

sycomore

ESG Integration Policy

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Preface

The financial sector funds the real economy, so it has a decisive role to play in developing a model that is able to meet key environmental and social challenges.

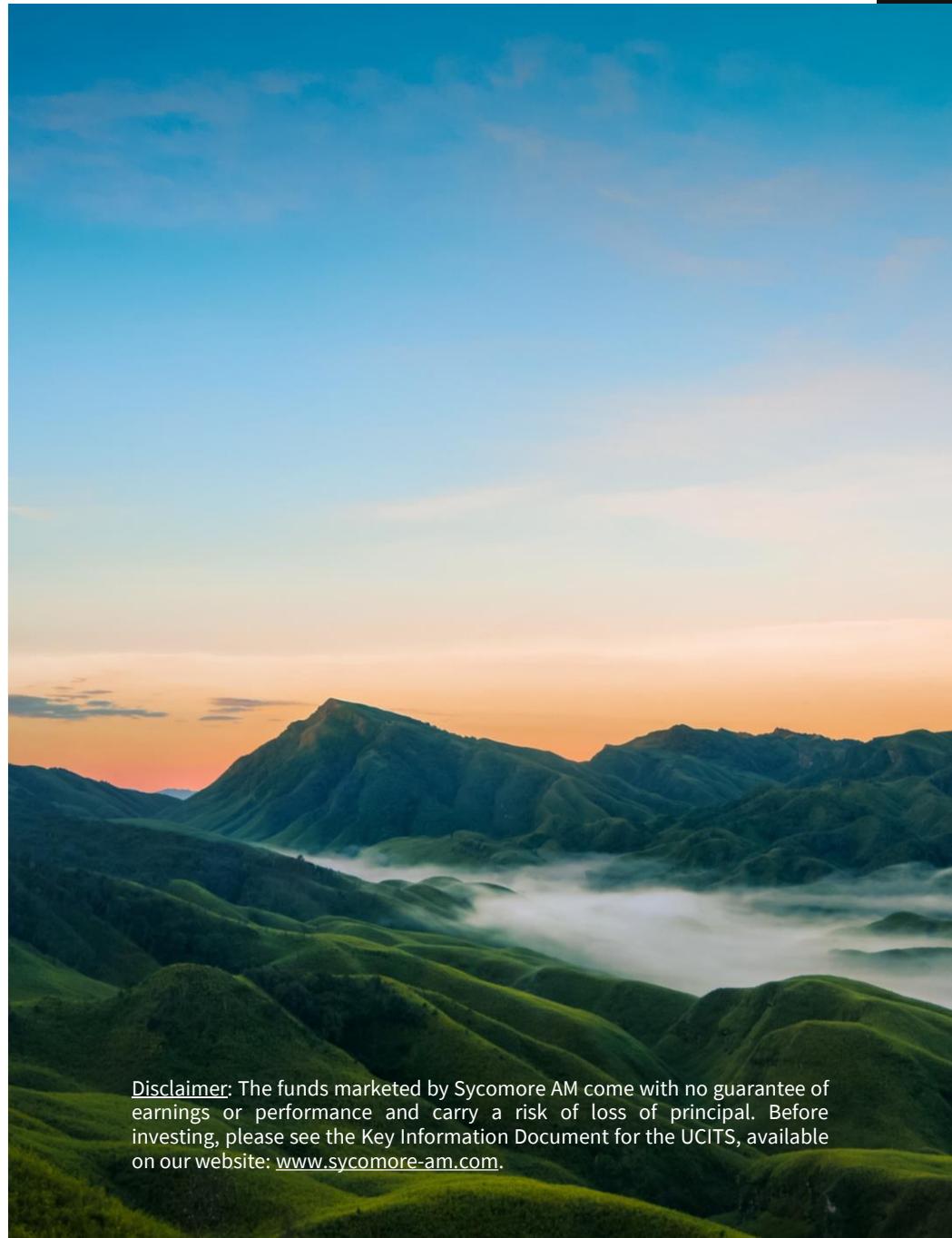
It is Sycomore AM's responsibility, as an asset manager, to make investment decisions in support of a sustainable economy and to help companies in their transition.

This document describes Sycomore AM's policy regarding the integration of environmental, social and governance (ESG) criteria. It is supplemented with other, more detailed policies on our exclusions, the exercise of our voting rights and our approach to shareholder engagement. All these policies are central to our company's identity and support our mission. "We invest to develop an economy that is more sustainable and more inclusive and to generate positive impacts for all our stakeholders. Our mission is to give a human dimension to investment."

These policies have been prepared in compliance with the requirements of Article R533-16 of the French Monetary and Financial Code and present the principles by which sustainability risks are integrated into our investment decision-making process, in accordance with the EU's Sustainable Finance Disclosure Regulation (SFDR).

In the following pages, we provide details on our investment philosophy, our investment analysis tools, the human resources we dedicate to integrating ESG (including sustainability risks), our governance, and the measures we implement for control and transparency. This document serves as a basis for our dialogue with Sycomore AM's stakeholders; it guides and formalises our responsible investment approach.

It is published on our website and updated each year by the ESG research team and validated by the Head of Sustainability.



Disclaimer: The funds marketed by Sycomore AM come with no guarantee of earnings or performance and carry a risk of loss of principal. Before investing, please see the Key Information Document for the UCITS, available on our website: www.sycomore-am.com.

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01

Responsible investing at the heart of our strategy

1.1 Our responsible investment mission

As a pioneer of responsible investing, Sycomore AM has built its mission on giving meaning to our clients' investments, which we do by creating **sustainable value that is shared over the long term**. We are convinced that only companies that fulfil genuine social and environmental needs will thrive in the future, driving a process of improvement that will ensure sustainable performance.

Among the **overarching goals** that we have set to achieve our mission, three focus specifically on our **impact investor approach**:



Provide **investment solutions** that deliver financial performance while allowing our clients to contribute to a more sustainable and inclusive economy.



Measure and improve the net environmental and social contribution of our investments while communicating rigorously, clearly and transparently.

Work to promote **socially useful finance** as a driver of change, engaging with investee **companies** and with stakeholders in our **ecosystem**.

“

We invest to develop an economy that is more sustainable and more inclusive and to generate positive impacts for all our stakeholders.

Our mission is to give a human dimension to investment.

”

1.2 Our impact approach

To achieve our mission as an engaged investor, our approach is to seek positive impacts that emerge on **three levels**.



