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input checked="" type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<p><b>Passively managed</b></p> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Porno-graphy <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input type="checkbox"/> Other (please specify)	€ 354,5 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	<p>- KIID - Prospectus  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-INC-EU_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_EDR-INC-EU_de.pdf</a></p> <p>- Monthly Report  <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU0992632538_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU0992632538_de.pdf</a></p> <p>Annual Report - Fund Portrait  <a href="https://funds.edram.com/en/edmond-de-rothschild-fund-income-europe-LU0992632538">https://funds.edram.com/en/edmond-de-rothschild-fund-income-europe-LU0992632538</a></p> <p>Transparency report  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdRF-Income-Europe.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdRF-Income-Europe.pdf</a></p> <p>- Corporate Presentation  <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a></p> <p>- SRI Expertise  <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a></p> <p> <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a> </p>

Name of the fund: EDR Fund Healthcare					
Dominant/pref erred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2 021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in- Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input checked="" type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engag ement <input type="checkbox"/> Sustainability Themed	<b>Passively managed</b> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking  <b>Actively managed</b> <input checked="" type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input checked="" type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Contro-versial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Porno-graphy <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Oil, Oil Fracking, Oil sand	€ 406,2 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	- KIID - Prospectus <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20GL%20HEALTH_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_Complet_SH%20GL%20HEALTH_de.pdf</a>  -Monthly Report <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU1160356009_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_LU1160356009_de.pdf</a>  -Annual Report - Fund Portrait <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20GL%20HEALTH_de.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_SH%20GL%20HEALTH_de.pdf</a>  -Voting Report <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRF-Healthcare.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-votes-EdRF-Healthcare.pdf</a>  -Corporate Presentation <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a>  -SRI Expertise <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a>  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a>

Name of the fund: EDR SICAV Tricolore Rendement					
Dominant/ preferred SRI strategy	Asset class	Exclusions standards and norms	AUM 30.04.2021	Other labels	Links to relevant documents
<input checked="" type="checkbox"/> Best-in-Universe Investment section <input type="checkbox"/> Engagement & Voting <input checked="" type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	<b>Passively managed</b> <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking  <b>Actively managed</b> <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic engineering <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions	€ 819,46 Mio.	<input checked="" type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	- KIID - Prospectus <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_TRICOLORE%20RDT_en.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Prospectus_TRICOLORE%20RDT_en.pdf</a>  -Monthly Report <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010588343_en.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/Monthly_Factsheet_FR0010588343_en.pdf</a>  -Annual Report <a href="https://funds.edram.com/en/edr-sicav---tricolore-rendement-FR0010588343">https://funds.edram.com/en/edr-sicav---tricolore-rendement-FR0010588343</a>  Fund portrait <a href="http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_TRICOLORE%20RDT_en.pdf">http://medianet.edmond-de-rothschild.fr/edram/pdf/RV_TRICOLORE%20RDT_en.pdf</a>  ESG Engagement report <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-EN-ESGS-Engagement-report-Tricolore-Rendement.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-EN-ESGS-Engagement-report-Tricolore-Rendement.pdf</a>  Transparency code <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-Tricolore-Rendement.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-code-transparence-EdR-Tricolore-Rendement.pdf</a>  -Corporate Presentation <a href="https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe">https://www.edmond-de-rothschild.com/de/unternehmensinformationen/uber-uns/gruppe</a>  -SRI Expertise <a href="https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments">https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments</a>  <a href="https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf">https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf</a>

## 2. GENERAL INFORMATION ABOUT THE FUND MANAGEMENT COMPANY

### 2.1. NAME OF THE FUND MANAGEMENT COMPANY THAT MANAGES THE APPLICANT FUND(S)

#### ***Edmond de Rothschild Asset Management (France)***

*47, rue du Faubourg Saint Honoré*

*75401 Paris Cedex 08*

*Société anonyme governed by an executive board and a supervisory board with a capital of 11.033,769 Euros.*

*AMF Registration number GP 04000015*

*332.652.536 R.C.S. Paris*

*Internet: [www.edram.fr](http://www.edram.fr)*

### 2.2. WHAT ARE THE COMPANY'S TRACK RECORD AND PRINCIPLES WHEN IT COMES TO INTEGRATING SRI INTO ITS PROCESSES?

Sustainability is part of our Investment DNA:

For more than 250 years, the Rothschild family has accompanied companies and participated in the development of economic structures. "Integritas" (ethics / honesty), which is at the center of the family's motto - Concordia, Integritas, Industria - expresses itself in the SRI approach. Through its commitment, the Edmond de Rothschild Group creates added value for all parties involved, which is beyond the financial performance. We believe that investment should have a positive impact on the real world and real economy. This said, Responsible & Sustainable Investment (SRI, ESG, SDG) is a strategic approach that forms a natural part of the investment DNA of Edmond de Rothschild: it is the strategic approach of an independent asset manager whose investment decisions have a long term orientation and are marked by high conviction portfolios based on fundamental stock picking that combines financial criteria / risks and non - financial ( ESG, SDG, SRI) criteria / risks.

Milestones:

This strategy materialized in 2007 with the launch of a thematic fund focusing on environmental aspects, EdR Ecosphere, which in 2009 was followed by a European equity fund integrating an SRI ("best in universe1") approach, namely EdR Europe SRI (now EdR SICAV Euro Sustainable Equity).

In 2010, EdR Tricolore Rendement (now EdR SICAV Tricolore Rendement) implemented an ESG engagement policy.

In 2015, Edmond de Rothschild launched its first SRI credit fund by transforming an existing mainstream credit IG fund : EdR SICAV Euro Sustainable Credit. The fund's process has been enriched by the integration of ESG criteria in the selection of securities and a diversification by also covering High Yield bond (exposure to High Yield is limited to 30%)

In 2020, we started a thematic SRI fund range with the launch/SRI transformation of three funds: EdR Fund Healthcare, EdR SICAV Green New Deal and EdR Fund Human Capital. In total seven additional funds obtained the official French State ESG label for their SRI approach, thus bringing the number of funds labelled at 11 with AUM of around 2,8 BN Euro. In April 2021, two additional funds obtained the French SRI label: EdR Fund China and EdR Sicav Equity Euro Solve.

In addition, since 2011, several institutions have trusted us by selecting us to manage dedicated mandates integrating an SRI approach, In total AUM in sustainable assets (mutual fund and dedicated funds/mandates) amount 3,8 BN Euro as at end of December 2020.

List of liquid funds with SRI label

- EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE CREDIT
- EDMOND DE ROTHSCHILD SICAV EURO SUSTAINABLE Equity
- EDR SICAV TRICOLORE RENDEMENT
- EDR SICAV GREEN NEW DEAL
- EDR FUND HEALTHCARE
- EDR FUND INCOME EUROPE
- EDR FUND CHINA
- EDR FUND HUMAN CAPITAL
- EDR INDIA
- EDR FUND INVESTMENT GRADE CREDIT (not registered for Sale in Germany & Austria)
- EDR SICAV TECH IMPACT

Please provide a hyperlink to any of the company's sustainable investment webpages.

Sustainability pages on the website for Germany & Austria

<https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments>

<https://www.edmond-de-rothschild.com/de/asset-management/fonds/nachhaltige-investments>

## 2.3. HOW DOES THE COMPANY FORMALISE ITS SUSTAINABLE INVESTMENT PROCESS?

Signatory of the PRI (Principles for Responsible Investment) since 2010, Edmond de Rothschild Asset Management (France) has formalized since then a Responsible Investment Policy. The relevant policies can be found via the below links

Sustainable investment policy of the EDR Group

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/group/sustainable-development/rapport/EdR-Gruppe-DE-Nachhaltige-Investmentpolitik.pdf>

Sustainable investment policy of Edmond de Rothschild Asset Management (France)

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-responsible-investment-policy.pdf>

Exclusion policy of Edmond de Rothschild Asset Management (France)

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-EN-Exclusion-policy.pdf>

Engagement policy of Edmond de Rothschild Asset Management (France)

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-Politique-Engagement.pdf>

Voting Report of Edmond de Rothschild Asset Management (France)

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-EN-annual-report-on-exercising-voting-rights.pdf>

Edmond de Rothschild Asset Management has also formalized a Responsible Investment Strategy since 2013. We have started at the beginning of 2021 our third 4-year SRI strategy (2021-2024) which for the first time encompasses all asset management activities (liquid and illiquid assets).

