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### **Background and scope**

This statement aims to present the required information as part of the Article 29 of the French LEC (at entity level), and the PAI report. We will present the state of our methodology at the present time, and the improvements we plan to implement.

The article 29 of the French Loi Energie-Climat precises the requirements previously stated in the article 173-V. It articulates the French regulation with the European Sustainable Finance Disclosure Regulation (SFDR) and Taxonomy settlements. It focuses on the alignment with the Paris Agreement, and the long terms objectives linked to biodiversity and sustainability risks. Investors must explain their policy, methodology, and goals in terms of sustainability.

This statement applies as of 30 June 2023, and reflects the activities carried out in 2022. This statement will be reviewed annually.

As an asset manager with less than €500M in assets under management, Amundsen Investment Management submits a simplified LEC29 report.

### **Link to other statements**

More information on Amundsen IM's ESG policy and shareholder commitment can be found there:

- ESG policy : <https://amundsen-im.com/investment-philosophy/>
- ❖ Shareholder commitment and the exercise of voting rights : [https://amundsen-im.com/wp-content/uploads/2021/11/V-6\\_Shareholder-commitment-and-the-exercise-of-voting-rights\\_1.0.pdf](https://amundsen-im.com/wp-content/uploads/2021/11/V-6_Shareholder-commitment-and-the-exercise-of-voting-rights_1.0.pdf)

### **General strategy of Amundsen IM**

Amundsen IM invests in listed companies, across all industries and company sizes. Our investment decisions are made independently of any benchmark considerations. We equally invest in new companies coming to the market or in existing listed companies in need of equity. We also provide liquidity to strategic or financial owners selling down their stakes. We invest across all European markets and opportunistically outside Europe.

The investment decision results from a process including meetings with the management, business and sectorial analysis, financial analysis, ESG risks and controversies analysis.

As an active and fundamental equity investor dedicated to capital markets events, Amundsen IM engages actively with our portfolio companies and their shareholders when they decide to tap equity markets. We aim to provide them a reliable and valuable source of capital.

## ESG policy

Amundsen's funds are categorized as Article 6 Funds, pursuant to SFDR. This means that the funds do not systematically take into account sustainability factors in the investments, due to the significant resources required to implement such a process.

Given the growth in ESG considerations by the broad asset management community, it has become essential for public companies to provide investors with sufficient transparency on their material ESG issues.

When meeting with companies' management in the period leading up to their IPOs or other public equity offerings, Amundsen is in a unique position to provide feedback, in cases where the companies are not reporting sufficiently or underperforming on key metrics. We seek to make our active engagement with companies and their advisors beneficial to both our investors and the companies we invest in, which we hope to see better equipped for interactions with public market investors. We also see this as contributing to positive returns to our investments, as a stronger shareholder base contributed to better performance over time.

### ❖ Exclusions

In terms of ESG policy, Amundsen IM is already implementing strict exclusion criteria on investments. These criteria are based on the ones advocated by Norges Bank Investment Management.

We seek to ensure that our investments do not contribute to violations of fundamental human rights, severe environmental damage including climate change, gross corruption, severe health risks, or other particularly serious violations of fundamental ethical norms.

Therefore, we exclude the following:

- Companies excluded from Government Pension Fund Global, following a product-based criteria:
  - Companies which themselves or through entities produce weapons that violate fundamental humanitarian principles through their normal use
  - Produce tobacco
  - Sell weapons or military material to states that are subject to investment restrictions on government bonds as described in the management mandate for the GPFG
  - Mining companies and power producers which themselves or through entities they control derive 30% or more of their income from thermal coal; base 30% or more of their operations from thermal coal; extract more than 20 million tons of thermal coal per year ; have a coal power capacity of more than 10 000 MW from thermal coal
- Companies excluded from Government Pension Fund Global, following a conduct-based criteria:
  - serious or systematic human rights violations, such as murder, torture, deprivation of liberty, forced labour and the worst forms of child labour
  - serious violations of the rights of individuals in situations of war or conflict
  - severe environmental damage
  - acts or omissions that on an aggregate company level lead to unacceptable greenhouse gas emissions
  - gross corruption
  - other particularly serious violations of fundamental ethical norms.
- Exclude upstream oil & gas
- Other specific investor-directed exclusions

### ❖ ESG assessment

Among the investable universe, we assess the level of disclosure of companies that are coming to the market for an IPO, when it is deemed necessary to appreciate the investment case: both the KPIs disclosure

on material indicators (depending on the sector) and the targets set by the company. Examples of indicators used can be:

#### *Environmental*

- GHG emissions: scope 1 and 2, measured in tCO<sub>2</sub>eq/sales,
- Energy intensity: energy consumption / sales,
- Water intensity: water consumption / sales.

#### *Social*

- Occupation health & safety
- LOST Time Injury Frequency Rate (LFTIR)

#### *Governance*

- Board independence
- Minority ownership

The material indicators depend on the sector the company is included in. We use the materiality matrix provided by the company if it is disclosed, or the SASB matrix, and our own analysis, to determine these indicators.

As Amundsen's mandate is to invest in primary markets events, including IPOs, the invested companies are generally not assessed by data providers.

### **Engagement policy**

The position that Amundsen IM has in the process of primary market events allows us to engage with the companies' management and their advisors, and give them feedback, especially regarding issues related to ESG factors. The first issue is the access to reliable data, which comes from a greater level of disclosures, the second one is the comparison with peers. In both cases, the management is given feedback about material issues and disclosures. We seek to make our engagement beneficial for our investors and for the companies which can be better prepared for the public markets. We generally encourage companies preparing for an IPO to disclose data as early as possible, for example through the preparation of a separate sustainability report prior to listing.

### **International initiatives**

We encourage the invested companies to align with international targets for limiting global warming in line with the Paris Agreement. Namely, we advocate commitment to a two-degree scenario approved by the SBTi. We are ourselves engaged along with the Institutional Investors Group on Climate Change (IIGCC).

### **List of financial products**

Our methodology is applied to all products we invest in – namely the listed equities.

### **Information to investors about the ESG policy**

Investors are informed about the company's approach to ESG through the website (including this report), and the prospectus of the funds.