Our intentionality

The stock selection and portfolio construction processes of our thematic funds are based on **specific criteria that reflect each fund's intention**. For example, the Sycomore Europe Eco Solutions fund, which aims to support companies that make a positive environmental contribution through their products and services, selects investments based on the measurement of their Net Environmental Contribution (NEC). More broadly, the development of our thematic SRI fund range reflects our intention, as an asset management company, to **contribute to a more sustainable and inclusive economy**.



Our additionality

Additionality involves **identifying our contribution, as an investor, to the positive impacts generated by our investments**. As we operate mainly on listed markets, we rarely provide the new capital needed by companies to grow, and our additionality may therefore appear limited. However, through our investment choices and our shareholder engagement actions, we encourage better business practices and urge companies to improve the contribution of their products and services to solutions that meet today's social and environmental challenges.



Measurements of the impact of our investments

Our goal is to **demonstrate our investments' contribution to a more sustainable and inclusive economy**. We are gradually developing our approach to impact measurement. For each fund, we disclose progress made towards targets for relevant non-financial indicators in monthly reports and an annual report. For example, we report on the impact of our investments using two metrics: the Net Environmental Contribution (NEC) and the Societal Contribution (SC) of the products and services of portfolio companies. For SRI funds, we also present the exposure of portfolio companies to the UN's **Sustainable Development Goals**.

Shareholder engagement takes the form of our individual dialogue with companies, the exercise of our voting rights and our participation in collaborative engagement initiatives. Although it is difficult to establish the connection between our engagement initiatives and improved company results, we are convinced of the importance of this **dialogue** and of the **collective activism** which we are a part of in supporting the development of more sustainable and more virtuous business models that focus more on sharing value with all stakeholders. This approach is rooted in our DNA as an active asset manager. As such, we monitor **progress** made by companies in the **areas for improvement** we communicate to them. We also define priority topics in line with our impact objectives.

In addition, a **share of the management fees** from some of our thematic SRI funds is **donated to non-profits** that generate positive impacts in line with each fund's approach. For example, the Sycomore Inclusive Jobs fund invests between 5% and 10% of its net assets in social and solidarity-based enterprises selected for their ability to create inclusive employment.

02 Integrating ESG into our funds

2.1 Systematic ESG integration for every asset class

Our ESG approach is global and integrated: it aims to provide the best possible understanding of the risks and opportunities faced by the companies in our investment universe. In addition to the extent to which companies integrate sustainability issues into their operations, our model also **assesses the positioning of their products and services in meeting societal and environmental challenges.**

We have developed our own model for the fundamental analysis of companies: **SPICE**. It is structured around five groups of stakeholders:

Society & Suppliers
People
Investors
Clients
Environment

(The **SPICE** methodology is detailed in section 3.1.).

The companies in our various investment universes are all analysed using our **SPICE** fundamental analysis model, which incorporates sustainability issues. At the end of this analysis, a rating is assigned to each company, ranging from 1/5 for the lowest-rated to 5/5 for the highest-rated.

Our responsible investor approach is based on **three areas of action:**



AVOID

Reduce our exposure to companies with high risks for stakeholders or the environment.

This area of action is based on our exclusion policy, our principal adverse impact policy and required minimum SPICE ratings.



ASSESS AND ALLOCATE

Conduct an in-depth analysis of how companies in our investment universe take sustainability issues into account, using our SPICE analysis criteria and indicators used to identify companies that use their products and services to bring solutions to social and environmental issues.

This analysis is based on our SPICE methodology and the definition of selection criteria that help to flag investments in line with the strategy of each fund.



ACTIVELY ENGAGE

Support companies through constructive and rigorous dialogue, to help them improve how they manage their impacts and participate in the transformation needed to build a sustainable and inclusive world.

Our engagement approach is detailed in our shareholder engagement policy and our voting policy.

2.1 Systematic ESG integration for every asset class

Sustainability issues are systematically integrated into our analysis. They are taken into account **in different ways depending on the asset class**:



For **equity investments**, the SPICE rating affects the safety margin of each issuer, which corresponds to the minimum potential for investing in the security. A good SPICE rating therefore leads to better appreciation potential and reduces the safety margin.



For **bond investments**, the SPICE rating also forms the basis for company analysis, as it captures the company's resilience and therefore its ability to repay its debt. Fund manager-analysts can adjust their main assumptions (revenue, profitability, provisions, tax rate, investments, etc.) based on figures relating to social and environmental issues. Thus, the SPICE rating directly influences our investment decisions.



For the evaluation of **sovereign issuers**, we have developed a **methodology that analyses specific ESG issues** (detailed in section 3.3). We also apply **positive screening** based on a set of criteria assessing the sustainable development and governance practices of the issuing country. These criteria fall into the following five categories: **the environment, governance, economic health, societal development and social inclusion**.



For our **managed fund offering**, our fund selection procedure incorporates **ESG criteria**: the selected fund managers must at least be signatories to the UN's Principles for Responsible Investment (PRI) or demonstrate that they implement an ESG integration strategy. For some funds, all or part of the underlying funds are SRI-labeled.

In addition to integrating the SPICE rating as previously described, our **SRI-certified funds and SRI mandates** apply **screens** to select companies meeting specific sustainability criteria.



The French SRI label authorises the temporary **use of derivatives** for SRI-certified funds.

This authorisation covers different types of derivatives, including futures, options, currency derivatives, equity derivatives such as warrants, certificates, bond derivatives such as convertible bonds or bonds with redeemable equity warrants, and over-the-counter contracts for differences (CFDs) that replicate the purchase or sale of securities or indices.

Derivatives may be used in the portfolio construction process and in stock selection to support the fund's objective, for example as a hedge against temporary risks identified by the manager or for exposure in the context of significant subscriptions. Currency derivatives are used to hedge the fund's exposure to a particular currency or to adjust the fund's overall exposure to currency risk.

For **hedging** purposes, the use of derivatives must be consistent with the fund's ESG policy and therefore not conflict with the fund's ESG approach. For **exposure**, marginal use of derivatives is allowed. The underlying must be transparent and taken into account in the label's quantitative standards. With bond and equity derivatives, the underlying asset must meet the fund's ESG selection criteria. In the fund's benchmark index or a comparable index, even if the index is not ESG, derivatives must only be used on a temporary basis (i.e. one month). With over-the-counter instruments, the ESG quality of the counterparty is analysed. Lastly, a short position cannot be held on an ESG asset as defined by the ESG criteria of each fund.

Broadly speaking, derivatives must only be used as a technique for **effective portfolio management**. By applying this rule, their use does not significantly or lastingly distort the ESG selection policy.

