

Crédit mutuel Impact

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*Statement on the principal
adverse impacts of investment
decisions on sustainability factors*

June 2025

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Basis

The following statement is made in accordance with Article 4 of the EU Regulation 2019-2088 and in its presentation complies with the requirements of Article 5 of Delegated Regulation (EU) 2022/1288 which refers to Annex 1 and Table 1 of that Regulation.

1. Summary

Crédit Mutuel Impact considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement of the principal adverse impacts on the sustainability factors of Crédit Mutuel Impact and its subsidiaries.

This statement on the principal adverse impacts covers a reference period from 1.01.2024 to 31.12.2024.

The concept of dual materiality emphasizes that the two dimensions, financial and impact, are interdependent and must be taken into account jointly in the overall assessment of a company's performance.

In particular, in addition to the positive impacts of investments, management companies are required to consider sustainability risks that represent an environmental, social or governance event or situation that, if they occur, could have a significant negative impact, actual or potential, on the value of the investment.

Crédit Mutuel Impact recognizes that its business, as well as the assets it helps finance, are likely to have negative impacts on the climate and environment (greenhouse gas emissions, biodiversity, water, waste), social, personnel and governance issues. The main negative impacts are monitored throughout the investment process, from pre-investment to divestiture, including through:

- monitoring controversies and enforcing normative exclusions, including compliance with the principles of the UN Global Compact and the OCDE Guiding Principles;
- strict compliance with sectoral exclusions: Crédit Mutuel Impact does not directly or indirectly invest, guarantee or grant financial or other support to companies or entities that do not comply with the Crédit mutuel alliance fédérale Sectoral Policies described in its Universal Registration Document (URD) available on the BFCM website (RSM/sectoral-policies section);
- the use of an internal questionnaire set up to measure, monitor and control the negative impacts of its investments and promote positive environmental, social and governance impacts;
- In accordance with the rules (EU SFDR. 2019/2088 supplemented by EU Delegated Regulation 2022/1288), Crédit Mutuel Impact describes and quantifies the main negative impacts on an annual basis and publishes them on its website.

The table below quantifies them according to the regulatory framework applicable to management companies in order to ensure the reliability, consistency and comparability of sustainability reporting in the financial services sector.

2. Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies (Table 1)				
Indicators of negative impact on sustainability		Measuring element	Impact 2024	Impact 2023
<i>Climate and other environmental indicators</i>				
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions in tons of CO2 equivalents	-34,255	-24,779
		Scope 2 GHG emissions in tons of CO2 equivalents	105	28
		Scope 3 GHG emissions in tons of CO2 equivalents	11,161	16,003
	2. Carbon footprint	Carbon footprint in tons of CO2 equivalents per million euro invested	-22	-15
	3. GHG intensity of the companies benefiting from the investments	GHG intensity of investee companies	-5,811	-4,037
	4. Exposure to fossil fuel companies	Share of investment in companies active in the fossil fuel sector (%)	0	0%
	5. Share of consumption and production of non-renewable energy	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources (%)	1%	6%
	6. Energy intensity by high climate impact sector	Energy consumption in GWh per million euro of turnover of investee companies, by sector with high climate impact	0.1	0.2
Biodiversity	7. Activities with a negative impact on biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those area (expressed in %)	0%	0%
Water	8. Discharges into water	Tons of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0	0
Waste	9. Ratio of hazardous and radioactive waste	Tons of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.9	0

Indicators of negative impact on sustainability		Measuring element	Impact 2024	Impact 2023
<i>Indicators related to social, personnel, human rights and anti-corruption issues</i>				
Social and personnel issues	10. Violations of the principles of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises	Share of investment in companies that participated in violations of the UN Global Compact or OECD Guidelines for Multinational Enterprises (expressed in %)	0%	0%
	11. Lack of compliance processes and mechanisms to monitor compliance with the principles of the United Nations Global Compact and the OECD guidelines for multinational enterprises	Share of investment in companies that do not have a compliance policy to monitor compliance with the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises, or complaint or dispute resolution mechanisms to address such violations (expressed in %)	19%	24%
	12. Uncorrected gender pay gap	Unadjusted average gender pay gap in companies receiving investments (expressed in monetary amount converted into euro)	14%	11%
	13. Gender diversity in governance bodies	Average ratio of women to men in the governance bodies of the companies concerned, as a percentage of the total number of members	26%	21%
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons or biological weapons)	Share of investment in companies involved in manufacturing or selling controversial weapons (expressed in %)	0%	0%

Indicators applicable to investments in sovereign or supranational issuers				
Environment	15. GHG intensity	GHG intensity of the investment countries in tons of CO2 equivalents per million euro of gross domestic product	Not applicable	Not applicable
Social	16. Investment countries with violations of social norms	Number of investment countries with breaches of social standards in accordance with international treaties and conventions, United Nations principles or, where applicable, national law (numerical value)	Not applicable	Not applicable
		Proportion of the total number of countries benefiting from investments experiencing violations of social norms in accordance with international treaties and conventions, United Nations principles or, where applicable, national law (expressed in %)	Not applicable	Not applicable
Indicators applicable to investments in real estate assets				
Fossil Fuels	17. Exposure to fossil fuels via real estate assets	Investment share in real estate assets used for extraction, storage, transport or production of fossil fuels (expressed in %)	Not applicable	Not applicable
Energy Efficiency	18. Exposures to energy inefficient real estate assets	Share of investment in energy inefficient real estate assets (%)	Not applicable	Not applicable