### Shareholder dialogue and Engagement

#### 1. Voting

Our voting policy is systematic: As a responsible management company, Edmond de Rothschild Asset Management (France) exercises its voting rights on the securities held in the UCITS funds it manages if the outstanding represents more than 0.01% of the company's capital, regardless of the nationality of the companies, as long as the information provided by the issuer is sufficient and the depositories are able to take votes into account. In 2020, the rate of securities held where we exercised our voting rights was 92,7%. The opposition rate was 21,9 % in 2020.



## 2. Engagement

Our engagement process is constructive, independent and long term - orientated: We have a comprehensive coverage of all asset class and our actions are validated and carried out by Portfolio managers and the Board. In line with our “discuss, encourage, reward and innovate” approach, we focus on precise areas for improvement, defined for a better transparency of ESG policy / strategy and practices, operational performance as well as a companies’ sustainability strategy.

Our action can be individual or collective (coordinated with other shareholders) where we participate to market initiatives. For the sake of consistency and to ensure our engagement is efficient, Edmond de Rothschild Asset Management (France)’s has set up a Dialogue and Engagement Committee, headed by the Global CIO Asset Management. The Committee is dedicated to the definition, validation, follow-up and reporting with respect to our engagement actions and meets on a bi - monthly basis.

### 2.4. HOW ARE ESG RISKS AND OPPORTUNITIES - INCLUDING THOSE LINKED TO CLIMATE CHANGE - UNDERSTOOD/TAKEN INTO ACCOUNT BY COMPANY?<sup>1</sup>

We accept and master the complexity of the challenges of sustainable development and the risks and opportunities related to it. Edmond de Rothschild has a well-defined and formal SRI strategy in place since 2013 and also - in 2011 - created its proprietary in - house model (EDR BUILD) for ESG analysis and ESG rating for companies and sovereign issuers. Our proprietary ESG analysis allows us to identify opportunities linked to solutions by sustainable development and thus provides investment ideas. It also allows detecting the most material ESG risks.

#### **Proprietary, in - house model for ESG analysis (risks & opportunities) and ESG ratings**

Our model covers a large number of ESG challenges with 45 quantitative and qualitative E, S and G criteria / thematic fields with financial and extra - financial materiality. Our in-house model also includes proprietary indicators such as Green Impact or Social Impact. It is important to note that our model has a high degree of granularity when it comes to assessing and rating ESG risks / opportunities, i.e. the 3 ESG Pillars are weighted with respect to a company’ specifics such as e.g. sector, country, Market Cap and shareholder structure to achieve a fair analysis and allow a realistic ESG rating. Our ESG analysis emphasises proprietary research. Our SRI analysts hold numerous company meeting on ESG topics and rely on specialized broker research. We emphasis raw data from companies (via Bloomberg and company publications) but also rely on ESG data providers (e.g. Sustainalytics, ISS, Reprisk, Carbone4, MSCI), stakeholders ( e.g. trade unions) or global bodies (e.g. OECD, United Nations).

Implemented in 2011, our proprietary in - house model EDR BUILD is constantly improved e.g.

- 2017: Integration of climate risk criteria (also reflected in the SRI strategy)
- 2017: Formalization of a climate 2°C roadmap
- 2018: Integration of the 17 Sustainable Development Goals of the UN
- Since 2020: Progressive integration of EU Taxonomy / 6 Sustainability Goals of the EU

Norms: next to proprietary criteria along E, S & G factors, our in - house ESG / SRI model is based upon & constantly updated on the basis of existing references, including:

- *General:* United Nations Global Compact, International Integrated Reporting Initiative (IIRC), Sustainability Accounting Standards Board (SASB)
- *Environment:* United Nations Convention on Climate Change, 2016 Paris Climate Agreement
- *Social:* Ottawa Convention (Anti-personnel mines) and Oslo Treaty (Cluster Bombs), Universal Declaration of Human Rights, WTO Conventions
- *Governance:* United Nations and OECD Anti-corruption Conventions, Extractive Industries Transparency Initiative, OECD Principles on Corporate Governance. The model currently covers approximately 350 European issuers (equities and credit), including the entire MSCI Europe.

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<sup>1</sup> Reference to Article 173 of the French TECV Act and the TCFD recommendations (risks and opportunities section)



## **SRI / ESG strategy**

Our ESG approach is well defined and formalized by our SRI policies and SRI strategy. The SRI strategy is regularly updated to reflect improvements and developments.

2013: launch of first multi-year SRI strategy (2013 – 2016)

2017: launch of our 2<sup>nd</sup> multi - year SRI strategy (2017 – 2020)

2021: Launch of our 3<sup>rd</sup> multi -year SRI strategy ( 2021 – 2024)

RI strategy aims to mitigate risks and to identify opportunities to make investments more sustainable and is underpinned by solid governance. A Responsible Investment Steering Committee, under the oversight of the Global CEO Asset Management, meeting at least once a year, validates and monitors the implementation of our RI strategy. Our 2017 -2020 SRI strategy has notably allowed us elaborate a demanding ESG integration approach covering the scope of our activities, to accelerate the development of a dedicated SRI fund range, to formalize a climate road map and to favour dialogue and engagement with companies in which we invest. The 2021-2024 Responsible investment strategy will enable us to accelerate and expand our approach and bolster the transversal ESG aspects of the various activities of the Edmond de Rothschild Group.

## **Climate Change Risk**

Edmond de Rothschild has been in 2015 an early signatory of the Montreal Carbon Pledge to demonstrate its commitment to climate transition.

### ***Integration of climate change risks & opportunities in the SRI policy and in-house ESG model***

The analysis of climate change risks & opportunities forms an integral part of our in - house ESG analyses & ESG rating model EDR BUILD

Our proprietary ESG process integrates a proprietary indicator “ Green Impact “ which covers amongst other aspects climate action (contribution to the fight against global warming / contribution to the achievement of the max 2 degree goal, contribution to the energy transition towards renewable energies and support of energy efficiency and the reduction of CO2 within the business model).

In addition, we integrated in 2018 the 17 UN SDGs in our ESG analysis whereby we differentiate between a positive or negative activation of the SDGs on which a company has a significant impact. A score (from +3 to -3) is attributed to the activated SDG, based on the ESG intensity of the sector. Notably SDG 13 “Climate Action” and SDG 7 “Affordable and Clean Energy” relate directly to the risks & opportunities linked to climate change.

In 2020, we integrated started to integrate the EU Taxonomy (“Green” Taxonomy) with the 6 environmental goals of the EU. Goal 1 “climate change mitigation” and goal 2 “climate change adaptation” relate directly to climate change.

Climate data, which feed our analysis, have recently been extended through our partnership with Carbone4, which notably integrates data on scope 3 (indirect emissions) and scope 4 (avoided emissions) and allows as calculating the temperature and the climate trajectory of our portfolios.

Portfolio managers can monitor via an ESG dashboard in their portfolio management tool the carbon footprint of each individual investment and of the portfolio as a whole versus the benchmark.