2.2 Sustainability risk management in compliance with regulations

Article 2 of the SFDR defines a sustainability risk as:

“ An environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment.”



Sycomore AM considers the **principal adverse impacts (PAI)** of its investment decisions on sustainability factors, as defined by the Sustainable Finance Disclosure Regulation (SFDR). In accordance with the SFDR, Sycomore AM publishes its Principal Adverse Impact Policy on its website. Since 2023, it has also published an annual Principal Adverse Impact Statement.

Our **SPICE** model's criteria assess the **management of the risks and negative impacts** covered by the indicators listed in the Sustainable Financial Disclosure Regulation (SFDR), based on their materiality to each company's operations and geographical footprint and on the availability of relevant data. The SPICE model takes into account the two inextricably linked concepts of sustainability risks and impacts.

Relying on more than 90 **qualitative and quantitative indicators**, SPICE analyses the company's exposure to and management of sustainability risks, including risks relating to business ethics, taxes, human rights, working conditions, the subcontracting chain, environmental disasters, the ecological and energy transition, and personal data protection. All of these points are in line with **Article 3 of the SFDR**, “**Transparency of sustainability risk policies**”.

Transition risks and physical risks are an integral part of the **E pillar (Environment)** in our **SPICE analysis**. Our Human Rights Policy follows the United Nations' Guiding Principles on Business and Human Rights and is the result of a consultation with all of our employees and external stakeholders, with the additional expertise of SILA Consulting. The policy establishes a framework to ensure the consideration of risks of human rights infringements in our investments.



Alongside the SPICE analysis, we apply our **SRI exclusion policy** to limit fund exposure to sustainability risks associated with controversial activities having significant adverse social or environmental impacts.

Under our policy, all our assets under management exclude **controversial weapons, thermal coal, tobacco, pesticides, palm oil, pornography, violations of the principles of the UN Global Compact and insufficient governance practices**. For our SRI funds and mandates, additional exclusions apply: conventional weapons, conventional and non-conventional oil and gas and, more broadly, carbon-based electricity generation. Most exclusions are determined by applying **strict criteria based on the exposure of company revenue**. Depending on the funds' investment strategy, exceptions are carefully monitored, especially in energy. This is done to help support companies that have set robust transition plans. As part of an improvement plan designed to contribute to the goals of the Paris Agreement and ensure that fossil fuels are being phased out, we have defined a specific engagement policy for companies exposed to fossil fuels.

Detailed definitions of the excluded activities, exclusion thresholds and the data sources used to establish the lists of exclusions can be found in our **exclusion policy**.



Sustainability risks undergo **specific checks run by the risk management teams**.

Given the nature of sustainability risks and the current state of academic research on the subject, the calculations of the impact on financial returns are not yet robust enough to be integrated effectively, and the result would run the risk of defeating its purpose. Consequently, we believe these risks should instead be managed by controlling **tail risks** and therefore limiting the fund's exposure to companies with the highest sustainability risks. This is why we have opted to apply the most comprehensive exclusion policy and selection criteria in the industry. By **only allowing companies with a SPICE rating above a minimum level to enter investment universes**, we are convinced that, for now, ours is the best possible approach to managing sustainability risks.

2.3 A rigorous definition of a sustainable investment

The SFDR defines a **sustainable investment** as follows:

“ An investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.”



2.3 A rigorous definition of a sustainable investment

Sycomore AM has established a harmonised, rigorous, and transparent definition of a sustainable investment to be used for every investment universe. The definition aligns with the one provided in the SFDR and has three main components:

1 Identifying investments that make a positive contribution to the environmental and social issues listed in the definition.

- Since 2015, Sycomore AM has rolled out **two metrics** assessing the ability of a company's **products and services** to meet environmental and societal challenges, such as access to renewable energy, effective management of resources, and access to healthcare: the Net Environmental Contribution and the Societal Contribution of products and services.
- We have also developed a metric, Responsible Employment Score, to assess companies' ability to **create quality jobs**.
- Lastly, our **human capital assessment**, Happy@Work, has been in use since 2015 to identify the companies that provide a particularly **favourable environment for individual fulfilment**.

An investment is identified as having a positive contribution if it meets the minimum score set by Sycomore AM for at least one of the four metrics.

2 Avoiding investments that may cause significant adverse impacts

We rely on our existing exclusion (SRI level) and controversy management policies, our SPICE fundamental analysis model based on ESG criteria, and our Principal Adverse Impact policy.

3 Ensuring the implementation of good governance practices

An investment must achieve a minimum governance rating before it can be accepted as sustainable.

This definition can be summarised as follows:

1

Makes a positive contribution

NEC

Effective measurement of overall environmental impact

SOCIETAL CONTRIBUTION

Innovative metric for societal impact

RESPONSIBLE EMPLOYMENT SCORE

Job quantity and quality

HAPPY@WORK RATING

Fulfilment at work as seen by Sycomore AM

2

Does no significant harm

SRI exclusion policy, including severe controversies

PAI policy*, including a minimum SPICE rating

3

Follows good governance practices

Minimum governance rating (defined in the exclusion policy)

*Principal Adverse Impact.

Consolidation method

Sustainable investments are counted as contributing to only one sustainable objective. Their percentage in funds and indices is calculated in the following order of priority: investments with a positive contribution to the NEC, societal contribution, the Responsible Employment Score, and the Happy@Work rating. Double counting is avoided for funds that report sustainable investments with both environmental and social objectives, with priority given to sustainable investments with an environmental objective.

2.4 Fund classification according to the SFDR

In addition to its rigorous definition of a sustainable investment, as described earlier, Sycomore AM **applies the following rules to classify the funds in its range**:

ARTICLE 9

Article 9 funds aim, as expressed through their investment objectives and company selection criteria, to **make a positive net impact on the environment and/or society**. Most of our thematic SRI funds, as well as mandates with similar management strategies, are therefore classified as Article 9.