Additional indicators (Table 2)				
Negative impact on sustainability	Negative impact on sustainability factors (qualitative or quantitative)	Measuring element	Impact 2024	Impact 2023
<i>Climate and other environmental indicators</i>				
Water, waste and other materials	Water use and recycling	1. Average amount of water consumed by the companies benefiting from the investments (in cubic meters), per million euro turnover	247	183
<i>Indicators related to social, personnel, human rights and anti-corruption issues</i>				
Social and personnel issues	Investments in enterprises without a policy for preventing accidents at work	Share of investment in companies without a policy for the prevention of accidents at work (expressed in %)	8%	6%

3. Description of policies to identify and prioritize major negative impacts on sustainability factors

Crédit Mutuel Impact's Sustainability Risk Integration policy covers managed funds classified as Article 8 or Article 9 under the SFDR., representing more than 95% of the outstanding amount managed at end-2024. This policy is directly inspired by the RSE process (last validated in March 2025) which outlines how Crédit Mutuel Impact policies and procedures integrate sustainability risks. In particular, it shall:

- define the concept of sustainable investment adopted for all the management company's investments;
- define the concept of dual materiality;
- recognize that Crédit Mutuel Impact's activity and the assets it helps finance are likely to have negative impacts on the climate and the environment (greenhouse gas emissions, biodiversity, water, waste), social, personnel and governance issues, and provides for monitoring and follow-up arrangements;
- list sustainability risk reporting elements;
- outline commitments to Crédit Mutuel Impact stakeholders;
- allocate roles and responsibilities for sustainability risks.

With regard to the latter point (distribution of roles and responsibilities in relation to sustainability risks), this document states in particular that:

- the prioritization of the main negative impacts and their consideration shall be defined with the subscribers to the Siloé Infrastructure and Environmental Revolution and Solidarity Funds, in particular regarding the monitoring of the indicators referred to in Table 1 of Annex 1 to Delegated Regulation (EU) 2022/1288 and the additional indicators (at least one of Table 2 and at least one of Table 3 of that Annex);
- their collection is carried out by the management team, on a declaratory basis of the companies financed and relying as necessary on the contractual framework provided for in the shareholders' agreement. The scope 1 (direct emissions), scope 2 (indirect energy emissions) and scope 3 (indirect emissions other than within scope 2) carbon emissions are calculated using the life cycle analyzes of the funded companies (global approach), which produce the product between the functional unit of reference for the year and the appropriate carbon intensity factor;
- For scope 3, the calculation shall endeavor to take into account all categories of ADEME's BEGES method where the carbon intensity factors of the footprint base are prioritized (unless the funded company uses specialized external firms to measure its carbon balance with specific source databases). This is where the potential margins of error are most significant, and Crédit mutuel Impact is making the best efforts to deepen the measures in close consultation with the funded companies.

4. Engagement Policy

The shareholder engagement policy and its implementation are summarized in the report prepared under article 29 of the Climate Energy Act (section 3).

The shareholder engagement policy and its implementation report are also public and published on the website (regulatory framework section).

5. References to international standards

With regard to the consideration of the main negative impacts on sustainability factors, the management company relies on the international standards referred to in European regulations and in particular at social level on the principles of the United Nations Global Compact and the OCDE Guidelines for Multinational Enterprises. The indicators used to take into account significant main impacts on sustainability factors are those in the table above (Section B), which are precisely defined by EU rules (Delegated Regulation EU 2022/1288 as an extension of Regulation EU 2019/2088).

Consistent with its commitment to address climate change and promote asset financing to achieve the Paris Agreements, Crédit Mutuel Impact also relies on:

- the International Climate Initiative recognized by the Principles for Responsible Investment;
- the European taxonomy, particularly in the selection of projects and promoters operating in sectors where the decarbonization challenges are most significant.

Crédit Mutuel Impact's definition of sustainable investment is broadly based around the six axes developed in Taxonomy Regulation 2020/852, presented by the European Parliament and the Council of the European Union as *"a key step towards the objective of a climate-neutral Union by 2050"* (recital 3). *"An economic activity that pursues the environmental objective of climate change mitigation should contribute substantially to the stabilization of greenhouse gas emissions by avoiding or reducing such emissions or by enhancing greenhouse gas removals. This economic activity should be consistent with the long-term objective of limiting temperature rise set out in the Paris Agreement"* (recital 24).

The share of sustainable investment with a substantial contribution to the climate change mitigation objective and the European Taxonomy's share of alignment to this objective are the methods used to measure the alignment of the management company's activity with the objectives of the Paris Agreement. These proportions are determined primarily from the Siloé Infrastructure and Environmental Revolution and Solidarity funds (together, these funds represent 95% of the assets under management) and reported in the periodic reports written for the subscribers.

The data are collected directly from the funded companies (themselves not subject to disclosure requirements due to their size) in a regular dialog.

Regarding prospective climate stress scenarios, these were used to assess the physical climate risk of portfolio holdings either through the use of the methodology deployed within Crédit mutuel alliance fédérale or through the analyzes collected from the funded companies (if applicable). When a stress scenario is chosen, it is the Intergovernmental Panel on Climate Change (IPCC) Scenario 8.5, the most pessimistic of the five emission scenarios defined in the Fifth Assessment Report published in 2014 to assess the potential impacts of climate change on the planet (warmest climate and modeling an average rise in global temperatures of +4°C).