## **Formalized climate strategy**

In addition, as mentioned above, Edmond de Rothschild Asset Management (France) has formalized in 2017 a “2 degree roadmap”, updated in 2020, foreseeing the gradual decarbonisation of all portfolios (not only those of dedicated ESG funds) by 2034. The roadmap was drawn up in line with the final recommendations of the Task Force on Climate-Related Financial Disclosures (TFCD) and relies on the Sustainable Development Scenario of the International Energy Agency (IEA). It identifies a number of high climate risk sectors and activities as well as – on the opposite spectrum - climate opportunity sectors and activities. -

## Carbon Footprint / Impact Reporting

The carbon footprint for each fund is available in the monthly reporting since beginning of 2020 and that of its benchmark since the second half of 2020. Carbon footprint for the benchmark will be added Q 2 2021.

As mentioned above, portfolio managers can already monitor via an ESG dashboard in their portfolio management tool the carbon footprint of each individual investment and of the portfolio as a whole versus the benchmark.

This dashboard represents a first step of integration carbon risk in portfolio management and carbon exposure management and prepares the way for future carbon risk steering. It also makes it possible to raise awareness of all stakeholders to the carbon issue and to underline the desire for transparency of Edmond de Rothschild Asset Management (France).

### 2.5. HOW MANY EMPLOYEES ARE DIRECTLY INVOLVED IN THE COMPANY'S SUSTAINABLE INVESTMENT ACTIVITY?

Edmond de Rothschild has a dedicated SRI team and chosen to integrate these SRI expert resources within its portfolio management teams, in order to promote exchanges between teams and thus facilitate the dissemination of the consideration of ESG issues in the analysis of companies and sovereign issuers.

This dedicated SRI team, integrated within the management company, is made up of 4 professionals.

- Jean-Philippe Desmartin, 27 years of experience including 20 in SRI, Director of Responsible Investment, SRI Manager & SRI Analyst
- Clémence Moullot, 13 years of experience, SRI Manager & SRI Analyst
- Benedicte Bazi, SRI Analyst, 32 years of experience
- Maria Kahane, ESG specialist

In addition, the dedicated SRI team benefits from the support of 10 RI correspondents integrated within the respective portfolio management teams: 9 portfolio managers/analysts and a product specialist across our main management expertise (European and global equities, credit, convertibles, sovereign debt, asset allocation and fund selection). Some of these correspondents are also specialized in specific themes (dialogue & engagement; governance, climate). These IR correspondents are more particularly in charge of promoting exchanges with the dedicated SRI / Responsible Investment team, to encourage joint work and promote dissemination and consideration of extra-financial issues in the analysis of values within portfolios managed by their respective teams.

A member of our Risks Department also acts as an RI correspondent relating to risk management and control issues. Daily risk controls integrate the control of portfolios' ESG guidelines and exclusion policy.

In addition, the Internal Control and Compliance Department of Edmond de Rothschild Asset Management (France) carries out an annual control of the management process and the ESG analysis methodology implemented within our SRI funds, in particular via verification the existence of securities sheets for each security in the portfolio and internal ESG ratings.

EdRAM (France) has also set up a "Voting Committee" which meets at least once a year and ensures compliance with the voting policy and decides on the evolution and possible update thereof, in particular according to new resolutions encountered and the evolution of legislation.

## 2.6. IS THE COMPANY INVOLVED IN ANY RI INITIATIVES?

General Initiatives	Environmental/Climate Initiatives	Social Initiatives	Governance Initiatives
<input type="checkbox"/> ECCR – Ecumenical Council for Corporate Responsibility <input type="checkbox"/> EFAMA RI WG <input type="checkbox"/> European Commission's High-Level Expert Group on Sustainable Finance <input type="checkbox"/> ICCR – Interfaith Center on Corporate Responsibility <input checked="" type="checkbox"/> National Asset Manager Association (RI Group) <input checked="" type="checkbox"/> PRI – Principles For Responsible Investment <input checked="" type="checkbox"/> SIFs – Sustainable Investment Forum <input checked="" type="checkbox"/> Commission Recherche du Forum pour l'investissement Responsable <input checked="" type="checkbox"/> PRI Academic Network <input checked="" type="checkbox"/> Comité consultatif de la francophonie des PRI <input checked="" type="checkbox"/> Commission ESG de l'EFFAS	<input checked="" type="checkbox"/> CDP – Carbon Disclosure Project (please specify carbon, forest, water etc.) <input type="checkbox"/> Climate Bond Initiative <input type="checkbox"/> Green Bond Principles <input checked="" type="checkbox"/> IIGCC – Institutional Investors Group on Climate Change <input checked="" type="checkbox"/> Montreal Carbon pledge <input type="checkbox"/> Paris Pledge for Action <input type="checkbox"/> Portfolio Decarbonization Coalition <input type="checkbox"/> Other (please specify)	<input type="checkbox"/> Access to Medicine Foundation <input type="checkbox"/> Access to Nutrition Foundation <input type="checkbox"/> Accord on Fire and Building Safety in Bangladesh <input checked="" type="checkbox"/> Bureau de l'Observatoire de l'Immatériel  <input checked="" type="checkbox"/> WICI Europe	<input checked="" type="checkbox"/> ICGN – International Corporate Governance Network <input type="checkbox"/> Other (please specify)

## 2.7. WHAT IS THE TOTAL NUMBER OF SRI ASSETS UNDER THE COMPANY'S MANAGEMENT?

Edmond de Rothschild Asset Management (France) is a major actor in the field of SRI in Europe, managing around €uro 3,8 Bn SRI assets across its entire range of products (including mutual funds and dedicated funds/mandates) whereby the assets held in SRI mutual funds amount to €uro 2,8 Bn as per 31.12.2020.

## 3. GENERAL INFORMATION ABOUT THE SRI FUND(S) THAT COME UNDER THE SCOPE OF THE CODE

### 3.1. WHAT IS (ARE) THE FUND(S) AIMING TO ACHIEVE BY INTEGRATING ESG FACTORS?

As bottom up stock pickers we believe in fundamental analysis of companies. Consequently we believe that considering non – financial criteria ( = ESG) and risks on top of financial criteria / risks means adds a lot of extra value and quality as it enables to make better – informed investment decisions.. This added value and improvement of quality is two-fold

- identify investment opportunities by identifying good governance companies with positive environmental and social impact which can increase the quality of your holdings and lead to positive contribution to performance.

- b) detect additional risks arising from non – financial aspects that could eventually materialize from a point of financial view, in other words, considering ESG criteria / risks can be a useful element of risk mitigation.

Our proprietary ESG analysis in Europe is primarily based on first-hand information gained through company meetings and company visits. In 2020, we had around 140 company meetings that exclusively focused on ESG issues. . Our analysts regularly meet brokers specializing in ESG issues ( e.g. Oddo, Kepler, Chevreux, Exane, Natixis, Société Générale, HSBC, JP Morgan etc.)

Finally, analysts also rely on ESG bases such as Bloomberg or Factset to have raw quantitative or qualitative data.

The ESG dimension is also taken into account during regular exchanges with companies in a process of dialogue and commitment carried out by all funds.

### **3.2. WHAT INTERNAL OR EXTERNAL RESOURCES ARE USED FOR ESG EVALUATION OF THE ISSUERS WHO MAKE UP THE INVESTMENT UNIVERSE OF THE FUND(S)?**

#### ***Proprietary , in – house ESG rating:***

The ESG rating is carried out by our dedicated SRI team with 3 experienced SRI analysts / managers because Edmond de Rothschild Asset Management (France) is convinced that this study is complementary to the financial study and rich in information on the long-term management and fundamentals of a company. We do not rely on external ESG ratings.

The dedicated SRI team translates the gathered ESG data and information per criteria in scores and thus obtains an overall ESG score for each company.

#### ***Source of ESG data and extra – financial information:***

For European companies, ESG data is primarily derived through our proprietary research, predominantly through company visits, company dialogue and also by information from stakeholders. 3 manager analysts are in charge of this proprietary analysis (around 330 companies in European coverage).