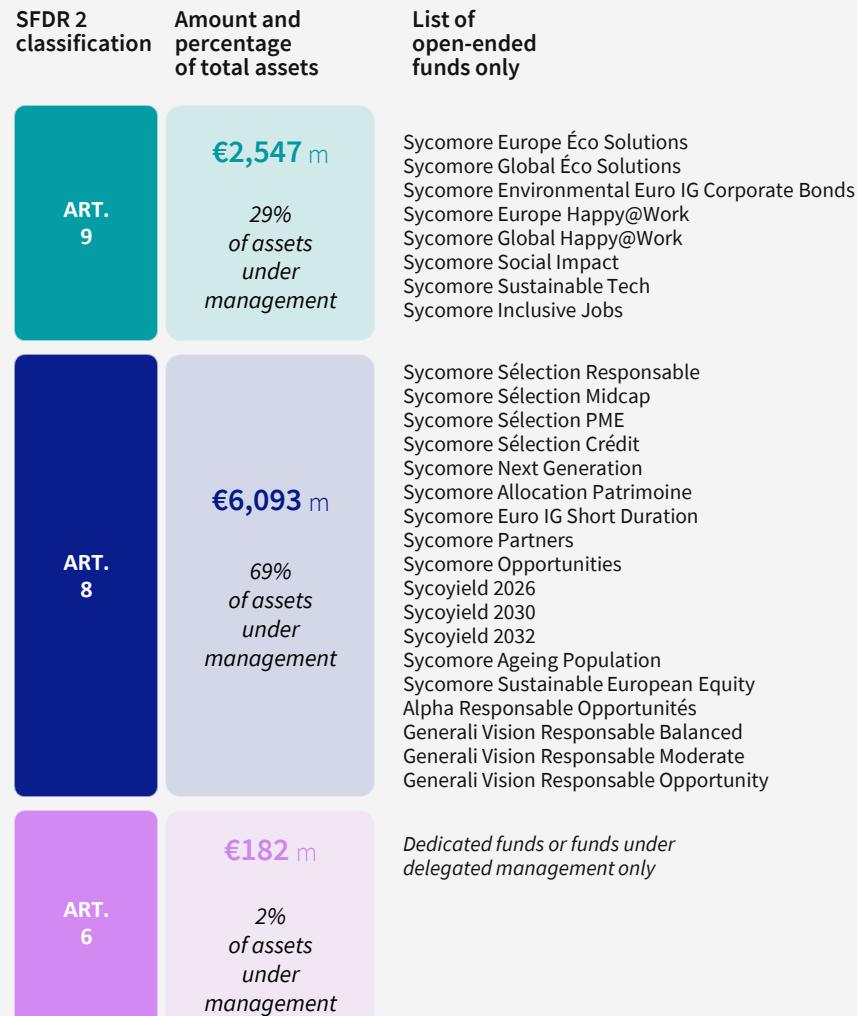
ARTICLE 8

Article 8 funds use **selection criteria based on our SPICE rating** and other specific criteria depending on the fund philosophy. Most of these are multi-themed, SRI-labelled funds with a high minimum proportion of sustainable investments, i.e., between 50% and 70%.

ARTICLE 6

Article 6 funds are the multi-asset funds of funds in our managed fund offering that do not use ESG criteria.

Breakdown of funds by SFDR classification (data from end-September 2025)



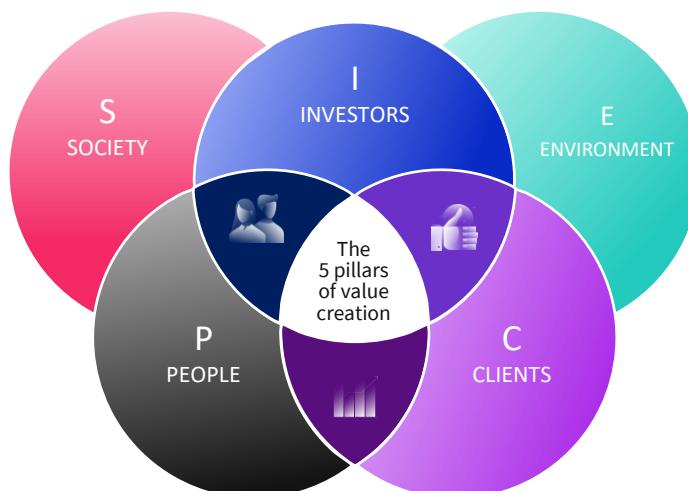
The funds listed here come with no guarantee of earnings or performance and carry a risk of loss of principal. Before investing, please see the Key Information Document for the UCITS, available on our website: [Sycomore AM](#).

03 Our proprietary ESG analysis methodology

3.1 The SPICE model

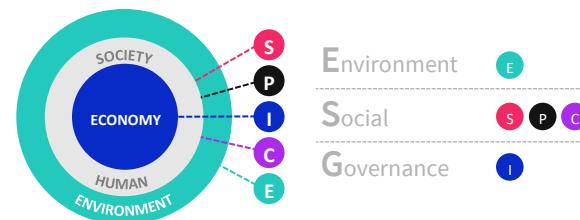
The SPICE model is a global and integrated approach for analysing companies according to the European Commission's concept of double materiality: this means that it considers not only the **risks that could affect the company's business value**, but also the **negative social or environmental impacts of its business activities on its stakeholders**. The approach also examines how these two factors are interconnected.

Our analysis methodology is continuously improved and reviewed at least once every two years to take into account the latest ESG information.



Sustainability correspondence

The illustration below shows the correspondence between the three sustainable development pillars (economy, human society, and environment), ESG issues, and the five stakeholder groups of our proprietary SPICE model.



Weighting of the SPICE pillars

To accurately assess the fundamental risk carried by our investments, our analysis team first analyses around 90 qualitative and quantitative criteria affecting a company's five stakeholder groups, using the SPICE model. At the end of this process, the company is assigned several ratings, on a scale of 1 to 5. By using various sources, these ratings are continually updated. The average of these scores, which are weighted according to the company's industry and business activities, constitutes its overall SPICE rating. The default weightings are as follows:



These weightings are adjusted to reflect the materiality of issues for each industry. For example, for companies in the consulting industry, the weighting for the People stakeholder group will be raised to 25%, while most companies in the manufacturing industry will have their Environment weighting increased to 30%. The weighting for the Investors score, including governance, remains the same for every industry. Beyond these sectoral adjustments, the E, S (pillars S, P, and C) and G (half of pillar I) issues retain a minimum weighting of 20%.

3.1 The SPICE model

SOCIETY & SUPPLIERS

The **S** rating measures **company performance with regard to its suppliers and civil society**. The criteria that are analysed include:



Societal contribution of products and services: we review a company's revenue and assess the contribution of each of its activities to societal priorities, such as those defined in the **United Nations' 17 Sustainable Development Goals (SDGs)**, which provide a common roadmap for public and private stakeholders to 2030. This review focuses on **two pillars: addressing the most vulnerable populations and improving quality of life**.



Companies' contribution as an employer: using a dedicated metric, *Responsible Employment Score*, based on quantitative and qualitative indicators, we assess **companies' ability to create quality jobs**. To do this, we use data on workforce growth over three years, diversity, pay equity, and training. This metric ranks companies relative to their peers in the sector.



Responsible business conduct: the company must also meet its primary obligations to society by **protecting human rights, implementing a responsible tax policy to help finance the economy, and fighting corruption**. Our analysis also considers the integration of environmental and social issues into the sub-contracting chain and in relations with local communities. We value companies that have set up effective responsible sourcing policies and that engage in dialogue with their partners, to help them improve their own practices in line with sustainability objectives.

PEOPLE

The **P** rating focuses on a company's **employees** and its **human capital management**. The assessment of the People pillar includes the following criteria:



Consideration of human capital issues: we value companies whose management embed human capital considerations into strategy and make efforts to cultivate employee fulfilment.



Fundamental rights of employees: we assess the measures taken to ensure respect for fundamental labour rights, such as the right to union representation and access to a decent wage and minimum healthcare coverage. In exposed industries, we also assess the workplace safety culture and performance, including for temporary workers and subcontractors.



Happy@Work environment: this part of the analysis process assesses a company's ability to create a work environment that fosters employee development. We believe that this is achieved where there is a strong corporate culture that empowers employees while giving meaning to their work. We also value clearly defined organisations, training initiatives, support for job mobility, constructive management relations, quality working conditions, equal opportunities, non-discrimination, and employee profit-sharing. Employee engagement is a key indicator in our assessment of the effectiveness of company measures to promote a work environment that contributes to individual fulfilment. Surveys help to pinpoint areas of risk or conflict, to take corrective action suited to the local context, and to measure changes in employee engagement over time.

3.1 The SPICE model

INVESTORS

The **I** rating focuses on the **relations between companies and their shareholders**. The rating is assigned based on a thorough analysis of a company's shareholder and legal structure and the interactions and power relations among various groups: its management, its shareholders and their representatives, and its directors. Our research covers the following aspects:



Business model: we analyse the **strength** of a company's business model based on its income structure, competitive positioning, growth drivers – such as innovation and external growth opportunities – and ability to create value.



Governance: we assess the quality of a company's governance based on the **balance of powers between the management team, the board of directors or supervisory board and the shareholders**. An important component of our analysis is to examine whether the interests of all stakeholders are taken into account, through an equitable distribution of the value created and the embedding of sustainable development into the company's strategy. We therefore analyse the quality of the company's financial communications and accounting risk management and assess the alignment of management's interests with those of the shareholders by examining the company's shareholder structure, executive shareholding, and remuneration policy. We also analyse the company's capital structure to assess bondholder risk.

CLIENTS

The **C** rating focuses on the **company's clients as stakeholders**. We take the following criteria into account:



Quality of the offering: we assess the **added value of the offering** created by taking consideration of the **expectations of targeted customers and brand awareness**. We identify the company's competitive positioning by comparing its products and services and its brands to those of its competitors and analysing the quality of its marketing, its distribution channels, and the digital-readiness of its products and services. We also assess the quality of the company's products and services by looking at the tools and resources it deploys for **customer service**. We investigate how well companies listen to their clients' needs and satisfy them.



Client risks: we identify and measure the risks associated with the company's products and services for its clients. We examine the **cybersecurity risks** that weigh on the company and its ability to protect its clients' digital rights. We analyse the company's ability to **maintain a strong brand image or improve it**. We value companies that guarantee the **safety of their products**.



3.1 The SPICE model

E Nvironment

The **E** rating assesses how the company stands with regards to **natural capital**. It considers the in-house management of environmental aspects and the positive or negative externalities of the company's business model. It also specifically considers companies from sectors with **biodiversity issues or high climate impact**.



Integration of environmental issues: we analyse the company's purpose from an environmental perspective, taking into consideration the management's goals, how well environmental issues are integrated into the company's strategy, the corporate culture, the company's mode of operation, and the robustness of its environmental risk management at the company level. We also assess the company's environmental footprint, the actual performance of its sites and operations, and the goals it has set and the means it deploys to limit their adverse environmental impacts.



Transition risk: we assess the company's environmental impacts using a Life Cycle Analysis (LCA) approach that incorporates upstream (supply chain) and downstream impacts (use of products and services). We consider direct and indirect impacts, both positive and negative. This assessment has its grounding in the **Net Environmental Contribution** (NEC). For each business activity, this indicator measures the contribution of the company's business model and its compatibility with the energy and environmental transition and global warming targets. The NEC ranges from -100% for activities that are highly destructive of natural capital to +100% for activities with a highly positive net environmental impact, which provide clear responses to the environmental transition and the climate challenge. In addition, we take into account data on the alignment of activities (revenue) and investments (CapEx) with the EU Taxonomy. We analyse the company's pathway and whether it aligns with the Paris Agreement, mainly based on data on implied temperature rise and the SBTi's approval of the company's climate targets.



Physical risks: we analyse the company's exposure to **chronic and/or extreme** physical risks associated with climate change and other disruptions to the ecosystem, with regard to the company's geographical exposure, the nature of its activities, and its dependence on services provided by ecosystems. This analysis covers not only a company's operations and assets, but also its upstream and downstream value chain.

OUR ANALYSIS OF CLIMATE TRANSITION PLANS

In our analysis of a company's environmental performance, we systematically include a quantitative and qualitative assessment of the climate transition plan to achieve global net zero. This assessment follows guidance provided in the Net Zero Investment Framework 2.0 developed by the Institutional Investors Group on Climate Change (IIGCC) and aims to meet minimum requirements.

According to its ambition and impact, each company is classified into one of five of the following alignment categories:

- Not aligning: the company has not expressed a long-term commitment consistent with the Paris Agreement target;
- Committed: the company has made a public commitment towards achieving net zero by 2050;
- Aligning: the company reports its Scope 3 emissions and has science-based targets (e.g. SBTi) and a credible transition plan (such as adequate resources and consistent lobbying practices);
- Aligned: the company is on a positive reduction pathway through actions that have a real impact on global emissions;
- Net zero: the company has met the reduction targets needed to achieve global net zero across its value chain (excluding the contribution of low-impact offsets).

The criteria used to categorise companies are set by the ESG investment team. These criteria take into consideration the specific sector and geography in which companies operate.

The assessments are based on publicly available data such as SBTi certifications, databases developed by CDP, the Transition Pathway Initiative, Net Zero Tracker, Influence Map on lobbying practices, and the assessment tools from Reclaim Finance used to analyse coal policies adopted by financial institutions. We also use MSCI climate data.