For companies not covered and companies outside Europe, the research is provided by a partnership with the specialized ESG data provider Sustainalytics as well as Reprisk for controversial issues. For governance analysis, Edmond de Rothschild Asset Management (France) also uses analyses of Proxinvest and ISS. ISS is also used for the exercise of voting rights during the shareholder general meetings. Our analysts regularly meet brokers specializing in ESG issues (Oddo, Kepler, Chevreux, Exane, Natixis, Société Générale, HSBC, JP Morgan etc.)

Finally, analysts also rely on ESG bases such as Bloomberg or Factset to have raw quantitative or qualitative data.

As part of the integration of ESG research into our fundamental analysis, we have added a detailed SWOT ESG analysis to the investment cases of each security review. SWOT stands as an acronym for Strengths, Weaknesses, Opportunities & Threats. Our goal is to assess the most important issues for a company, based on a sector approach, as well as long-term ESG opportunities such as the impact of the energy transition in renewable energies or the growth of circular economy. This sectoral assessment in terms of risks / opportunities ESG is based on a detailed analysis based on a series of 20 questions to develop a good understanding of corporate governance and quality of its management. In addition, our portfolio management tool Dimension includes an ESG dashboard providing a detailed overview of the fund's ESG profile and coal exposure, indicating the proprietary and external ratings, security by security, highlighting the concentration of ESG risks in the portfolio as well as exposure to controversies (provided by Sustainalytics).

### 3.3 WHAT ESG CRITERIA ARE TAKEN INTO ACCOUNT BY THE FUND(S)?

The main analysis criteria linked to the 3 pillars E,S,G (Environment, Social, Governance) are:

Environment (E)	Social (S)	Governance (G)
<b>Environmental risk management</b> <ul style="list-style-type: none"> <li>• Deployment of environmental management system</li> <li>• Integration of climate change risks</li> <li>• Respect for biodiversity</li> </ul>	<b>Human resources management</b> <ul style="list-style-type: none"> <li>• Job quality</li> <li>• Career and further training management</li> <li>• Further training and diversity</li> <li>• Attractiveness</li> <li>• Health &amp; safety</li> </ul>	<b>Business ethics and fundamental rights</b> <ul style="list-style-type: none"> <li>• Compliance with human rights and child labour</li> <li>• Fight against corruption and anti-competition practices</li> <li>• Fiscal transparency</li> <li>• Responsible lobbying</li> </ul>
<b>Green innovation and product impact</b> <ul style="list-style-type: none"> <li>• Added environmental value from products and services, innovation</li> <li>• Eco-designed products</li> </ul>	<b>Social impact</b> <ul style="list-style-type: none"> <li>• Job and restructuring management</li> <li>• Relations with suppliers</li> <li>• Social added value from products or services</li> <li>• Licence to operate</li> </ul>	<b>Board</b> <ul style="list-style-type: none"> <li>• Independence of board of directors from audit, remuneration committees, etc.</li> <li>• Separation of powers</li> <li>• Board diversity</li> </ul>
<b>Environmental footprint</b> <ul style="list-style-type: none"> <li>• Greenhouse gas emissions</li> <li>• Energy consumption</li> <li>• Water consumption</li> <li>• Waste management</li> <li>• Discharges</li> </ul>	<b>Client relations</b> <ul style="list-style-type: none"> <li>• Product/service information and safety</li> <li>• Client satisfaction</li> </ul>	<b>CEO and executive committee</b> <ul style="list-style-type: none"> <li>• Executive committee: composition and procedures</li> <li>• CEO profile and succession</li> <li>• Remuneration transparency and appropriateness</li> </ul>
		<b>Shareholders</b> <ul style="list-style-type: none"> <li>• Audit and Internal Control</li> <li>• Recognition of minority interests</li> </ul>

Source: Edmond de Rothschild Asset Management (France)

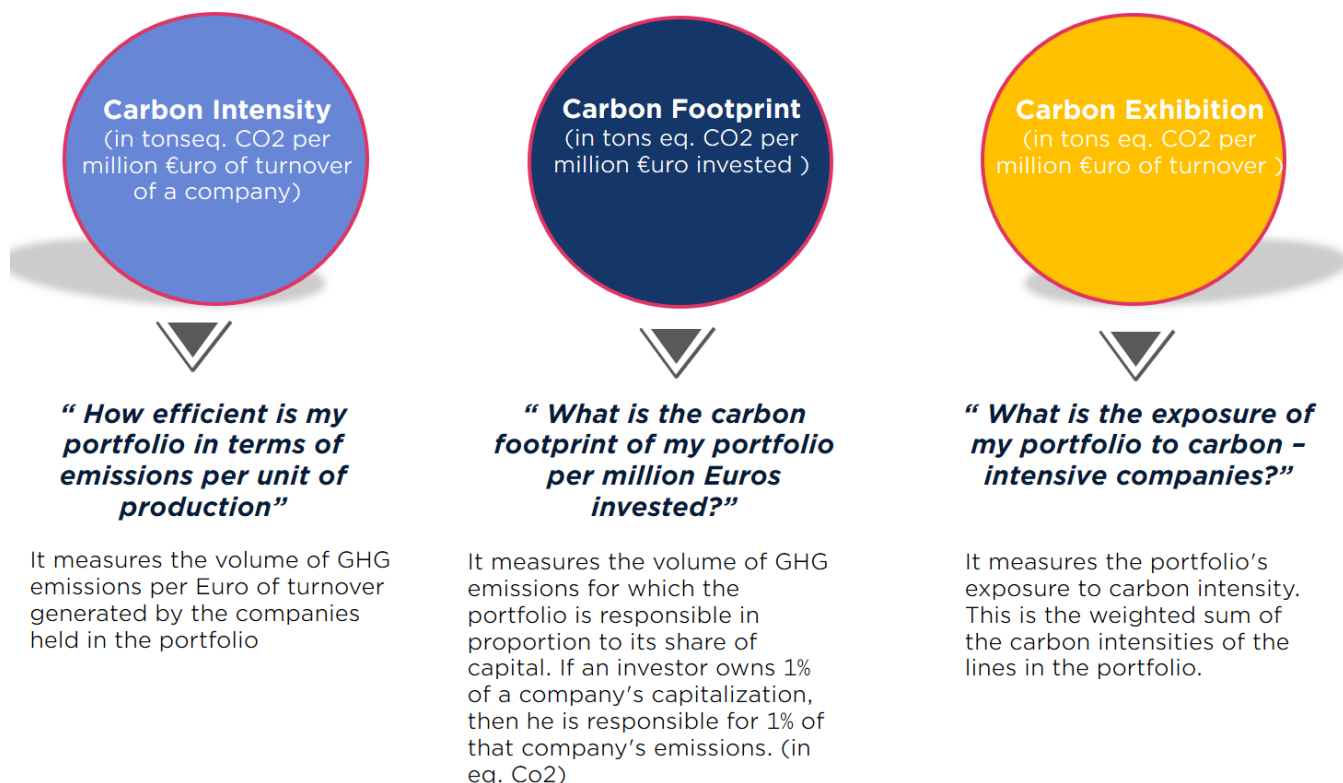
### 3.4. WHAT PRINCIPLES AND CRITERIA LINKED TO CLIMATE CHANGE ARE TAKEN INTO ACCOUNT IN THE FUND(S)?<sup>2</sup>

The risks associated to climate change for companies are of several kinds:

- Physical risks associated with the physical disturbances induced by the change climate (change in mean temperatures and precipitation regimes, increase, frequency and severity of extreme weather events, etc.) are not easily quantifiable.
- Transition risks, generated by adjustment processes aimed at limiting greenhouse gas emissions (regulations, price trends for energy resources, adaptation of production and consumption patterns) can be addressed quantitatively through carbon emissions (scope 1, 2 and 3 as soon as possible). We have recently signed a partnership with Carbone4, which notably integrates data on scope 3 (indirect emissions) and scope 4 (avoided emissions) and allows as calculating the temperature and the climate trajectory of our portfolios.