In addition to being included in SPICE, these analyses are key in leading climate engagement actions, applying our voting policy and making investment decisions for the Sycomore Global Climate Transition fund.

3.2 Active management of controversies

Sycomore AM monitors controversies that affect the companies in our investment universe, drawing upon various external data sources to do so. This analysis helps to identify potential discrepancies between a company's statements and its actions, areas of weakness, or new risks. It supplements our own ESG analysis of a company and helps us to detect any events that could decrease its market value.

The monitoring of ESG controversies is carried out daily by the ESG investment team. Controversies are monitored with the support of our daily media watch, warnings issued by external analysts or MSCI ESG Research for most companies in our coverage universe. As soon as a controversy is identified, it is entered in our research and analysis management system. The controversies analysed by MSCI ESG Research are imported into the tool on a weekly basis, covering both new and ongoing controversy cases.

Based on the analysis by the ESG investment team, irrespective of the investment criteria, each controversy is assigned a score, for each of the four criteria described opposite, on a scale of 0 for immaterial controversies to -3 for the most severe controversies. The investment team is systematically informed of controversies with a rating of -2 or -3. These controversies may be monitored more closely and discussed in greater detail at the weekly investment management meetings. Controversies that are considered to be very severe (rating of -3) can lead to exclusion from the fund, after consultation with the ESG investment team and approval by the Sustainability Director and, if necessary, the CEO via the Sustainability Committee (up to three months to best time the divestment for clients). Apart from these most severe controversies, managers must make investment decisions that they deem relevant in light of the risks identified and the ESG targets of each fund. Engagement initiatives are frequently taken following the identification of a controversy. The company's response to our initiatives is taken into account in assessing the severity of the controversy affecting it. Our analysis may be adjusted based on our monitoring of the facts and companies' responses. The summary of our analysis, decisions, engagement initiatives and, where applicable, the conditions for lifting severity level -3, is formally set out in our research management system.

OUR FOUR CONTROVERSY RATING CRITERIA (ON A SCALE OF 0 TO -3)

CONTROVERSY SEVERITY

*What is the severity of the harm caused by the controversy
(for example, did a fatal accident occur or was a flaw discovered in the
workplace safety policy)?*

*What is the scope of the controversy's impact?
Does it concern just one entity, business or project,
or does it affect the entire company?*

CONTROVERSY STATUS

*Is the controversy established, still active or has it been resolved?
Is legal action still underway? Have fines or compensation been paid?*

CONTROVERSY TYPE

*Has the controversy arisen before? Does it stem from a structural
problem in the organisation, or, for example, from misfortune or a
malicious act committed by an employee?
Could the controversial event have been avoided by establishing better
processes?*

ATTITUDE & REACTIONS OF THE COMPANY INVOLVED

*Has the company made a statement on the issue?
What action does it intend to take to remedy the situation?*

3.2 Active management of controversies

The controversy level (0, -1, -2 or -3) has a direct bearing on the company's SPICE rating: every controversy point lowers the relevant stakeholder group's rating by 0.1 point, with a tapering mechanism after three years. To limit the bias due to the company's size, using the results of a study of the relationship between company revenue size and controversy points, the impact of controversy points on the SPICE rating is now adjusted based on the company's total revenue.

CONTROVERSY SCORES

1 controversy point = 0.1 point deducted from the corresponding rating, which we then adjust based on the company's revenue

DESCRIPTION OF THE CONTROVERSY

The impact of the controversy decreases automatically every three years

IN-HOUSE ANALYSIS AND MONITORING OF DECISIONS MADE

MONITORING OF THE CONTROVERSY

The screenshot shows the Sycomore software interface. At the top, there are tabs for 'Methodology', 'Means', 'Controls', and 'Shareholder engagement'. Below these are sections for 'CONTROVERSY SCORES', 'DESCRIPTION OF THE CONTROVERSY', 'IN-HOUSE ANALYSIS AND MONITORING OF DECISIONS MADE', and 'MONITORING OF THE CONTROVERSY'. The 'CONTROVERSY SCORES' section shows a table for LVMH with columns for Société, Notes initiales, Controverses, Contr. ajustées, and Notes controv. The 'IN-HOUSE ANALYSIS AND MONITORING OF DECISIONS MADE' section shows a list of controversies with columns for Date, Date MAJ, Sujet, Impact, and various rating scales (S, P, I, C, E). The 'MONITORING OF THE CONTROVERSY' section shows a detailed analysis of a specific controversy: 'Human Rights - Luxury perfumes linked to child labour, BBC finds'. It includes an 'Analyse Interne' section with text and a reference number (JRC 08/07/24), and a 'Suivi' section with a table of follow-up actions and responses.

3.3 Analysis of sovereign issuers

We have developed a **methodology for analysing sovereign issuers**. First, **two exclusionary screens** are applied:

1 **We exclude countries that are not signatories of the Charter of the United Nations.** Initially adopted by 51 Member States on 26 April 1945, the charter lays down the UN's objectives, principles and rules of procedure. As signatories, the countries commit to promoting intergovernmental cooperation in order to maintain international peace and security. The charter is based on the people's self-determination rights and acknowledges fundamental human rights and liberties.

2 **We also exclude countries that are targeted by international financial sanctions.** More specifically, these include countries targeted by sanctions from the Office of Financial Assets Control (OFAC) or the Office of Financial Sanctions Implementation (OFSI), countries subject to restrictive financial or trade measures implemented by the UN or the EU Council, countries on the EU list of non-cooperative jurisdictions for tax purposes, and countries sanctioned by the Financial Action Task Force (FATF).

Our analysis methodology for sovereign issuers uses multiple criteria to **assess a country's sustainable development and governance practices**. These criteria are sorted into **five categories and weighted in the following manner**:

- **Environment:** COEFFICIENT 2
- **Governance:** COEFFICIENT 1
- **Economic health:** COEFFICIENT 1
- **Societal development:** COEFFICIENT 2
- **Social inclusion:** COEFFICIENT 2

Each indicator used in our analysis methodology for sovereign issuers can be **linked to one of the 17 Sustainable Development Goals (SDGs)** set by the UN in its **2030 Agenda**. These links ensure that our analysis **covers a maximum of priority issues**, such as the climate, biodiversity, energy, water, poverty, gender equality, economic prosperity, peace, agriculture, and education. Our methodology is not designed to be exhaustive, since our choice of indicators is largely dependent on available data and consistency with respect to our initial investment universe. Therefore, **our methodology covers the following SDGs and enables us to assess countries' alignment with certain priorities identified by the United Nations**:

After the criteria are weighted, a **final score on a scale of 1 to 5** is calculated. Each category is assessed based on **five indicators**. A few examples of indicators for each category follow:

- **Environement:** the share of renewable energy in the country's energy mix and its overshoot day are two of the five indicators used. Our aim is to promote responsible and sustainable ecological footprints.
- **Governance:** the type of political regime, press freedom, and respect for human rights are three of the five indicators used to assess pluralism, freedom of expression, religious freedom and civil liberties.
- **Economic health:** the Gini coefficient is used to assess income inequality, and changes in unemployment rate are used to assess labour market resilience. The selected indicators evaluate not only economic performance but also economic fairness.
- **Society:**
 - **Societal development:** The World Justice Project's index measuring adherence to the rule of law, national healthcare expenditure, and the food security index are used to assess how well a country addresses two fundamental social needs: access to healthcare and justice.
 - **Social inclusion:** the Human Development Index, education level, gender inequality and life expectancy are four of the five indicators used to assess not only the economic distribution of wealth, but also social and cultural equality.



04 The means allocated to our ESG analysis

4.1 High-level governance of sustainability issues



Denis Panel
CEO



Anne-Claire Imperiale
Sustainability Director

Sycomore AM's SRI approach forms the core of our mission and strategy. It is embodied at the highest level of the organisation, from its beginnings by the co-founding partners and, since 2023 by Denis Panel, CEO, and Anne-Claire Imperiale, Sustainability Director.

The Sustainability Director is in charge of ESG research. She oversees the work of the ESG analysts, steers changes to our ESG analysis methodologies and, more broadly, participates in the development and promotion of Sycomore AM's SRI policy. In addition, she defines the annual individual qualitative and quantitative key performance indicators of the ESG analysis team members and proposes the fixed and variable components to be integrated into remuneration plans. In close collaboration with the risk management team, she surveys the quality and efficiency of auditing tools and ensures that the investable universe of managed portfolios is effectively covered. She also selects the external service providers involved in ESG research activities. Anne-Claire Imperiale is responsible for changes to the policies underlying Sycomore AM's SRI approach (ESG integration, shareholder engagement, exclusion and voting policies, for example). These documents are updated every year. Significant updates are discussed by the Sustainability Committee, led by the Sustainability Director and chaired by the CEO.

4.2 Remuneration policy

In line with our remuneration policy and Article 5 of the SFDR, “**Transparency of remuneration policies in relation to the integration of sustainability risks**”, the remuneration of Sycomore AM staff consists of at least the following components:

- **Fixed remuneration**
- **Variable remuneration**, which rewards staff's individual and collective performance
- **Additional schemes**, which are part of a general, non-discretionary, company-wide policy that is either in effect or to be effective, such as profit-sharing, company savings plans, and individual or group retirement savings plans or funds

An appropriate balance is established between the fixed and variable components of the total remuneration awarded to staff members. At the end of each financial year, Sycomore AM determines the added value created by the company to ensure fair after-tax distribution of income between salaried employees, on the one hand, and, on the other hand, the company and its shareholders, to finance the company's growth.

Once this total remuneration budget has been determined, **all staff members undergo an annual review** in January, after which a theoretical amount of individual variable remuneration is calculated, within the limits of the total variable remuneration budget. For all staff members, this assessment is based on pre-determined key performance indicators proposed by team managers and approved by an extended management committee, taking into account Sycomore AM's status as a certified B corporation.

4.3 Our expertise

The **investment team's** responsibilities include making investments and managing them day-to-day on behalf of our clients, assessing companies and analysing them using our SPICE methodology, monitoring events that could affect a company's performance (current events, controversies, etc.), dialoguing with companies (engagement), contributing to the execution of our voting rights at shareholder meetings and measuring the overall (financial and ESG) performance of our investments.

Reporting to the Head of Sustainability, the **ESG research team** develops sectoral and thematic ESG expertise to be used in investment analysis and selection, conducts engagement initiatives, analyses controversies, and exercises voting rights.

Furthermore, for each of our funds, an **ESG specialist** assists the **investment team** in monitoring the fund's sustainability objective and performance, implementing regulatory and contractual ESG criteria, and producing ESG reports.

In-house training is regularly provided by the ESG research team to raise the awareness of all staff about ESG and SPICE issues and how they are integrated into fundamental analysis. These trainings are delivered in a variety of formats to suit different needs:

- **General training:** General courses are conducted, for example for new hires, to present Sycomore AM's SRI approach and, more specifically, our SPICE analysis methodology and incorporation of SPICE into investments' decisions.
- **Detailed training:** Courses focusing on specific topics, such as one of the SPICE criteria, are regularly held for the investment team.
- **Individual training:** We also encourage one-on-one sessions between experienced ESG analysts and other analysts.

For more information on the training provided in the previous financial year, see our PRI report on our ["Our ESG publications"](#) page.

4.4 Our data sources

The **investment team** relies on the following sources and partners to carry out SPICE analyses. External ESG research is used by our analysts to support their work. We use indicators collected and reliability-tested by MSCI to generate a SPICE score according to our methodology. These scores are supplemented or reviewed on a case-by-case basis by our analysts.

ISS and Proxinvest: expertise on voting at shareholder meetings

MSCI: controversies monitoring and exclusion analysis, raw ESG indicators including adverse impact indicators

NEC Initiative: training on the NEC and data access



■ Experts and external sources we work with to conduct our analyses

■ Company information that we analyse directly

4.5 A shared tool for our financial and ESG research

The strength of our asset management is rooted in the **collective nature** of our research and monitoring of the companies in our investment universe, using our shared research, analysis and valuation tool. This shared tool is the **backbone of our investment process**.

This tool stores the investment team's **collective memory**, since it contains a vast pool of **historical** and **analytical** information from which each fund manager-analyst sources investment ideas to support their strategy.

Updated daily, the tool enables users to **compile, extract and archive a wide range of data on each company researched**:



Quantitative financial data: account statement history, forecasts, comparisons to the consensus, valuation ratios, profitability levels, growth rates, etc.



Qualitative data and ESG information: minutes from interviews and on-site visits, analyses of competitive positioning, outlook and growth, assessments of performance with regard to stakeholders, using the SPICE analysis (ESG indicators, controversies, exclusions and engagement initiatives)

The tool is tailored to our needs: our SPICE analysis methodology is detailed in it, internal metrics on social and environmental issues are integrated into it, and the sustainability qualification of a company is also formalized in this tool.