<sup>2</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>



Source: Edmond de Rothschild Asset Management (France)

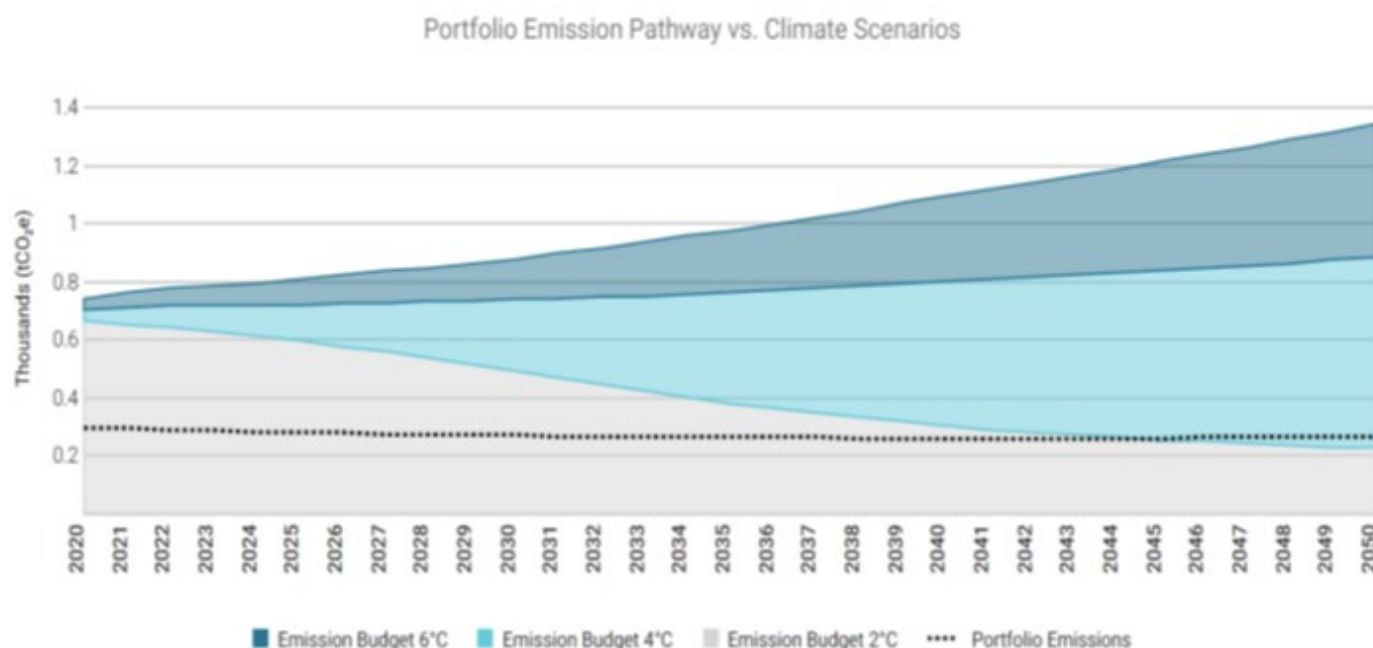
Our carbon measurements - carried out at the present internally and via Carbone4 starting from Q2/Q3 2021 - are based on data provided by companies and updated annually (annual report, Carbon Disclosure Project). These 3 indicators are market standards. The progress of Edmond de Rothschild Asset Management (France) is gradual in this area, in line with methodologies and access to data provided by companies.

Beyond these quantitative indicators, we have developed in-house a proprietary indicator called “green impact” indicator, centred on more qualitative criterion, which complements the shortcomings of an indicator purely focused on emissions of greenhouse gases, taking into account a company’s contribution in terms of “green innovation” as well as reducing the environmental impact of its products.

At a more strategic level, a more qualitative analysis of the initiatives and commitments made by companies to reduce their emissions allows for a more detailed assessment of exposure to risks, particularly of transition, and to measure the consistency of the company’s strategy, and in particular the degree of integration of risks linked to climate change with a 2 ° scenario or new regulations.

In 2017, Edmond de Rothschild Asset Management (France) formalized a climate road map which includes a “2 degrees” roadmap updated in 2020, drawn up in line with the final recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) and on the Sustainable Development Scenario of the International Energy Agency (IEA).

## Climate Alignment: Example EDR SICAV Green New Deal



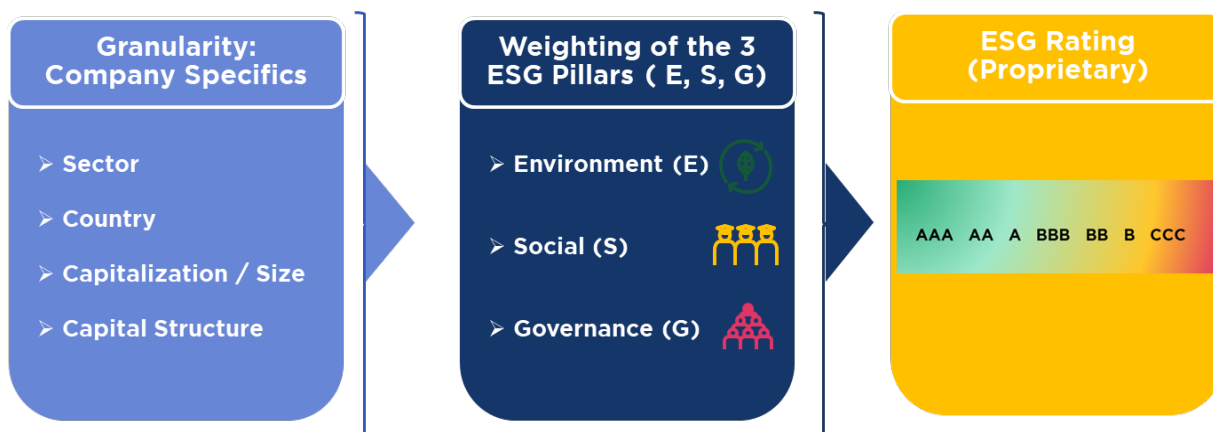
Source: Edmond de Rothschild Asset Management (France). C4F. Data as of 24/08/2020. Data refers to the past and is not a reliable indicator of the future. The information about the companies cannot be assimilated to an opinion of Edmond de Rothschild Asset Management (France) on the expected evolution of the securities and on the foreseeable evolution of the price of the financial instruments they issue. The simulation presented should not be considered as the projection of future results generated by your investment. It is exclusively designed to illustrate the mechanisms of your investment over the recommended period. The change in the value of your investment may deviate from the simulation, upwards or downwards.

### 3.5. WHAT IS THE ESG ANALYSIS AND EVALUATION METHODOLOGY OF THE FUND MANAGER/FUND MANAGEMENT COMPANY (HOW IS THE INVESTMENT UNIVERSE BUILT, WHAT RATING SCALE IS USED ETC.)?

The SRI rating model was built:

- in order to favour the most efficient companies regardless of financial rating, size or sector, according to a Best-in-Universe approach.
- with differentiated weightings of ESG criteria by business sector according to their specific challenges: in fact, the various extra-financial criteria are assigned a more or less important weighting depending on the sector considered, which results in a different weight from each of the three pillars. For example, a chemical company will be more concerned with environmental issues, whereas a company in the business services will see greater weight given to social factors.





#### EXAMPLE: EDRAM FRAMEWORK FOR ESG SECTOR RATING MATRIX

SECTEURS GICS LEVEL 2	ENVIRONMENT	SOCIAL	GOVERNANCE
Energy	34%	34%	32%
Transport	29%	33%	38%
Media	15%	42%	43%

Source: Edmond de Rothschild Asset Management

In order to determine whether the analysed company embodies the characteristics of responsible and sustainable company as defined by Edmond de Rothschild Asset Management (France), the SRI / ESG team carries out its study which results in an internal ESG rating ranging from 0 to 2, is then then translated in a scale with 7 gradations going from CCC to AAA. The score is the aggregation of the results obtained on the various criteria E, S, G of the scoring grid determined by the analysts.

The weighting of the extra-financial criteria of this grid differs depending on the sector of activity of the company but the rating is absolute and not relative to the performance of the sector.

(AAA = ESG rating greater than 15/20, AA = rating between 13 and 15, A = rating between 11 and 13, BBB = rating between 9 and 11, BB = rating between 7 and 9, B = score between 5 and 7, CCC = score less than 5.)

In April 2018, we broadened the integration of the Sustainable Development Goals (SDGs) into our analysis on private issuers (stocks and bonds). We focus on those SDGs to which the company contributes in a significant way and activate (positively or negatively) those with a real impact. This assessment varies according to the intensity of sustainable development (low, medium, strong) of the sector, on a scale of -3 to +3). We are particularly vigilant regarding the declarations of contributions of companies to the SDGs, who are often "optimistic" or cite isolated examples and few relevant to the overall group or value chain level. Ultimately, our analysis shows us and makes it possible to identify and quantify the contribution of a company, a fund or an investment universe for each of the SDGs. This analysis of the contribution to the SDGs reflects the score of the company on certain criteria but is not used in the rating.

For companies not covered by our internal analysis, we rely on the SDG scores from MSCI.

The SRI funds like all those investment funds managed by Edmond de Rothschild Asset management (France), exclude companies involved in the production of controversial weapons, tobacco and coal. The company wide list for exclusions is defined internally and reviewed at least once a year.

The list of group-wide exclusions can be found on the website:

<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-DE-Ausschlusspolitik.pdf>



### 3.6. HOW OFTEN IS THE ESG EVALUATION OF THE ISSUERS REVIEWED? HOW ARE ANY CONTROVERSIES MANAGED?

The update of the ESG rating of companies covered by our internal extra-financial analysis is performed every 18-24 months. We also adjust ratings according to the news flow, controversies, or meetings with companies. The ESG rating are consequently dynamic. Analysts follow controversies via the Reprisk and Sustainalytics, by reflecting in the ESG analysis the most controversial material, frequent or serious, on a scale of 0 to -10 (by controversy).

Controversies affect ESG ratings downward, depending on the recurrence and severity of the controversy. If a company is at the heart of a severe controversy, the ESG rating is downgraded. The SRI analysts then place this company under surveillance in order to study the explanations and check if and what means are implemented for remedy of the controversy. In the event that due to the downgrading in respect of controversies, the rating of a company falls below the threshold minimal, the title is sold quickly.

Concerning the ESG analysis methodology, extra-financial analysis criteria or the respective weighting of the 3 pillars Environment, Social and Governance may be modified during each annual review according to their relevance or enriched following the detection of new sustainable development issues. The analysis carried out by our partner Sustainalytics are updated every 24 months or ad-hoc.

## 4. INVESTMENT PROCESS

### 4.1. HOW ARE THE RESULTS OF THE ESG RESEARCH INTEGRATED INTO PORTFOLIO CONSTRUCTION?

The "Best in universe" selection consists of favouring the best-rated companies in ESG matters regardless of their industry/ sector.

All portfolios respect at least a selectivity rate above 20%. All issuers held in the portfolio undergo an ESG analysis or evaluation via

- our internal ESG analysis (mainly European universe -please see above)
- the ESG analysis of our partner Sustainalytics (issuers not covered by our internal analysis - please see above)
- an ESG "fast check" (issuers covered neither by our internal analysis nor by Sustainalytics). In this case our SRI analysts check for controversies prior to any investment and perform an audit focused on the company's development model, the impact of its products and services, its governance as well as controversies, transparency and quality of its ESG reporting. It then gives portfolio management teams a formal "GO" or a "Veto".

The investment universe eligible for the portfolio of the Edmond de Rothschild SICAV Euro fund Sustainable Equity is based on a selectivity rate  $\geq 40\%$  and corresponds only to companies having obtained an extra-financial rating greater than or equal to A. The fund applies a specific exclusion policy, available on the website.

### 4.2. HOW ARE THE CRITERIA SPECIFIC TO CLIMATE CHANGE INTEGRATED INTO PORTFOLIO CONSTRUCTION?

Our SRI analysts also regularly monitor so-called impact indicators, which allow a better understanding of the extra-financial impact of the portfolio (see question 6.2). The

"Green Impact" criteria and carbon exposure aim more particularly to analyse the risks linked to climate change. These indicators make it possible to monitor the extra-financial performance of the fund compared to its benchmark indicator. However, these indicators are not formally integrated into portfolio construction. In respect to the analysis and approach towards risks and opportunities linked to climate change, please also refer to question 2.4 & 3.4.

#### 4.3. HOW ARE THE ISSUERS THAT ARE PRESENT IN THE PORTFOLIO, BUT NOT SUBJECT TO ESG ANALYSIS EVALUATED (NOT INCLUDING MUTUAL FUNDS)?

The funds covered by this transparency code follow a dedicated ESG strategy. Companies in the portfolio undergo prior to investment an SRI / ESG analysis either in form of an internal ESG analysis or external analysis (by our partner Sustainalytics). The internal ESG analysis evaluates companies on a scale up to 20 and translates into a proprietary rating from AAA to C. Analysis from Sustainalytics is based on a risk approach. The closer the risk score is to 0, the less risky the company is, the more the company can be considered to have good ESG performance.

Our systematic analysis also covers issuers that are not rated or whose rating is pending, via an ESG “fast check” which results in a formal “Go” or “No Go”..

This analysis covers 4 stages:

- ESG qualification of the business model of the company
- Issuer’s degree of general ESG transparency
- Quality of governance
- Existence of controversies deemed material by our team

As a result, 100% of the portfolio is subject to an ESG evaluation prior to investment.

#### 4.4. HAS THE ESG EVALUATION OR INVESTMENT PROCESS CHANGED IN THE LAST 12 MONTHS?

We regularly update our ESG analysis grids in order to adapt to best practices and new ESG issues. For example, in 2018 we integrated the 17 UN SDGs and in 2020 we started to introduce elements of the European green taxonomy into our company analysis.

#### 4.5. IS A PART OF THE FUND(S) INVESTED IN ENTITIES PURSUING STRONG SOCIAL GOALS/SOCIAL ENTERPRISES?

No, there is no investment in solidarity organizations

#### 4.6. DOES (DO) THE FUND(S) ENGAGE IN SECURITIES LENDING ACTIVITIES?

IF SO,

(I) IS THERE A POLICY IN PLACE TO RECALL THE SECURITIES SO AS TO EXERCISE THE VOTING RIGHTS?

(II) DOES THE PROCESS FOR SELECTING THE COUNTERPARTY(IES) INTEGRATE ESG CRITERIA?

**Answer:** The funds do not engage in securities lending / borrowing.

#### 4.7. DOES (DO) THE FUND(S) USE DERIVATIVE INSTRUMENTS?

*If so, please describe*

*(i) their nature;*

*(ii) their objectives;*

*(iii) the potential limits in terms of exposure;*

*(iv) if appropriate, their impact on the SRI nature of the fund(s).*

**Answer:** The funds EdR SICAV Euro Sustainable Equity, EdR Sicav Tricolore Rendement, EdR Sicav Green New Deal, EdR Fund Healthcare, EdR India, EdR Sicav Tech Impact EdR Fund Human Capital, EdR Fund China do not use derivative instruments in the portfolio management at 12/30/2020 and have never invested in instruments derivatives. The use of derivatives is authorized for these funds in the event of market risk or to manage temporarily the overall exposure of the portfolio, while respecting

the limits authorized by the AMF, and in accordance with the prospectus and the fund's SRI policy and the criteria of the label SRI.