Data sourcing and overrides management: externally sourced raw ESG indicators are available for visualisation in our research management system. Analysts override the data directly in the system: this process enables us to enhance data quality and freshness. In such a case, the source is changed in the system from MSCI to Sycomore and the changes made are documented by the analyst.



05 Internal and external controls

5.1 Level 1 controls

Two first-level controls are conducted:

1 **Compliance with the fund's selection and exclusion criteria undergo pre-trade controls** that are configured into our trading order tool. These controls are configured based on the criteria set out in the fund prospectus.

On a daily basis, **the Risk Management department controls for compliance with all ESG criteria**. This control covers the following items:

2

- Verification of compliance with the **fund's ESG selection criteria**
- Verification of compliance with the **exclusion policy**
- Verification of coverage of the **ESG analysis**
- Verification of compliance with the **selectivity percentage**, if applicable
- Verification of the **outperformance** of two indicators and the **data coverage ratios** for these two indicators, as applicable.

In the event of a **non-conformity**, a warning summarising the control items and the observed gaps is sent to the relevant investment team. The managers then have five working days to explain the non-conformity to the Risk Management and Internal Control departments and communicate any proposed corrective actions.

5.2 Level 2 internal controls

A second-level control is carried out **every six months** by the internal control team. It verifies each fund's compliance with the ESG criteria set out in its legal documentation, the effective implementation of first-level controls and compliance with the ESG information communicated to clients. Level 2 controls are also carried out quarterly to verify compliance with the requirements of any labels or certifications obtained by the managed funds.

5.3 Level 3 periodic controls and audits

Sycomore AM has selected an outside firm to conduct regular audits on a number of themes (which include compliance with ESG and SRI criteria) according to a schedule set out in a three-year calendar. This same firm can also be called upon if Sycomore AM deems that an additional or a more focused audit is required.

Sycomore AM has also outsourced the internal audit function to Assicurazioni Generali's Group Audit. In accordance with a multi-year plan, they conduct audits of the group's various structures.

5.4 External audits

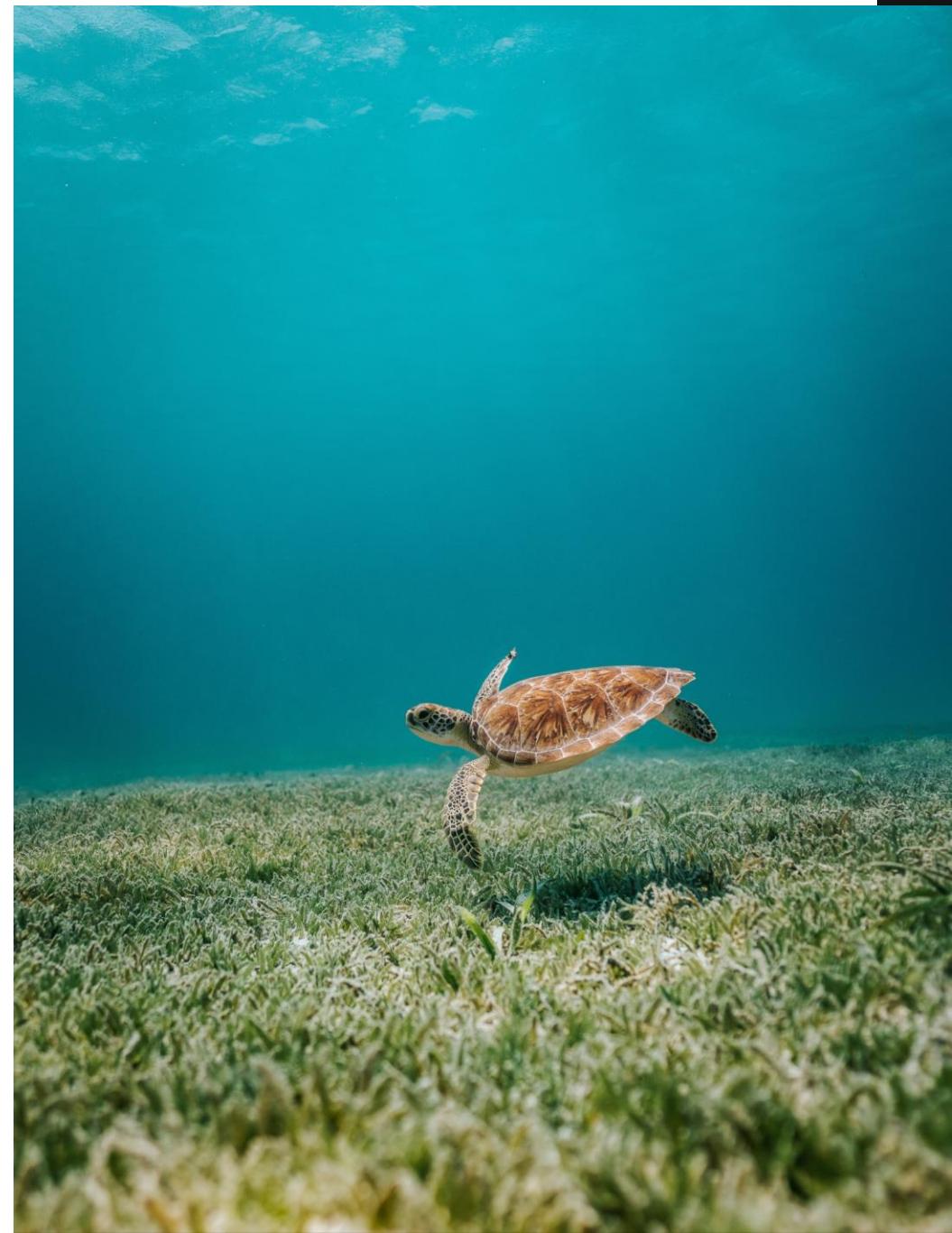
Certification processes in France, Austria and Belgium require verification by an independent third party of SRI investment procedures, their effective implementation, and portfolio compliance. These external audits are conducted annually.



06 Shareholder engagement policy

Shareholder engagement is about **driving companies to make structural improvements to their sustainability practices, by articulating areas for improvement through constructive dialogue and long-term monitoring**. This is a key feature of putting our mission into action and, above all, achieving our overarching goal of measuring and increasing the social and environmental contributions of our investments.

Our approach to shareholder engagement is detailed in our [shareholder engagement policy](#) and our [voting policy](#).





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