In order to achieve the objective of managing or hedging assets, the funds EdR SICAV Euro Sustainable Credit and EdR Fund Investment Grade Credit may use financial contracts (futures, options, futures, swaps including derivatives of credit), up to 100% of net assets. For example, funds may use indices of CDS Itraxx for the purpose of managing the fund's exposure to credit market risk. Moreover, the use of interest rate derivatives (Futures and/or options) allows it to manage/hedge the fund to the risk of interest rate fluctuations. Edmond de Rothschild Asset Management (France) verifies the ESG quality of the counterparties with which we contracted for over-the-counter derivative instruments.

EdR Fund Income Europe may invest in financial derivative instruments. However, our approach to derivatives consists to use them in order to reduce some of the risks created by our investments in equities or bonds. Derivatives thus make it possible to reduce the exposure of exchange (through futures or currency swaps). Our practice is to hedge 100% of the currency exposure on the credit side while our approach for equities consists of not hedging the currency exposure of our investments in other currencies than the Euro). We use derivatives to reduce equity exposure / risk (through futures or options on equity indices in particular), reduce credit exposure (through credit derivatives on indices in particular) and reduce sensitivity to interest rates (through futures or swaps rate). The use of derivatives for exposure is restricted to cases of reduction liquidity risk (for example, in the event of a significant subscription in the fund, taking exposure via equity or credit derivatives, before subsequently substituting to this synthetic exposure of live securities). Most of the derivatives used (futures of rates, futures on equity indices, options on equity indices, currency futures) are listed derivatives cleared by a clearinghouse with global compensation. Certain derivatives remain traded on the over-the-counter markets (in particular credit derivative indices). These derivatives are the subject of postage of daily collateral and the counterparties of these derivatives are undergoing an ESG analysis.

#### **4.8. DOES (DO) THE FUND(S) INVEST IN MUTUAL FUNDS?**

*If so, how do you ensure compatibility between the policy for selecting mutual funds and the SRI policy of the fund(s)? How many funds can be held?*

The exposure that our funds may have towards mutual funds (UCITS) is a share limited to a maximum of 10% fund assets. The funds may incidentally invest in the UCITS of Edmond de Rothschild Asset Management (France), regardless of the management process. Edmond de Rothschild Asset Management (France) is attentive in all cases to the quality of the UCITS in which the fund invests. Most of our SIR funds do de facto not invest in other UCITS funds except the money market fund EdR Credit Very Short Term. Please note that we consider the ESG analysis more relevant to long-term asset classes and that the ESG analysis of short-term money market funds is deemed of little relevance.

## 5. ESG CONTROLS

### 5.1. 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?<sup>3</sup>

The Internal Control Department of Edmond de Rothschild Asset Management (France) annually controls the investment process and the effective application of the ESG analysis methodology within the fund by verifying the existence of value sheets for each security in the portfolio and the internal ESG ratings. SRI constraints such as exclusions are set up in our front to back tool to prevent any investment in an ineligible security.

## 6. IMPACT MEASURES AND ESG REPORTING

### 6.1. HOW IS THE ESG QUALITY OF THE FUND(S) ASSESSED?

The overall ESG ratings of the funds are calculated and compared to those of their reference index. The carbon footprint of the funds and benchmark are calculated. These data are currently available in the monthly reporting for the fund and will be available for the benchmark during Q2 2021. All holdings in the fund undergo an ESG evaluation (either internal research or external research e.g. by Sustainalytics or internal “fast check”).

Within the portfolios, at least 90% of the equity holdings and debt securities and money market instruments with an investment grade credit rating and 75% of the debt securities and money market instruments with a high yield credit rating have an ESG rating.

### 6.2. WHAT ESG INDICATORS ARE USED BY THE FUND(S)?

A monitoring of environmental, social, governance and stakeholder indicators, which allow to better understand the extra-financial impact, is carried out regularly.

The indicators are calculated internally via a database, based on data from companies, CDP, Sustainalytics and Bloomberg. Data will be provided via Carbone 4 data starting from Q2 2021. The indicators are available in the documents relating to extra-financial performance, the transparency report and/or the methodology and SRI management report of the different funds on our website.

<https://www.edmond-de-rothschild.com/de/asset-management/expertise/nachhaltigen-investments>

Edmond de Rothschild Asset Management (France) has chosen a few key indicators deemed most relevant and whose data are accessible. These indicators (for ex. % of woman on the Board) are calculated for all funds. Other indicators are specific for certain funds (ex. R&D for EdR Fund Healthcare). Our selection of indicators systematically covers the environmental, social and governmental pillars and includes “mainstream” indicators, specific indicators and in-house indicators (“green impact” and “social impact”).










All funds are committed to systematically outperforming their benchmark at least on one indicator (second one planned).

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<sup>3</sup> Reference to Article 173 of the French TECV Act

### Example: EDR SICAV Euro Sustainable Equity

Proprietary ESG Indicator "Green"

	EDR SICAV- EURO SUSTAINABLE EQUITY	Benchmark*
 Umweltbilanz ( /20) (eigener Indikator)	13,5	11,5
 CO2-Ausstoß (kg / USD 1.000 Investitionsvolumen)	180	220
 Energieanteil (% des Portfolios)	2,7%**	5,1% **
 Soziale Wirkung ( /20) (eigener Indikator)	13,3	12,2
 Durchschnittliche Unfallquote (Millionen Arbeitsstunden)	2,9	2,8
 Durchschnittliche Fehlzeitenrate (%)	3,4%	3,6%
 Anteil unabhängiger Mitglieder im Aufsichtsgremium (%)	77%	75%
 Anteil weiblicher Vorstandsmitglieder (%)	16%	13%
 Unterzeichnung des UN Global Compact (%)	72%	83%

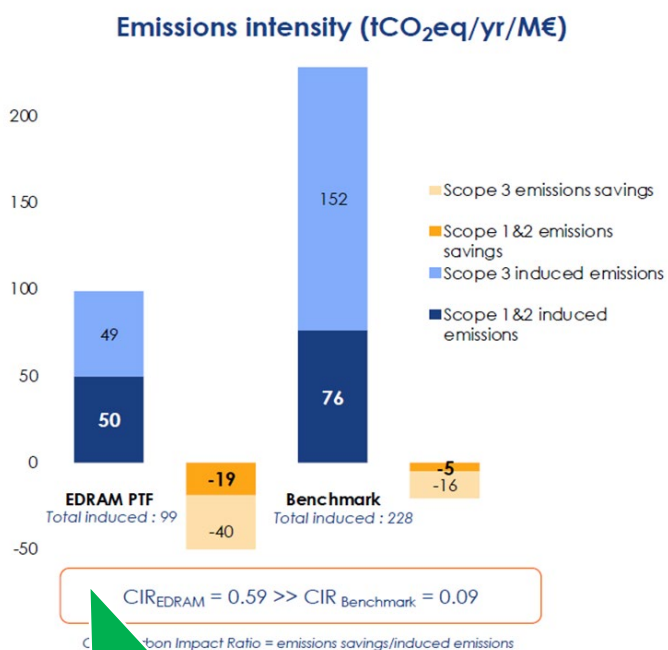
E Substantiell positive Umweltbilanz

S Überdurchschnittliche soziale Wirkung

G Positive Governance

"Mainstream Indicator"

### Example: EDR SICAV Green New Deal



Proprietary ESG Indicator  
"Carbon Impact rEDRAM"

## SDG Mapping: Example EDR SICAV Euro Sustainable Equity



Sources: Edmond de Rothschild Asset Management (France)

## 6.3. WHAT COMMUNICATION RESOURCES ARE USED TO PROVIDE INVESTORS WITH INFORMATION ABOUT THE SRI MANAGEMENT OF THE FUND(S)?

### ► EDR SICAV Euro Sustainable Equity

Prospectus, KIID, Monthly Reporting, Annual Report, Fund Portrait

<https://funds.edram.com/de/edr-sicav---euro-sustainable-equity-FR0010505578>

### ► EDR SICAV Green New Deal

Prospectus, KIID, Monthly Reporting to come ( fund under 1 year) Fund Portrait

<https://funds.edram.com/de/edr-sicav---green-new-deal-FR0013428927>

### ► EDR Fund China

Prospectus, KIID, Monthly Reporting, Annual Report, Fund Portrait

<https://funds.edram.com/de/edmond-de-rothschild-fund-china-LU1160365091>

### ► EDR Fund Healthcare

Prospectus, KIID, Monthly Reporting, Annual Report, Fund Portrait / Two Pager

<https://funds.edram.com/de/edmond-de-rothschild-fund-healthcare-LU1160356009>

### ► EDR Fund Human Capital

Prospectus, KIID, Fund Portrait / Two Pager, Monthly Reporting to come (fund under 1 year)

<https://funds.edram.com/de/edmond-de-rothschild-fund-human-capital-LU2221884823>

► **EDR Fund Income Europe**

Prospectus, KIID, Monthly Reporting, Annual Report, Monthly Comment, Fund Portrait  
<https://funds.edram.com/de/edmond-de-rothschild-fund-income-europe-LU0992632538>

► **EDR India**

Prospectus, KIID, Monthly Reporting, Annual Report, Fund Portrait  
<https://funds.edram.com/de/edmond-de-rothschild-india-FR0010479931>

► **EDR SICAV Euro Sustainable Credit**

Prospectus, KIID, Monthly Reporting, Annual Report, Fund Portrait  
<https://funds.edram.com/de/edr-sicav---euro-sustainable-credit-FR0010172767>

► **EDR SICAV Tech Impact**

Prospectus, KIID, Monthly Reporting to come ( fund under 1 year), Fund Portrait  
<https://funds.edram.com/de/edr-sicav---tech-impact-FR0013488244>

► **EDR SICAV Tricolore Rendement**

Prospectus, KIID, Monthly Reporting, Annual Report. Fund Portrait  
<https://funds.edram.com/de/edr-sicav---tricolore-rendement-FR0010588343>

#### **6.4. DOES THE FUND MANAGEMENT COMPANY PUBLISH THE RESULTS OF ITS VOTING AND ENGAGEMENT POLICIES?<sup>4</sup>**

##### **IF SO, PLEASE INCLUDE LINKS TO RELEVANT ACTIVITY REPORTS.**

Yes. The annual report an voting and engagement is publicly accessible via our website  
<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-Rapport-annuel-sur-exercice-des-droits-de-vote.pdf>

Our voting and engagement policy is also publicly accessible via our website  
<https://www.edmond-de-rothschild.com/SiteCollectionDocuments/asset-management/isr/EDRAM-FR-Politique-Engagement.pdf>

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<sup>4</sup> Reference to Article 173 of the French TECV Act and the HLEG recommendations on GOVERNANCE

## 7. GLOSSARY

### DEFINITIONS

#### ESG CRITERIA: ENVIRONMENT, SOCIAL AND GOVERNANCE.

Environmental dimension: refers to the direct or indirect impact of an issuer's activity on the environment.

Social dimension: relating to the direct or indirect impact of an issuer's activity on its stakeholders, with reference to universal values (in particular human rights, international labour standards, the fight against corruption, etc.).

Governance dimension: the set of processes, regulations, laws and institutions that influence the way in which the company is managed, administered and controlled. It also includes the relationships between the many stakeholders and the objectives that govern the company. These key stakeholders include the company's shareholders, management and board of directors.

SRI: "SRI (Socially Responsible Investment) is an investment that aims to reconcile economic performance with social and environmental impact by financing companies and public entities that contribute to sustainable development regardless of their sector of activity. By influencing the governance and behaviour of actors, SRI promotes a responsible economy. (AFG - FIR, July 2013)

ISSUERS: all entities (companies, states, agencies, supranationals or local authorities) that call on the market to finance themselves by issuing shares, bonds and other financial securities.

### APPROACHES

#### ESG SELECTION

This approach consists of selecting issuers with the best environmental, social or governance practices. ESG screening can take several forms:

- best-in-class: selection of issuers with the best ESG practices within their industry. This approach includes all sectors of the economy.
- best-in-universe: selection of issuers with the best ESG practices independently of their sector of activity.
- best effort: selection of issuers demonstrating an improvement in their ESG practices over time.

#### ESG THEME

Funds that specialise in environmental, social or governance themes. They invest in issuers whose products or services contribute to generating benefits in line with the investment strategy. The selected companies must at least meet certain ESG requirements such as active monitoring of environmental (E), social (S) and governance (G) controversies and demonstrate their E or S or G impact.

### EXCLUSION

There are two types of exclusions that funds may apply:

#### NORMATIVE EXCLUSIONS

Normative exclusions consist of excluding companies that do not respect certain international standards or conventions (human rights, ILO conventions, Global Compact, etc.), or states that have not ratified certain international treaties or conventions.



## SECTORAL EXCLUSIONS

Sectoral exclusions consist of excluding companies from sectors of activity such as alcohol, tobacco, arms, gambling and pornography for ethical or public health reasons, or GMOs, nuclear power, thermal coal, etc. for environmental reasons.

Exclusions resulting from regulatory bans alone (e.g. controversial weapons, countries under embargo, etc.) are not sufficient to characterise an exclusionary approach.

## COMMITMENT

A fund whose objective is to influence the behaviour of invested companies to improve their environmental, social or governance practices. Engagement themes must be defined and the follow-up of engagement actions (individual or collective dialogue, voting in general meetings, tabling of resolutions) must be documented.

IMPACT INVESTING: funds that invest in companies or organisations whose primary purpose is to generate a positive environmental or social impact. The impact induced by the investments must be measurable.

In France, impact investing can be compared to solidarity funds that invest in companies in the social economy (SSE).

## ESG INTEGRATION

ESG integration consists of a manager taking into account environmental, social and governance (ESG) analysis in his investment decisions. ESG integration relies on appropriate resources and aims to improve understanding of the risks and opportunities associated with each issuer.

## LEGAL DISCLAIMER

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Main investment risks: Risk of capital loss, discretionary management risk, equity risk, SRI selection risk, small and mid cap risk, interest rate risk, credit risk and currency risk. The synthetic risk/return indicator rates this fund in category 5 (A share) on a scale of 1 to 7, which reflects the exposure of up to 110% of its assets to the equity markets, which have a high risk/return profile.

EdRAM (France) is solely responsible for its responses to the questions in the Code.

For more information on the Transparency Code: <http://www.frenchsif.org/isr-esg/code-de-transparence/>

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The figures, comments, projections and other elements contained in this presentation reflect EdRAM's opinion of the markets and their development, taking into account the economic context and the information available to date.

Any investment involves specific risks. Investors are advised to ensure that any investment is appropriate for their personal circumstances by seeking independent advice where necessary. In addition, investors should read the Key Investor Information Document (KIID) and/or any other document required by local regulations, which is provided prior to any subscription and is available on the website [www.edmond-de-rothschild.com](http://www.edmond-de-rothschild.com) under the "Fund Center" tab or free of charge on request.

"Edmond de Rothschild Asset Management" or "EdRAM" is the trade name of the asset management entities of the Edmond de Rothschild Group.

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